

**AVISON
YOUNG**



Planning Statement

Change of Use: Millom Library, St. George's Road, Millom, LA18 4DD

May 2022

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Status: Final

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For and on behalf of Avison Young Planning and Regeneration Limited

1. Introduction

- 1.1 This Planning Statement has been prepared by Avison Young on behalf of the applicant NDA Properties Ltd to assist Copeland Borough Council as local planning authority ('the Council') in its consideration of the accompanying full planning application for the *full planning application for the change of use of the site and premises from a library at ground floor and council meeting rooms/offices on the first floor to an office hub with ancillary meeting rooms and car parking* at Millom Library, St. George's Road, Millom, LA18 4DD.
- 1.2 The building was last used for Council offices and the town's library. The current building has seen little maintenance and investment in recent years and is in a poor state of repair.
- 1.3 This Statement examines the application against section 38(6) of the Planning and Compulsory Purchase Act (2004). It discusses how the development proposals conform to local and national planning policy requirements and how the development proposals accord with the Council's wider strategic regeneration aims for the City.
- 1.4 A pre-application was submitted to the Council in November and response issued in December 2021 (reference: PAA/21/0086) broadly supporting the proposals. Christie Burns (Planning Officer, Development Management) was the case officer for this enquiry. The comments provided in this response have been taken into consideration in developing the proposals for the site, and the supporting evidence suggested as validation requirements have been submitted with this application.

Application Documentation

- 1.4 This statement should be read alongside:
- Application Forms (Avison Young);
 - Heritage Statement (Avison Young)
 - Transport Statement and Interim Travel Plan (Vectos)
- 1.5 In addition, the application is supported by the following plans:
- Site Location Plan
 - Basement Plan 144-18 M01
 - Ground Floor Plan 144-18 M02
 - Upper Floor Plan 144-18 M03
 - Elevation 1-8 144-18 M05
 - Elevation 9-13 144-18 M06

- Existing Car Park Plan 144-18 M07
- Proposed Car Park Plan 144-18 M09

Structure

1.6 This Statement is structured as follows:

- Chapter 2 Site and Surrounding Area
- Chapter 3: Development Proposals
- Chapter 4: Planning Policy Context
- Chapter 5: Planning Appraisal
- Chapter 6: Summary and Conclusions

2. Site and Surrounding Area

The Application Site

- 2.1 The application relates to Millom Library, St. George's Road, Millom, LA18 4DD. Millom Library is located within the recognised town centre of Millom. The site area measures circa 0.145ha and comprises the library building and car park to the rear of the building.
- 2.2 The building was built as a library, but in 1995 application reference 4/95/0610/0 granted permission for 'alterations to form new local government centre'. The building was last used for Council offices and the town's library. The current building has seen little maintenance and investment in recent years and is in a poor state of repair. It is understood that the Council currently own the building and the applicant will purchase the building upon grant of planning permission for the desired use.
- 2.3 The surrounding area comprises primarily town centre uses, including a restaurant use to the immediate northwest of the site and property management professional services company to the southeast. In the wider area are more food and beverage uses, banks and professional services and retail uses. The built form appears to be primarily converted residential buildings in origin. The scale is limited to mostly two storeys. There is a purpose-built hospital to the south of the site and Millom Park and Cricket Club opposite the site which provide large areas of green space.

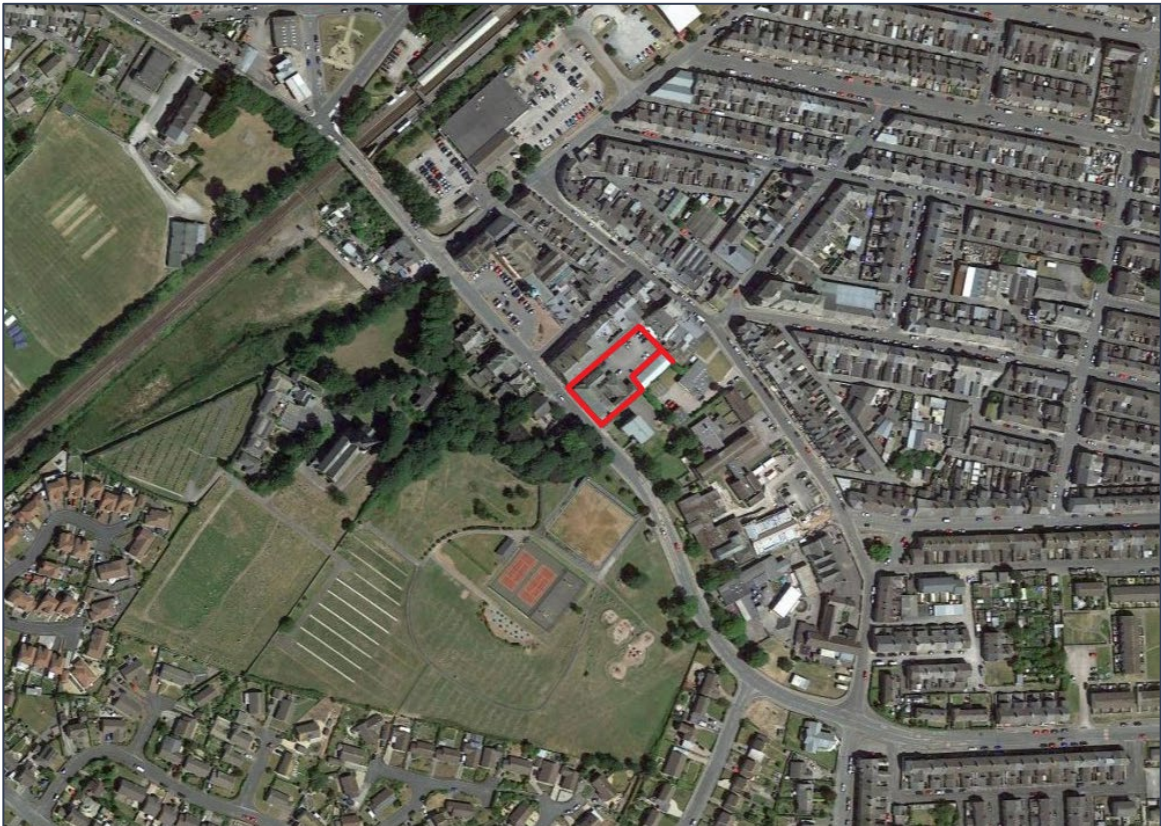


Figure 1: Site Location (indicative location in red)

- 2.4 The building is accessed directly from the footway of St. George's Road. The car park is accessed through an alley to the northwest of the building from St George's Road.
- 2.5 The site is within the Millom Town Centre boundary. Millom train station is located around 300 metres or a 4-minute walk to the north. The A595 is 6.2km north of Millom and can be reached in around 8 minutes by car. The journey west to reach the A595 is 5.8km or 7 minutes.

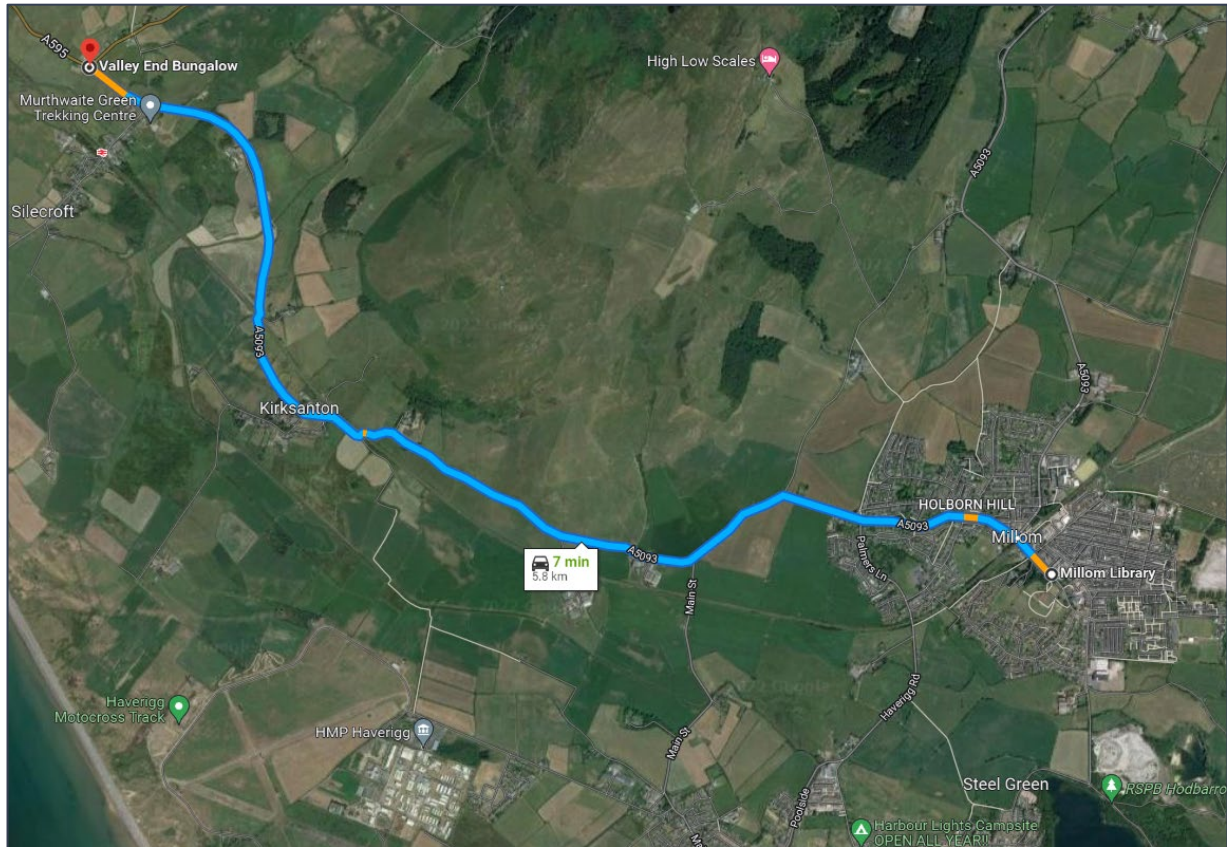


Figure 2: The Site in relation to distance from Strategic Road Network (SRN)

- 2.6 A search of relevant statutory bodies databases confirms the site:
- Is not designated locally or nationally for its geological nor biological importance (i.e., it is not a Site of Nature Conservation Importance or Sites of Special Scientific Interest);
 - Is not located within the Green Belt or an Area of Outstanding Natural Beauty;
 - Is not covered by any statutory landscape designations, such as AONB's, National Parks and The Broads;
 - Does not contain any locally or nationally listed buildings, however the site is within a Conservation Area; and
 - Is not subject to any nationally significant designations such as Scheduled Ancient Monument or World Heritage Site.

Planning History

- 2.7 A pre-application was submitted to the Council in November and response issued in December 2021 (reference: PAA/21/0086) broadly supporting the proposals. Christie Burns (Planning Officer, Development Management) was the case officer for this enquiry. The comments provided in this response have been taken into consideration in developing the proposals for the site, and the supporting evidence suggested as validation requirements have been submitted with this application.
- 2.8 The building was built as a library, but in 1995 application reference 4/95/0610/0 granted permission for 'alterations to form new local government centre'. The building was last used for Council offices and the town's library. The current building has seen little maintenance and investment in recent years and is in a poor state of repair.

3. The Proposed Development

- 3.1 This section of the Statement provides a summary of the development for which detailed planning permission is sought.
- 3.2 The proposed description of development is for:
- “Change of use of premises from a library to office hub with ancillary meeting rooms and car parking”.*
- 3.3 The proposals have been prepared mindful of the local planning policy framework. The statutory development plan for the authority is the Copeland Local Plan 2013-2028. This covers the area of Copeland outside of the Lake District National Park. The Core Strategy and Development Management Policies DPD (adopted 5 December 2013) forms the main part of the Development Plan for the borough. The Council also continues to have regard to the remaining ‘saved’ policies from the Copeland Local Plan 2001-2016 (adopted 2006) relating to specific areas of land (which will be reviewed in the Local Plan).
- 3.4 The application seeks permission for a change of use of the premises from the current use as a library and Council offices to an office hub and ancillary meeting rooms and car parking. There are no external physical alterations proposed to the building as part of this application. Internal refurbishment is proposed which will respect the historic nature and features of the building.
- 3.5 In terms of car parking the whole of this rear car park will be used for staff parking providing 22 car parking space in total, including 2 no. electric vehicle charging bays, 1 no. accessible bay and dedicated motorcycle parking. It is estimated that approximately 100 staff could be accommodated in the building - dependent on the Agile working density to be applied. Both desk space and car parking will be manage using an online booking system to ensure this capacity is not increased.

4. Planning Policy Context

Legislative Context

- 4.1 The Town and Country Planning Act (1990) and the Planning and Compulsory Purchase Act (2004) are relevant to the consideration of this application. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the statutory development plan unless material considerations indicate otherwise.
- 4.2 The statutory development plan for the authority is the Copeland Local Plan 2013-2028. This covers the area of Copeland outside of the Lake District National Park. The Core Strategy and Development Management Policies DPD (adopted 5 December 2013) forms the main part of the Development Plan for the borough. The Council also continues to have regard to the remaining 'saved' policies from the Copeland Local Plan 2001-2016 (adopted 2006) relating to specific areas of land (which will be reviewed in the Local Plan).
- 4.3 The Council is in the process of preparing a new development plan, and recently consulted on the Copeland Local Plan 2021-2038 Publication Draft in January – March 2022. The Publication Draft is the final draft of the Copeland Local Plan before submission for examination. This contains the Local Plan Vision and Objectives to 2038, the scale of likely growth, planning policies (strategic and development management Policies), land allocations and areas of protection that will guide future development in the borough and assist with making planning decisions.
- 4.4 This is a relatively advanced stage of preparation and policies should therefore be afforded appropriate weight commensurate with the stage of preparation.

National Planning Policy

National Planning Policy Framework (2021)

- 4.4 The NPPF sets out the Government's planning policies for England and how these should be applied and is a material consideration in the determination of the accompanying planning application. The most pertinent policies relating to the principle of development at the site are set out below.

The Presumption in Favour of Sustainable Development

- 4.5 The NPPF outlines that the purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development means that the planning system has three objectives which are interdependent and need to be pursued in mutually supportive ways:

- Economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity;
- Social objective – to support strong, vibrant and healthy communities; and
- Environmental objective – to contribute to protecting and enhancing the natural, built and historic environment.

4.6 Paragraph 9 confirms that these objectives should be delivered through the application of policies in the Framework; however, they are not criteria against which every decision can or should be judged.

4.7 Paragraph 10 states:

“So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development”.

4.8 Paragraph 11 is unequivocal in that that for decision-taking this means:

“c) approving development proposals that accord with an up-to-date development plan without delay; or d) where there are no relevant development plan policies or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

Building a Strong, Competitive Economy

4.9 Paragraph 81 states:

“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.”

Decision Making

- 4.10 Paragraph 38 notes that Local Planning Authorities should *“approach decisions on proposed development in a positive and creative way”*. This includes working proactively with the Applicant to *“secure developments that will improve the economic, social and environmental conditions of the area.”*

Promoting Sustainable Transport

- 4.11 The NPPF advises in paragraph 104 that:

“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) *the potential impacts of development on transport networks can be addressed;*
- b) *opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) *opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) *the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) *patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.”* (para. 102)

- 4.12 The NPPF requires all developments which generate significant amounts of movement to provide a Travel Plan, and Transport Statement or Transport Assessment so that the likely impacts of the proposal can be assessed (para. 113).

Achieving Well-Designed Places

- 4.13 The NPPF places great weight on achieving well-designed places. Paragraph 130 states that planning policies and decisions should ensure that developments:

- a) *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*

- d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."*

4.14 Paragraph 132 states that design quality should be considered throughout the evolution and assessment of proposals. It recommends that applicants work closely with those affected by their proposals to evolve designs that take into account the views of the community. *"Applications that can demonstrate early, proactive and effective engagement with the community should be looked upon 'more favourably than those that cannot."*

Planning Practice Guidance (PPG)

4.15 The PPG supports the NPPF. It is an online resource that is updated regularly to reflect current Government guidance and changes to the NPPF.

Design

4.16 The PPG states that good quality design is an integral part of sustainable development and that achieving good design is about creating places, buildings, and spaces that work well for everyone, look good, have longevity and are adaptable to changing needs.

Travel Plans, Transport Assessments and Statements

4.17 The PPG states that Travel Plans, Transport Assessments and Statements are all ways of assessing and mitigating the negative transport impacts of development in order to promote sustainable development. They are required for all developments which generate significant amounts of movements.

4.18 It is noted that Travel Plans, Transport Assessments and Statements can positively contribute to:

- encouraging sustainable travel;
- lessening traffic generation and its detrimental impacts;
- reducing carbon emissions and climate impacts;
- creating accessible, connected, inclusive communities;
- improving health outcomes and quality of life;

- improving road safety; and
- reducing the need for new development to increase existing road capacity.

4.19 They support national planning policy which sets out that planning should actively manage patterns of growth in order to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.

Local Planning Policy

Copeland Local Plan 2013 – 2028

- 4.20 The adopted Copeland Local Plan covers the area of Copeland outside of the Lake District National Park. The Core Strategy and Development Management Policies DPD (adopted 5 December 2013) forms the main part of the Development Plan for the borough. This contains planning policies (strategic and development management Policies), land allocations and areas of protection that will guide future development in the borough and assist with making planning decisions.
- 4.21 **Policy ST1 Strategic Development Principles** outlines the principles that inform and underpin the Local Plan, including economic and social sustainability, environmental sustainability, protecting, enhancing and restoring the Plan Areas valued assets, and ensuring the creation and retention of quality places. Planning application that accord with these principles will be approved unless material considerations indicate otherwise.
- 4.22 **Policy ST2 Spatial Development Strategy** sets the principles by which development within the Plan Area should be distributed, including growing the local economy (particular the energy sector) and concentrating development within defined settlement boundaries, in accordance with the settlement hierarchy. Development outside of defined settlement boundaries should be restricted unless a proven requirements is identified. The four identified towns should accommodate approximately 80% development over the plan period.
- 4.23 **Policy ST3 Strategic Development Priorities** prioritises the following locations for development:
- The site at Moorside selected in National Policy Statement 1-EN6 as the location for a nuclear power station;
 - Regeneration sites in south and central Whitehaven – the town centre and harbourside, Pow Beck Valley, Coastal Fringe and the South Whitehaven Housing Market Renewal Area;
 - Town centre renewal in Cleator Moor, Egremont and Millom;
 - The sites prioritised for development in the Energy Coast Master Plan;
- 4.24 **Policy ER1 Planning for the Nuclear Sector** sets out the Council's support for the nuclear sector's contribution to the economic development of the region. The policy sets out various methods of achieving this, including:

- Maximising opportunities from the proposed nuclear decommissioning phase for the Borough to become a centre of excellence for knowledge and skills in nuclear energy;
- Work with Sellafield Ltd and companies operating at Sellafield to optimise the number of functions and jobs that do not have to be based on site and can be located at, or relocated to, sustainable locations in the Borough's towns

4.25 **Policy ER5 Improving the Quality of Employment Space** sets out the Council's ambition to improve the quality of employment land portfolio by:

- Prioritising high-quality office provision within Whitehaven and Key Service Centres to meet inward investment needs in particular and in line with the requirements of Policy ST3B;
- Promoting investment in the public realm at specific employment sites and working with owners to achieve improvements more generally throughout industrial areas.

4.26 **Policy ER6 Location of Employment** sets out the preferred location for employment development, which identifies support for Whitehaven and Key Service Centres.

4.27 **Policy ER7 Principal Town Centre, Key Service Centres, Local Centres and other Service Areas: Roles and Functions** defines the roles and functions of settlements within the settlement hierarchy, which Whitehaven identifies the Principal Town and aims to protect and where possible enhance the services and facilities provided in the Key Service Centres of Cleator Moor, Egremont and Millom.

4.28 **Policy SS4 Community and Cultural Facilities and Services** encourages the provision and retention of good quality services and facilities which meet the needs of local communities and are accessible by public transport, cycling or on foot.

4.29 **Policy DM21 Protecting Community Facilities** states that development or change of use which would result in the loss of an existing social, community, cultural or sports facility will be resisted where there is evidence that there is a demand for that facility that is unlikely to be met elsewhere.

4.30 **Policy T1 Improving Accessibility and Transport** sets out Council support for transport improvements that maximise accessibility for all modes of transport but particularly by foot, cycle and public transport. Priority will be given to improving the accessibility of the Borough's key development and regeneration sites, town and village centres, service, employment and transport hubs, and rural areas.

4.31 **Policy ER9 The Key Service Centres, Local Centres and Other Small Centres** supports retail and service development which promotes the vitality and viability of Key Service Centres, Local Centres and other smaller centres, and is consistent with the spatial development strategy as defined in Policy ST2. This includes appropriate retail and service sector provision within the defined boundaries of each Key Service Centre to serve local communities. Further physical improvements in association with town centre management initiatives will be considered to attract more visitors and to reduce levels of vacancy.

4.32 **Policy ENV4 Heritage Assets** seeks to maximise the value of the Borough's heritage assets by:

- A. Protecting listed buildings, conservation areas and other townscape and rural features considered to be of historic, archaeological or cultural value;
- B. Supporting proposals for heritage led regeneration, ensuring that any listed buildings or other heritage assets are put to an appropriate, viable and sustainable use;
- C. Strengthening the distinctive character of the Borough's settlements, through the application of high-quality urban design and architecture that respects this character and enhances the settings of listed buildings

4.33 **Policy DM27 Built Heritage and Archaeology** supports the above policy, setting out the Council's approach to development which affects built heritage and archaeology. The Council will support 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.

4.34 Development within Conservation Areas will only be permitted where it preserves or enhances the character or appearance of the area and, where appropriate, views in and out of the area. The Council will pay particular attention to how new development respects the character of existing architecture and any historical associations, landscape features, open spaces, trees, walls and quality of townscape.

4.35 **Policy DM6A Managing Non-Retail Development in Town Centres** seeks to protect and promote the vitality and viability of the defined town centres by:

- A. Seeking for the most part continuous retail outlets and frontages at the ground floor of premises within the designated Primary Frontages Area in Whitehaven;
- B. Permitting non-retail uses such as cafes, bars, restaurants and other leisure uses which support the night-time economy, provided that such uses do not lead to an overconcentration of non-retail units;
- C. Requiring non-retail uses in premises with shop frontages to incorporate a suitable window display

4.36 **Policy DM10 Achieving Quality of Place** seeks a high standard of design and the fostering of 'quality places'. Development proposals are required to:

- A. Incorporate a complementary mix of uses, especially within or near town centres or at sites adjacent to public transport routes
- B. Respond positively to the character of the site and the immediate and wider setting and enhance local distinctiveness through:
 - i. An appropriate size and arrangement of development plots
 - ii. The appropriate provision, orientation, proportion, scale and massing of buildings
 - iii. Careful attention to the design of spaces between buildings, including provision for efficient and unobtrusive recycling and waste storage
 - iv. Careful selection and use of building materials which reflects local character and vernacular
- C. Incorporate existing features of interest including landscape, topography, local vernacular styles and building materials; and in doing so, have regard to the maintenance of biodiversity

- D. Address vulnerability to and fear of crime and anti-social behaviour by ensuring that the design, location and layout of all new development creates:
 - i. Clear distinctions between public and private spaces
 - ii. Overlooked routes and spaces within and on the edges of development
- E. Create and maintain reasonable standards of general amenity
- F. Incorporate new works of art as part of development schemes where appropriate

4.37 **Policy DM22 Accessible Developments** requires development proposals to be accessible to all users and accord with the following principles:

- A. The layout of the development responds positively to existing movement patterns in the area by providing or contributing towards:
 - i. Permeable and legible layouts which are convenient for access into and through the site for pedestrians, cyclists and disabled people
 - ii. Access for public transport
 - iii. Access for emergency and service vehicles
- B. Incorporate innovative approaches to managing vehicular access and parking with:
 - i. Standards incorporated into the design of the development which manage traffic access and speeds without excessive engineering measures
 - ii. Incorporate car parking, through a variety of on street and off-street arrangements which avoid vehicles dominating the street scene, whilst meeting adopted car parking standards which reflect the needs of the Borough in its rural context

4.38 Where necessary the potential transport implications of development will be required to be supported by a Transport Assessment and a Travel Plan to manage any significant transport implications.

5. Planning Appraisal

5.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. In this instance the statutory development for the determination of the planning application is the Copeland Local Plan 2013 – 2028.

5.2 Following a review of the local and national planning policy context the following matters are considered pertinent to the determination of the planning application:

- Principle of development
- Design and heritage consideration;
- Amenity;
- Loss of community facility
- Highways and transportation matters

5.3 Each of the above issues will be assessed in turn.

Principle of Development

5.4 The strategic development principles as set out in CSDP Policy ST1 include economic and social sustainability, environmental sustainability and ensuring the creation and retention of quality places. Planning applications that accord with these principles will be approved unless material considerations indicate otherwise. Policy ST2 sets the principles by which development within the Plan Area should be distributed, including growing the local economy (particular the energy sector) and concentrating development within defined settlement boundaries, in accordance with the settlement hierarchy.

5.5 This application proposes a development which is economically and socially sustainable by relocating jobs currently distributed across multiple, relatively dispersed sites in one central location within an identified town settlement. This will benefit the local economy through linked trips to local shops and services and encourage sustainable modes of transport by the increase in transport options afforded by the central location. More people working within Millom on a regular basis will contribute to a more vibrant town centre and will work as a catalyst to encourage other employers looking for office space and cafes and shops considering sites and premises to open.

5.6 The proposal is environmentally sustainable as it proposes the delivery of circa 785m² of office space to accommodate approximately 100 staff through the re-use of an existing underutilised building. The reuse of an existing building is preferable in terms of environmental sustainability as there a minimal physical construction works required (no changes proposed to the external building). There are environmental impacts involved in the demolition process such as emission from machinery, noise and dust. The

construction of a new building would have these issues plus the need for construction materials, of which the production has environmental impacts.

- 5.7 The Plan identifies a settlement hierarchy within which four identified towns (including Millom) should accommodate approximately 80% development over the plan period. Furthermore, Policy ST3 identifies Millom as a priority for town centre renewal.
- 5.8 In terms of employment development specifically, Policy ER6 sets out the preferred location for employment development, which identifies support for Whitehaven and Key Service Centres (which includes Millom). Policy ER5 of the Local Plan sets out the Council's ambition to improve the quality of employment space by prioritising high-quality office provision within Whitehaven and Key Service Centres.
- 5.9 The proposals for office space in this location aligns with the Local Plan's overarching strategic policies for development in general and policies which focus on employment development specifically. Furthermore, Policy ER1 sets out the Council's support for the nuclear sector's contribution to the economic development of the region, including working with Sellafield Ltd to optimise the number of functions and jobs that do not have to be based on site and can be located at, or relocated to, sustainable locations in the Borough's towns. Therefore, it must be considered that the principle of development in this location is acceptable.

Design and Heritage Considerations

- 5.10 The application site is located within Millom town centre conservation area. The building is not listed. The Council's approach as set out in Policy ENV4 is to maximise the value of the area's heritage assets by protecting listed buildings, conservation areas and other townscape and rural features considered to be of historic, archaeological or cultural value.
- 5.11 Policy DM27 states 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. Development within Conservation Areas will only be permitted where it preserves or enhances the character or appearance of the area.
- 5.12 The application does not propose any physical alterations to the building. It is therefore considered that the application would not have any detrimental impact to the character or significance of the conservation area. Conversely, ensuring the continued occupation of the premises will help the ongoing maintenance and conservation of the building and therefore enhance the character and appearance of the conservation area. The proposal is therefore compliant with the design and heritage policies of the

Local Plan should be supported by the Council.

Amenity

- 5.13 In planning terms, 'amenity' is often used to refer to the quality or character of an area and elements that contribute to the overall enjoyment of an area. Policy ER7 defines the roles and functions of settlements within the settlement hierarchy, identifying Millom as a Key Service Centre. Policy ER9 sets out the role of Key Service Centres, which is to support retail and service development and promote vitality and viability, consistent with the spatial development strategy as defined in Policy ST2.
- 5.14 Policy DM6A seeks to protect and promote the vitality and viability of defined town centres and Policy DM10 seeks a high standard of design and the fostering of 'quality places', responding positively to the character of the site and the immediate and wider setting and enhance local distinctiveness.
- 5.15 It must be considered that bringing this building back into active use and maximising the use of available space would contribute to the vitality and viability of Millom Town Centre. This is a town centre as defined in planning policy and the character is therefore established as commercial through retail and office developments. The proposed use would bring over 100 jobs into Millom Town Centre which will strengthen the town centre character and have a ripple effect in spend in neighbouring businesses such as cafes, pubs, restaurants and transport providers. Notwithstanding this, the proposal is to bring back into use an historic building with no physical alterations therefore maintaining the established visual character and amenity of this location. Overall, the proposal aligns with all visual, residential and general amenity aims and policies of the Local Plan.

Loss of Community Facilities

- 5.16 The application premises currently operates as a library and Council offices. As a library, this would therefore be considered a community facility, although the library is in a poor state of repair and is not particularly well used by the community. Policy SS4 encourages the provision and retention of good quality services and facilities which meet the needs of local communities and are accessible by public transport, cycling or on foot.
- 5.17 Policy DM21 states that development or change of use which would result in the loss of an existing social, community, cultural or sports facility will be resisted where there is evidence that there is a demand for that facility that is unlikely to be met elsewhere. The proposal will result in the loss of a communal facility, therefore, there needs to be acknowledgement of this and how this demand would be met elsewhere should the application be approved.
- 5.18 The proposed relocation of staff to the application site is inextricably linked with £250,000 grant funding provided by the applicant Sellafield Ltd. to Cumbria County Council for the 'Millom Hub'

project. This project will help to facilitate a range of activities and work toward creating set spaces around the town as part of the vision for the Town Deal (project to deliver grant funding from central government Levelling Up Fund).

- 5.19 This project will create a community hub that will house a range of services and provide flexible space for multiple uses by the public and other users of the Hub. The existing layout of the Hub is dominated by small spaces that are not flexible. This project will open up the front foyer, café and offices to create a large open exhibition space built around a café environment. This will then allow the library to be hosted with space users and community groups to hold events.
- 5.20 There will also be smaller rooms for tech training and employment and skills support through a range of providers including some of the tenants of the Hub such as the Phoenix Enterprise Centre, Cumbria Adult Learning and Skills and Groundwork. The foyer will also provide space for Copeland Borough Council's Revenue and Benefits team from to meet with clients and offer support and guidance to the local residents.
- 5.21 There will be the creation of discreet facilities for off-site meetings for Millom School, staff and parents. The close proximity to the school will enable afterschool clubs to be supported as well as career and employment-based activity to be encouraged from the Hub.
- 5.22 Outside the building, the current school playground has been used for multiple purposes which has led to confusion for users. This project will allow it to have clear definition between a car park with a separate bus layby being created to ensure safe access to and from the facility.
- 5.23 The project will provide improved access to the community facilities especially for those using buses or disabled users with cars or bikes. It is considered that this project will more than compensate for the loss of the existing library which is not utilised to its full potential. The funding to deliver this project would not be possible without the grant from the applicant which is dependent on the approval of this application. It is therefore considered that the application is compliant with policies SS4 and DM21 and should be approved.

Highways and Transportation Matters

- 5.24 Paragraph 110 of the NPPF encourages applications to take opportunities to promote sustainable transport modes relevant to type of development and site location. Paragraph 111 goes on to state that 'development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'.

- 5.25 This is reflected in local policy with Policy T1 setting out Council support for transport improvements that maximise accessibility for all modes of transport but particularly by foot, cycle and public transport. Policy DM22 requires development proposals to be accessible to all users, appropriate car parking and where necessary supported by a Transport Assessment and a Travel Plan to manage any significant transport implications.
- 5.26 The application is supported by a Transport Statement prepared by Vectos which addresses the transport implications of the proposal in more detail. A summary of conclusions from the transport statement and accordance with transport planning policy is included below:
- In accordance with planning policy guidance, which promotes sustainable development, the site has been demonstrated to be accessible on foot, by cycle and by public transport.
 - The analysis has been supplemented with information on staff and contractor home locations which has been provided in NDA. This information has demonstrated the excellent opportunity the site provides for staff to travel by sustainable means, in particular by rail.
 - To further promote and enhance travel by sustainable means an Interim Travel Plan has been prepared.
 - A review of historical collision data has demonstrated that there are no existing accident blackspots in the vicinity of the site.
 - Vehicle access to the car park will be provided from an existing access onto St George's Road. The accident data analysis also demonstrated that this access operates without safety issues.
 - A trip generation analysis has been undertaken. Even adopting robust assumptions it has been demonstrated that the increase in vehicle trips resulting from the proposed development will be imperceptible on the surrounding road network and will certainly have no materially detrimental impact upon its safe and efficient operation.
 - The level of car parking proposed has been demonstrated to accord with Cumbria County Council's guidance and be of sufficient quantum to meet forecast demand.
 - Servicing of the site will be undertaken in accordance with the existing arrangements.
- 5.27 The development site is in a sustainable location and would not have a detrimental impact upon either the operation or safety of the local highway network. It provides an appropriate level of car parking and can be safely serviced.
- 5.28 The National Planning Policy Framework states that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the

residual cumulative impacts on the road network would be severe.”

- 5.29 The Transport Statement demonstrates that the proposed development would have no impact upon highway safety and that the residual cumulative impacts of the proposed development would not be severe. Therefore, it is considered there are no reasons why the planning application should be refused on highway or transportation grounds.

6. Summary and Conclusions

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the statutory development plan unless material considerations indicate otherwise. It has been demonstrated that the proposal is in accordance with the statutory development plan.
- 6.2 Paragraph 38 notes that Local Planning Authorities should “approach decisions on proposed development in a positive and creative way”. This includes working proactively with the Applicant to “secure developments that will improve the economic, social and environmental conditions of the area.”
- 6.3 In summary, this application proposes a town centre use within a town centre location and is therefore acceptable in principle. It involves relocating staff from various remote disparate locations within one central location highly accessible by public transport and will have various social and economic benefits for Millom Town Centre. The reuse of an existing underutilised building to provide this office space is environmentally friendly and should be considered sustainable development.
- 6.4 Although the proposal involves the loss of a community facility, the application is linked to £250,000 grant funding from NDA to improve the Millom Hub to replace and improve this facility for the local community.
- 6.5 The application site is within a Conservation Area. However, no physical alterations are proposed to the building and its continued occupation will ensure the ongoing management and maintenance of this building to preserve its integrity and significance.
- 6.6 The proposal has been assessed in terms of transport impact and supported by a Transport Statement and Interim Travel Plan which demonstrates that the proposed development would have no impact upon highway safety and that the residual cumulative impacts of the proposed development would not be severe. highway
- 6.7 It has been demonstrated that the proposed development is compliant with the revised NPPF, PPG and the Local Development Plan, and on the basis of the justification set out in this statement and the supporting documentation, it is respectfully requested that the planning application be approved without delay.

Contact Details

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