

## Oliver Hoban

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**From:** Thomas Whitfield  
**Sent:** 22 May 2025 20:05  
**To:** Development Control  
**Cc:** Samuel Woodford  
**Subject:** Re: Case 4/24/2268/OL1 - 46 Lowther Street, Whitehaven

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Dear Sara Papaleo,

Thank you for notifying The Georgian Group of a second round of revisions to application 4/24/2268/OL1 to undertake a scheme of renovation works at Grade II listed 46 Lowther Street, Whitehaven. The Group has assessed the revised application, and we maintain significant concerns with the harmful impact of the proposed scheme.

The Group previously offered comments on this application in letters dated 5th September 2024 and 27th September 2024. In these letters we raised significant concerns with the poor quality of the applicant's supporting documentation and with the irreversible harm that would be caused by the proposed demolition of the existing nineteenth-century staircase and the demolition of a wall at 1F level. We additionally registered concerns about the lack of details regarding the proposed cavity drainage system proposed for the basement.

The Group acknowledges that the applicant has submitted additional supporting documentation to explain the proposed cavity drainage system. We are however disappointed that no revisions, amendments or clarifications have been submitted to address our concerns with the poor quality of the Heritage Statement, with the proposals for the demolition of the staircase, or the demolition of the probable original 1F partition wall. The Group consequently maintains our profound concerns, advice and recommendations on all of these points.

### *Damp Control*

The Group thanks the applicant for having submitted additional information regarding the materials proposed for the cavity drainage system. We maintain overall concerns however regarding the appropriateness and necessity of this system. We register significant disappointment that the applicant has still not engaged with any of the numerous specialist advice and guidance documents on damp control in historic and traditional buildings (e.g. SPAB 2018 'Control of Dampness' Technical Advice Note; Historic England, et.al. 2022 'Investigation of Moisture and its effects on traditional buildings').

We advise that the applicant's failure to investigate the root cause of the damp accumulations continues to be of significant concern, and we advise that without understanding the cause, the harm that would attend the proposed management solution cannot be considered to be either clearly or convincingly justified under the terms of NPPF (2024) paragraph 213.

We thank the applicant for having provided additional photographs of the basement which clearly illustrate its state of disrepair and disuse with past failed dry-lining solutions particularly evident in photos 1 and 2. We also note that the floor appears to be a concrete slab (this is also noted in the DAS). Also noted in the DAS is that the wall finish 'appears to be off sand and cement probably with a lime element'. We strongly advise that none of these materials are vapour permeable and in combination may well be causing or exacerbating the damp accumulation problems within the walls.

We therefore strongly recommend that the applicant engages a specialist contractor with experience of damp management in traditional solid masonry buildings to investigate the root cause(s) of the damp accumulations and to develop a solution which addresses the cause.

We advise that if the root cause of the damp is due to the historic use of non-vapour permeable materials, replacing the floor and wall finishes with materials which are compatible with the building's hygroscopic function (e.g. limecrete floor and lime plastered walls) and improving ventilation, may solve the problem without the need for a harmful cavity drainage system. We note that it is already proposed to remove the existing concrete slab floor, and we are consequently surprised that the applicant has not submitted any evidence of having considered replacing it with a vapour permeable alternative.

## 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,

Dr. Thomas Whitfield  
Senior Conservation Adviser (Northern England)

Cc'd is Dr. Samuel Woodford, – Conservation and Design Officer at Cumberland Council.



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## Georgian Group Heritage at Risk List 2025: Call for nominations.

We are now beginning to compile a new Georgian Group Heritage at Risk list for 2025. You can nominate any Georgian heritage building or landscape (regardless of listed status) which you consider to be 'at risk' by e-mailing [atrisk@georgiangroup.org.uk](mailto:atrisk@georgiangroup.org.uk). The deadline for entries is 26 September 2025.

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