

**CUMBERLAND COUNCIL  
CONSULTATION RESPONSE**

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**Proposal:** Discharge of condition 3 of planning application 4/24/2172/0F1

**Address:** Former Library, St George's Road, Millom

**Reference:** 4/25/2140/DOC

**Date:** 29/04/25

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**Description:** This former library and grammar school are a pair of buildings designed as part of Millom's civic offering, close to the square, along with the banks, church and former town hall. The former library is impressive and prominent, and the former school, which was attended by Norman Nicholson and some other locals who went on to high attainment, is more modest and has urgent conservation needs.

**Conclusion:** Request further information and design revision

**Assessment:**

1. In prior consultation, the general approach was agreed that the front (SW) and side (SE) elevations of the former library should be fenestrated using timber windows that replicate the design of the existing windows to preserve the appearance of the conservation area.
2. The rear (NE) and opposite side (NW) are well hidden and so less sensitive. Here, it was agreed in principle to make use of a suitable uPVC alternative.
3. The former grammar school at the rear lies outside the conservation area, and here it was determined it would not be reasonable to apply conservation area legislation, so it was also agreed in principle that suitable uPVC windows could be used.
4. The information enclosed with this discharge of condition application appears to show all the windows throughout the building being replaced with uPVC, and that the units selected are not designed in a way to offset the impact of their being uPVC. It is, however, difficult to tell which window is intended for which opening, and the details of appearance are provided in thumbnail only, making their actual appearance difficult to gauge.
5. It appears that windows are for the most part top-hinged, mitred at the corners, and featuring Georgian bar (internal plastic strips) to suggest the appearance of glazing bars. It also appears to be the case that where window openings are wider than high, this basic recipe has been stretched horizontally, rather than adjusted to suit the different opening.
6. I am not able to support these details in their current form.
  - a. To the front (SW) and side (SE) elevations, windows should be timber sliding sashes of a design that corresponds to the existing windows.
  - b. To other elevations, including to the former grammar school to the rear, uPVC windows should be of a design that suits the opening proportions and size, with sliding sash used where the opening is tall and large.
  - c. Where openings on these elevations are too small for sashes, or are square or landscape in proportions, side-hinged casements should be favoured. Use of flush casement frames can provide a better appearance, offsetting impact from use of plastic in a conservation area.

- d. The former grammar school is outside the conservation area, but affects its setting and is a modest non-designated heritage asset in its own right (mainly due to its association with Norman Nicholson), and affects the setting of the former library, which is also a non-designated heritage asset. Though outside the conservation area, we would expect impact on heritage to be taken into consideration, and it would be reasonable to extend the use of uPVC sashes and flush casements, as suit the openings, to the former grammar school as well.
- e. The designs of the proposed windows should therefore be updated to reflect the above feedback.
- f. The supporting information should be updated to clarify which windows are proposed in which openings. This could be accomplished by annotating photos of the outside of the building, with numbers referring to windows, or by submitting as-proposed elevation drawings that show the appearance of the building.

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**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 139 of the National Planning Policy Framework (NPPF) asserts that “Development that is not well designed should be refused”.

NPPF para. 210 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. 212 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. 215).

Paragraph 216 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. 219)

Referring to assets in a conservation area, NPPF para. 220 states that loss of an element that makes a positive contribution to a conservation area should be treated as either substantial (under para. 213-14) or less-than-substantial harm (under paragraph 215).

The Copeland area’s Local Plan contains a number of relevant policies:

- BE1 provides for the preservation and enhancement of built heritage assets by:
  - Requiring a heritage impact assessment or heritage statement where the proposal would affect a heritage asset;
  - Giving great weight to the conservation of Copeland’s designated heritage assets when decision making;
  - Ensuring that new development is sympathetic to local character and history;
  - Supporting proposals that increase the enhancement, promotion and interpretation of Copeland’s architectural and archaeological resources;

- Strengthening the distinctive character of Copeland's settlements, through the application of high-quality design and architecture that respects this character and enhances the setting of heritage assets.
- BE2 states that development should preserve or enhance designated heritage assets (or important archaeological sites) and their settings. The more important the asset, the greater weight that will be given to its conservation. Proposals that better reveal the significance of heritage assets will be supported in principle. Any harm to, or loss of, the significance of a designated heritage asset will require clear and convincing justification.
- BE4 refers to non-designated heritage assets, saying that development should preserve or enhance such heritage assets and their settings. Proposals that better reveal the significance of heritage assets will be supported in principle. Proposals affecting non-designated heritage assets or their settings should demonstrate that consideration has been given to their significance.
- DS4 outlines the Council's expectation that all new development will meet high-quality design standards that contribute positively to the health and well-being of residents.

The Conservation Area Design Guide is a supplementary planning document adopted in 2017 that is a material consideration in the determination of planning applications within conservation areas in the legacy Copeland area. It is therefore applicable to this application.

Sammy Woodford

Conservation and Design Officer