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Copeland area Planning Department, Cumberland Council

For the attention of Christie M Burns

Date: 15 January 2026  
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 DEMARCTION 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.

I have reviewed the various updated / revised documents (Oct / Nov / Dec 2025) and the Local Highway Authority (LHA) and Lead Local Flood Authority (LLFA) can confirm as follows. Please note that I have repeated the outstanding observations and recommendations from my previous response with an updated response.

**Local Highway Authority response:**

**Travel Plan/ Visitor Management Plan**

The Visitor Management Plan has been updated / appended with the necessary information to make it consistent with the Travel Plan. Both documents are acceptable to the LHA.

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

#### **Cycle Parking**

The applicant has revised the cycle parking provision in line with my previous comments to deliver the required spaces with flexibility to expand to meet demand. This element is now acceptable to the LHA.

#### **Mainsgate Road Entrance (Drawing 1200)**

The applicant has clarified the pedestrian and cycle movements at the entrance and routes to the visitor centre. It is clear that the footway is not a shared-use facility and that the cycle route to the VC is via the road. In the detailed design (DoC), attention should be given to the layout of bollards, fences / barriers etc at the end of the car park to prevent vehicles driving around the row of bollards and accessing the BOAT.

This proposal is acceptable to the LHA, subject to the proposed conditions.

#### **Hodbarrow Car Park (Drawing 1201)**

Pedestrians, cyclists and wheelers are routed to the rear of the car parking bays. I note there are proposals to include signs advising reverse parking to mitigate the risk. I understand that the hatched area provides the necessary 6m to allow for car reversing / manoeuvring. It may be necessary to remove the hatched markings on the ground to deter parking in this area or erect signs stating no parking. This matter can be finalised through the DoC detailed design.

The LHA have no objection to this layout now.

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

The applicant has

- re-aligned the path to the north of the carriageway
- reviewed the coach parking area to ensure it is suitable for use by minibuses and coaches with disabled visitors.
- provided detail of the raised steel walkway
- provided a car free route to the cycle parking area near the entrance

All outstanding queries and concerns raised on these drawings have been addressed to the satisfaction of the LHA.

#### Iron Line Entrance (Drawing 1204)

There is no change to the materials or layout but there is no reason why the threshold between the stone/dust surface and concrete plinth should be a problem if attention to detail and construction methods / workmanship is managed appropriately.

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

The tracks have been realigned to between 45 and 60 degrees as advised and since the track features are completely flush consisting of corten steel and concrete either side it is considered very unlikely that these will now present a hazard to wheeled traffic. The LHA has no objection to the redesigned features.

#### Coal Pit Hyde (Drawing 1206)

Adaptive cycle parking provision has been provided as recommended.

#### White Rock Junction (Drawing 1207)

The cycle parking has been repositioned as suggested. The LHA have no objections to this revised layout..

#### Haverigg Lighthouse (Drawing 2012)

The area surrounding the cycle stands is flush so there is scope to use both sides of them. No objection to the revised design.

#### 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.

#### *Boat Entrance 289 LYR- XX-ZZ-DWG-L-6006*

The gap between each of the bollards does not comply with the British Standard for Gates, Gaps & Stiles (BS 5709:2018), the Equality Act 2010 and the advice set out in the [Outdoor Accessibility Guidance](#).

Sufficient space must be provided between each of the bollards to ensure that the BOAT is fully accessible for all potential users. (a minimum of 1.5m clear gap between bollards is required). Note, all bollards on the BOAT must be at least 1m high (including the removable ones) . Also, bollards and barriers should contrast with the background and should be fitted with retroreflective material to ensure they can easily be seen in all conditions.

However, if the Traffic Regulation Order is unsuccessful it should be noted that no barriers can be placed on the BOAT to control access to it.

#### *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 are some inconsistencies and inaccuracies in the information submitted in relation to the location and referencing of the KCIII England Coast Path as described below. These should be corrected in any revised versions of the documents. These are not, however, not a reason to recommend refusal.

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, secondary paths and also the details of the raised steel walkway on the primary route leading to the Visitors Centre. However, we would ask the applicant to supply a detailed drawing / specification of the footpath / cycleways in the DoC

#### **Landmarks & Key Spaces Towsey Hole Windmill**

The additional information provided shows the proposal for Towsey Hole Windmill will not obstruct FP 415016.

#### **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, Signage & Barriers**

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 Statements**

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 .*

### **Informative Statement - Public Right of Way Network**

In terms of the wider application, we would advise that:

The granting of planning permission would not give the applicant the right to block or obstruct the Public Rights of Way as 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 divert, stop up or to temporarily close them has been confirmed.

### **LHA Conclusion**

We have no objections to the proposal but would recommend the following conditions are included in any consent:

### **Suggested LHA Conditions**

**The carriageway, car parking, footways, footpaths, cycleways - including features and street furniture such as walkways, bollards, cycle-stands and the like, shall be designed, constructed, drained to the satisfaction of the Local Planning Authority and in this respect further details, including design specifications / dimensions shall be submitted to the Local Planning Authority for approval before work commences on site. No work shall be commenced until a full specification has been approved. Any works so approved shall be constructed before the development is complete.**

**Reason:** *To ensure a minimum standard of construction in the interests of highway safety.*

**Any new signage relating to the King Charles III England Coastal Path is consistent with designs already used along KCIII ECP as approved by Natural England. Prior to installation of any signage, details shall be submitted to and approved in writing by the LPA.**

**Reason:** *To ensure a minimum standard of consistency and legibility in route finding.*

**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 - (with outfall to the lagoon)**

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 majority of the site naturally falls towards Red Hills Quarry but it has proved not possible to drain to this receptor. Instead, with the proposed strategy, surface water drains to the lagoon (via gravity). Whilst this in theory drains rainfall from one small catchments to another, I am satisfied that in reality there is no increase in flood risk to any property presented by this proposal.
- The proposed controlled discharge is to greenfield rates utilising suitable attenuation.
- The appropriate Climate Change factor of 35% (for a 60 year life) has been applied to the rainfall events.
- 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 (Downstream Defender) 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.

**Operation & Maintenance Manual**

The O&M Manual contains the necessary provisions to ensure the system continues to operate as designed.

I note that details such as final exceedance routes have not been submitted at this time. 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 Hodbarrow Lagoon.**

**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](mailto:LFRM.consent@cumbria.gov.uk) to confirm if an Ordinary Watercourse Flood Defence Consent is required. If it is confirmed



**Flood & Development Management**  
**Parkhouse Building**  
**Carlisle**  
**CA6 4SJ**  
**[cumberland.gov.uk](http://cumberland.gov.uk)**

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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