



# **Copeland Local Plan 2013-2028**

## **Conservation Area Design Guide Supplementary Planning Document**

### **Consultation Report**

**November 2017**

## **Introduction**

Copeland Borough embarked upon a statutory public consultation exercise to hear views on the draft Conservation Area Design Guide Supplementary Planning Document for a six-week period between Monday 10<sup>th</sup> July and Friday 18<sup>th</sup> August 2017.

A total of 13 representations were received, with the main comments relating to:

- Adding preferred types of roof slate material to be used;
- General formatting of the SPD;
- Additions to list of contacts and useful links at appendix 3;
- Additional ground surface photos at section 10;
- Inclusion of removal of or works to trees at section 10.3 and appendix 2.

The Council has amended the draft Conservation Area Design Guide, based on the comments received and will adopt the document as a Supplementary Planning Document at the meeting of Full Council in December 2015.

The full list of responses received and the Council's response to them can be found in the table on the following page.

Organisation	Page	Section	Supporting, Objecting or Commenting	Comments	CBC Response and Proposed Change
St Bees Parish Council	12	Slate Roofs	Making a Comment	P12 - Slates. Too prescriptive. Agree that slates should be replaced with slates - but there are also Kirby, Buttermere, ETC. Too many slate roofs have been replaced by tiles and no enforcement action taken.	<p><u>CBC Response:</u> Representation acknowledged and text modified.</p> <p><u>Proposed Change:</u> (P.12) 'When any re-roofing is proposed, it should be undertaken in a colour to match the existing slate and laid in courses to match the existing, (so where the existing roof is Westmorland slate, any new slates should be laid in diminishing courses to match the existing).'</p>

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Beckermet with Thornhill Parish Council		Throughout	Objecting	<p>Please see attached. RESPONSE TO BECKERMET CONSERVATION AREA PROPOSALS. The Parish Council has discussed the current consultation about changing the requirements in conservation areas. A number of residents have also made comments, and these have been incorporated.</p> <p>1 • People feel that you should have contacted the properties in the area directly, rather than relying on the system that you have used.</p> <p>2 • There has been very little support for the proposals to change the requirements in the Beckermet Conservation Area.</p> <p>3 • Whilst there are some interesting buildings in the village, it is hardly very special and does not warrant the suggested extra restrictions. Restrictions should be proportionate. The examples of the bad practice that you cite with which we agree could have been stopped by CBC, using the existing arrangements.</p> <p>4 • The village has already evolved, and should be allowed to continue to do so. There is concern that people may be deterred from making reasonable developments (or even moving in) by the extra cost, uncertainty, and bureaucracy. The area could then deteriorate.</p> <p>5 • In these days when you can get PVC that looks quite similar to wood, the restrictions on PVC are particularly unwelcome. Likewise, it should be reasonable to replace sash windows with other types.</p> <p>6 • Also, the cost of Westmoreland or Welsh slate is quite prohibitive when compared with other slates that are available.</p>	<p><u>CBC Response:</u></p> <ul style="list-style-type: none"> <li>• 1 The public consultation was widely advertised on the Council's website, Facebook and Twitter accounts. It was also highlighted by the local press and websites such as Cumbria Crack. Town / Parish Clerks were provided with posters giving details of the consultation and public drop in session in their areas, for display on public notice boards. As well as public drop in sessions in each area, an officer also attended each town/parish council meeting during the consultation period.</li> </ul> <p>It would be impracticable and expensive to contact every property owner in every conservation area in Copeland.</p> <ul style="list-style-type: none"> <li>• 2 No changes to requirements in conservation areas are being proposed</li> <li>• 3 The recent independent character appraisal concludes that Beckermet is still worthy of its conservation area designation, although its special character has been threatened by unsympathetic alterations to traditional buildings, hence the need for a formal Design Guide. Although CBC has certain 'enhanced' powers within its conservation areas, these are limited. This document, therefore, is intended to reinforce local and national planning policy and to encourage the protection and enhancement of the character and appearance of the Council's conservation areas.</li> <li>• 4 Conservation areas are about managing change, and change is acceptable where it does not detract from the special character and significance of the area.</li> <li>• 5 Apart from the poor appearance and detailing of pvc windows and doors, the overall environmental burden across several factors has been shown to be significantly higher for pvc than wood. Traditional joinery makes an important contribution to the heritage interest and</li> </ul>

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				<p>7 • As long as things are done sensitively, alternatives such as new methods of construction, new construction materials, and improved energy efficiency should be allowed.</p> <p>8 • Many of the properties have already changed from their original state. What matters is that changes blend in; not that they should always remain as before.</p> <p>9 • The ambiance of the village may become determined by the nearby presence of nuclear reactors. It seems strange to worry about retaining the look of the village, when councils are encouraging the construction of the nuclear station.</p> <p>10 • There has been concern that there may be pressure to backfit the new requirements in some areas. E.g. reposition satellite dishes, change building arrangements. A statement on this subject is needed.</p> <p>11 • There is no mention of whether grants would be available to offset extra costs.</p>	<p>significance of historic buildings. Historic England is opposed to the removal or alteration of such architectural features, and recommends that they should be retained and repaired or ultimately replicated if beyond practical repair.</p> <p><u>Proposed Change:</u></p> <ul style="list-style-type: none"> <li>• 1-5 No change proposed.</li> </ul> <p><u>CBC Response:</u></p> <ul style="list-style-type: none"> <li>• 6 Representation acknowledged and text modified.</li> </ul> <p><u>Proposed Change:</u></p> <ul style="list-style-type: none"> <li>• 6 (P.12) 'When any re-roofing is proposed, it should be undertaken in a colour to match the existing slate and laid in courses to match the existing, (so where the existing roof is Westmorland slate, any new slates should be laid in diminishing courses to match the existing).'</li> </ul> <p><u>CBC Response:</u></p> <ul style="list-style-type: none"> <li>• 7 Conservation areas are about managing change and change is acceptable where it does not detract from the special character and significance of the area.</li> <li>• 8 Conservation areas are about managing change and change is acceptable where it does not detract from the special character and significance of the area.</li> <li>• 9 Comment noted.</li> <li>• 10 Although the Council has no power to do this unless the works are unauthorised, the Design Guide is intended to encourage owners to make sensitive changes.</li> <li>• 11 Comment noted. Grants are not generally available but this document may help to attract grant programmes in the future.</li> </ul> <p><u>Proposed Change:</u></p> <ul style="list-style-type: none"> <li>• 7-11 No change proposed.</li> </ul>
Millom Town Council		All	Supporting	No further comments.	<p><u>CBC Response:</u>Representation comment noted.</p> <p><u>Proposed Change:</u>No change required.</p>

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Historic England				<p>Thank you for consulting Historic England, we do not need to be consulted in respect of design guide SPDs. However, having visited Whitehaven on the 28th July and briefly discussed the guide with Copeland staff, I offer the following general advice. I would also like to commend Copeland Council for producing such a document with a view to raising design standards.</p> <p>1. The SPDs current presentation would benefit from being given more space, key messages would be clearer if each architectural element was given its own page.</p> <p>2. i. Your design guide SPD does not adequately describe what constitutes good quality new design, specifically guiding the appropriate scale, height, layout, and massing of new development in your conservation areas, including their gap sites.</p> <p>2. ii. Reference ought to be made to NPPF Section 7 which requires "good design" and sets out national policies to achieve this. It is important for your SPD to inspire and encourage innovation and originality; it should not impose specific forms of development or styles. At present the guide focusses, arguably too heavily, on local historic buildings features in conservation areas and not sufficiently upon urban design principles and policies to help guide new development to address Copeland's growth agenda. Historic England advocates the use of Conservation Principles and Constructive Conservation to help manage change in historic places, please see our guidance at:  <a href="https://historicengland.org.uk/advice/constructive-conservation/">https://historicengland.org.uk/advice/constructive-conservation/</a> . Given your aspirations for Whitehaven marina, I also commend our recent guidance:  <a href="https://historicengland.org.uk/images-books/publications/heritage-works/">https://historicengland.org.uk/images-books/publications/heritage-works/</a></p>	<p><u>CBC Response:</u> Commendation welcomed.</p> <p><u>CBC Response:</u> 1. Representation comments accepted.</p> <p><u>Proposed Change:</u> 1. New format with main headings at top of columns will be incorporated into the final design and layout.</p> <p><u>CBC Response:</u> 2.i. The purpose of the guide is to ensure that the 'repair, re-instatement and alterations' to buildings are sensitively undertaken.</p> <p><u>Proposed Change:</u> 2.i. No change proposed.</p> <p><u>CBC Response:</u> 2.ii. Reference is made to NPPF Section 7 in Appendix 2, and reference to HE advice is referenced in Appendix 3 Contacts and Useful Links.</p> <p><u>Proposed Change:</u> 2.ii. No change proposed.</p>

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				<p>3. Have you considered providing hyperlinks to specific architectural advice alongside the relevant section? For example, Historic England published "Traditional windows, their care, repair and upgrading" in Feb 2017: <a href="https://historicengland.org.uk/images-books/publications/traditional-windows-care-repair-upgrading/">https://historicengland.org.uk/images-books/publications/traditional-windows-care-repair-upgrading/</a>, this could usefully sit in your section 2 "Windows and Doors". We have also produced guidance on thermally upgrading traditional windows and doors: <a href="https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historic-buildings/windows-and-doors-in-historic-buildings/">https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historic-buildings/windows-and-doors-in-historic-buildings/</a>. See also "Making Changes to my Property": <a href="https://historicengland.org.uk/advice/your-home/making-changes-your-property/types-of-work/alter-my-windows/">https://historicengland.org.uk/advice/your-home/making-changes-your-property/types-of-work/alter-my-windows/</a>. The Victorian Society, Georgian Group and Ancient Monuments Society all provide specific elemental design guidance that could usefully be referenced in the appropriate sections with hyperlinks.</p> <p>4.i. It would help the owners of heritage assets seeking to alter or extend properties if the SPD were to signpost them to local sources of conservation expertise such as NW or Cumbrian conservation accredited architects (<a href="https://www.aabc-register.co.uk/">https://www.aabc-register.co.uk/</a>) and CARE engineers (<a href="http://www.careregister.org.uk/">www.careregister.org.uk/</a>)</p>	<p><u>CBC Response:</u> 3. Hyperlinks to advice are already included in Appendix 3 (apart from the Ancient Monuments Society).</p> <p><u>Proposed Change:</u> 3. Ancient Monuments Society added to list of Contacts and Useful Links in Appendix 3: 'ANCIENT MONUMENTS SOCIETY'</p> <p><u>CBC Response:</u> 4.i. Representation comments accepted.</p> <p><u>Proposed Change:</u> 4. i. Links to AABC, RIBA and CARE registers added in Appendix 3: 'REGISTER OF ARCHITECTS ACCREDITED IN BUILDING CONSERVATION' <a href="http://www.aabc-register.co.uk">www.aabc-register.co.uk</a> RIBA CONSERVATION REGISTER <a href="http://www.architecture.com/knowledge-and-resources/resources-landing-page/find-a-conservation-architect">www.architecture.com/knowledge-and-resources/resources-landing-page/find-a-conservation-architect</a> CONSERVATION ACCREDITED REGISTER FOR ENGINEERS (CARE) <a href="http://www.careregister.org.uk">www.careregister.org.uk</a>'</p>

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Historic England				<p>4. ii. You might also consider listing specialist conservation contractors and suppliers of locally distinctive materials or goods in your area; one way to do this may be to produce one or two case studies that have been delivered locally and to refer to those involved during the project and the services they provided; another might be to consider sponsorship of the Design Guide, with a view to also widening its circulation. 5. The Ground Surfaces section could be improved significantly by providing additional images and explanatory text. It is currently lacking examples of traditional local pebble stone, flagged and cobbled surfaces. You might also consider signposting customers to local quarries and explaining where specialist surface laying skills might be obtained. Many of Copeland's terraced streets contain stone surfaced ginnels or snickets, these could be referenced alongside other associated locally distinctive features.</p>	<p>4.ii <u>CBC Response</u>:Representation comment noted, but there is no organisation currently providing accredited registration for contractors and suppliers.4.ii <u>Proposed Change</u>:No change proposed.5. <u>CBC Response</u>:Representation comments accepted.5. <u>Proposed Change</u>:Section 10 expanded slightly to include extra photographs.</p>
Natural England				<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England has no comments to make on this document at this time. We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</p>	<p><u>CBC Response</u>: Representation Comment noted. <u>Proposed Change</u>: No change required.</p>
Environment Agency				<p>Thank you for consulting with us on your: COPELAND BOROUGH COUNCIL DRAFT CONSERVATION AREA DESIGN GUIDE - SUPPLEMENTARY PLANNING DOCUMENT I can confirm that on this occasion we have no comments to make.</p>	<p><u>CC Response</u>: Representation comments noted. <u>Proposed Change</u>: No change required.</p>

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Ramblers Lake District Area		10.1	Making a Comment	I appreciate that this is a document giving advice about possible changes to architectural features in different conservation areas of the Borough. However, single mature trees and groups of trees can contribute to the setting of buildings in conservation areas by providing a framework for the townscape and softening it. They also give a link to the countryside beyond the built - up area. Perhaps there could be a mention of the control over works to trees in conservation areas. (Section 211 notices giving 6 weeks' notice of works to trees).	<p><u>CBC Response:</u> Representation Comment noted but there is already mention of control over works to trees in Appendix 2 Relevant Policies &amp; Legislation. However amendments to main text proposed to make this clearer.</p> <p><u>Proposed Change:</u> Reference made to Appendix 2 in Introduction: 'Under current legislation, conservation area designation automatically brings the following works under planning control (See Appendix 2 for further details): - demolition of buildings - removal of or works to trees - development that may be permitted elsewhere, for example some house extensions'.</p> <p>The following addition is also now made in Section 10 of the Guide: '10.3 TREES IN CONSERVATION AREAS Trees can make an important contribution in Conservation Areas, and works to them are not permitted without giving the appropriate notice to the local planning authority. Please see Appendix 2 for legal requirements.'</p>

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N/A (private individual)				<p>My house is within the Beckermat Conservation Area. I am supportive of the concept of conservation areas. I agree generally with the advice given in the draft SPD and the conclusion of the SA and, as a lay person in these matters, have no detailed observations to make. However, there are some general comments I wish to make:</p> <p>1. From the many examples in the Guide of bad practice, it seems to me that the objective of preserving the vernacular architecture of Copeland is in danger of becoming a lost cause. Even where planning permission is required (eg shop fronts), control of alterations seems to have been inadequate over a number of years.</p> <p>2. As the successful implementation of the Guide relies so heavily on the voluntary cooperation of property owners, I suggest that more needs to be done to encourage and help them, such as:</p> <p>(i) giving each property owner in conservation areas and builders a copy of the SPD when finally adopted and, as some of the aims of the SA are to enhance the historic environment, encourage leisure and tourism, and sustain the local economy, with the result that others, including residents and workers, are benefiting from the actions of property owners in conservation areas,</p> <p>(ii) waiving planning application fees</p> <p>(iii) setting up a fund to reimburse property owners for the extra cost of complying with the Guide</p>	<p><u>CBC Response:</u>Representation Comments noted.1. The Guide, as an SPD, will provide more substantial support when deciding future planning applications and on enforcement of unauthorised works.2.i) This document and the Love it or Lose It pamphlet are available to download as the Council is moving towards being paperless, but copies are available from the Council on request2.ii) Planning application fees are set by national government2.iii) Grants are not generally available but this document may help to attract grant programmes in the future. <u>Proposed Change:</u>No change proposed.</p>
Millom Town Council	32		Supporting	<p>Millom Town Council would like to fully support the Design Guide; preserving the heritage of the borough is extremely important alongside maintaining the current shop fronts and town centre areas.</p>	<p><u>CBC Response:</u>Representation comments accepted and welcomed. <u>Proposed Change:</u> No change required.</p>

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Canal & River Trust				<p>Thank you for your consultation in relation to the Draft Conservation Area Design Guide SPD. The Canal &amp; River Trust (the Trust) do not own or manage any waterways within the area that would be covered by the policy document. The Trust therefore have no comments to make on the draft.</p> <p>We do not need to be consulted further on the document.</p>	<p><u>CBC Response:</u> Representation comments noted.</p> <p><u>Proposed Change:</u> No change required.</p>
N/A (private individual)				<p>I am a member of the Cumbria Vernacular Buildings Group. As such I have an interest in how older buildings are preserved and used. I am also a member of the Beckermeth with Thornhill Parish Council. However the objections expressed below are my personal thoughts. Some objections to the new draft guide, Copeland Design Guide for Conservation Areas:</p> <ol style="list-style-type: none"> <li>1. If restrictions are to be placed on individual house owners then grants should be available to offset the additional expenses involved. My understanding is that no such grants are available to property owners within conservation areas - the restrictions placed on them for the 'public good' ought to be minimized.</li> <li>2. The new guide appears to preclude the replacement of sliding sash windows [which are notoriously difficult to seal against draughts] and most people would prefer to install modern high performance window systems [which can maintain the visual appearance of the originals]. I am prejudiced against plastic windows, but wood high performance windows of appropriate design should be acceptable in conservation areas. The expense of repairing old sliding sash windows, which will never be sealed satisfactorily nor meet modern insulation standards, cannot be justified.</li> <li>3. Older buildings have always throughout history been modified to new uses, and incorporated new materials</li> </ol>	<p><u>CBC Response:</u> Representation comments noted.</p> <ol style="list-style-type: none"> <li>1. No changes to requirements in conservation areas are being proposed. Grants are not generally available but this document may help to attract grant programmes in the future.</li> <li>2. The use of high performance timber sliding sash windows is acceptable providing they maintain traditional details and construction. Other forms of high performance window do not replicate the elegance, opening pattern or detail appearance of traditional sliding sash windows and their use is therefore discouraged. The use of double glazing can be considered conditionally. Replacing an otherwise sound or repairable sash window is contrary to Historic England's guidance and policy. Most joinery firms are able to retrofit draught proofing into existing sash windows.</li> <li>3. Improvements in construction methods and materials are not precluded from conservation areas provided that they are sympathetic to the character of the conservation area.</li> </ol> <p><u>Proposed Change:</u> 1,2 &amp; 3: No change proposed.</p> <p><u>CBC Response:</u> 4. Representation acknowledged and text modified.</p> <p><u>Proposed Change:</u> 4. (Page 12) 'When any re-roofing is proposed, it should be undertaken in a colour to match the existing slate and laid</p>

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				<p>and construction methods. How many stately homes, castles, or medieval halls, were built in a single phase? Improvements in construction methods and materials should not be precluded from conservation areas.</p> <p>4. Roofing materials; Slate sourced from Spain is much cheaper than Lakeland slate and has been used instead of greenslate for conservation buildings. [Eg barns in Beckermet.]. The new guide appears to preclude this option.</p> <p>5 Whilst the new guide may have relevance for top quality conservation areas, its strict application to conservation areas of mixed ages of housing [such as Beckermet] is not appropriate.</p>	<p>in courses to match the existing, (so where the existing roof is Westmorland slate, any new slates should be laid in diminishing courses to match the existing).'  <u>CBC Response:</u>            5. Mixed ages of housing is often a factor in helping to create the character of the conservation area where it has evolved over time as in Beckermet and St Bees. The guide is particularly relevant to these conservation areas in an attempt to halt the continuing erosion of character that has taken place over recent years.  <u>Proposed Change:</u>            No change proposed.</p>
Egremont town council	3	3 - Egremont Details		All the Egremont details are present and correct.	<u>CBC Response:</u> Representation comments accepted. <u>Proposed Change:</u> No change required.
Egremont town council				<p>Egremont town council fully supports the whole document.</p> <p>All the information contained applies to the Egremont towns conservation area and the town council continues to ensure that building owners and businesses based in market place and around the castle area comply with the statutory rules and regulations that protect conservation zones.</p> <p>Egremont town council feels very strongly that special feel and look of the building facades and roof tops must be fully maintained and the council feels that this document in its entirety will help in its endeavours to attract both new businesses and building development within our historic market town as well as help attract more tourism and visitors to the town.</p> <p>We thank all involved in its creation and find nothing within the document counter to or opposing the balance of new whilst maintaining the past.</p>	<p><u>CBC Response:</u>            Representation comments accepted and welcomed.  <u>Proposed Change:</u>            No change required.</p>