

**Q+A Planning**  
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Cumberland Council (Copeland Area)  
The Market Hall  
Market Place  
Whitehaven  
Cumbria  
CA28 7JG

28th November 2023

Dear Sir / Madam

**Planning Application – Change of Use at 8 Corkickle, Whitehaven, CA28 8AA**

On behalf of Lifestyle Breaks, Q+A Planning submit a planning application for the change of use of the above property from a dwelling house (C3) to an 8 bed holiday let.

The application is accompanied by the following documents:

- Site layout plan;
- Guest Agreement; and
- Existing / proposed internal layout plans.

The application has been submitted via the planning portal and given the reference number PP-12608560. The requisite planning fee of £462 plus portal charges has been paid at the point of submission.

**Site and Surroundings**

The property comprises an attractive, Georgian property facing onto 'Front' Corkickle. The property is semi-detached and adjoins 7 Corkickle which is in use as individual flats together with 8a Corkickle, currently used as a 2 bed holiday let and owned by the applicant. The side boundary (to the south east) abuts a side road.

There is a courtyard garden to the rear of the property as well as a further garden on the opposite side of Front Corkickle (like adjoining properties). The property has one garage located to the rear and accessed off the side road. The property lies within the Corkickle Conservation Area and is Grade II listed. The wall, railings, and small iron gate to the front of the property are also Grade II listed.

Whilst Front Corkickle is generally in residential use, given the close proximity to the centre of Whitehaven, the area generally is of a mixed character. There are amenities and services close to the site, bus services on Calder Avenue and Corkickle and a train station in Corkickle itself.

A small part of the rear garden lies within Flood Zone 2 whilst the majority of the garden and house lie within Flood Zone 1.

## Proposed Development

The applicant purchased the property some 18 months ago. At that time the building was in a poor state of repair and the owner has, since purchasing the property undertaken an extensive programme of works to restore the building both internally and externally. Lifestyle Breaks have made a significant financial investment to improve the condition of the building and provide a high-quality and attractive holiday let.

The property is substantial, spread over 4 floors with an internal floorspace of approximately 507m<sup>2</sup>. The property is to provide 8 bedrooms with one bedroom on the ground floor, 4 bedrooms on the first floor and 3 on the third floor, all served by 3 bathrooms. There is a large kitchen diner, separate dining room, lounge and utility room. Storage space is available in the basement. The property will accommodate a total of 17 adults.

It is intended that the property will appeal to extended families and large groups of friends looking to stay within the centre of Whitehaven with good access to the many tourist attractions, restaurants and bars together within easy reach of Cumbria generally.

The property has one car parking spaces in a garage to the rear of the property. There is space for additional parking on the side road. Furthermore, it is the applicant's intention to lease 2 car parking spaces in the nearby Morrisons car park for use by guests staying in the property.

It is proposed that a secure covered cycle shelter be provided in the rear courtyard which can accommodate 4 cycles. Bins are also to be stored within the rear courtyard.

The property will be managed in the same manner as other properties within the Lifestyle Breaks / UK Breaks portfolio. On booking the property, guests are required to complete a Guest Agreement (copy included as part of the application for reference). This document sets out the 'house rules' as to how guests should use the property and maintain it. If guests do not comply with the requirements of the Agreement they stand to forfeit part/all of the substantial booking deposit.

## Development Plan Policy

### Copeland Local Plan

Copeland Borough Council now forms part of the newly created Cumberland Council. Until a new Cumberland Local Plan is produced, the development plan remains the 2013 Copeland Local Plan together with the emerging Copeland Local Plan.

Relevant policies within the Copeland Local Plan (CLP) are set out below.

*Policy ST1 – Strategic Development Principles* – sets out the key economic, social, and environmental principles which underpin the Borough's planning policies including the support of the tourist industry in appropriate locations.

*Policy ST2 – Spatial Development Strategy* – confirms the principle of directing development to within the Borough's settlements and according to a settlement hierarchy with particular focus on the main settlement of Whitehaven.

*Policy ER7 – Principal Town Centre, Key Service Centres, Local Centres and other service areas -: Roles and Functions* – notes that development will be required to meet the needs of the area, to be of a scale appropriate to the centre, and not to have an adverse impact on the vitality or viability of other nearby centres. It is noted that support will be given to Whitehaven’s role as a tourist and visitor destination linked to its unique heritage and independent and specialist retailers.

*Policy ER10 – Renaissance Through Tourism* – notes that the Council will maximise the potential of tourism in the Borough and will seek to:

- expand tourism outside the Lake District National Park boundaries and delivers economic benefits in the Borough;
- locate new tourist accommodation where there is proven capacity for additional visitors to be accommodated without adverse environmental or amenity impacts, with consideration being given to a number of factors including to focus major tourist accommodation in Whitehaven and to permit holiday accommodation which meets the requirements of Policy DM9;
- support appropriate tourism development which accords with the principles of sustainable development;
- support appropriate developments which improve and enhance the quality of the tourism product; and
- ensure that the tourist facility is well connected to other tourist destinations and amenities, particularly by public transport, walking and cycling.

*ENV1 – Flood Risk and Risk Management* – seeks to ensure that development is not prejudiced by flood risk through permitting new development only on sites located outside of areas at risk from flooding and ensuring that new development does not contribute to increased surface water run-off.

*Policy ENV4 – Heritage Assets* – notes that it is the Council’s policy is to maximise the value of the Borough’s heritage assets by:

- protecting listed buildings, conservation areas and other heritage assets;
- supporting proposals for heritage led regeneration, ensuring that any listed buildings are put to an appropriate, viable and sustainable use
- strengthening the distinctive character of the Borough’s settlements.

*Policy DM9 – Visitor Accommodation* – notes that 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.

*Policy DM10 – Achieving Quality of Place* – notes that the Council will expect high standard of design and the fostering of ‘quality places’.

*Policy DM22 – Accessible Developments* – notes that the Council will require development proposals to be accessible to all users with access to public transport and incorporates appropriate levels of car parking both within the site and through on street parking.

*Policy DM27 – Built Heritage and Archaeology* – notes that 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.

The policy goes on to note that development within Conservation Areas will only be permitted where it preserves or enhances the character or appearance of the area. With regards to the change of use of Listed buildings, support will be given where the development contributes to the conservation and overall economic viability of the building and where the use can be implemented without any adverse alterations.

### **Emerging Copeland Local Plan**

Cumberland Council are in the process of preparing a new plan; the Copeland Local Plan 2017-2038. The emerging Copeland Local Plan (ELP) comprises the Publication Draft (January 2022) and Addendum (July 2022) which have recently been the subject of an Examination. Post examination modifications have been issued and given the stage of preparation of the local plan; it is relevant to place some weight on emerging policies in accordance with direction from the NPPF. The emerging policies relevant to this proposal are set out below.

*Strategic Policy DS1PU: Presumption in favour of Sustainable Development* – notes that the Council will support development proposals that make a positive contribution towards achieving the Cumbrian wide goal of net zero carbon by 2037.

*Strategic Policy DS3PU: Settlement Hierarchy* – Whitehaven continues to be the focus for new development.

*Policy DS6PU: Design and Development Standards* – notes that the Council will expect all new development to meet high-quality standards of design and will require new development to meet a number of criteria including:

- Make use of existing buildings on site wherever practicable and deliverable, unless they have a negative impact upon the street scene;
- Create and enhance locally distinctive places which are sympathetic to the surrounding context of the built environment;
- provide high levels of residential amenity; and
- encourage walking and cycling.

*Strategic Policy DS8PU: Reducing Flood Risk* – seeks to minimise flood risk through various means including directing development to allocated sites outside areas of flood risk where possible, only permitting windfall development in areas of flood risk where a flood risk sequential and exception tests have been carried out and the provision of SuDS where appropriate.

*Strategic Policy T1PU: Tourism Development* – notes that support is given to the creation, enhancement and expansion of tourist attractions, new build visitor accommodation and infrastructure in line with the settlement hierarchy. All tourism development must be of an appropriate scale, located where the environment and infrastructure can accommodate the visitor impact, and where it does not result in unacceptable harm to environmental assets or the character of the area.

*Strategic Policy BE1PU – Heritage Assets* – notes that heritage assets and their setting will be conserved and enhanced by a variety of measures including ensuring that new development is sympathetic to local character and supporting proposals for the appropriate reuse of vacant historic buildings, recognising that putting buildings into viable uses consistent with their conservation can help sustain and enhance their significance.

*Policy BE2PU – Designated Heritage Assets* – notes that development should preserve or enhance designated heritage assets and their setting. Where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm will be weighed against the public benefits of the proposal.

Proposals that preserve or enhance the character or appearance of a Conservation Area, especially that make a positive contribution to its significance will be supported.

*Policy CO7PU: Parking Standards and Electric Vehicle Charging Infrastructure* – requires that new development provide parking in accordance with the Cumbria Development Design Guide.

## **Assessment of the Proposal**

### ***Principle of Development***

Whitehaven is designated as Copeland's Principal Town under policy ST2 of the CLP and within policy DS3PU of the ELP. Whitehaven is to be the focus for development within the Borough including both residential and tourism uses.

Policy ER10 of the CLP and T1PU of the ELP seek to locate tourism accommodation where there is proven capacity for additional visitors without adverse environmental or amenity impacts. Policy DM9 of the CLP supports proposals for visitor accommodation provided the scale and character is appropriate to the location and setting.

The building is located within the settlement boundary of Whitehaven. The property is in use as a single residential property and the change of use to holiday let will not materially change its use (planning permission is only required since the number of occupants will exceed 6). Adjoining properties and those along Front Corkickle are in use as dwellings (single houses and apartments) and as a holiday let and therefore the proposals consistent with adjoining uses.

The property is sustainably located being readily accessible by foot / cycle and public transport to the services and tourist attractions within Whitehaven and further afield.

In terms of heritage, it is recognised that the building is listed and falls within the Corkickle Conservation Area. Policy ENV4 of the CLP and BE1PU of the ELP acknowledge the importance of ensuring viable uses are found for historic buildings to ensure their long term protection. Significant investment has been made in the property and a new use is proposed to satisfy the demands of the tourist industry. This will ensure the building remains in productive use and its maintenance secured.

On this basis, the principle of proposed use of the property as a holiday let is considered to be acceptable and accords with policies ST2, ER10, DM27 DM9 of the CLP and DS3PU, T1PU and BE1PU, BE2PU of the ELP.

Given that the principle is acceptable, the appropriateness of the development is dependent on the particular details of the scheme namely the impact of the development would have on the amenity of adjoining residential properties, the provision of appropriate levels of parking that the development is consistent with heritage and flood risk policies. These issues are discussed in turn below.

## **Scale of the development and impact on residential amenity**

The property readily lends itself to use as a holiday let. The existing layout of the building is to be retained and there have been no structural alterations required to create the proposed use (hence there has been no requirement for Listed Building Consent). The period detailing within the rooms has been maintained and sensitively restored.

The property has been refurbished to a high standard and will provide comfortable and spacious accommodation for groups of people wishing to stay in Whitehaven. There are currently limited opportunities for larger groups to stay in self catering accommodation in the area, and the use of this substantial property as a holiday let would provide a valuable addition to the tourist accommodation offer. In addition, the use of the property by guests will provide wider spin off economic benefits to the local economy generally too.

The use as a single holiday let is likely to be of a similar nature to its use as a private dwelling. The house is substantial and, if fully occupied could not only accommodate a large family, associated relatives but could also provide accommodation for associated staff or used for ancillary business purposes (providing there was no material change of use). Likely activity and noise generated by the holiday let would therefore not be dissimilar.

The internal layout has been arranged so that the main social space comprising the lounge and kitchen are positioned away from the party wall boundary which will minimise disturbance to adjoining occupiers. In addition, to further protect the residential amenity of the adjoining occupiers of 7 Corkickle, Lifestyle Breaks intend to install noise detectors so that in the unlikely event that noise levels exceed a certain level, contact is automatically made to the monitoring company which would result in attendance on site to manage the disturbance. Should a call out be required a sum would be deducted from the deposit to act as a deterrent.

It is noted that planning permission has recently been secured for the same form of development as the current proposals; change of use of 18 Irish Street, Whitehaven from a dwelling to a holiday let (8 beds) (4/23/2188/0F1). This property is also a Listed Building and located within a Conservation Area. Unlike the application site, this property is a terraced house and has no parking provision. Notwithstanding this, the Council considered that the development was appropriate use of the building and met tourism objectives, would not have an adverse impact on the adjoining occupiers and ensured the longevity of the listed building. It is asserted that the same approach should be adopted in respect of the current proposals.

Given the above it is asserted that the proposed development accords with policies ST1 and DM10 of the CLP and DS6PU of the ELP since the use of the property as a holiday let is of an appropriate scale and layout and that the use will not have any adverse impacts on the neighbouring amenity of the surrounding area.

## **Parking and Servicing**

The property has one car parking spaces within a garage and it is possible to park on the adjoining side road. It is sustainably located, and guests are likely to arrive both by car and public transport. Notwithstanding this, the applicant intends to lease two parking spaces within the Morrisons car park for use by visitors.

As part of the development, it is proposed that a secure bike shelter be provided within the rear courtyard to accommodate 4 cycles. Further storage space is available in the basement should this be required.

In terms of waste collection, it is intended that the property will have a private waste collection through Biffa. Bins will be brought to the front of the property on bin collection today.

It is considered that given the sustainable location of the property, the proposed car and cycle parking provision that the development accords with policy DM22 of the CLP and CO7PU of the ELP.

### **Impact on the Listed Building and Conservation Area**

The building and the railings are both listed. The listing description in respect of both notes:

*'Late Georgian-early Victorian. Scored stucco. 2 storeys, and 2 gabled dormers on roof, and basement. Tuscan porch with pediment and cast iron fret infilling at sides of porch in "Chinese" pattern. 2 plain sash windows on ground floor and 3 above, with glazing bars removed'.  
and*

*'FRONT CORKICKLE (1) 1814 Area railings, wall and railings to front, and small iron gate at No 8 (2) Late Georgian-early Victorian. Same date as house. Simple ironwork good of its kind, part of group.*

The properties along Front Corkickle are listed, generally as having group value (1-4, 5-6, 7, 9-11 and 12).

Section 16 of the NPPF relates to conserving the heritage environment. The NPPF notes that when considering the impact of development proposals on designated heritage assets such as listed buildings, great weight should be given to the conservation of the asset's significance. It also acknowledges the importance of ensuring that the building has a viable use consistent with their conservation and acknowledges the positive contribution that the conservation of heritage assets can make to sustainable communities including their economic viability.

The proposed use of the property for a holiday let does not require Listed Building Consent since no structural alterations to the building are proposed. However, Lifestyle Breaks have undertaken decoration and maintenance improvements works to the property since the building was previously in a poor state of repair. The works have been sensitively carried out to ensure that the character and appearance of the building is retained and the viable use of the building secured. The Conservation Officer has been aware of the refurbishment and has visited the site on a number of occasions and raised no objections to the work.

Given the above it is considered that the development accords with the NPPF and policies ENV4 and DM27 of the CLP and BE1PU and BE2PU of the ELP which seek to protect, conserve and where possible enhance listed buildings and their settings.

### **Flood Risk**

It is acknowledged that a very minor portion of the rear garden and boundary wall fall within Flood Zone 2. However, the property itself, which the application relates lies comfortably within Flood Zone 1. Furthermore, the current proposals are for a change of use of an existing building from residential use to holiday let accommodation and does not involve any new built development or increase in floor space.

The Copeland Borough Council Local Validation List and in particular the Draft Flood Risk Assessment document (Appendix G) sets out the parameters which trigger the submission of an FRA. Reference is made to proposals which create additional floorspace or the creation of a new dwelling, neither of which apply.

For these reasons, it is considered that a Flood Risk assessment is not required in this instance (this was confirmed by way of an email dated 1.12.23 as part of the validation process) and the policy requirements set out in ENV1 and DS8PU of the adopted and emerging plan will not be compromised through the proposed development.

### **Summary**

The proposal seeks to change the use of an existing single dwelling to a holiday let (sui generis use). The building is sustainably located within the settlement boundary for Whitehaven. Current and emerging Local Plan policies support the development of tourist accommodation within Whitehaven. Further, encouragement is given to the re-use of existing buildings (including Listed Buildings) for viable purposes and including for tourism. The principle of the use is therefore acceptable.

The proposed use is compatible with adjoining uses and will not have any adverse impacts on residential amenity. The property is to be appropriately managed and there are mechanisms in place to deter inappropriate use of the building. Appropriate levels of car and cycle parking are to be provided.

A sensitive refurbishment of the property has been undertaken which will have a positive effect on the longevity of the Listed Building and will enhance the appearance of the Conservation Area. The proposed use will provide a valuable addition to the tourist accommodation market, offering self catering accommodation to meet the needs of larger groups and is an appropriate use of the Listed Building (as accepted with approved holiday let at 18 Irish Street).

Given the above it is considered that the proposed change of use of the property accords with planning policy and planning permission should be forthcoming.

Yours sincerely

**Amanda Pickering**  
**Senior Planning Consultant**

For and on behalf of  
**Q+A Planning Ltd**