

Copeland area Planning Department, Cumberland Council

For the attention of Christie M Burns

Date: 22 July 2025

Your reference: 4/25/2198/0F1

Dear Christie M Burns

## **CONSULTATION ON PLANNING APPLICATION**

**Appn: 4/25/2198/0F1**  
**Site Address: LAND AT HODBARROW NATURE RESERVE, MILLOM**  
**Proposal: 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)**

Thank you for your consultation on the above Planning Application.

The Local Highway Authority (LHA) and Lead Local Flood Authority (LLFA) can confirm as follows :

### **Local Highway Authority response:**

The LHA has had extensive discussions with the designers as part of the previous application 4/23/2249/0F1 in 2023 and also during 2024 and 2025 as part of the pre-app discussions for the current application. The LHA raised several concerns about the initial proposals and sought additional details on how these would be addressed. This current version of the scheme addresses all these points as set out below with additional comments by the LHA:

- 1. Financial contributions were requested for potential TROs on Mainsgate Road and the monitoring of the travel plan. It is understood that the concerns regarding Mainsgate Road are to be addressed by the Connecting Millom and Haverigg project. As the Council is the applicant, it is not possible for an S106 agreement to be entered into;*
  - The LHA are satisfied with this approach and resolution.

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2. *Some comments, such as surfacing the BOAT with macadam, segregated cycleways, and wider paths are unviable for several reasons, including that it is no longer proposed to change the width of the BOAT, the impact on habitat and the character of Hodbarrow, vehicle speeds, BNG, and the availability of space;*
    - The LHA and Countryside Access team accept this reasoning and accept that there will be some compromises necessary in the design to meet the various objectives taking into account the site and legal constraints.
  3. *The lack of segregation has instead been addressed by the proposed TRO to restrict most motor vehicles from using the BOAT;*
    - This is acceptable to the LHA
  4. *Comments, such as tramper turning, are matters for the detailed design stage; and the ramp to the Visitor Centre and tramway detailing, do not apply to the updated proposals.*
    - These points are acknowledged and the LHA will make recommendations for further details to be submitted for approval at the detailed stage.

### Vehicle Parking

I note the 18 car park spaces near the Mainsgate Road access and a further 63 at the visitor centre with further coach and car parking across the wider site totalling 81 spaces.

There is no directly relevant parking standard in the CDDG for a development such as this and therefore it is difficult to determine the necessary number to prevent overflowing and possible parking on the highway. However, the TRICS analysis in the TA shows that the maximum occupancy will be about 55%. The provision is therefore considered robust and allows for significant variance in peak visitor flows which would cover any events and Bank Holidays.

### Accessibility

The visitor centre has suitable blue-badge parking spaces sited near to the main entrance. The link path features a series of zig-zags to provide a suitable gradient for wheelers. However, there are some areas where additional blue-badge holder parking may be beneficial. See the Active Travel comments below.

### Trips and Impact on the Highway Network

The TA uses two methodologies for calculating trips. In the worst-case scenario for the AM peak, Methodology 1 gives an increase of nine 2-way trips in the peak hours in the peak month and Methodology 2 gives an increase of 34. With the multitude of accesses

and parking areas, by the time distribution has been factored in, the LHA agree that this is a minor increase and will not have a material impact on the local highway network.

Also, the peak traffic for this attraction / development does not coincide with normal peak traffic hours. There are no junctions at or near capacity that require further modelling.

### Travel Plan

The Interim Travel Plan shows that the site is reasonably accessible by walking, cycling and public transport modes for this type of attraction / facility.

A series of measures and initiatives are proposed to encourage active and sustainable travel and reduce single occupancy.

The range of initiatives is comprehensive, it is considered that they will provide the necessary incentives, confidence and awareness of the travel options to contribute to modal shift.

I note the proposal to carry out a baseline travel habit survey 3 months after first occupancy. The full TP will need to set targets (short, medium and long-term). These requirements will be conditioned.

However, there is a lack of consistency and some discrepancies between the Visitor Management Plan, Transport Assessment and Interim Travel Plan. This includes car parking provision figures quoted paragraph 3.8 of the Visitor Management Plan and paragraph 3.4.5 of the Transport Assessment. Cycle parking is not covered in the Visitor Management Plan but there is potential for it to be picked up as part of action 10 in table 2 of the Visitor Management Plan.

**The applicant is requested to update the Visitor Management Plan in line with the Transport Assessment. And also ensure consistency between the Interim Travel Plan and Visitor Management Plan.**

### Active Travel Comments (Pedestrian and Cycle Access & Cycle Parking)

#### Cycle Parking

There is suitable cycle parking area provided very near the main entrance to the visitor centre building and other parking totalling 46 spaces across the wider site. However, assumptions for cycle parking have been based on trip rate rather than LTN 1/20 – Cycle Infrastructure Design. In relation to the visitor centre cycle parking, the applicant should also calculate cycle parking figures using table 11.1 in chapter 11 of LTN 1/20. It is likely cycle trips will be seasonal with a bias towards weekends and holiday periods. As the café is a leisure destination there is still a risk of under provision using the estimating methods.

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**The applicant is advised to design the cycle parking area with flexibility to expand to meet demand.**

#### Mainsgate Road Entrance (Drawing 1200)

I note the access road is 4.8m wide with 1.5m wide footway. Whilst the footway width is narrower than the desirable minimum (1.8m wide) but this is not the most desirable pedestrian route to the visitor centre. The signed pedestrian route from Mainsgate Road will be via the traffic free footpath link. The road width is also at its practical minimum at 4.8m which allows an HGV and car to pass at low speed. Taking into account the width constraints of the road corridor, the proposal is acceptable.

I note there are passing places at strategic intervals which will allow for the rare occasion two refuse vehicles will need to pass each other.

Further details will be required to be submitted for approval at the detailed planning stage.

The onward route for cyclists arriving to the site via the proposed shared use path (delivered under a separate project) on the east side of Mainsgate Road is not so apparent however - the cycle route to the visitor centre appears to be via the main access road.

**The applicant is requested to clarify pedestrian and cycle movements at the entrance and if this 'footway' leading to the visitor centre is shared use – pedestrian and cycle route or part of carriageway.**

#### Hodbarrow Car Park (Drawing 1201)

Pedestrians, cyclists and wheelers are routed to the rear of the car parking bays. This creates a collision risk. There is also a risk of informal parking in the hatched area shown opposite the parking bays on the general arrangement drawing for the car park. The purpose of this hatched area is unclear.

**The applicant is advised to revise layout to segregate pedestrians and cyclists from the car parking area. The lack of disabled parking makes the car park less accessible for wheeling – particularly wheelchair users.**

#### Visitor Centre (Drawings 1202 and 1203)

The path from the coach parking / drop off area to the visitor centre involves two crossings of the carriageway. People follow the north side of the carriageway, then cross to the south side and follow this before crossing to the north side and heading northwards to the visitor centre. This is off the desire line, people staying on the north side of the carriageway. Layout of paths at the visitor centre would benefit from revision.

**The applicant is advised to review and re-align the path to the north of the carriageway if practicable. This will protect vulnerable groups who arrive by coach including school groups and groups with disabilities.**

**The applicant is encouraged to review the path width to ensure it is wide enough for groups to move comfortably between coach park and path to visitor centre.**

**The applicant is encouraged to review the coach parking area to ensure it is suitable for use by minibuses and coaches with disabled visitors. Layout changes would also be required if public transport bus service was to use the site. The current layout also lacks detail on capacity – where and how many coaches can be accommodated. The applicant is encouraged to design for potential expansion.**

**The applicant is encouraged to review the circulation areas either side of the crossing to the south of the visitor centre. Provision should cater for groups waiting to cross the carriageway.**

**The applicant is requested to clarify the surfacing detail of the raised steel walkway north of the crossing. Image 5 on page 43 of the Design and Access Statement suggest a metal grid structure. This has the potential to be a barrier to wheeling and so accessibility for wheelchair users / people with buggies or prams.**

Cycle parking at the visitor centre is proposed to be adjacent to the main entrance to the centre itself. The location is in line with paragraph 11.2.3 of LTN 1/20. Whilst the location is welcomed the current layout requires cyclists to access / egress via the car park. This exposes cyclist to risk of collision from reversing vehicles. The applicant is advised to review the access routes for cyclists to the cycle parking. When considering this the applicant is advised to consider the needs of adaptive cycles and disabled cyclists. Chapter 11 of LTN 1/20 provides information on disabled cycle parking and Chapter 5 provides information on the geometric requirements of bicycles.

Images of Sheffield type stands on page 65 in Section 5 of the Design and Access Statement indicate the stands have angles. The applicant should consider potential risk of damage to cycles when selecting the design – paint and suspension fork coatings being scratched / scraped.

#### Iron Line Entrance (Drawing 1204)

Care needs to be taken with design of threshold feature to ensure it does not impact on wheelers, especially wheelchair users and people with buggies or prams.

#### Iron Line Railway Pass (Drawing 1205)

Diagonal features seek to emulate a tram track and present a hazard to cyclists as there is a risk of the front wheel skidding causing the cyclist to veer or come off their cycle.

Paragraphs 6.6.16 to 6.6.19 of LTN 1/20 provide further information. Rule 306 of the Highway Code recommends cyclist take particular care when crossing tram tracks at a shallow angle. LTN 1/20 designs for cycle crossings on tram tracks should be at least 60 degrees and definitely no less than 45 degrees. Given the 'tracks' are being inserted into an existing route it is the tracks that need to move.

**The applicant is strongly advised to re-design or remove these features as they present a hazard to cyclists.**

#### Coal Pit Hyde (Drawing 1206)

Cycle parking provision would not be accessible to adaptive cycles. **The applicant is advised to review the arrangement of the cycle parking and potential for increasing the area of surfacing adjacent to the outermost stands. LTN 1/20 provides further guidance on cycle parking provision.**

#### White Rock Junction (Drawing 1207)

Inclusion of cycle parking is welcomed. **The applicant may want to consider relocating the cycle parking to the sides of the visitor infrastructure to allow more usable space around the seating area. This would also allow people to access the parking whilst not disturbing people at seating. The cycle parking also appears to serve the Towley Windmill, there may need to be a modest increase in provision.**

#### Towley Windmill (Drawing 1208)

No comments

#### Hodbarrow Beacon (Drawing 1209)

The applicant could consider the addition of one or two Sheffield type stands to allow people to park their cycles and walk to the beacon.

Annie Lowther Hide (Drawing 1210)

Provision of cycle parking is welcomed.

Sea Wall (Typical arrangement)(Drawing 1211)

The proposed traffic regulation order is welcomed.

Haverigg Lighthouse (Drawing 2012)

The current alignment and proposed cycle parking creates a potential conflict point between cyclists using parking and pedestrian movements to and from lighthouse. Moreover it seems only the northern side of the Sheffield stand would be usable whereas four stands would normally allow for 8 cycles.

**The applicant is encouraged to review the location of the cycle parking. It is suggested consideration is given to moving parking to either side of the lighthouse public realm area.**

**Countryside Access Comments**

We are fully supportive of the Iron Line application which seeks to improve the access opportunities within and to Hodbarrow by upgrading the surfacing and infrastructure along the Public Right of Way network, the King Charles III England Coast Path and the informal network of desire lines within the site.

**Public Right of Way Network**

In terms of the Public Right of Way Network, the application proposes placing a Traffic Regulation Order on the BOAT (Byway Open to All Traffic) and putting measures in place to control vehicular access.

The BOAT as described in the application is made up of 5 separate public rights of way FP 415023, FP 415032, Part of FP 415016, FP 415024, FP 415009.

Public Footpath FP 415016 – links the BOAT to the wider PROW Network and KCIII ECP.

Given the scale of the proposed works, we would anticipate that a Temporary Closure would be required to be put in place for phases of the works. We would advise that:

- The granting of planning permission would not give the applicant the right to block or obstruct the Public Right of Ways shown on the Definitive Map and Statement.



- The Public Rights of Way as shown on the Definitive Map and Statement must be kept open and unaltered for public use until an order is made to temporarily close them has been confirmed.

### The King Charles III England Coast Path

The King Charles III England Coast Path is a National Trail established under the Marine and Coastal Access Act 2009 to improve access to the English coast.

Coastal access rights on the 11.5-mile section between Silecroft to Green Road Railway Station came into force on Wednesday 9 February 2022, by order of the Secretary of State.

There is a degree of dubiety in the information submitted in relation to the location and referencing of the KCIII England Coast Path.

In the Design & Access Statement

- the map on page 41 shows a section of the KCII ECP following the line of the BOAT which is incorrect.
- the Sea Wall By Way cross section on P47 refers to it as a desire line

In the Planning Statement on Page 5 - Site Description – 2.15 suggests that the BOAT is included within the England Coast Path which is incorrect.

We would clarify that the KCIII ECP is on a separate path which runs parallel to BOAT (415023) on its seaward side. The map on page 46 of the Design & Access Statement shows the correct alignment of both the KCIII ECP and the BOAT.

### Design & Access Statement

- Movement Surface – materials

We welcome the choice of materials proposed for BOAT, primary and secondary paths. However, we do have reservations in relation to the use of a raised steel walkway on the primary route leading to the Visitors Centre and would ask the applicant to supply a detailed drawing / specification for the item of infrastructure to enable us to assess the suitability of the item. This can be conditioned.

- Landmarks & Key Spaces Towsey Hole Windmill

To enable us to assess if the proposed works would obstruct the recorded line of FP 415016 shown on the Definitive Map and Statement, **the applicant should provide a**



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geo-referenced pdf for the area between the BOAT & Towsey Hole showing the lines of the FP 414016. The LHA require this information to review at this stage to ensure the proposal does not obstruct the line of the PROW.

- Enriching the Landscape Furniture and Signage Strategy

We welcome the proposal to add new furniture and signage to the site but in the interest of sustainability would suggest that the design any new furniture that is installed needs to be easy to maintain and cost effective to replace.

Any new furniture and signage should conform with advice set out in the [Outdoor Accessibility Guidance, formerly Countryside for All, by Sensory Trust and Paths for All](#) good practice and the Equality Act 2010.

The A1 information board on the KCIII ECP next to Haverigg Gateway must be retained to comply with the terms and conditions of the grant received by Cumberland Council for the establishment of the KCIII ECP.

#### *Furniture and Signage & Barriers typology*

The British Standard for Gates, Gaps & Stile (BS 5709:2018) and least restrictive option principles must be adhered to in the design and siting of any furniture.

Arrival Gateway – the design & location of these features needs to be carefully considered so they do not obstruct user's rights to use routes within the site. The recommended clearance height for a horse and rider is 3.75m.

To ensure that any new signage is consistent with our needs for the Public Right of Way Network and the King Charles III England Coast Path we ask to be consulted in the design and siting of it. ***Any new signage relating to the KCIII ECP must incorporate the National Trail Logo and to ensure consistency must conform with the designs used along the KCIII ECP which have been approved by Natural England.***

#### *Visitor and Access Management Plan*

We support the short- and medium-term actions, key conclusions and recommendations outlined in the Visitor and Access Management Plan. However, the documents focus is primarily on visitor management.

To ensure that the site can be sustainably maintained to a quality standard we would stress the need for a more comprehensive management plan for the site which provides indicative costing for the short to medium term maintenance of it.

## **Advisory Planning Statement**

We would suggest that the application is also consistent with National Planning Policy Framework – paragraph 105 -

*Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.*

& 185d.

*185. Development in a Coastal Change Management Area will be appropriate only where it is demonstrated that:*

*d) the development does not hinder the creation and maintenance of a continuous signed and managed route around the coast .*

## **LHA Conclusion**

**We are unable to make a full assessment at present and require further information as follows:**

- **A geo-referenced pdf for the area between the BOAT & Towsey Hole showing the lines of the FP 414016**
- **Clarifications / comments / design revisions to address the various Highways and Active Travel Comments**

We welcome direct discussion with the applicant to resolve these matters.

**Lead Local Flood Authority response:**

**Flood Risk Assessment**

Having reviewed the FRA I note that the non-residential Visitor Centre development is located in Flood Zone 1, and therefore at very low risk from all sources of flooding.

The other elements of the proposed development are considered to be 'Water Compatible' and therefore are appropriate within all Flood Zone 2 and 3 within the site.

The only risk of flooding is tidal, and therefore the suitability, mitigation measures, finished floor levels and evacuation plan is a matter for the Environment Agency.

**Surface Water Drainage Strategy**

The LLFA has had extensive discussions with the applicant as part of the previous application 4/23/2249/0F1 in 2023 and also during 2024 and 2025 as part of the pre-app discussions for the current application. The LLFA is satisfied that the NSTS methodology and design standards has been followed as follows (note this only applies to the visitor centre building and car park areas, the other areas of the scheme do not need a Surface Water Drainage Strategy):

- The potential for infiltration is limited by ground conditions, the site is made ground and infiltration is deemed unsuitable due to the contamination risk.
- The site naturally falls towards Red Hills Quarry and the proposed strategy mimics this.
- The proposed controlled discharge is to greenfield rates utilising suitable attenuation.
- I note that the connection to the quarry pond will be via a newly drain or open channel/swale adjacent to the access road. The developer should explore every opportunity to utilise open water features such as swales over pipes in the detailed design.
- Flows from the Visitor Centre access road/aisles require two stages of treatment. This will be provided by sediment traps / filter drains followed by a proprietary treatment system. Other methods of initial treatment include the use of Trapped Gullies and Catchpit chambers may be used to filter out high volumes of sediment and aid maintenance. The final design shall be submitted for review and approval by the LLFA. This requirement will be conditioned.
- Permeable paving/ filter drain and an interceptor are proposed as a final stage of treatment for the contributing catchment.
- Runoff from roofs can be effectively treated by frequent sediment traps.

I note that details such as final exceedance routes and the management / maintenance plan have not been submitted. However, with the details and evidence provided I am satisfied that a suitable exceedance route can be included and these other details can be resolved at the detailed design stage.

**Conclusion:**

The LLFA has no objection in principle to the proposed surface water drainage strategy but recommends the following condition is included in any consent granted:

**Prior to the commencement of any development, a surface water drainage scheme, based on the hierarchy of drainage options in the National Planning Practice Guidance shall be submitted to and approved in writing by the Local Planning Authority. (Refer to the CDDG Appendix 7 for list of documents and evidence to be submitted). The scheme shall incorporate SUDs features as far as practicable and be accompanied by a maintenance schedule.**

**The surface water drainage scheme must be in accordance with the Non-Statutory Technical Standards for Sustainable Drainage Systems (March 2015) or any subsequent replacement national standards and unless otherwise agreed in writing by the Local Planning Authority, no surface water shall discharge to the public sewerage system either directly or indirectly.**

**The drainage scheme submitted for approval shall also be in accordance with the principles set out in the Flood Risk Assessment & Drainage Strategy Report dated 7 April 2025 proposing surface water discharging to Redhills Quarry.**

**The works shall be constructed, maintained and managed in accordance with the approved details.**

*Reason: To promote sustainable development, secure proper drainage and to manage the risk of flooding and pollution. This condition is imposed in light of policies within the NPPF and NPPG.*

**No development shall commence until a construction surface water management plan has been agreed in writing with the local planning authority.**

*Reason: To safeguard against flooding to surrounding sites and to safeguard against pollution of surrounding watercourses and drainage systems.*

**Informative Statement**

Prior to any work commencing on the watercourse the applicant should contact the Lead Local Flood Authority on tel: 01228 221331 or email: LFRM.consent@cumbria.gov.uk to confirm if an Ordinary Watercourse Flood Defence Consent is required. If it is confirmed that consent is required it should be noted that a fee of £50 will be required and that it can take up to two months to determine.

Yours sincerely

**Shamus Giles**

Lead Officer - Flood & Development Management