

**CUMBERLAND COUNCIL
CONSULTATION RESPONSE**

Proposal:

Address: Land to the South of Holly Mews, Abbey Road, St Bees

Reference: 4/24/2094/OF1

Date: 17/04/24

Description: Site is an area of scrubby open ground to the south of Holly Mews and west of St Bees Priory and vicarage, located within St Bees conservation area.

Conclusion: Recommend refusal

Assessment:

I'll address the following two questions separately:

1. Is the principle of this proposal acceptable?
2. Does this particular design response satisfactorily offset any harm?

Principle of development

The St Bees Conservation Area Appraisal says:

Pow Beck valley is the main open space in St Bees, and forms a key element of its character and appearance. Within the conservation area, it is composed of fields, the priory grounds, and various recreation and sports grounds. Apart from this there is little open space within St Bees beyond a variety of private gardens.

The majority of the buildings in [the Abbey Road] part of the area's setting have had a harmful effect on it and are also highly conspicuous, being elevated.

The Holly Mews houses are quite successful, and make use of a façade articulation with projecting roof, and red sandstone cladding that looks at home alongside the converted buildings of Abbey Farm. However, sites in this area are visible across wide surroundings and great care should be taken in urbanising the remaining green spaces of the valley as this is key backdrop to several highly significant heritage assets, the conservation area, and the village itself, and is a finite resource.

The SWOT analysis lists the following strength:

The greenness of the valley is largely unspoilt. Not only is this beautiful, but it allows St Bees' agriculturally-developed layout to retain a connection with the fields that were an integral part of it.

the following weakness:

Some housing development has taken place in a way that has harmed the setting of heritage assets and the conservation area.

and the following threat:

Housing development harming the setting of the conservation area and its assets.

The proposal would have the effect of consuming more of the “finite resource” of the green open space of the valley, mentioned above, eroding a key element of the conservation area’s character and appearance, as well as the backdrop that forms part of the setting of several heritage assets, including principally the priory. Great care should be taken not to urbanise remaining green space in the valley, as its greenness is still largely unspoilt, even if its setting has been harmed by housing development that’s taken place since the War.

Phase 2 is consented, though as yet unbuilt, and I take the view that extending development rearwards, behind this row (to the south) intrudes upon the green space of the valley character area, increasing development and reducing the clearance between one side of the valley and the other, and the ratio of developed to undeveloped land.

I appreciate that the new houses would mostly be viewed against the backdrop of Phase 2 from some angles, however I would consider the harm to the conservation area through the loss of green open space and extension of the built footprint further to the south to constitute less-than-substantial harm. It additionally constitutes less-than-substantial harm to the setting of the priory.

Justifying harm on the basis that harm has already been approved in the past does not seem convincing.

- This visual impact of this proposal is justified partly on the basis of Phase 2, which it abuts on the south side.
- Justification for Phase 2, as part of the Phase 1 and 2 application from 2010, was partly made on the basis that development along Abbey Road, Abbey Vale and Monk’s Rise had already harmed the character and appearance of the conservation area and setting of the Priory.
- Justification for the development along Abbey Road is now lost to time, but was clearly made under a different planning context.
- I am concerned that justifying incremental harm on the basis that it’s part of a trend highlights its scale rather than downplaying it.

Design response

- The houses consist of two types. These have some distinctiveness, although are let down slightly by the blunt fascia and soffit detailing.
- The houses appear to have been designed with somewhat limited consideration for their contexts and with no consideration for each other – they are five separate houses rather than a unified place.
- The grain and layout of the development is characteristically suburban, consisting of detached properties with two-car driveways and garages.
- This development represents a substantial increase in the hard surfacing within the site, with areas of tarmac in addition to the footprints of the houses themselves.

Summary

- I am unable to support the principle of developing housing on this site as it represents an intrusion into the remaining green open space of the valley, which forms a central part of St Bees’ conservation area. This would have the effect of suburbanising finite and valuable

space that additionally constitutes part of the setting of heritage assets, including the grade I listed St Bees Priory.

- The design solution is not sufficiently high quality to enhance or better reveal the significance of the conservation area and affected heritage assets. It lacks compactness, is unresponsive to context, and distinctly suburban, being detached houses prominently featuring parking and hard surfacing. This objection is secondary to the principle objection.
- I do not view the proposal as preserving (or enhancing) the character and appearance of the conservation area, of entailing loss of an element that makes a positive contribution to the conservation area, and would view the likely harm as less-than-substantial. This should be given great weight. I would also view this as being less-than-substantial harm to the setting of St Bees Priory, particularly in views towards the priory from Station Road and the open space of Pow Beck valley. It additionally has some effect on the setting of Abbots Court, a non-designated heritage asset, which should be taken into consideration.

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.”

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).

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 emphasizes 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 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".
- DM27B: "Development proposals which have a significant adverse effect on a Scheduled Ancient Monument or its wider site or setting will not be permitted".
- 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.

Sammy Woodford

Conservation and Design Officer