

**CUMBERLAND COUNCIL**  
**CONSULTATION RESPONSE**

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**Proposal:** Erection of welcome building with café, retail space, staff facilities and car park, installation of air source heat pumps, repair and stabilisation works and installation of suspended periscope mirrors at Hodbarrow Beacon, repair and stabilisation works and installation of camera obscura structure at Towsey Hole Windmill, installation of cladding and new living roof to existing bird hide, erection of new bird hides and viewing platforms, creation of new multi-use pathways with signage, gateway features and street furniture, making good of existing byway (boat) along sea wall, enhancement of wildlife habitats, and associated access, landscaping and drainage infrastructure

**Address:** Land at Hodbarrow Nature Reserve, Millom

**Reference:** 4/23/2249/0F1

**Date:** 19/10/23

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**Description:** Hodbarrow is a former haematite mining location, consisting of a variously worked and reclaimed foreshore, which has subsequently been flooded and turned into a nature reserve following the closure of mining and ironworking activities in Millom in the late 1960s.

**Conclusion: No objection (Informal query; see summary)**

**Assessment:** There are a number of proposals here that can be assessed from a conservation and design perspective:

Impact on heritage assets:

- Windmill
  - Towsey Hole Windmill is a ruined 18<sup>th</sup> century windmill and a non-designated heritage asset. It pre-dates the mining activities in the area, being associated with earlier agricultural uses. During the mining years, it was used as a powder store, before falling out of use in the mid-20<sup>th</sup> century.
  - Today, only the lower part of the main conical body survives. It is not immediately identifiable as a windmill, but nonetheless retains significance character when viewed in the context of its history.
  - Proposal entails major impact on appearance of asset, but relatively lower impact on the fabric itself. It is a lightweight, additive structure intended to slot within the existing ruin, although it is proposed to slate cap the tops of the rubble walls.
  - In doing this, it would somewhat re-establish the low form of the windmill's body, but without suggesting that it is anything other than a new insertion into historic fabric. This strikes me as an honest and rhetorical response to the site, and also as an opportunity to bring far more people into contact with the remains of the windmill, in a way that will broaden understanding of it and arrest further decline.
- Beacon
  - The Beacon is a scheduled monument, and neither a listed building nor a non-designated heritage asset. Therefore, assessing impact falls within the scope of a

scheduled monument consent application, which would be considered by Historic England.

- I am supportive of the proposal to repair the Beacon and fit it with a subtle installation consisting of a pair of mirrors that would allow the view to be appreciated from the doorway. I would view the impact on this heritage asset as being positive.
- I would question whether there is any possibility of dazzling viewers or even of setting fire to nearby dry grass where the afternoon sun and orientation of the mirrors perfectly align on a hot, dry summer's day.
- Lighthouse
  - This cast iron lighthouse was completed as part of the Outer Barrier scheme in 1905, replacing the Beacon as Hodbarrow's active lighthouse. It is a non-designated heritage asset, and was the subject of a restoration during 2003.
  - The scheme has the lighthouse as a focal point and a node, with surfacing and seating around it, and a hide positioned to the north via a causeway.
  - I would view this as having a positive impact on the lighthouse, by allowing its significance to be better appreciated.
- Outer Barrier
  - The Outer Barrier, the final of three, was constructed between 1900 and 1905. It is a non-designated heritage asset and an important part of the local industrial heritage.
  - Improvements to the pathways and surfaces along the top of the barrier are likely to allow its significance to be better understood.
- Inner Barrier
  - There is little change proposed to the Inner Barrier, which now exists only partially, having been breached during a storm in 1898.
  - Annie Lowther Hide is positioned close to and aligned with, but not on the barrier.

Design quality of new proposals:

- Welcome Centre
  - The Welcome Centre manages to balance boldness with subtlety and appears to be a distinctive and high quality piece of architecture that will establish a key node at Hodbarrow.
  - The splitting of the lower level into three volumes will potentially cause an increase in complexity, cost and heat loss, however that will be balanced against the architectural effect and mixing of interior and exterior spaces.
  - The visual lightness and openness of the upper rotunda, combined with the landscaping and planting that will partially submerge the ground floor, create an effect that will speak the same language as the hides located around the reserve, while clearly being the principle structure.
- Hides (Annie Lowther and Quarry)
  - The trestle-framed approach to Annie Lowther Hide is perhaps slightly overwrought, however given its setting among trees, and the fact it is unique, I think the references it sets up and sense of place it will establish are probably worth the increased footprint.
  - The new Quarry Hides appear simpler, and form a junction between them where visitors can appreciate views of flooded quarry pools to either side of the Iron Line.
- Paths, signage and furniture

- This shows an innovative and quality-led approach that should complement the heritage assets and new structures.

### **Summary:**

I am supportive of these proposals and believe they are well designed and beneficial to the heritage assets within the site.

Although we are not considering the scheduled monument consent application for works to the Beacon, I raise the question of whether there is any capacity for the mirror installation to either dazzle onlookers or to focus the sun's rays in such a way as to present a fire risk.

It would be helpful to have clearer information on the lighting strategy to be used throughout the site. Given the sensitivity of the location to light pollution, artificial lighting will need scrutinising carefully.

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### **Relevant Policies and Guidance:**

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)

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.
- 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.

- 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”.
- DM27B: “Development proposals which have a significant adverse effect on a Scheduled Ancient Monument or its wider site or setting will not be permitted”.

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