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**From:** Thomas Whitfield  
**Sent:** 27 September 2024 11:30  
**To:** Development Control  
**Subject:** Case4/24/2268/OL1 - 46 Lowther Street, Whitehaven

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Dear Sara Papaleo,

Thank you for notifying The Georgian Group of revisions to application 4/24/2268/OL1 to undertake a scheme of works at Grade II listed 46 Lowther Street, Whitehaven.

The Group previously offered comments on this application in a letter dated 5<sup>th</sup> September 2024.

The Group has assessed the revised scheme, and we maintain concerns with the application.

### **Advice and Recommendations**

The Group thanks the applicant for having offered some revisions to the application, and we notably advise that it is welcomed that the proposed demolition of the remnants of the relict newel staircase in the cellar has been deleted from the scheme.

We advise however that this is the only revision which addresses the concerns registered in our previous letter. We therefore maintain the concerns, advice and recommendations, established in our previous letter of 5<sup>th</sup> September 2024.

#### *Cellar Works*

The Group notes that the applicant has offered further information in the revised DAHS regarding the proposed works to convert the cellar for residential usage. We register significant concerns however that it is proposed to introduce a vapour impermeable tanking system to both the floor and walls reliant on a sump pump. We highlight however that no section drawings have been provided to illustrate the proposed system.

We further register concerns that the proposed floor build up and wall linings will impact on the historic room volume and have the potential to mask the historic structure of the walls and any notable features such as the chimney breast. This may result in a harmful oversantisation of the space eroding its historic character and legibility of its historic function. We emphasise here that no photographs or detailed description of the cellar has been offered by the applicant to help support the assessment of the significance of the space and the impact of the proposed scheme of works thereon.

We therefore draw attention to the requirements of NPPF (2023) paragraphs 200, 201, 205 and 206.

We strongly recommend that the applicant provides more detailed information on the proposed works to the cellar to justify the proposed scheme.

## Conclusion

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

The Group advises that whilst we thank the applicant of having offered revisions and additional details, we maintain our advice that the proposed internal works would cause irreversible harm to the building's historic fabric, evidential value and special architectural significance as a grade II listed heritage asset.

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

Yours sincerely,

Thomas Whitfield, PhD, MLitt, BA (hons)  
Conservation Adviser, Northern England

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*You can nominate a heritage building or landscape that is at risk via: [atrisk@georgiangroup.org.uk](mailto:atrisk@georgiangroup.org.uk) The deadline for nominations is 20 September 2024.*

*Please include in your email details of when it was created, its location, the reasons why you believe it should be included on the Georgian Group's list, together with one or more photographs. The nominated building or landscape must be in **England** or **Wales** and built between **1700 - 1837**. It can be listed or unlisted but must be in a poor state of repair or condition, be disused or unoccupied or perhaps threatened by demolition or inappropriate alterations or change of use.*

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