
From: Thomas Whitfield
Sent: 16 December 2025 15:24
To: Development Control
Cc: Samuel Woodford; Christopher Harrison
Subject: Case 4/24/2268/0L1 - 46 Lowther Street, Whitehaven

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Dear Sara Papaleo,

Thank you for notifying The Georgian Group of revisions to Application 4/24/2268/0L1 to undertake a scheme of works at Grade II listed 46 Lowther Street, Whitehaven. The Group last offered formal comments on this application in a letter dated 11th July 2025, since this letter we have however also been engaged in extensive informal discussions with the applicant team and the local planning authority.

Notable revisions to the scheme being now consulted on are the retention of the existing main staircase, the retention of the existing 1F ante-room without new or altered openings, subdivision of the 1F front room [Bedroom 5], and an additional bathroom/WC at 2F level.

Advice and Comments

Main Staircase

The Group thanks the applicant for revising the scheme to retain the existing nineteenth-century central staircase. This is welcomed and addresses one of the central tenets of our objection to the application. The Group is accordingly content to withdraw our objection on this point.

1F Ante-Room

The Group likewise welcomes the deletion of the proposal to alter the potentially primary phase wall at 1F level. We are again content to withdraw our objection on this point.

WCs

The Group registers some puzzlement that it is now proposed to introduce an additional shared WC at 2F level. This would take the total number of WC's in the property to 7no. when the property only has 6no. bedrooms, this feels excessive and to our eye is neither clearly nor convincingly justified. We recommend that if your LPA is minded to grant consent for the application you should be fully satisfied that this additional WC is clearly and convincingly justified under the terms of the NPPF (2024).

Cellar Dry-Lining

The Group maintains our deferral to your LPA's Conservation Officer to offer expert advice on whether the proposed cellar conversion works are appropriately justified under the terms of the NPPF paragraph 213.

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 despite the above mentioned welcome revisions, the proposed scheme of works continues to be for an intensive scheme of conversion of 46 Lowther Street to form a 6 bedroom HMO. The scheme of works will cause harm to the special architectural significance of the building as a grade II listed heritage asset.

We therefore advise that, if your LPA is minded to grant consent for the application, you must be fully satisfied that the harm which would be caused by the proposed scheme is clearly and convincingly justified, and/or offset by sufficient public benefits under the terms of the NPPF paragraphs 213 and 215.

Dr. Thomas Whitfield

Senior Conservation Adviser (Northern England)



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