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Christie Burns  
Cumberland Council  
The Market Hall  
Whitehaven  
Cumbria  
CA28 7JG

27 June 2025

Your reference: 4/25/2198/0F1 • Our reference: JNP/Cu/4252198

Dear Christie Burns,

**ERECTION OF VISITOR CENTRE WITH CAFÉ/SHOP, GROUP ROOM,  
STAFF/VOLUNTEER, TOILET FACILITIES AND CAR PARK; CONSOLIDATION,  
REPAIR AND INSTALLATION OF INTERPRETIVE SCULPTURE TO TOWSEY HOLE  
WINDMILL; REFURBISHMENT OF EXISTING TERN HIDE; NEW BIRD  
HIDES/VIEWING SCREENS, PATHWAYS, GATEWAY FEATURES, STREET  
FURNITURE AND DEMARCATION OF SPACES AT EXISTING CAR PARK;  
ENHANCEMENT OF WILDLIFE HABITATS; ASSOCIATED LANDSCAPING AND  
DRAINAGE INFRASTRUCTURE; AND MAINTENANCE OF BYWAY WITH  
RESTRICTED VEHICULAR ACCESS (THE IRON LINE PROJECT)  
LAND AT HODBARROW NATURE RESERVE, MILLOM**

Thank you for consulting me on the above application.

The scheme is an amendment to the earlier withdrawn application (4/23/2249/0F1). I consider that the current scheme will provide welcome positive benefits to the reserve's historical industrial landscape, but the construction work will impact upon a small number of archaeological assets. These impacts are:

- The proposed car park to the proposed welcome building will be located on the site of an industrial building and a reservoir shown on the 1890s OS map;
- A section of the proposed footpath to Towsey Hole Windmill will be located on the site of offices shown on an 1870s map;
- A section of the proposed footpath to Hodbarrow Beacon will be located on the site of a building associated with Hodbarrow House, which is shown on the 1890s OS map;
- The proposed sculpture in the remains of Towsey Hole Windmill will affect the character and appearance of the 18<sup>th</sup> century windmill.

I therefore recommend that, in the event planning consent is granted, an archaeological watching brief is undertaken during the course of construction of three elements of the scheme: the proposed car park to the proposed welcome building; a short section of the proposed footpath to Towsey Hole Windmill; and a short section of the proposed footpath to Hodbarrow Beacon. Furthermore, I also recommend that a photographic record of Towsey Hole Windmill should be

carried out prior to the construction work commencing. This programme of archaeological work should be commissioned and undertaken at the expense of the developer and can be secured through the inclusion of a condition in any planning consent. I suggest the following form of words:

*Prior to the commencement of development, a written scheme of investigation for: 1) an archaeological watching brief; and 2) a photographic record of Towsey Hole Windmill, must be submitted by the applicant and approved by the Local Planning Authority. Once approved, the scheme shall be implemented in full with an archaeological watching brief and a photographic record being undertaken by a qualified archaeologist. Within two months of the completion of the development, a digital copy of the archaeological report shall be furnished to the Local Planning Authority.*

*Reasons: Watching brief - To afford reasonable opportunity for an examination to be made to determine the existence of any remains of archaeological interest within the site and for the investigation and recording of such remains. Photographic record of Towsey Hole Windmill - To ensure that a permanent record is made of the building of architectural and historical interest prior to its alteration as part of the proposed development.*

A written scheme of investigation for an archaeological watching brief and a photographic record of the windmill has been submitted with the application. This document refers to the impacts of the earlier application however, and so needs to be slightly revised in light of the impacts of the current application as described in my letter above.

Please do not hesitate to contact me if you have any queries regarding the above.

Yours sincerely,

Jeremy Parsons  
Historic Environment Officer