

COPELAND BOROUGH COUNCIL
CONSULTATION RESPONSE

Proposal: Replacement of roof finishes incorporating insulation & increase in existing roof heights; installation of photovoltaics on front roof slope; amendments to existing access including widening site access, installation of equal access platform lift, & alterations/extensions of existing levels to create an external terrace seating area; reduction to front boundary wall & installation of glazed balustrade

Address: Reading Room, Beckermets

Reference: 4/22/2412/0F1

Date: 03/11/22

Description: Beckermets Reading Room is a small but handsome non-designated heritage asset dating from the early 20th century. It is located within a leafy and mainly residential part of the conservation area.

Conclusion: Request further information and design revision

Assessment: I am supportive of the general proposal, which would extend the offering of this community asset.

The PV array and modifications to the roof could be expected to have a minor impact on the significance of the building, and entail less-than-substantial harm on the character and appearance of the conservation area,

- This may be justifiable by improvements in the building's sustainability, but for the avoidance of doubt I'd be grateful for clarification on whether the annual yield of this PV array has already been modelled and is satisfactory (I ask as it is on a west-facing pitch and its efficiency will be reduced compared with the same design's theoretical maximum on a south-facing pitch.)

See attached annual yield sheet calculated by the consultant M+E Engineer taking into account the solar orientation of the building. (Note that this calculation is for 9 panels. We are now proposing 10 because this will balance the building with 5 each side as the size of the panels he is proposing are bisected by the porch roof).

Furthermore, the consultant team and client have had a meeting on site and a revised approach to the heating has been taken in light of a new 'air to air' ASHP that has been brought onto the market by Daikin. It is now proposed by the engineer that the space heating will be taken care of by a couple of low level ASHP compressor units on the two gables of the building (see revised plans and elevation). These will directly power an air distribution system for the space heating without the need for a hot water cylinder to store any hot water for radiators. This is a significant efficiency over his previous proposals for electric convector heaters.

The photovoltaics alone will provide for the hot water provision within the building and therefore allow the 'air to air' ASHP system to cater for the space heating requirements without the two needing to be interlinked.

- Similarly, if a specification sheet showing the appearance of the proposed array can be provided, that will be helpful in understanding its impact. **See attached provided by the M+E Engineer**
- I would be grateful if a specification sheet with photo sample for the new roof tile could be included with the application to understand its appearance better. **We proposed the Sandtoft Rivius tile in antique grey. See attached sheet.**

The insertion of a pair of bifold doors will rob the façade of some symmetry.

- I would view this as a minor level of harm to the building that is justifiable on the grounds of improving circulation between the interior and exterior spaces during summer.

Platform lifts are never attractive things, particularly after a few years of weather exposure, and I note that the reason a lift is needed is that the present ramp access will be removed to facilitate a terrace. Although the ramp is not attractive, it is neatly hidden by the boundary wall and also doesn't require electricity and maintenance. **The existing ramp is however completely non compliant providing a gradient of 1:9. This is sub standard and less than the 1:12 specified in the Building Regulations. At the start of the project, the design of a 'compliant' ramp was examined in the first instance, but this was not afforded without the removal of the front AND the entrance porch leaving no room for any external area for seating.**

I also note the bicycle racks, turning space for wheelchair access and 2-person bench are all trying to make use of a cramped space in which there also appears to be maintenance access to the sides and rear of the building (which will presumably be used rarely but be necessary when it is).

- This section of the proposals would appear to entail minor harm to the significance of the building and less-than-substantial harm to the character and appearance of the conservation area, but to have justification in the form of allowing access to be maintained while freeing up the space occupied by the ramp.
- However, this arrangement also entails substantial loss of the front wall.

The removal of most of the front boundary wall and its replacement with a glass balustrade would cost an attractive element of the conservation area. This part of the area gives the impression of being bounded by sandstone walls that run along the street edges, with vegetation above/behind and buildings that are set back a little way.

- This proposal is more difficult to view as justified. It will entail a fairly obvious less-than-substantial harm to the character and appearance of the conservation area while only bringing the benefit of an extra few inches of terrace space. I appreciate space is at a premium on this plot, but alternative layouts could enable it to be retained. **Unfortunately the removal of the top of the front wall does afford more than just a few inches. Because the wall is 425mm wide and it extended 15.5m across the frontage from proposed steps to boundary, this actually equates to 6.56m² of area. This is a substantial amount in terms of useability and is the difference between being able to accommodate outdoor seating and not. Part of the business plan of the Reading Rooms is to further its existing offering of refreshments to the community and to passers by on the coast to coast route and therefore if the Reading Rooms were not able to gain this space, they have little to encourage / welcome passers by to stop. This is particularly important for cyclists who often dont feel comfortable with leaving a bike out of sight.**

Furthermore, if the existing wall were to be retained, and the ramp omitted, we would most likely be obliged by Building Control to add a balustrade and protection from falling regardless. Although this is largely an existing situation, the removal of the ramp constitutes an increased risk in terms of the potential of a fall from the terrace level to pavement level. Therefore I think they will require a barrier to prevent this. Arguably a structural glass balustrade would present the least visual impact?

Summary

- I am supportive of the general proposal although feel the removal of the front boundary wall and its replacement with glass is too invasive given the small amount of extra space gained and the seasonal nature of the terrace. I'd be grateful for alternative arrangements that enable this positive aspect of the conservation area to be retained. **Given the importance of this aspect to the business plan of The Reading Rooms, I wonder if you might reconsider? If the wall had to stay, this would substantially narrow the terrace with the loss of at least 6 seats and potentially a bike rack housing 2 bikes as the stairs and lift will have to be moved over. We would be happy to use structural glass which would have no vertical posts to minimise the visual impact and to liaise over your preferred details if this was at all possible?**
- I request spec sheets with photo samples for new roofing and paving materials, and spec sheets for the proposed bifold doors and PV array. **Attached and explanation below;.**
- Origin Glass brochure – Proposed Origin Slimline window OW70 powder coated aluminium screen
- PV Array – See Vertex Data sheet. This will be mounted in line with the roof tiles.
- Roof covering – Sandtoft Rivius Antique Grey. See brochure sheet
- Paving Material. – Natural stone – Such as Brownridge Indian Sandstone Brushed and Hammered. This will likely constitute Phase II works when funding allows and therefore this particular product may not be available OR if quarrying a new seam, may not be available in these hues. We proposed a beige brown stone to pick up the tone of the wall and be warm in feel. **'Natural stone Paving in beige/brown'** has been added to the drawing in the hope that you will let us choose this nearer the time taking into account what is available.

Apparently Marshalls don't do a PDF images of their paving in situ in a finished projects and so I can only give you a link to the page on their website which indicates the tone of the beige/brown sandstone proposed;

<https://www.marshalls.co.uk/commercial/product/brownridge-sandstone>

Has the PV array's annual yield been modelled, and if so is it sufficient to justify its inclusion? Being on a west pitch, it may not generate very much energy. **Yes and yes. See logic provided above.**

- There are one or two notes on the drawings that are written as questions – it should be made clear whether these are proposals or not. **Apologies. All notes on the drawing are included. The question marks were for the client at design stage pre-planning. I think I have now removed the question marks**

Relevant Policies and Guidance:

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 134 of the National Planning Policy Framework (NPPF) asserts that “Development that is not well designed should be refused”.

NPPF para. 197 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. 199 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. 202).

Paragraph 203 of the National Planning Policy Framework (NPPF) states the effect on the significance of a non-designated heritage asset should be taken into account when making decisions.

Opportunities should be sought for new development within conservation areas and the settings of heritage assets that enhances or better reveals their significance. (para. 206)

Referring to assets in a conservation area, NPPF para. 207 states that loss of an element that makes a positive contribution to a conservation area should be treated as either substantial (under para. 201) or less-than-substantial harm (under paragraph 202).

Copeland Borough Council’s Local Plan contains a number of relevant policies:

- Local Plan Policy ST1C(ii) highlights the importance of protecting, enhancing and restoring the Borough’s cultural and heritage features and their settings.
- ST1D emphasises the council’s commitment to creating and retaining quality places.
- ENV4A stresses the importance of protecting listed buildings, conservation areas and other features considered to be of historic, archaeological or cultural value.
- ENV4B outlines support for heritage-led regeneration, ensuring assets are put to appropriate, viable and sustainable uses.
- ENV4C aims to strengthen the distinctive character of Copeland’s settlements through high quality urban design and architecture that respect character and setting.
- DM10 emphasises the need for high quality design and quality places. Part B requires design to respond to local character at multiple scales, paying attention to plot size and arrangement, massing and scale, interstitial spaces, and materials. Part C requires the incorporation of existing features such as landscape and vernacular style.
- DM27A outlines support in principle for developments that “protect, conserve and where possible enhance the historic, cultural and architectural character of the borough’s historic sites and their settings”.
- DM27C outlines the restriction in principle of development within conservation areas to that which preserves or enhances the character or appearance of the area.

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. It is therefore applicable to this application.

Sammy Woodford

Conservation and Design Officer