
From: Joanne Needham
Sent: 23 February 2026 11:21
To: Development Control
Subject: Re: 4/26/2021/OL1 - 22 Lowther Street, Whitehaven, Copeland, Cumbria, CA28 7AL

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Dear Sarah Papaleo,

Application ref: 4/26/2021/OL1

Site Address: 22 Lowther Street, Whitehaven, Copeland, Cumbria, CA28 7AL

Proposal: Application for Listed Building Consent for internal alterations to improve existing layout of rooms, provision of a disabled WC & Lift, Demolition of Existing Conservatory & Alterations to Shop Front.

Our ref: SPAB/JN/214724/26

Thank you for notifying the SPAB of the above application. Having reviewed the documents on your Council's website, I now write with the Society's response.

Unfortunately, the present application does not contain sufficient information to fully understand the needs, the building and its significance, and the impact of the proposals on the building's significance and special interest. Additionally, from the limited information that has been provided, it appears that the proposals would have a significant impact on the building that would not preserve its features of special and architectural interest, and would cause harm to/loss of significance, and for which the application lacks the requisite clear and convincing justification.

Taking the matter of the building's special architectural and historic interest, and significance first:

-The Design & Heritage Statement(D&H) states that the "*vast majority of works are internal so there is no significant impact on the Asset.*" This indicates a possible misunderstanding about what the listing actually covers (which is not just the exterior as seems to be implied). We advise therefore that you authority clarify this with the applicant and agent.

-Secondly, the three sentence paragraph in the section titled "*Significance of the Heritage Asset*" is wholly insufficient, and even at a minimum, the age and significance of the areas and fabric are not described and assessed in the D&A, and no photographs (exterior and interior) have been provided. The application therefore immediately fails to meet the requirements of National Planning Policy Framework (NPPF) paragraph 207 and will likely prevent your authority from fulfilling subsequent paragraph 208. A detailed Heritage Statement, undertaken by a suitably qualified and experienced historic buildings professional, is required.

With regard to the need for the proposed works:

-We advise that an Access Strategy and Access Audit are required, together with an Options Appraisal.

-We direct the applicant to the following guidance from Historic England which will hopefully be of assistance in understanding how to approach access to historic buildings and applications for related works: [Easy Access to Historic Buildings | Historic England](#)

Lastly, we advise that the drawings presently provided with the application are not sufficiently detailed (for example, there is little-no annotation, no details of materials, and are not of sufficient scale and detail to understand the existing and proposed details - an example being the shop front. There are also no 'As Existing' and 'As Proposed' sections).

In considering whether to grant listed building consent, Section 16 of the Planning(Listed Buildings and Conservation Areas) Act 1990 requires that the local planning authority shall 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. The authority must also consider if the application meets the requirements of national policy as set out in the National Planning Policy Framework (NPPF).

For the reasons outlined above, we advise that the applicant consider withdrawing the existing application to enable sufficient time for the necessary assessments to be undertaken and which should then inform (and provide justification) for any proposals. Withdrawing the current application would also enable the applicant to engage with the Council's Conservation Officer - which we strongly encourage.

Should, however, the application not be withdrawn and remain unrevised (and without the requisite information and justification), then we advise that:

- it would be contrary to the aim of Section 16 of the Planning(Listed Buildings and Conservation Areas) Act 1990
- And
- does not fulfill the requirements, and align with, the National Planning Policy Framework (NPPF), in particular paragraphs 202, 207, 208, 210, 212, 213, 214/215.

Please send any future consultations/re-consultations to the following address: casework@jcnas.org.uk

Regards,

Joanne.

Joanne Needham
Senior Casework Manager (Acting)

Usual working days: Monday to Thursday

Please send all notifications of listed building consent applications, faculty applications, and requests for pre-application advice to casework@jcnas.org.uk

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