

## Oliver Hoban

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**From:** Lorayne Wall  
**Sent:** 13 October 2023 12:32  
**To:** Development Control  
**Subject:** 4/23/2249/0F1 - LAND AT HODBARROW NATURE RESERVE, MILLOM

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Dear Planning Team

Many thanks for consulting Friends of the Lake District (FLD) on the above application. We are the only charity wholly dedicated to protecting the landscape and natural environment of Cumbria and the Lake District.

We note that the proposals involve small-scale visitor facilities, formal parking, interpretive re-use of some of the old mining structures, visitor management measures and interpretation proposals.

Besides a brief mention of 'minimal external lighting', we could find no further details as to the location, quantity, or specification of any of the lighting proposed, nor any mention of the importance of reducing light pollution and protecting Dark Skies. This is a significant omission given that the site is a Nature Reserve and part of the Duddon Estuary Ramsar site and SSSI, Morecambe Bay SAC and Morecambe Bay & Duddon Estuary SPA.

The potential impact of new lighting is a concern for the wildlife, local character and the tranquillity of the area. This evidence <https://www.lightpollutionmap.info/> shows that although there are existing sources of light pollution nearby, care must be taken not to exacerbate these. Hodbarrow is currently a low emitter of light pollution and is of course particularly important for wildlife.

FLD leads the Dark Skies Cumbria Project <https://www.friendsofthelakedistrict.org.uk/dark-skies-subsite>, which celebrates the value of dark skies and aims to drive a net reduction in light pollution across Cumbria. As part of this project, an emerging Good Lighting Technical Advice Note (TAN) for the whole of Cumbria has been developed in conjunction with, and on behalf of, all the Cumbrian planning authorities. It sets out specific measures to support decision-making and the application of relevant local plan policies and the NPPF. It aims to secure a net reduction in light pollution across the County. Five Local Planning Authorities, including Cumberland Council, have contributed financially to the production of this document, which is now complete and just awaiting final sign off from the LPAs. The TAN recently won Build Back Better Platinum and Build Back Better Green Awards.

There are strong references to dark skies and light pollution in the forthcoming local plan covering the former Copeland area of Cumberland and relevant references in the NPPF (Para. 185).

In this context, we would strongly recommend that the TAN is applied to this proposal and that full details of all lighting are provided within the application to demonstrate no impact on light pollution or on wildlife. We would be grateful to be notified when these details are available.

Please do feel free to contact our Dark Skies Officer Jack Ellerby for advice.

With kind regards,

Lorayne Wall

**Lorayne Woodend Wall MRTPI**  
**Planning Officer**



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