

architecture : planning

Upp

PLANNING, DESIGN AND ACCESS STATEMENT

**Full-Planning and Listed Building Consent for the use
of the property as a C3 (single family dwelling) with
flexible C3 Holiday Let use including internal and
external alterations to the property**

18 Irish Street, Whitehaven, CA28 7BU



1. Introduction

- 1.1 UPP Architects + Town Planners have been instructed by the applicant, Clear Restoration Whitehaven Ltd, to apply for full planning permission and listed building consent at 18 Irish Street, Whitehaven, CA28 7BU. The application seeks planning permission and listed building consent for the continued use of the property as a C3 (single family dwelling) with additional flexible C3 Holiday Let use, together with minor internal and external alterations to the property.
- 1.2 This document provides details of the proposed scheme and will demonstrate that proposal is in accordance with planning policy and guidance at national and local levels.

2. The Site and Surroundings

- 2.1 The existing site, comprises a 3-storey terraced property with a basement level. 18 Irish Street is currently being used as a single family home paying council tax for over the last 30 years and before this, a guest house. However, in recent times it has been no longer been admitting guests. It has fallen into a state of disrepair in recent years. However, the property has always been used as a single property and its last known use was as a single-family dwelling house. The property is accessible via a small set of stairs which abut the pedestrian pavement with a generous garden found towards the rear of the property. The red painted property features timber framed sash windows in a two over two formation with intricate stucco surrounds. Two chimneys sit majestically on top of the existing slate roof.
- 2.2 It is noted that the site is Grade II listed with No.17 and 19 / 20 also Grade II listed forming a historic parade on the southern side of Irish Street. The property is also located in the Whitehaven Town Centre Conservation Area.
- 2.3 The surrounding area is mixed in character by virtue of the site's central location in Whitehaven Town Centre. The surrounding area has a range of uses including retail, residential and commercial uses.

3. Planning Designations

- The site is located within Copeland Borough Council.



- The building is Grade II listed.
- The site is located within the Whitehaven Town Centre Conservation Area.
- The site is located within Whitehaven Town Centre
- The site is located within Flood Zone 1 which is considered to have a low risk of flooding from rivers and seas. The site has low risk from surface water flooding.

4. Relevant Planning History

- 4.1 4/23/2062/0F1 - CHANGE OF USE FROM A GUEST HOUSE (USE CLASS C1) TO SINGLE USE HOLIDAY LET (USE CLASS C1) INCLUDING INTERNAL AND EXTERNAL ALTERATIONS TO THE PROPERTY. Withdrawn (15/06/2023)
- 4.2 4/23/2063/0L1 - LISTED BUILDING CONSENT FOR CHANGE OF USE FROM A GUEST HOUSE (USE CLASS C1) TO SINGLE USE HOLIDAY LET (USE CLASS C1) INCLUDING INTERNAL AND EXTERNAL ALTERATIONS TO THE PROPERTY. Withdrawn (15/06/2023)

5. Pre-Application Summary

- 5.1 On 31st May 2022, a pre-application advice request was registered requesting pre-application advice for the change of use of the property from residential property to single use furnished holiday let. On 7th July 2022, written advice was provided concerning the pre-application proposals.
- 5.2 The pre-application feedback outlines that the majority of development should take place in Whitehaven which forms Copeland's Principal Town. The pre-application establishes the principle of holiday let accommodation subject to meeting the full suite of material planning considerations including tourism and heritage considerations and notes that further details and submitted evidence would be required to provide an assessment of the conversion in relation to these criteria.

6. Planning Policy

- 6.1 The Local Development Framework is as follows:



- The National Planning Policy Framework (NPPF)
- Copeland Local Plan 2013-2028

6.2 The Emerging Local Development Framework is as follows which has been submitted for examination:

- Copeland Local Plan 2021-2038

National Planning Policy Framework (NPPF)

6.3 The National Planning Policy Framework (NPPF) holds an emphasis on creating sustainable development. There are three aspects which comprise sustainable development; these are the economic role, the social role and the environmental role. In terms of the economic aspect land has to be made available where there is a demand to support growth; the environmental role involves the protection of the natural, built and historic environment; and the social role is to support strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations.

Copeland Local Plan 2013-2028

6.4 Policy ST1 – Strategic Development Principles – this policy outlines the wider strategic development principles to inform and underpin development in the Borough regarding all aspects of sustainable development.

6.5 Policy ST2 – Spatial Development Strategy - *“development will be located in the Borough’s settlements at an appropriate scale, within defined settlement boundaries, in accordance with the Borough’s settlement hierarchy as set out in Figure 3.2*

i) Focusing the largest scale development and regeneration on Whitehaven and the important development opportunities there”

6.6 Policy ER10 – Renaissance through Tourism – *“The Council will maximise the potential of tourism in the Borough and will seek to:*

A. Expand tourism outside the Lake District National Park boundaries, with a complementary offer that takes pressure off the National Park’s busiest locations, and delivers economic benefits in the Borough

B. Locate new tourist accommodation, facilities and attractions where there is proven capacity for additional visitors to be accommodated without adverse environmental or amenity impacts, with consideration given to the following:

- i. *Focus major tourist accommodation and attractions in Whitehaven and develop the town as a base for exploring the wider area*
 - ii. *Encourage development of an appropriate scale in the Key Service Centres of Cleator Moor, Millom and Egremont which takes pressure off more sensitive areas*
 - iii. *Support development requiring a rural location within the smaller villages and countryside, if proven necessary to enhance the Borough's existing place-bound assets*
 - iv. *Permit holiday accommodation which meets the requirements of Policy DM9*
 - C. *Support appropriate tourism development which accords with the principles of sustainable development and does not compromise the special qualities and character of allocated Tourism Opportunity Sites, the area surrounding them or public access thereto, in the following locations:*
 - i. *Hodbarrow*
 - ii. *Ehen / Keekle Valleys*
 - iii. *Whitehaven Coastal Fringe*
 - iv. *Lowca Coastal Area"*
- 6.7 Policy ENV4 – Heritage Assets – *“The Council’s policy is to maximise the value of the Borough’s heritage assets by:*
- A. *Protecting listed buildings, conservation areas and other townscape and rural features considered to be of historic, archaeological or cultural value*
 - B. *Supporting proposals for heritage led regeneration, ensuring that any listed buildings or other heritage assets are put to an appropriate, viable and sustainable use*
 - C. *Strengthening the distinctive character of the Borough’s settlements, through the application of high quality urban design and architecture that respects this character and enhances the settings of listed buildings”*
- 6.8 Policy ER8 – Whitehaven Town Centre – *Developments are encouraged which “Diversifies the range of residential accommodation in the town centre, including the conversion and re-use of vacant floors over shops.”*
- 6.9 Policy DM9 – Visitor Accommodation – *“Proposals for new or improved visitor accommodation in the Borough will be supported subject to compliance with the principles of sustainable design outlined in ST1 and ER10 and so long as their scale and character are appropriate to the location and setting.”*
- 6.10 Policy DM10 – Achieving Quality of Place – *“The Council will expect a high standard of design and the fostering of ‘quality places’. Development proposals will be required to:*



- A. *Incorporate a complementary mix of uses, especially within or near town centres or at sites adjacent to public transport routes*
- B. *Respond positively to the character of the site and the immediate and wider setting and enhance local distinctiveness through:*
 - i. *An appropriate size and arrangement of development plots*
 - ii. *The appropriate provision, orientation, proportion, scale and massing of buildings*
 - iii. *Careful attention to the design of spaces between buildings, including provision for efficient and unobtrusive recycling and waste storage*
 - iv. *Careful selection and use of building materials which reflects local character and vernacular”*

6.11 Policy DM22 – Accessible Developments – *“The Council will require development proposals to be accessible to all users and accord with the following principles:*

- A. *The layout of the development responds positively to existing movement patterns in the area by providing or contributing towards:*
 - i. *Permeable and legible layouts which are convenient for access into and through the site for pedestrians, cyclists and disabled people*
 - ii. *Access for public transport*
 - iii. *Access for emergency and service vehicles”*

6.12 Policy DM27 – Built Heritage and Archaeology – *“Development proposals which protect, conserve and where possible enhance the historic, cultural and architectural character of the Borough’s historic sites and their settings will be supported. This will be particularly relevant in the case of:*

- i. *Scheduled Ancient Monuments*
- ii. *Conservation Areas*
- iii. *Listed Buildings and structures*
- iv. *Non-listed buildings and structures or landscape features of local heritage and archaeological value*
- v. *Surface and below ground archaeological deposits”*

Copeland Local Plan 2021-2038 (under examination)

- 6.13 Strategic Policy DS1PU - Presumption in favour of Sustainable Development
- 6.14 Strategic Policy DS3PU - Settlement Hierarchy
- 6.15 Strategic Policy DS4PU - Settlement Boundaries



- 6.16 Policy DS6PU - Design and Development Standards Strategic
- 6.17 Policy T1PU: Tourism Development Strategic
- 6.18 Policy BE1PU: Heritage Assets
- 6.19 Policy BE2PU: Designated Heritage Assets

7. Policy Considerations

Principle of Development

- 7.1 Policy ST1 of the adopted Copeland Plan promotes and encourages development which meets the wider strategic, sustainable development principles and underlies all development. The proposal is seeking to restore and refurbish the fabric of the listed building as part of this proposal. As the property will assist in a long-term sustainable use in support of its long-term conservation by reason of its continued use as within the C3 use class in the form of a residential dwelling with short term holiday let and, will require regular maintenance, it is considered that this directly aligns with the council's key principles of sustainable development.
- 7.2 Policy ER8 supports residential accommodation of various sizes within Whitehaven Town Centre. Similarly, Policy ER10 seeks to encourage tourism in central locations such as Whitehaven. The property is located in an extremely accessible location in close proximity to the Whitehaven Town Centre, Whitehaven Marina and within 800m of Corkickle mainline station and 1km of Whitehaven mainline station. The Local Plan also identifies the site as being located within the Town Centre boundary. Given its prominent location, the site is located within walking distance to local amenities which adds to its value as a site for residential accommodation with ancillary use as a holiday let.
- 7.3 Although it has not been possible to find the planning history for the site, as is evident from its name, the site was historically used as Huntley Guest House, a guest house as well as a single family dwelling. Online records also show that the property was historically used both as tourist accommodation and a single family dwelling home. Council tax records have always shown the property in use as a single property.
- 7.4 Part B of Policy ER10 encourages new tourist accommodation to be located in areas where there is proven capacity for additional accommodation without adversely impacting on amenity or environmental concerns. In particular, the policy states that it should "Focus major tourist accommodation and attractions in Whitehaven and develop the town as a base for exploring the wider area."



- 7.5 The 8 bedroom property is ideally suited and located primarily as a single family dwelling house with ancillary tourist accommodation on a short let basis given its central Whitehaven location and it has been demonstrated in the Local Plan that there is an identified need for both these uses in this location. The proposal is seeking to restore the property back to its original features and retain the dwelling as a single property. It will therefore be let to a group of people who all form part of the same multi-generational party rather than individual rooms let out to unconnected individuals. As such, the comings and goings are less likely to be noise intensive in comparison to individual lets. Furthermore, as the property was historically let us as both a single family dwelling and a guest house and is located in a town centre location, it is not anticipated that the proposal will result in a noise intensive use that would have any adverse impacts on neighbouring amenity, especially given that Irish Street itself is a main thoroughfare of traffic and is a noisy road.
- 7.6 Additionally, as no significant external alterations are proposed, and the site will be accessible either on foot or by bike, it is not considered that the proposal would have environmental impacts. Given the above, it has been demonstrated that the application site is ideally situated for residential and visitor accommodation and meets the local council's goals in both these areas.

Design

- 7.7 The proposal seeks to create internal and external alterations to enhance and optimise the listed building to revert as much of the building to its historic built fabric.
- 7.8 As detailed in the heritage section below, the proposal will largely involve repair and refurbishment work to the Grade II listed building in order to ensure the longevity of the building and bring it back up to a standard befitting of a building of that era. No alterations are proposed to the front or rear of the building and the only new alterations in the garden involve the insertion of a freestanding hot tub together with cycle storage to improve the onsite amenities for visiting tourists to the area. It is proposed that the freestanding hot tub will be located on paving stones which will be identical in size, colour and materials to the existing paving stones in the rear garden. Additionally, cycle storage facilities will be located in the far end of the garden away from the listed building as far as it practical. Full details of the materials for cycle storage can be provided at the conditions stage, unless agreed otherwise.
- 7.9 Given that negligible design changes are required to the external fabric of the building, it is not anticipated that these additions would have a harmful impact on the character and appearance of the existing heritage asset or wider locality.



Heritage

- 7.10 In order to preserve, restore and refurbish the building to prevent it from further degradation, internal and external alterations are required to the property to ensure that the building continues to be habitable. Whilst no new fixtures are proposed in their entirety, where existing timber, stucco or slate tiles on the external façade of the property are in a poor state of repair, they will be sensitively replaced with like for like materials. This will ensure that the historic value of the building is maintained. Additionally, the pipes will be clad in cast iron to ensure that they are more historically sensitive than the existing arrangement. A free-standing hot tub is also proposed in the rear garden. Whilst the proposal will increase the extent of hard surfacing to accommodate this change, it is proposed that the new paving will accurately match the existing paving to ensure historically appropriate materials are used on site.
- 7.11 It is also proposed that the external façade of the building will be painted and brought back to its original colour. It is evident that the existing brick red colour is not part of its original fabric. Historic research has demonstrated that the colour of the building was originally cream which is also more in keeping with the character and appearance of the surrounding area. This is considered to be a heritage benefit.
- 7.12 Internally, it is proposed that at basement level the flagstone flooring will be retained, restored and the brick cladding will be treated with breathable plaster, both of which are seen as heritage benefits. At lower ground and ground floor levels, carpet will be replaced with laminate in some rooms whilst the wooden flooring will be retained to the front of the house. It should be noted that where existing flooring is replaced this will be done over existing concrete floors and there will be no loss of original fabric.
- 7.13 At all levels it is proposed that cornicing and original features will be retained and existing doors to be reused. The existing fire places will be replaced with more historically sensitive fireplaces and skirtings will match the rest of the room.
- 7.14 It should also be noted that there is currently visible damp coming through the walls of the property that will require extensive restoration of the plastering/rendering on the outside of the building. In time, this damp will cause further dilapidation of the building similar to 17 Irish Street. Urgent restoration needs to be undertaken to prevent the building falling further into disrepair. Additionally, restoration is required of the window sills, bannister, guttering and roofing which will all be replaced with like for like materials.
- 7.15 The proposal will retain the building as a single unit and will accurately represent the historic plan form. Whilst internal and external changes are required to the building this is all associated with the preservation to ensure that the property does not fall into a poor state of disrepair and further



erode this historic asset. The internal and external alterations will maintain the appearance of the building and as such are continued to preserve and enhance the character and appearance of this Grade II listed building and the wider conservation area.

Standard of Residential Accommodation

- 7.16 The proposed scheme has been designed to ensure residential amenity is optimized to create high quality accommodation for future occupiers. The proposal is seeking to retain the property as one dwelling to avoid any potential harmful subdivisions to the unit which would destroy its existing fabric.
- 7.17 It is proposed that the main living space will be located at ground floor, lower ground floor and basement levels whilst the bedrooms and bathrooms will be located on the upper floors. There will be capacity for up to 16 people on site with the same number of beds provided in the existing bedrooms. Given that the property will be used as a single family dwelling it is considered to create a high standard of living for future occupiers.

Neighbouring Amenity

- 7.18 As part of any planning application, it is important to ensure development proposals would not have an adverse impact on neighbouring amenity with regards to light, outlook or increased sense of enclosure.
- 7.19 It is noted that the proposals do not seek to make any significant external changes to the property, with the exception of the hot tub and cycle storage, nor add any new window openings. The freestanding hot tub will only be in use during limited times of the year. Therefore, as no physical alterations are proposed to the property, it is considered that the proposals will have no impact on the neighbouring occupiers in regard to outlook, sense of enclosure or levels of daylight.
- 7.20 With regards to noise and disturbance it is noteworthy that the property will predominantly be in use as a single-family dwelling. The proposal is not seeking to increase occupancy levels in comparison to the existing property as the number of bedrooms will largely remain the same as previously with the exception of one single room at ground floor level. Furthermore, the property was always used as a single family dwelling/visitor accommodation.



- 7.21 The property is located in a largely commercial area and the immediate surrounding properties are in commercial use or are vacant. There are a large number of offices and shops in close proximity to the site with limited residential properties. Given that the site is located in a noise intensive area in a town centre location, it is not anticipated that the noise and disturbance from the associated comings and goings would have a detrimental impact on the amenities of adjoining occupiers.

Transport and Highways

- 7.22 The site is located in an extremely accessible location within the Whitehaven Town Centre. The site is located within 800m of Corkickle mainline station, 1km of Whitehaven mainline station and is also within walking distance of the bus stops on New Town. The property is therefore in an extremely accessible location from a public transport perspective.
- 7.23 It is also proposed that cycle storage for up to 16no. bicycles will be provided in the rear garden. This will encourage sustainable modes of transport to the property and will also attract many cyclists who take advantage of the cycling opportunities in the wider area.
- 7.24 It is noted that there are currently no parking spaces on site for the property and there is no plan to introduce parking provision. Given that the property has always been car-free and is in a town centre location, it would be unreasonable to request otherwise.

Refuse and Recycling

- 7.25 The refuse and recycling will be maintained as per the existing arrangement.

8. Conclusions

- 8.1 To conclude, it has been identified that the site is ideally located for the use of the property as a C3 (single family dwelling) with flexible C3 Holiday Let use. There is a demand for single family dwelling houses within the borough and the proposal will maintain the residential use. With respect to the size of tourist accommodation proposed as part of this development is an anomaly as the majority of existing tourist accommodation is not suitable for large groups and families as it is predominantly single couple rooms in guest houses and hotels. The historic use of the building



as well as the fact that the property will be retained as a single property further emphasises this point. It has also been identified that the proposal will not have any adverse environmental or amenity impacts to warrant refusal for this reason.

- 8.2 In terms of the alterations to the Grade II listed building, it has been demonstrated that the alterations are largely repair and maintenance to allow the continued use and preservation of the building through occupancy. The internal and external fabric of the building will be sensitively updated through the use of historically accurate materials in order to safeguard its character and appearance and ensure that the site continues to preserve and enhance the character and appearance of the conservation area. The improvements to the internal and external appearance of the property are considered heritage benefits.
- 8.3 It has been demonstrated that the proposal is compliant with national and local planning policies and will provide a use which is in high demand in this locality.