

Planning Statement

The Iron Line, Millom

**Proposed new visitor facilities
and attractions at Hodbarrow
Nature Reserve**

Cumberland Council

August 2023

Document Control Sheet

Project Name: Iron Line, Millom

Project Ref: 056

Report Title: Planning Statement

Date: August 2023

Originator	Reviewed	Version	Date Issued	Version Comments
RM	ST	v.3		Final

© Identity Consult Planning (IC Planning Ltd). All rights reserved. This document is expressly provided to and solely for the use of our client and must not be quoted from, referred to, used by or distributed to any other party without the prior consent of Identity Consult Planning who accept no liability of whatsoever nature for any use by any other party.

Contents

1	Introduction	1
2	Site Context	4
3	Proposed Development	6
4	Planning Policy Context	8
5	Planning Assessment	22
6	Summary and Conclusions	28

Tables

Application Documents	Table 1.1
Application Drawings	Table 1.2
Site Planning History	Table 2.1
CLP Policies	Table 4.1

Figures

Aerial Site Plan	Figure 2.1
Illustrative Masterplan	Figure 3.1

1 Introduction

Overview

- 1.1 This Planning Statement has been prepared by IC Planning Ltd and is submitted in support of a planning application made to the Cumberland Council Local Planning Authority ('LPA') on behalf of Cumberland Council who is 'the Applicant', seeking full planning permission for new visitor facilities and attractions at Hodbarrow Nature Reserve, Millom ('the site'). The description of development is as follows:

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.

- 1.2 The project has been referred to as 'The Iron Line' throughout the pre-application consultation, and so this term is also in reference to the site. The Iron Line is one of four projects which are part of the Town Deal and is being led by Copeland Borough Council and the Millom Town Deal Board. The project is funded by the Towns Fund secured by the Council in 2019 under the Government's Levelling Up agenda.
- 1.3 The Planning Statement provides detailed commentary on the application site and its surroundings as well as any relevant planning history before providing a detailed description of the proposed development. A summary of relevant national and local planning policies and guidance is then provided before presenting an assessment of the proposal in the context of adopted planning policy and other material considerations.

Application Submission

- 1.4 In accordance with the Council's validation requirements and the scoping undertaken as part of the pre-application consultation process, the application comprises the following submission documents:

Table 1.1 – Application documents

Document	Prepared by
Application Form and Ownership Certificates	IC Planning
Planning Statement	IC Planning
Statement of Community Involvement	Placed

Design and Access Statement	Layer Studio / Gargarin Studio
Heritage Statement (Included with DAS)	Layer Studio / Gargarin Studio
Materials Schedule (Included with DAS)	Layer Studio / Gargarin Studio
Construction Method Statement Framework	Gargarin Studio
Landscape and Visual Assessment	One Environments
Contaminated Land Assessment	Curtins
Flood Risk Assessment	Curtins
Drainage Strategy	Curtins
Transport Assessment and Travel Plan	Curtins
Visitor Access Management Plan	Appletons
Preliminary Ecological Appraisal	Appletons
Ecology Phase 2 Survey Report	Greengage
Ecological Impact Assessment	Greengage
Biodiversity Net Gain Assessment	Greengage
Shadow Habitats Regulations Assessment (sHRA)	Lucy Gibson Consulting
Archaeological Assessment	Wardell Armstrong

- 1.5 A comprehensive package of plans and drawings prepared by Layer Studio and Gargarin Studio is also included with the application as detailed below:

Table 1.2 – Application drawings

Submitted Plans	Drawing No.
Site Masterplan	289-LYR-XX-ZZ-DWG-L-1000
Site Location Plan (Application Boundary)	289-LYR-XX-ZZ-DWG-L-1001
Drawing Locator Key	289-LYR-XX-ZZ-DWG-L-1002
Mainsgate Road Entrance Plan	289-LYR-XX-ZZ-DWG-L-1200
Hodbarrow Car Park (1:100 Plan)	289-LYR-XX-ZZ-DWG-L-1201
Welcome Building (1:500 Plan)	289-LYR-XX-ZZ-DWG-L-1202
Welcome Building (1:200 Plan)	289-LYR-XX-ZZ-DWG-L-1203
Iron Line Entrance Plan	289-LYR-XX-ZZ-DWG-L-1204
Iron Line Railway Pass Plan	289-LYR-XX-ZZ-DWG-L-1205
Quarry Hides Plan	289-LYR-XX-ZZ-DWG-L-1206
Whiterock Junction Plan	289-LYR-XX-ZZ-DWG-L-1207

Towsey Holde Windmill Plan	289-LYR-XX-ZZ-DWG-L-1208
Hodbarrow Beacon Plan	289-LYR-XX-ZZ-DWG-L-1209
Annie Lowther Hide Plan	289-LYR-XX-ZZ-DWG-L-1210
Sea Wall (Typical Arrangement Plan)	289-LYR-XX-ZZ-DWG-L-1211
Haverigg Lighthouse Plan	289-LYR-XX-ZZ-DWG-L-1212
Haverigg Lighthouse and Tern Island Hide Plan	289-LYR-XX-ZZ-DWG-L-1213
Welcome Building Ground Floor Plan	GAG 293 3200
Welcome Building First Floor Plan	GAG 293 3201
Welcome Building Roof Plan	GAG 293 3202
Welcome Building Sections AA BB	GAG 293 3300
Welcome Building Sections EE FF	GAG 293 3301
Welcome Building Sections GG HH	GAG 293 3302
Welcome Building Sections II JJ	GAG 293 3303
Welcome Building Section CC	GAG 293 3304
Welcome Building Materials Study	GAG 293 3310
Windmill Site Plan	GAG 293 3400
Towsey Hile Windmill Site (Section and Detail)	GAG 293 3401
Towsey Hile Windmill (Elevations)	GAG 293 3402
Hodbarrow Beacon (Plans and Elevations)	GAG 293 3403
Hodbarrow Beacon (Site Section and Details)	GAG 293 3404
Tern Island Hide (Plan and Elevations)	GAG 293 3405
Quarry Hides (Plan and Site Section)	GAG 293 3406
Quarry Hides (Elevations)	GAG 293 3407
Annie Lowther Hide (Plan and Section A)	GAG 293 3408
Annie Lowther Hide (Site Section)	GAG 293 3409
Hodbarrow Beacon Existing Floor Plans and Elevations	P10913.AMR.6
Towsey Hole Windmill Existing Floor Plan and Elevations	P10913.AMR.7
Bird Hide, Haverigg Lighthouse Existing Floor Plan and Elevations	P10913.AMR.9

1.6 The Planning Statement should be read in conjunction with the technical reports and plans outlined in Tables 1.1 and 1.2 above which provide the evidence base upon which the planning policy assessment has been made and the technical considerations to demonstrate deliverability.

2 Site Context

Site Description

- 2.1 The site is located approximately 1.5km south from the centre of Millom, and 1km east of Haverigg. The site boundary broadly follows the existing “Iron Line” walking and cycling route, including Hodbarrow Nature Reserve, the seawall and land adjacent to Redhills Quarry Recycling Centre. Vehicular access to the site is via Mainsgate Road which runs north to south from Millom. There is also access to the east from Harverigg.
- 2.2 The closest residential premises are those at Port Haverigg Marina Village holiday park. The surrounding land use is predominantly agricultural, with the exception of the holiday park and campsites. The Hodbarrow Reserve is owned and managed by the RSPB, who have been a key consultee throughout the development of the proposals.
- 2.3 The site has an industrial heritage. The reserve is located on the site of a former iron ore mine which was operational from 1850 to 1968, when the mine closed and was flooded. During this time the site developed a large railway system to transport goods across the mines and further onto the Furness Railway mainline. In 1986 the RSPB purchased the site which now comprises a large coastal lagoon and grasslands.
- 2.4 A full description of site context is contained within the Design and Access Statement (including Heritage) prepared by Layer Studio and Gagarin Studio which accompany the planning application.

Figure 2.1 – Aerial Site Plan



Planning History

2.5 The most relevant planning history relating to the site that is accessible on the Council’s planning portal is summarised in the table below:

Table 2.1 – Site Planning History

<i>Application Ref</i>	<i>Description of Development</i>	<i>Date</i>
<i>4/91/0685/4</i>	<i>SINGLE STOREY BLOCK HIDE</i>	<i>12 Sep 1991</i>
<i>4/92/9002/0</i>	<i>ACCESS, SECURITY COMPOUND, LANDFILL AND CLINICAL, WASTE TRANSFER AREA.</i>	<i>31 Mar 1992</i>
<i>4/94/9012/0</i>	<i>CIVIC AMENITY SITE</i>	<i>20 Oct 1994</i>
<i>4/96/0422/0</i>	<i>CREATE VEHICLE CONTROL BUND AND LEVEL STEEP BANKS</i>	<i>1 Aug 1996</i>
<i>4/07/2213/0</i>	<i>NON ILLUMINATED ADVERT SIGN</i>	<i>15 May 2007</i>
<i>4/15/2060/0A1</i>	<i>COASTAL INTERPRETATION INFORMATION BOARD AND MARINE LITTER MESSAGE SIGNAGE</i>	<i>29 Apr 2015</i>
<i>4/18/9003/0F2</i>	<i>VARIATION OF CONDITIONS 1 AND 2 OF PLANNING PERMISSION 4/13/9001 FOR EXTENSION OF OPERATIONAL TIME OF HOUSEHOLD WASTE RECYCLING CENTRE</i>	<i>28 Mar 2018</i>

3 Proposed Development

Pre-Application Consultation

- 3.1 A number of consultations with the local planning authority and key stakeholders were carried out throughout the design development process, including Council officers from planning, conservation, ecology, highways and drainage. Natural England and the RSPB have been part of the project team providing regular feedback. Public consultation with the local community was also carried out.
- 3.2 A summary of the feedback received from the LPA and key stakeholders is contained within the accompanying Statement of Community Involvement ('SCI'), as well as the results from the consultation questionnaires.
- 3.3 The feedback from the pre-application consultation has informed the design development and the proposals that are now presented in the application submission, summarised below.

Application Proposal

- 3.4 The application is seeking full planning permission for a proposed new welcome building at Hodbarrow Nature Reserve together with new facilities to improve the visitor experience and conserve and enhance ecological habitats. The main elements of the proposal include:
 - Erection of welcome building including café, retail unit, staff facilities and semi-external circular viewing rotunda, with living roof and solar panels.
 - Installation of Air Source Heat Pumps.
 - Formation of car parking areas with 76no. vehicle spaces including 6 EV charging spaces and 5 accessible spaces.
 - Provision for 44no. cycle parking spaces.
 - Repair and stabilisation works to Hodbarrow Beacon with new perimeter hardstanding.
 - Repair and stabilisation works to Towsey Hole Windmill and installation of 'camera obscura' structure with new perimeter hardstanding.
 - New perimeter hardstanding at base of Haverigg Lighthouse.
 - Cladding of existing tern island hide and installation of living roof.
 - Erection of 3no. new bird hides (Annie Lowther, 2x quarry hides).
 - Creation of 3no. viewing platforms (2 at windmill, 1 at lagoon).
 - 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.

Figure 3.1 – Illustrative Masterplan



- 3.5 The proposal will also result in a number of environmental benefits through better management of pedestrian movements and improved signage as well as significant biodiversity net gains from the creation of new habitats and improvement of existing habitats.
- 3.6 The application is supported by a Design, Access and Heritage Statement and a full suite of architectural drawings prepared by Layer Studio and Gagarin Studio which present the development proposals in detail with commentary on the design evolution and high-quality visualisations and images.

4 Planning Policy Context

Decision Taking

- 4.1 Section 70(2) of the Town and Country Planning Act 1990 states that where an application is made to a local planning authority for planning permission, the authority shall have regard to the provisions of the development plan, so far as material to the application. The development plan in this instance comprises the Copeland Local Plan 2013 - 2028 (adopted in December 2013).
- 4.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the statutory development plan, unless material considerations indicate otherwise. The National Planning Policy Framework 2021 ('NPPF') and any relevant Supplementary Planning Documents (SPDs) are a material consideration.

National Planning Policy Framework

- 4.3 The NPPF sets out the Government's overarching policy framework for planning and is a material consideration in the determination of applications. The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. To achieve sustainable development, the NPPF states that economic, social and environmental gains should be sought jointly and simultaneously through the planning system. Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life.
- 4.4 Paragraph 11 of the NPPF sets out a 'presumption in favour of sustainable development', which for decision-taking means *"approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits..."*
- 4.5 Paragraph 38 of the NPPF is clear that *"Local planning authorities should approach decisions on proposed development in a positive and creative way"*. In accordance with the presumption in favour of sustainable development, LPAs should *"work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area... Decision-makers at every level should seek to approve applications for sustainable development where possible"*.
- 4.6 The NPPF sets out policies under themes that reflect the Government's key objectives for the planning system. Of particular relevance to this application are:

- Achieving sustainable Development
- Promoting healthy and safe communities
- Making effective use of land
- Achieving well-designed places
- Conserving and enhancing the natural environment

Achieving sustainable development

4.7 Paragraph 8 states that achieving sustainable development means that the planning system has three overarching objectives; an economic objective, a social objective and an environmental objective. Paragraph 9 requires that *“Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.”* At the heart of the NPPF is a *“presumption in favour of sustainable development (paragraph 11)”*.

4.8 For decision taking, this means *“approving development proposals that accord with an up – to – date development plan without delay ;or where there are no relevant development plans.....granting permission unless: the application of policies in this framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

Promoting healthy and safe communities

4.9 Paragraph 92 states that planning decisions should *“aim to achieve healthy, inclusive and safe places enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.”*

4.10 Paragraph 93 states that *“to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should plan in a positive way providing shared spaces, community facilities (such as local shops, meeting places, sports venue, open space, cultural buildings, public houses and places of worship) and other services to enhance the sustainability of communities and residential environments”* and *“take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community”*.

Making efficient use of land

- 4.11 Paragraph 119 requires policy and decision making to promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 120 of the NPPF emphasises this by stating at criterion (c) that planning policies and decisions should *“give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs...”* and criterion (d) *“promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained...”*.
- 4.12 Paragraph 124 states that planning policies and decisions should support development that makes efficient use of land, taking into account the identified need for different types of housing, the availability of land and local market conditions and viability, maintaining an area’s prevailing character and setting, and the importance of promoting regeneration and change and securing well-designed, attractive and healthy places. Local planning authorities should refuse applications which they consider fail to make efficient use of land (paragraph 125).

Achieving well-designed places

- 4.13 The NPPF attaches great importance to the design of the built environment stating that it is fundamental to what the planning and development process should achieve, and that good design is a key aspect of sustainable development (paragraph 126). It calls upon effective engagement between applicants, communities, local planning authorities and other interests throughout the process.
- 4.14 Planning policies and decisions should ensure that developments (amongst other things) will function well, add to the overall quality of the area, and are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change, such as increased densities (paragraph 130). The NPPF specifically states that permission should be refused for development or poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

Conserving and enhancing the natural environment

- 4.15 Para 174 requires planning policies and decisions should contribute to and enhance the natural and local environment by *“protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital*

and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.....”

- 4.16 Paragraph 180 states that when determining planning applications, local planning authorities should apply the principle that *“development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.”* Paragraph 181 extends this principle to habitat sites *“(a) potential Special Protection Areas and possible Special Areas of Conservation; (c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.”*

The Development Plan

- 4.17 The development plan is the starting point for considering planning applications. As set out above, the development plan relevant to the assessment of this application is the Copeland Local Plan 2013-2028
- 4.18 The Copeland Local Plan was adopted in December 2013. Although Copeland Borough Council has since been replaced by Cumberland Council, the adopted development plan remains the same.

Table 4.1 – CLP planning policies (extracts only)

Policy	Summary
<i>Policy ST1 – Strategic Development Principles – Environmental Sustainability</i>	<p><i>The Strategic Development Principles that inform and underpin the Borough’s planning policies are:</i></p> <p><i>A. Economic and Social Sustainability</i></p> <p><i>i) Support the development of energy infrastructure, related economic clusters, rural diversification and tourism in appropriate locations</i></p> <p><i>ii) Support diversity in jobs, and investment in education and training, especially that which creates and attracts business</i></p> <p><i>iii) Ensure development creates a residential offer which meets the needs and aspirations of the Borough’s housing markets</i></p> <p><i>iv) Support development that provides or contributes to the Borough’s social and community infrastructure enabling everyone to have good access to jobs, shops, services and recreational and sports facilities.</i></p> <p><i>B. Environmental Sustainability</i></p>

- i) Encourage development that minimises carbon emissions, maximises energy efficiency and helps us to adapt to the effects of climate change*
 - ii) Protect, enhance and encourage the creation of new areas of green infrastructure, recognising the important role that the natural environment and healthy ecosystems have to play in the future social and economic, as well as environmental sustainability of Copeland*
 - iii) Reuse existing buildings and previously developed land wherever possible, directing development away from greenfield sites, where this is consistent with wider sustainability objectives*
- C. Protect, enhance and restore the Borough's valued assets*
- i. Protect and enhance areas, sites, species and features of biodiversity value, landscapes and the undeveloped coast*
 - ii. Protect and enhance the Borough's cultural and historic features and their settings*
 - iii. Provide and enhance recreational opportunities for the Borough's residents and its visitors, protecting existing provision and ensuring that future development meets appropriate standards in terms of quantity and quality.*
 - iv. Manage development pressures to protect the Borough's agricultural assets*
 - v. Support the reclamation and redevelopment or restoration of the Borough's vacant or derelict sites, whilst taking account of landscape, biodiversity and historic environment objectives*
 - vi. Ensure development minimises air, ground and water pollution*
- D. Ensure the creation and retention of quality places*
- i. Apply rigorous design standards that retain and enhance locally distinctive places, improve build quality and achieve efficient use of land*
 - ii. Ensure development provides or safeguards good levels of residential amenity and security*
 - iii. Accommodate traffic and access arrangements in ways that make it safe and convenient for pedestrians and cyclists to move around*
 - iv. Ensure new development addresses land contamination with appropriate remediation measures*

Planning applications that accord with these principles and relevant Development Management policies, and do not undermine the Spatial Development Strategy, will be approved without unnecessary delay, unless material considerations indicate otherwise.

<p><i>Policy ST2 – Spatial Development Strategy</i></p>	<p><i>Development in the Borough should be distributed in accordance with: C. Restricting development outside the defined settlement boundaries to that which has a proven requirement for such a location, including Land uses characteristically located outside settlements, such as agriculture or forestry, farm diversification schemes or tourism activities requiring location in the countryside, or prisons.</i></p>
<p><i>Policy ST3 – Strategic Development Priorities</i></p>	<p><i>The council will prioritise economic regeneration and growth to fulfil strategic objectives for Copeland and West Cumbria, in (amongst others) Millom (C.). Other sites that may emerge, which reflect the above priorities and/or other Core Strategy or agreed sub-regional growth objectives, will be similarly supported.</i></p>
<p><i>Policy ST4 – Providing Infrastructure</i></p>	<p><i>A. Development that generates a demand for physical, social or environmental infrastructure will be permitted if the relevant infrastructure is either already in place and has the capacity to meet the additional demand, or there is a reliable mechanism in place to ensure that it will be provided when and where required</i></p> <p><i>B. In the specific case of major development, particularly in the energy sector, where the Council is not the determining authority, we will work with developers, Government and the National Infrastructure Directorate to agree packages of measures which ensure that such development makes an optimal contribution to the Borough’s needs</i></p> <p><i>C The Council will, until a Community Infrastructure Levy is adopted, apply the following principles in securing developer contributions:</i></p> <ul style="list-style-type: none"> <i>i) Development proposals should provide, or contribute to the provision of facilities, infrastructure, services, and other environmental and social requirements either on or off site, as is reasonable and necessary to support and mitigate the impact of the development.</i> <i>ii) The nature and scale of any planning requirements sought for this purpose should be related to the type of development, its potential impact upon the surrounding area and, in the case of residential proposals, the need for developer contributions for the provision of affordable housing (see Policy SS3). The Council will not seek contributions which would prejudice the viability of a development, beyond those which would be necessary to make it acceptable.</i> <i>iii) Contributions for the initial running costs of services and facilities to secure their medium and long-term viability will be agreed through appropriate conditions or obligations, where such costs cannot be sustained in the short term.</i>

	<p><i>D. The Council will expect utility and other infrastructure providers to rectify as soon as possible any network shortcomings which risk preventing or delaying development.</i></p> <p><i>E. A Supplementary Planning Document on Developer Contributions for Infrastructure will set out the appropriate range and level of contributions, and matters for which they will be sought. This, supported by data from the Infrastructure Plan, may form the basis for a future Community Infrastructure Levy.</i></p>
<p><i>Policy ER7 – Principal Town Centre, Key Service Centres, Local Centres and other service areas: Roles and Functions</i></p>	<p><i>Development will be required to meet the needs of the area, to be of a scale appropriate to the centre, and to not adversely impact on the vitality or viability of other nearby centres. The purpose of each centre will differ according to its role and function.</i></p> <p><i>Development objectives are to (amongst others):</i></p> <p><i>C. Protect and where possible enhance the services and facilities provided in the Key Service Centres of Cleator Moor, Egremont and Millom</i></p>
<p><i>Policy ER9 – The Key Service Centres, Local Centres and other smaller centres</i></p>	<p><i>Retail and service development which promotes the vitality and viability of Key Service Centres, Local Centres and other smaller centres, and is consistent with the spatial development strategy as defined in Policy ST2 and Figure 3.2, will be supported.</i></p> <p><i>A. In Key Service Centres Cleator Moor, Egremont and Millom:</i></p> <p><i>i) Appropriate retail and service sector provision will be actively encouraged within the defined boundaries of each Key Service Centre to serve local communities and to facilitate small scale tourism. Evening entertainment and leisure uses will also be acceptable if they meet the criteria as set out in ER7 E above.</i></p> <p><i>ii) The town centre boundaries of the Key Service Centres will be reviewed and may be redrawn to reflect current circumstances.</i></p> <p><i>iv) Further physical improvements in association with town centre management initiatives will be considered to attract more visitors and to reduce levels of vacancy.</i></p>
<p><i>Policy ER10 – Renaissance through Tourism</i></p>	<p><i>The Council will maximise the potential of tourism in the Borough and will seek to:</i></p> <p><i>A. Expand tourism outside the Lake District National Park boundaries, with a complementary offer that takes pressure off the National Park’s busiest locations, and delivers economic benefits in the Borough</i></p>

- B. Locate new tourist accommodation, facilities and attractions where there is proven capacity for additional visitors to be accommodated without adverse environmental or amenity impacts, with consideration given to the following:*
- i. Encourage development of an appropriate scale in the Key Service Centres of Cleator Moor, Millom and Egremont which takes pressure off more sensitive areas*
 - ii. Support development requiring a rural location within the smaller villages and countryside, if proven necessary to enhance the Borough's existing place-bound assets*
 - iii. Permit holiday accommodation which meets the requirements of Policy DM9*
- C. Support appropriate tourism development which accords with the principles of sustainable development and does not compromise the special qualities and character of allocated Tourism Opportunity Sites, the area surrounding them or public access thereto, in the following locations:*
- i) Hodbarrow*
 - ii) Ehen / Keekle Valleys*
 - iii) Whitehaven Coastal Fringe*
 - iv) Lowca Coastal Area*
- E. Support appropriate developments which improve and enhance the quality of the tourism product*
- F. Wherever possible tourism providers will be required to ensure that accommodation and attractions are well connected to other tourist destinations and amenities, particularly by public transport, walking and cycling*
- G. The Council will work with the Lake District National Park Authority, Cumbria Tourism, West Cumbria Tourism Partnership and other tourism organisations in marketing, co-ordinating and managing the development of the Borough's offer and to maximise the benefits of the 'Lake District' brand.*

*Policy SS4 –
Community
and Cultural
Facilities and
Services*

The Council states that the range of services and facilities serving the Borough's communities will be protected by:

A. Encouraging the provision and retention of good quality services and facilities which meet the needs of local communities and are accessible by public transport, cycling or on foot. Services and facilities which benefit the less mobile or more deprived members of the community and which maximise opportunities for people to improve their health and well-being, will be given particular support.

	<p><i>B. Ensuring that needs are met in the most appropriate, effective and accessible way, by:</i></p> <ul style="list-style-type: none"> <i>i) increasing provision of local community facilities, such as community centres and public open space, in Local Centres and villages identified as needing them</i> <i>ii) improving the number and quality of facilities in areas of the Borough which exhibit higher than average levels of socio-economic deprivation – especially as regards health care, sports and fitness facilities where healthy living is an issue</i> <i>iii) providing specifically for the leisure and recreational needs of older people</i> <p><i>C. Guarding against the loss of land or buildings belonging to existing facilities in all locations by:</i></p> <ul style="list-style-type: none"> <i>i) wherever possible ensuring sites are retained for other forms of community use</i> <p><i>D. Allowing the expansion and / or enhancement of existing community and cultural facilities to assist continuing viability, particularly in areas where new development will increase the demand for facilities</i></p> <p><i>H. Where development proposals are likely to increase demand for certain community facilities and services the Council will expect developers to contribute to their provision, enlargement, improvement or enhanced maintenance, in accordance with Policy ST4 and Local Development Documents relating to infrastructure provision.</i></p>
<p><i>Policy SS5 – Provision and Access to Open Space and Green Infrastructure</i></p>	<p><i>The Council advises that adequate provision and access to open space, and the development of the Borough’s green infrastructure, will be promoted by:</i></p> <ul style="list-style-type: none"> <i>A. Protecting against the loss of designated open space (including playing fields, play areas and allotments) within settlements, and of the access routes or wildlife corridors which connect them, whilst ensuring also that they are well maintained. Where it is necessary to build on land covered by this policy, equivalent replacement provision should be made</i> <i>B. Setting minimum open space standards for new development in accordance with Policy DM12</i> <i>C. Promoting the establishment, improvement and protection of green infrastructure networks connecting open spaces with each other and with the countryside</i>

<p><i>Policy T1 – Improving Accessibility and Transport</i></p>	<p><i>The Council will support transport improvements that maximise accessibility for all modes of transport but particularly by foot, cycle and public transport.</i></p> <p><i>A. Priority will be given to improving the accessibility of the Borough’s key development and regeneration sites, town and village centres, service, employment and transport hubs, and rural areas</i></p> <p><i>E. Transport system improvements must include measures to upgrade the environment, safety and convenience of the system and its setting</i></p>
<p><i>Policy ENV2 – Coastal Management</i></p>	<p><i>To reinforce the Coastal Zone’s assets and opportunities the Council will:</i></p> <p><i>A. Promote the developed coast as a destination for leisure, culture and tourism, with strong links to Whitehaven Harbour / town centre in the north and to Millom in the south</i></p> <p><i>B. Maximise opportunities along the undeveloped coast for tourism and outdoor recreation through support for the North West Coastal Trail and Colourful Coast projects</i></p> <p><i>C. Support the management of more of the undeveloped coast for biodiversity</i></p> <p><i>D. Support energy generating developments that require a coastal location along the undeveloped coast, provided that the potential impacts on biodiversity, landscape and heritage assets are carefully assessed against the benefits. Where negative impacts are likely these must be mitigated against and compensated for</i></p> <p><i>E. Encourage schemes which assist appropriate access to and interpretation of the Heritage Coast area</i></p>
<p><i>Policy ENV3 – Biodiversity and Geodiversity</i></p>	<p><i>The Council will contribute to the implementation of the UK and Cumbria Biodiversity Action Plan within the plan area by seeking to:</i></p> <p><i>A. Improve the condition of internationally, nationally and locally designated sites</i></p> <p><i>B. Ensure that development incorporates measures to protect and enhance any biodiversity interest</i></p> <p><i>C. Enhance, extend and restore priority habitats and look for opportunities to create new habitat</i></p> <p><i>D. Protect and strengthen populations of priority or other protected species</i></p> <p><i>E. Boost the biodiversity value of existing wildlife corridors and create new corridors, and stepping stones that connect them, to develop a functional Ecological Network</i></p> <p><i>F. Restrict access and usage where appropriate and necessary in order to conserve an area’s biodiversity value</i></p>

<p><i>Policy ENV4 – Heritage Assets</i></p>	<p><i>The Council’s policy is to maximise the value of the Borough’s heritage assets by:</i></p> <ul style="list-style-type: none"> <i>A. Protecting listed buildings, conservation areas and other townscape and rural features considered to be of historic, archaeological or cultural value</i> <i>B. Supporting proposals for heritage led regeneration, ensuring that any listed buildings or other heritage assets are put to an appropriate, viable and sustainable use</i> <i>C. Strengthening the distinctive character of the Borough’s settlements, through the application of high quality urban design and architecture that respects this character and enhances the settings of listed building</i>
<p><i>Policy ENV5 – Protecting and Enhancing the Borough’s Landscapes</i></p>	<p><i>The Council will protect and enhance the Borough’s landscapes by</i></p> <ul style="list-style-type: none"> <i>A. Protecting all landscapes from inappropriate change by ensuring that development does not threaten or detract from the distinctive characteristics of that particular area</i> <i>B. Where the benefits of the development outweigh the potential harm, ensuring that the impact of the development on the landscape is minimised through adequate mitigation, preferably on-site</i> <i>C. Supporting proposals which enhance the value of the Borough’s landscapes</i>
<p><i>Policy ENV6 – Access to the Countryside</i></p>	<p><i>The Council’s policy is to ensure access to the countryside for residents and visitors by:</i></p> <ul style="list-style-type: none"> <i>A Identifying opportunities to provide or improve access on routes and gateways from settlements and to secure the implementation of improvement measures with key partners and developers</i> <i>B Investigating opportunities for reclaiming contaminated and derelict land for recreation purposes</i> <i>C Identifying potential for the development of a community forest, long distance walks or outdoor adventure activity centre</i>
<p><i>Policy DM8 – Tourism Development in Rural Areas</i></p>	<p><i>Outside the Tourism Opportunity Sites, tourism facilities will be permitted in rural areas by the council where it involves small scale development and it:</i></p> <ul style="list-style-type: none"> <i>A. Is demonstrated to be necessary for enhancing the natural, cultural or heritage value of the place-bound asset; or it</i> <i>B. Involves the re-use, conversion or replacement of existing buildings on site</i> <p><i>The development of new or extended buildings will only be considered favourably where there is a robust case that demonstrates that there is a genuine need that cannot be met through the conversion of existing rural buildings.</i></p>

<p><i>Policy DM10 – Achieving Quality of Place</i></p>	<p><i>The Council will expect a high standard of design and the fostering of ‘quality places’. Development proposals will be required to (amongst other things) respond positively to the character of the site and the immediate and wider setting and enhance local distinctiveness through the appropriate provision, orientation, proportion, scale and massing of buildings... careful selection and use of building materials which reflects local character and vernacular... incorporate existing features of interest including landscape, topography, local vernacular styles and building materials; and in doing so, have regard to the maintenance of biodiversity.</i></p>
<p><i>Policy DM11 – Sustainable Development Standards</i></p>	<p><i>The Council will ensure that development proposals reach high standards of sustainability by:</i></p> <p><i>B Encouraging developers to achieve high energy efficiency standards in relation to the Code for Sustainable Homes and BREEAM</i></p> <p><i>C Requiring renewable energy generating technology on site in developments of 10 or more dwellings or 1,000m2 non-residential development</i></p> <p><i>D Orientating and designing buildings to maximise solar gain, so far as practicable without compromising wider design and quality of place objectives</i></p> <p><i>E Encouraging construction materials to be sourced, where possible, from local and sustainable sources of production</i></p> <p><i>F Requiring water saving technology, including grey water recycling to be incorporated in all developments</i></p> <p><i>G Ensuring surface water is managed appropriately, with the inclusion of Sustainable Drainage Systems where possible</i></p> <p><i>Development should not result in the unnecessary sterilisation of surface mineral resources, and wherever appropriate should incorporate remediation measures to ensure that the development is not at risk from ground instability arising from mining legacy or other former uses.</i></p>
<p><i>Policy DM24 – Development Proposals and Flood Risk</i></p>	<p><i>The Council requires that where a proposed development is likely to be at risk from flooding or increases risk of flooding elsewhere, a Flood Risk Assessment (FRA) will be required to be submitted as part of the planning application.</i></p> <p><i>Development will not be permitted where it is found that:</i></p> <p><i>A. There is an unacceptable risk of flooding; or</i></p> <p><i>B. The development would increase the risk of flooding elsewhere; or</i></p> <p><i>C. The development would cause interference with or loss of access to a watercourse and the benefits of the development do not outweigh the risks of flooding.</i></p>

	<p><i>Where a development requires the provision of additional flood defence and mitigation works, any costs, including maintenance, should be met by the developer.</i></p>
<p><i>Policy DM25 – Protecting Nature Conservation Sites, Habitats and Species</i></p>	<p><i>The Council states that:</i></p> <p><i>A. All development proposals should:</i></p> <ul style="list-style-type: none"> <i>i) Protect the biodiversity value of land and buildings</i> <i>ii) Minimise fragmentation of habitats</i> <i>iii) Maximise opportunities for conservation, restoration, enhancement and connection of natural habitats and creation of habitats for species listed in UK and Cumbria Biodiversity Action Plans. Special consideration should also be given to those European habitats that lie outside the boundaries of European designated sites</i> <p><i>B. Development proposals that would cause a direct or indirect adverse effect on locally recognised sites of biodiversity and geodiversity importance, including County Wildlife Sites, Local Nature Reserves and Regionally Important Geological/Geomorphological Sites or protected species will not be permitted unless:</i></p> <ul style="list-style-type: none"> <i>i) The benefits of the development clearly outweigh the impacts on the features of the site and the wider network of natural habitats, and;</i> <i>ii) Prevention, mitigation and/or compensation measures are provided. An appropriate long-term management plan will be sought and arrangements to provide adequate funding will be made in accordance with a formal planning agreement or obligation</i> <p><i>C. Where compensatory habitat is created, it should be of equal or greater size than the area lost as a result of the development</i></p> <p><i>D. Development proposals where the principal objective is to conserve or enhance biodiversity or geodiversity interests will be supported in principle</i></p> <p><i>E. Where there is evidence to suspect the presence of protected species any planning application should be accompanied by a survey assessing their presence and, if present, the proposal must be sensitive to, and make provision for, their needs</i></p> <p><i>F. All development proposals must take into account any likely significant effects on the internationally important sites both within the Borough and within a 20km radius of the Borough boundary as well as those that are hydrologically linked to the development plan area</i></p>

<p><i>Policy DM26 – Landscaping</i></p>	<p><i>The council will assess all development proposals in terms of their potential impact on the landscape. Developers should refer to the Cumbria Landscape Character Assessment and Cumbria Historic Landscape Characterisation documents for their particular character area and design their development to be congruent with that character.</i></p> <p><i>The Council will continue to protect the areas designated as Landscapes of County Importance on the Proposals Map from inappropriate change until a more detailed Landscape Character Assessment can be completed for the Copeland plan area. Proposals will be assessed according to whether the proposed structures and associated landscaping relate well in terms of visual impact, scale, character, amenity value and local distinctiveness and the cumulative impact of developments will be taken into account as part of this assessment.</i></p> <p><i>Development proposals, where necessary, will be required to include landscaping schemes that retain existing landscape features, reinforce local landscape character and mitigate against any adverse visual impact. Care should be taken that landscaping schemes do not include invasive non-native species. The Council will require landscaping schemes to be maintained for a minimum of five years.</i></p>
<p><i>Policy DM27 – Built Heritage and Archaeology</i></p>	<p><i>The council will support the development proposals which protect, conserve and where possible enhance the historic, cultural and architectural character of the Borough’s historic sites and their setting. This will be particularly relevant in the case of Non-listed buildings and structures or landscape features of local heritage and archaeological value.</i></p>

Other Material Considerations

- 4.19 Supplementary Planning Documents (SPDs) provide detail to support policy in higher level development plan documents. SPDs are a material consideration in the assessment and determination of any planning application. It is understood the Council is in the process of preparing a Design Quality SPD and a Developer Contributions SPD but as yet nothing has been published.
- 4.20 The Council is in the process of producing a new Local Plan which will replace the Core Strategy and saved policies. The Council submitted the emerging Local Plan for independent Examination on 16th September 2022. The Council may consider the emerging Local Plan to be sufficient advanced to carry some weight in decision making as a material consideration.

5 Planning Assessment

Determining Issues

5.1 Taking into account the characteristics of the application site, the nature of the development proposal and the planning policy context, it is considered that the key issues to be assessed in the determination of this planning application are as follows:

- Principle of development
- Design considerations
- Heritage impact
- Ecology and biodiversity
- Trees and landscape
- Access and highways
- Flood risk and drainage
- Site conditions
- Planning obligations

Principle of Development

5.2 Policy ST1 sets out a general presumption in favour of sustainable development under the Council's Strategic Development Principles, reflecting national planning guidance and supporting development that will create and sustain thriving communities and a more prosperous economy, focusing development in sustainable locations and conserving and enhancing the environment. Policy ST2 provides a spatial strategy for the distribution of development in the borough, concentrating growth in the main settlements and restricting development outside of defined settlement boundaries to that which has a proven requirement for such a location, such as tourism activities in the countryside.

5.3 The site is outside the settlement boundary for Millom, forming part of the 'Undeveloped Coast' designation where opportunities for tourism, outdoor recreation and biodiversity management are supported (Policy ENV2). The CLP Policies Map recognises the site as forming part of the Hodbarrow Tourism Opportunity Site, where tourism development will be supported which accords with the principles of sustainable development and does not compromise the special qualities and character of the area.

5.4 The main element of the application proposal is the erection of a welcome building to provide facilities for visitors to the RSPB Hodbarrow Nature Reserve. This includes the creation of floorspace for retail uses including a small shop and café. However, these uses are ancillary to the primary use of the site as a visitor

attraction in a recognised tourism opportunity area in the countryside, outside a defined settlement boundary. The floorspace to be created for these uses falls well below the thresholds for retail sequential and impact assessments in the NPPF (para. 90) as well as the reduced thresholds proposed in the emerging Local Plan. As such, these ancillary functions will not be competition to the retail offering of the town centre and do not undermine the principle of development.

- 5.5 The application proposal is in an appropriate location for sustainable tourism, as recognised by Policy ER10 and in line with the objectives of ENV2 to support outdoor recreation whilst conserving the environment through effective management. The proposal will also increase visitor numbers and support the regeneration objectives for Millom. The principle of development is therefore considered acceptable.

Design Considerations

- 5.6 Policy DM10 sets out the general development principles which all development proposals must accord with to ensure the suitability of the location and that the development is of a high standard of design. Development proposals must respond positively to the character of the site and the immediate and wider setting and enhance local distinctiveness through the appropriate provision, orientation, proportion, scale and massing of buildings and careful selection and use of building materials which reflects local character and vernacular. Development proposal should incorporate existing features of interest including landscape, and topography and have regard to the maintenance of biodiversity.
- 5.7 In developing the design approach for the proposed development at the site, full consideration has been given the requirements of Policy DM10, together with the design principles set out in national planning guidance, including the recently published National Model Design Code and National Design Guide.
- 5.8 The DAS prepared by Layer Studio and Gagarin Studio demonstrates how a strong understanding of the site conditions and historic context have informed the evolution of a high quality design for the proposed new buildings and landscape features. The proposal also incorporates roof mounted solar panels, air source heat pumps and adopts a 'fabric first' approach, in accordance with Policy DM11.

Heritage Impact

- 5.9 There are no Listed buildings on the site, the only designated structure is Hodbarrow Beacon which is a scheduled monument. The majority of the works are to repair and stabilise the structure of Hodbarrow Beacon to ensure it will continue to be standing in this exposed location well into the future. Beyond the repair and stabilisation describe, it is proposed to introduce a simple optical installation within the beacon in the form of two suspended stainless steel mirrors which will work together as a periscopic device, bringing high-level views out through the oculus down to ground level to the observer at the doorway.

- 5.10 The proposed works have been sensitively considered and are appropriate to the location and condition of the structure. These works will ultimately have a positive impact on the scheduled monument both in the short and long term. The proposed installation of the periscopic mirrors will enhance the experience of visiting the beacon as well as the wider site, they will quench the desire to enter and climb the structure for majority of visitors by enabling internal and high level views externally from ground level while still maintaining the security of the structure. The proposed fixings of the installation is light touch, without the loss of any historic building fabric and ultimately it could be removed without any legacy impact on the beacon.
- 5.11 A Heritage Statement has been prepared by Gargarin Studio and is included within the Design and Access Statement. The Heritage Statement gives full consideration to the significance of the heritage asset and sets out how this has been taken into account in developing the proposals before assessing the impact of these works. An Archaeology Assessment has also been prepared by specialist heritage consultants at Wardell Armstrong with recommendations for mitigation works where necessary. Accordingly, it has been demonstrated that the proposal accords with policies ENV4 and DM27 in regard to the conservation of built heritage.

Ecology

- 5.12 The site is located in the Duddon Estuary which is designated as a SSSI and Ramsar site. The site also forms part of the Morecambe Bay SAC. The Hodbarrow Nature Reserve, centred within the site, is owned and managed by RSPB and comprises a freshwater lagoon contained by the seawall, with the wider landscape supporting rich flower and insect communities living on the limestone slag. Grassland and scrub stretches inland providing habitats for insects and breeding songbirds. Of particular importance to the RSPB is the tern colony which comes to Hodbarrow annually to breed.
- 5.13 The most significant building operation as part of the development proposals is the erection of a new welcome building. To be located on elevated topography to the north east of Hodbarrow Reserve (see General Arrangement Plan), outside the Duddon Estuary SSSI and Morecambe Bay SAC,.
- 5.14 To document the baseline ecological position, survey work has been undertaken for a number of years and has included, in chronological order:
- Amphibian survey, Tyrer August 2021
 - NVC Botanical Survey, Josh Styles August 2021
 - Invertebrate Survey, Stenecology 2021
 - Preliminary Ecological Appraisal, Appletons December 2021

- Preliminary Ecological Appraisal Extension, Appletons January 2022
- Further Amphibian Survey, Tyrer April/May 2022
- Further Invertebrate Survey, Stenecology April/May 2022
- Botanical Survey, Josh Styles May 2022
- Reptile Survey, Appletons July 2022
- Draft Visitor Access Management Plan, Appletons July 2022
- Mycology Survey, September 2022

5.15 The findings of this reporting have fed into the design proposals and will continue to influence the project. Given the importance of Hodbarrow and the estuarial context, the RSPB as landowner and Natural England as statutory consultee, have been party to regular project team meetings and are well versed in the development proposals. In addition to the surveys listed above, the following documentation is included as part of the planning application:

- Shadow Habitats Regulations Assessment (sHRA)
- Protected Species Survey Report - *(single report compiling all survey results)*
- Ecological Impact Assessment – *(single report which contextualises the results of surveys and assesses impact of proposed development)*
- Biodiversity Net Gain Assessment

5.16 Notwithstanding the findings of the ecology surveys, the proposal includes substantial areas of new landscaping with the potential to increase biodiversity, as demonstrated in the Biodiversity Net Gain Assessment by Greengage. Accordingly, the application complies with the requirements of Policies ENV3 and DM25 and the NPPF.

Access and Highways

5.17 A Transport Assessment has been prepared by specialist highways consultants at Curtins. A review of baseline conditions and highway safety in the vicinity of the site has been undertaken. It is not considered that there is an existing highway safety issue that is likely to be exacerbated by the proposed development.

5.18 The site is accessible by sustainable modes of transport. The surrounding area exhibits reasonable levels of pedestrian and cycling infrastructure, and there is a train station within walking distance of the site.

5.19 Trip generation forecasts using a first principles approach and TRICS data have demonstrated that there would be an increase of up to 34 vehicle trips between 12:00 and 13:00, or 25 and 14 trips in the AM and

PM network peaks, respectively. The trips would dissipate across multiple parking locations and routes to and from the site. As such, any vehicular impact would be negligible on the surrounding area in terms of highways, traffic, and transportation.

- 5.20 Additionally, measures are proposed in the accompanying Interim Travel Plan to increase the level of walking, cycling and public transport use to and from the site, and to reduce reliance on the private car.
- 5.21 There will be 76no. car parking spaces, including 6no. EV charging spaces and 5no. accessible bays, across three paid car parks and 44no. cycle parking spaces spread across six locations at site. Further details on parking provision are available in Section 3.3 of the Transport Assessment.
- 5.22 The proposal will not have an unacceptable impact on highway safety or a severe impact on the highway network and the application can be considered to accord with Policy T1 and the NPPF in respect of access and highways.

Site Conditions

- 5.23 A Phase I Desk Top Study has been prepared by Curtins and are submitted in support of this application. These assessments have been undertaken in the context of the NPPF and relevant local plan policies to ensure the proposed development scheme is policy compliant and deliverable from a technical perspective, and with a view to limiting the conditions on any planning approval for the proposed future use.
- 5.24 Further intrusive site surveys will be necessary prior to construction to be coordinated in line with the ecological mitigation and management plans. The survey work has not identified any constraints that cannot be appropriately addressed through the engineering and construction design of the development or through mitigation where necessary. As such, there are not considered to be any technical constraints to development. Accordingly, the proposal meets the requirements of national and local planning policy with regard to these matters.

Flood Risk and Drainage

- 5.25 The site has been assessed to lie across Flood Zone 1, Flood Zone 2 and Flood Zone 3 by reference to the Environment Agency Flood Map for Planning. A further review of the Copeland Strategic Flood Risk Assessment confirms the Flood Zone 3 area to be Flood Zone 3a.
- 5.26 The development proposal is for non-residential development. The Welcome Building is to be located in an area of the site designated as Flood Zone 1 and is classed as 'Less Vulnerable' development. Therefore, in accordance with national planning policy guidance it is concluded to be appropriate within this Flood Zone.

- 5.27 The other elements of the proposed development are determined to be 'Water Compatible' in accordance with national planning policy guidance, and are therefore concluded to be appropriate within all Flood Zones within the site.
- 5.28 In respect to surface water flooding from the site post-development, a Surface Water Drainage Strategy has been developed as part of the accompanying documents to the planning submission demonstrating a sustainable solution discharging to a waterbody.
- 5.29 Accordingly, the proposal meets the requirements of the NPPF and Policies DM11 and DM22 of the CLP with regard to flood risk and drainage provisions.

Sustainability

- 5.30 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. The proposal will deliver a low carbon building that is energy efficient and utilises renewable energy sources.
- 5.31 The proposed sustainability strategy as set out in the DAS (page 58) emphasises an integrated design approach to energy generation and uses that optimise building performance and environment quality. The proposed sustainability features include:
- Solar panels positioned on top of the rotunda.
 - Electric vehicle charging points within the car park.
 - Secure bicycle storage and charging point for e-bikes to encourage sustainable transport options to the Iron Line.
 - Sustainable drainage for surface water including swales and attenuation.
 - Low-energy lighting, and other fittings to minimise electrical usage.
 - Minimised reliance on mechanical extraction.
 - An emphasis on semi-external spaces which provide some of the accommodation and activities in unheated, sheltered spaces - thereby reducing the scale of the heated internal areas.
 - Minimal external lighting to avoid impact on habitats.
 - Green roofs to help the thermal performance, increased habitats and 'slow the flow' of rainwater from these areas.
- 5.32 The proposal, therefore, presents the opportunity to deliver sustainable benefits as part of the design and operation of the building and quality of the local environment in accordance with the CLP and the NPPF.

6 Summary and Conclusions

- 6.1 This Planning Statement and the supporting information contained within the application submission clearly demonstrate that the application proposal accords with all relevant planning policies of the CLP and the guiding principles of the NPPF.
- 6.2 The application proposal is the result of an extensive pre-application consultation process with the Local Planning Authority, relevant stakeholders and the local community which has informed the final design.
- 6.3 The proposal will deliver a high quality, functional and sustainable building to provide visitor facilities to the Hodbarrow Nature Reserve. The building itself will become a feature to draw more visitors, particularly when combined with the substantial improvements to be made to the walking and cycling routes around the nature reserve and the increased opportunities to appreciate the wildlife, which will be protected and allowed to flourish. The potential for the development to increase visitors to the area and stimulate tourist activity is a significant benefit of the proposal which meets the Council's strategic objectives to support the local economy and help create new employment opportunities.
- 6.4 The supporting documents to the application have demonstrated that the proposal will not have an adverse impact on the environment and there are no technical constraints to development.
- 6.5 Whilst it is evident that the proposals accords with the development plan in so far as those policies that are relevant to the application, it is also evident that the benefits of the proposal draw support from the presumption in favour of sustainable development at the heart of national planning policy. On this basis, it is respectfully requested that Cumberland Council grant planning permission for the proposed development.

