

---

**From:** Thomas Whitfield  
**Sent:** 24 February 2026 16:22  
**To:** Development Control  
**Cc:** Samuel Woodford  
**Subject:** Case 4/26/2021/0L1 - 22 Lowther Street, Whitehaven.

**CAUTION: External email, think before you click!**  
Please report any suspicious email to our [IT Helpdesk](#)

Dear Sara Papaleo,

Thank you for notifying The Georgian Group of application 4/26/2021/0L1 to undertake a scheme of works at Grade II listed 22 Lowther Street, Whitehaven. The Group objects to the application on the following grounds.

22 Lowther Street is well appraised in the 1991 RCHME Volume 'Whitehaven 1660-1800'. The volume states that the house was the first built on Lowther Street, between 1693 and 1696. It was subsequently altered during the mid-eighteenth-century with a new central dog-leg staircase to the upper floors, replacing an original Newel staircase which is understood to survive in the basement.

The application is for a scheme of internal works altering room layouts and inserting an accessible WC and access lift. External alterations to the shop front are also proposed.

#### **Advice and Comments**

The Group notes that your LPA Conservation and Design Officer, The Victorian Society and The SPAB have already submitted comments raising concerns with the lack of information provided in the applicant's heritage statement and with the destructive and potentially highly harmful nature of the proposed scheme of works. In the interest of brevity we echo and support their comments and recommendations that more information is needed to explain the age, condition and significance of the building as a listed heritage asset.

The Group particularly wishes to highlight and emphasise your LPA Conservation Officer's advice that 'Listed buildings are listed in their entirety, inside and out, although not all elements will contribute equally to the building's significance, and some may detract.' We advise that there seems to be a misapprehension of this in the applicant's supporting documentation which erroneously only considers the exterior to be listed.

We furthermore strongly emphasise your LPA Conservation Officer's advice that 'Assessment of significance and capacity for change should be the first step in modifying a heritage asset, followed by design of the proposal.'

We advise that in its present form, the application fails to meet the requirements of NPPF (2024) paragraph 207 and may also prevent your LPA from fulfilling your responsibilities under paragraph 208.

We accordingly advise that the applicant must submit a more authoritative and detailed heritage statement assessing the age, condition and significance of all building elements affected by the proposed scheme. We recommend that the applicant may benefit from engaging an appropriately experienced and qualified heritage consultant to help them navigate working with a listed building.

The Group registers additional significant concerns that it is proposed to demolish the existing main staircase. We emphasise that the RCHME volume states that this is a mid-eighteenth-century staircase. We strongly recommend that the applicant must offer some discussion of the age, condition and significance of the existing staircase. This should be supported by comprehensive photography.

We advise that if the staircase is indeed of mid-eighteenth-century date, we would object to its demolition.

The Group furthermore notes from plans submitted that it is proposed to demolish a probable historic partition wall at GF level and to relocate potentially historic doorways at 1F and 2F levels. We advise that these works have the potential to cause irreversible losses of historic fabric, and potentially of historic decorative schemes such as plasterwork or joinery. We strongly recommend that the applicant provides an assessment of the age, condition and significance of the fabric affected.

The Group acknowledges that sympathetically upgrading the accessibility of small Georgian townhouses can be a considerable challenge and we recognise that improving accessibility is a strong justification for works. We strongly advise however that this needs to be carefully measured and considered against the harm which the proposed scheme of works would cause to the building's special architectural and historic significance as a Grade II listed heritage asset. This requirement is stated under the terms of NPPF paragraphs 212 and 213. We advise that, as it stands, the application does not provide sufficient information to allow such any informed or authoritative balancing exercise to be undertaken.

We would like to extend to the applicant that we would be pleased to discuss the proposals, and our above concerns and objections, in the interest of securing a sympathetic and sustainable future for No.22 Lowther Street as a listed heritage asset.

### **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.

The Group advises that the application has inadequate supporting documentation to explain the building's significance or the impact of the proposed scheme of works thereon. This prevents an informed authoritative assessment of the impact of the scheme to be made. Despite the inadequacies in the supporting documentation the scheme proposes extensive demolitions of potentially historic fabric, including a probable mid-eighteenth-century staircase, which have the potential to cause significant and irreversible harm.

We recommend that the applicant revises the scheme to address the above advice and comments and those submitted by other consultees.

We trust that this representation will be useful to your LPA in determining the application and to the applicant in developing a revised scheme which will secure a sympathetic future for the building.

Yours sincerely,

**Dr. Thomas Whitfield**

Senior Conservation Adviser (Northern England)



Support us <https://georgiangroup.org.uk/memberships/>



# VANBRUGH 300

Presented by THE GEORGIAN GROUP

*The information contained in this e-mail and any files transmitted with it are confidential and intended solely for the use of the individual(s) named. If you are not the named addressee(s) you should not copy, disseminate or distribute this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free since information can arrive late or contain viruses, or be corrupted, destroyed, incomplete, intercepted, or lost. The sender therefore does not accept liability for any errors or omissions in the contents of this message which arise as a result of e-mail transmission. If verification is required please ask for a hard-copy version.*