

CUMBERLAND COUNCIL
CONSULTATION RESPONSE

Proposal: Change of use of old toilet block into either retail use (class a1) or office use (class a2)

Address: Former Toilet Block, Lancashire Road, Millom

Reference: 4/23/2270/OF1

Date: 24/10/23

Description: This former toilet block is a small, detached building within Millom Conservation Area. It is not a heritage asset and makes no contribution to the character and appearance of the conservation area, or the settings of any nearby heritage assets. Opportunity exists for improving it.

Conclusion: Suggest design revisions and additional information

Assessment:

- NPPF 206: “Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance.”
- Local Plan policy ENV4C aims to strengthen the distinctive character of settlements through high quality urban design and architecture that respect character and setting.
- Local Plan policy DM27C outlines the restriction in principle of development within conservation areas to that which preserves or enhances the character or appearance of the area.

- I am supportive of the proposal to convert this unused building and bring it back into use.
- The WC block is identified in the [Millom Conservation Area Appraisal](#) as being a detractor that has a negative effect on the conservation area and the settings of the converted railway goods shed (Tesco) and West County Court over the road. Additionally, it impacts views towards St George’s Church spire and precinct from the vicinity of the south-west end of the former goods shed.
- Opportunity exists to improve its appearance and increase its active frontage, setting it up as a linking device between the road and the goods shed, and reducing the sense of Millom’s conservation area being divided into two halves around the bridge by the expanse of inactive fabric (the rear of West County Court, the WC block and Tesco’s car park).
- Proposals should be specified according to the guidance in the [Conservation Area Design Guide](#) and the [Shop Front Design Guide](#).
- The colour scheme, external signage and materials are the main ways in which the impact of the building could be improved, and its status as a destination to be visited enhanced, which will be beneficial to the custom of the tenants and therefore the viability of the new use.
- Typically, windows and doors should be of timber construction, as per the guidance outlined in the Conservation Area Design Guide.

- White tends to be among the least attractive options for new windows and doors, particularly in conservation areas, and if they are to be timber there is a much wider choice of paint colours. I'd recommend considering an alternative. A new coat of the existing green colour could look very attractive, but experimentation can be rewarding. Both the guidance documents named above contain advice on choosing colours.
- Similarly, the background wall colour could benefit from a more interesting choice than white or magnolia, something that would complement the new use and attract people. A pastel shade could look good, and also avoid the coldness of greyscale colours when the weather is cloudy. Mockups of different colour combinations are a good way of finding something that works. Given that this used to be a toilet block, and that is how most people will think of it, the more that can be done to distance this new chapter from the old one, the better the likely outcome.
- It would be worth taking a look at the documentation for the most recent approved application on this site, 4/22/2100/OF1, as this contains some interesting and bold material choices.
- It may give a better effect to take the side-lights adjacent to the shop doors down to floor level as the current layout appears lopsided and rather reminiscent of a domestic porch.
- Details/specifications should be provided of the new PV panels to allow their impact to be properly understood. These should ideally be an in-roof system, mounted flush with the roof face.
- Details of the proposed flat grey roofing tile should be provided. The existing appear to be cement, but have a matte finish that may look better than an alternative that has a shiny, plasticky appearance. The likely appearance should be understood.
- Details of the signage and illumination should be included, taking mind of the advice outlined in the two guidance documents listed above.

Relevant Policies and Guidance:

Section 72 of the 1990 Act states that "special attention shall be paid to the desirability of preserving or enhancing the character or appearance of [a conservation] area."

Paragraph 134 of the National Planning Policy Framework (NPPF) asserts that "Development that is not well designed should be refused".

NPPF para. 197 states that "In determining applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation..."

NPPF para. 199 states, in the case of designated heritage assets, "great weight should be given to the asset's conservation", irrespective of whether potential harm is substantial, less-than-substantial, or total loss. Where harm to a designated heritage asset is less-than-substantial, it should be weighed against the public benefits of the proposal (para. 202).

Paragraph 203 of the National Planning Policy Framework (NPPF) states the effect on the significance of a non-designated heritage asset should be taken into account when making decisions.

Opportunities should be sought for new development within conservation areas and the settings of heritage assets that enhances or better reveals their significance. (para. 206)

Referring to assets in a conservation area, NPPF para. 207 states that loss of an element that makes a positive contribution to a conservation area should be treated as either substantial (under para. 201) or less-than-substantial harm (under paragraph 202).

The former Copeland Borough Council's Local Plan contains a number of relevant policies:

- Local Plan Policy ST1C(ii) highlights the importance of protecting, enhancing and restoring the Borough's cultural and heritage features and their settings.
- ST1D emphasises the council's commitment to creating and retaining quality places.
- ENV4A stresses the importance of protecting listed buildings, conservation areas and other features considered to be of historic, archaeological or cultural value.
- ENV4B outlines support for heritage-led regeneration, ensuring assets are put to appropriate, viable and sustainable uses.
- ENV4C aims to strengthen the distinctive character of settlements through high quality urban design and architecture that respect character and setting.
- DM10 emphasises the need for high quality design and quality places. Part B requires design to respond to local character at multiple scales, paying attention to plot size and arrangement, massing and scale, interstitial spaces, and materials. Part C requires the incorporation of existing features such as landscape and vernacular style.
- DM13D outlines the need, in converting non-residential buildings within settlement limits, or in subdividing large residential buildings within settlement limits, for conversion works to conserve the character of the building.
- DM27A outlines support in principle for developments that "protect, conserve and where possible enhance the historic, cultural and architectural character of the borough's historic sites and their settings".
- DM27C outlines the restriction in principle of development within conservation areas to that which preserves or enhances the character or appearance of the area.
- DM27D highlights the necessity of avoiding disrespectful alterations, substantial demolition, adverse effects on setting or views, or changes of use that harm the conservation or economic viability of a listed building.

The Conservation Area Design Guide and Shop Front Design Guide are supplementary planning documents adopted in 2017 and 2021 that are material considerations in the determination of planning applications within conservation areas in the legacy Copeland area. They are therefore applicable to this application.

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