CUMBERLAND COUNCIL

CONSULTATION RESPONSE

Proposal: Replacement of doors and windows

Address: BC Goulding Joinery, Marlborough Street, Whitehaven

Reference: 4/24/2251/0F1

Date: 15/08/24

Description: This is an apparently mid-20th century building used as a workshop, of simple square form, constructed in partially rendered brick.

Conclusion: Request design revision

Assessment:

- The building does not make a positive architectural impression on the character and appearance of the conservation area overall.
- This is however largely due to its relationship with its immediate setting, which consists of various concrete and tarmac aprons that are unattractive in their own right and also allow the building's sides and silhouette to be prominent. Were the building part of a row or group, with only the frontage visible, it would be both less visible and more attractive.
- However, it is also almost the only surviving remnant of the harbourside's former industrial character, which extended up until the late 20th century, with the transformation to today's leisure and tourism focus largely following the 1980s.
- I would consider its contribution to the conservation area's character and appearance overall to be neutral or slightly positive.
- The proposal does not seek to change the use, but it does seek to change the windows and doors, which are of a timber construction and featuring some simple ornamentation in the form of glazing bars and moulded panelling. These enhance the appearance of the frontage of what is otherwise a fairly unattractive building.
- The proposal is to replace all of the window and doors with uPVC replacements. This would be contrary to the guidance provided in the Conservation Area Design Guide, however, it is reasonable to balance this against the type of building it is.
- For a building with a more industrial character such as this, I feel that extending the palette to include metal, e.g. steel or aluminium, would be in keeping.
- Also worth noting is the Shop Front Design Guide. Though not exactly a shop front, the front of the workshop shares characteristics that make it suitable to consider in the context of this guidance.
- The Shop Front Design Guide urges avoidance of roller shutters as they are unattractive. The existing four-panel sliding door is by comparison much more attractive, and similar in principle to another example located on Cross Street.
- This similarly applies to the single pedestrian door on the front.
- The replacement windows on the front and side elevations is lower impact, being a very similar style.

• The replacement windows on the rear elevation appears to be an improvement in terms of style, being side hinged rather than top-hinged quarterlights, although this elevation is almost totally hidden.

Summary:

- I suggest making use of timber or a suitable metal alternative for the replacement windows to preserve the character of the building and conform to the Conservation Area Design Guide, which explicitly urges avoidance of plastic windows and doors.
- I suggest that the modest ornamentation of some of the windows and doors on the frontage help improve the building's appearance, and that more consideration should be given to either retaining it or finding a new way to accomplish something similar.
- The roller shutter doors are not attractive and are also contrary to our design guidance.
- Collectively, these proposals constitute loss of elements that make a modest positive impact on the character and appearance of the conservation area, constituting less than substantial harm.
- There is also a very minor negative impact on the setting of the grade II listed Number 1 Marlborough Street with Attached Warehouse, situated opposite on the harbourside.

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."

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.

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).

The former 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 emphases 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.

- 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.
- DM27D highlights the necessity of avoiding disrespectful alterations, substantial demolition, adverse effects on setting or views, or changes of use that harm the conservation or economic viability of a listed building.

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.

The Shop Front Design Guide is a supplementary planning document adopted in 2021 that is a material consideration in the determination of planning applications affecting shop fronts within the legacy Copeland area. Although not a shop per se, the presence of a loading door is relevant to some guidance within it.

Sammy Woodford

Conservation and Design Officer