



# PLACED

PLACE EDUCATION

Statement of Community Involvement  
Iron Line

August 2023

## 1. Introduction

- 1.1 This Statement of Community Involvement ('SCI') has been prepared by PLACED and is submitted in support of a planning application made to Cumberland Council Local Planning Authority ('LPA') on behalf of Cumberland Council who is 'the Applicant', seeking full planning permission for the proposed *erection of welcome building with café, retail space, staff facilities and car park, repair and stabilisation works 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 ('the proposal')* on land at Hodbarrow Nature Reserve, Millom ('the site'). The project has been referred to as 'Millom Iron Line' throughout the pre-application consultation, and is used here to refer to the project on site.
- 1.2 This SCI includes full details of the community engagement undertaken on the application proposals and how this has informed the preparations of the planning application in the context of the relevant national and local planning policy.
- 1.3 The proposals are described in full detail within the accompanying Planning Statement.

## 2. Planning policy context

- 2.1 We provide a brief overview of the national and local planning policy with regards to public engagement and the important role pre-application engagement can have in providing opportunity for the community to raise concerns and for issues to be resolved before submitting a planning application.
- 2.2 The National Planning Policy Framework (NPPF) (2021) emphasises the importance

of pre-application engagement, potentially improving the efficiency and effectiveness of the planning application system as well as improving outcomes for the community. Applicants are encouraged to 'engage with the local community [...] before submitting their applications' (NPPF – paragraph 40).

- 2.3 Copeland Borough Council (2020), in their Revised Statement of Community Involvement state their commitment to improving the way the community is consulted and involved in the planning system. They recognise that 'community consultation also provides an opportunity to identify and resolve any possible areas of conflict early on in the process' (Copeland Borough Council, 2020 – p.5).

## 3. Millom Town Deal

- 3.1 The application proposal forms part of the Millom Town Deal. The project aims to revitalise the area and improve connections to build inclusive economic growth which maximises Millom's natural landscape and heritage. Copeland Borough Council and the Millom Town Deal Board successfully bid for £20.6 million investment from the UK Government.
- 3.2 The Iron Line is part of four projects that form the Millom Town Deal. The other three projects are:
- Activating Community Health,
  - Reactivating Heritage Buildings, and
  - Connecting Millom and Haverigg.



^ Image of the sea wall at Hodbarrow Nature Reserve.

## 4. Pre-application engagement

### Early community engagement

- 4.1 Copeland Borough Council and the Town Deal Board shortlisted five design teams and their submissions were made publicly available for comment in November 2021 at the Haverigg Lighthouse Centre and online via the Town Deal Facebook page. Through this process the final design team was selected.
- 4.2 Alongside this, Copeland Borough Council and the Town Deal Board organised a logo competition with local schools. A set of winning logos were selected showing the creativity of local young people.



^ Logo competition winners: overall winner Jessica, Millom School (top), Kacie, Thwaites School (bottom left) and Emmy, Haverigg Primary (bottom right).

### Pre-application engagement

- 4.3 A range of engagement approaches were utilised during the pre-application phase to ensure community voices were incorporated into the designs for Millom Iron Line. Pre-application engagement included:
- Online engagement platform (Early 2022)
  - In-person drop-in session (April 2022)
  - In-person community workshop (April 2022)
  - Primary School resource packs for school-led activities (April 2022)
  - Secondary School design workshop led by PLACED (May 2022)
  - In-person drop-in events (May 2022)
  - In-person drop-in event (March 2023)
  - Multiple online updates to provide further information/latest designs
  - Final Town Deal drop-in events (June 2023)
- 4.4 Engagement events were publicised through Copeland Borough Council social media and online channels, PLACED social media, targeted stakeholder emails, posters in local venues, and emails to a community mailing list compiled during the project.
- 4.5 **Online engagement** launched on 31 January 2022 and included a survey, interactive map, and ideas wall. The survey closed on 19 April 2022. The other online engagement elements closed on Monday 23 May 2022. During this time new materials were added to the online platform to enable further waves of engagement. Further updates to the online materials were provided in August 2022 and March 2023. The online engagement platform can be viewed here until at least June 2023 ([www.placed-engagement.org.uk/iron-line](http://www.placed-engagement.org.uk/iron-line)). 71 people completed the online survey, 108 comments were left on the ideas wall and 35 comments added to the interactive map.

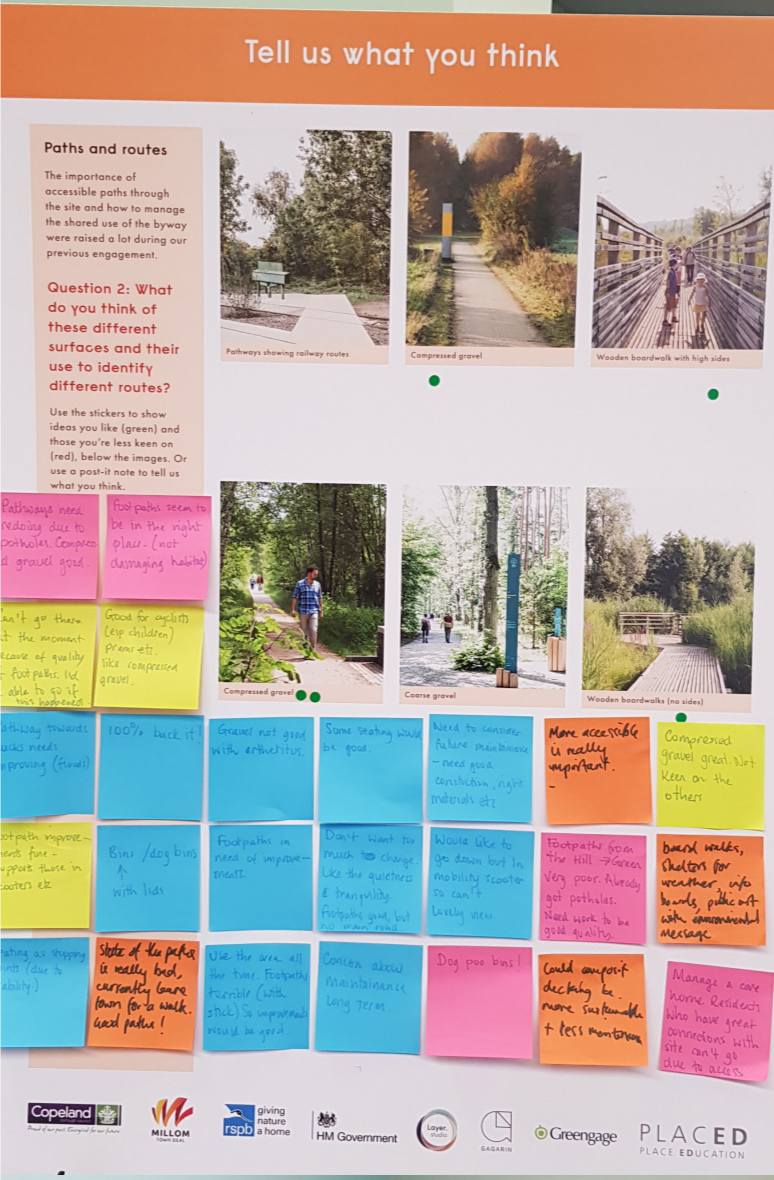


^ Image of one of the public drop-in events held in Millom Guide Hall.

- 4.6 A **community drop-in** session was held at Millom Guide Hall on Wednesday 6 April 2022 between 11:00am and 4:00pm. This offered an opportunity to view initial ideas and precedent images, and to give feedback and comments. 30 people attended.
- 4.7 Two **community workshops** were held at Millom Guide Hall on Thursday 7 April 2022 between 12:00pm and 4:30pm. This offered an opportunity to view initial ideas and talk things through in a smaller group in a relaxed atmosphere. 16 people attended.
- 4.8 **Primary School resource packs** were available to all local schools during April 2022. Haverigg Primary School, Black Combe Junior School and Captain Shaw's Church of England School led many of their Key Stage 2 pupils through an exercise to learn about Hodbarrow, say how they feel about Hodbarrow now and design an information board telling visitors all about the site. 200+ children participated.
- 4.9 A **design workshop at Millom School** with Year 10 Design Technology class was held on Thursday 5 May 2022. The workshop guided young people to analyse the site and project, and the to create their own designs for the Iron Line. 25 young people participated.
- 4.10 A **community drop-in** was held at Millom Tesco on Friday 6 May 2022 between 1pm and 6pm. This offered an opportunity for the public to see refined design ideas and offer further comments. 45 people attended.
- 4.11 A **community drop-in** was held at Millom Guide Hall on Saturday 7 May 2022 between 10am and 3pm. This offered an opportunity for the public to see refined design ideas and offer further comments. 35 people attended.
- 4.12 A **community drop-in** at Millom Guide Hall on Saturday 6 March 2023 between 12:30pm and 6:30pm. This offered an opportunity for the public to see the final designs and offer any final comments before the preparation of

the planning application. Approximately 100+ people attended.

- 4.13 Final drop-in events for the Millom Town Deal as a whole were held in Haverigg and Millom on 28 June 2023. All four of the Town Deal projects were on display giving another opportunity for feedback on the Iron Line. It is estimated over 150 people attended the events on the day.
- 4.14 PLACED also received some information by direct communication via email and letter.
- 4.15 Across the engagement activities approximately 650 people participated. Although some people may have participated at the various stages of the engagement.
- 4.16 Community comments, responses, feedback and ideas collected through the various activities and events were compiled and periodically reported back to the wider design team and Council to ensure that community views were influencing the development of the designs. Design team members also supported many of the in-person events to ensure that community participants could ask direct questions of those working on the design of the Iron Line.



Starter question from PLACED: How do you think the Visitors / Welcome Hub should feel? What would you like the building to look like?

[Start a discussion](#)

^ Images of community engagement: display board (top left), members of the public at drop-in event (top right), member of the public at Tesco drop-in (bottom left), and example post on the ideas wall (bottom right).

## 5. Summary of community views

5.1 The majority of people we spoke to or who participated in our various engagement activities were in support of the Iron Line project. Although many also had concerns, questions and local information to add to the design process.

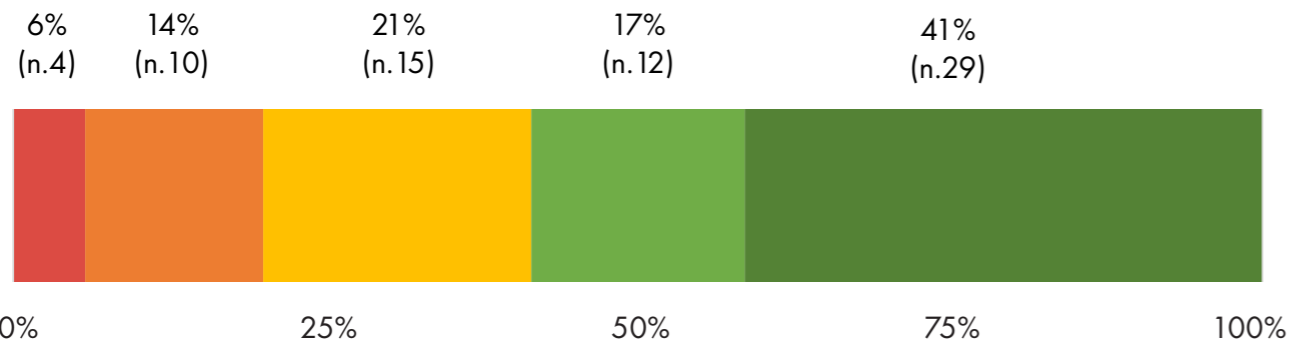
5.2 As part of the online survey we asked people if, overall, they supported the Iron Line project. We also asked this question at our most recent community engagement drop-in event in March 2023.

5.3 Although both relatively small polls they do show broad support amongst respondents and similar responses in support of the Iron Line.

5.4 At the march 2023 pop-up, overall support for the project was still good, however, we note an increased number of participants selecting 'Definitely not' and 'Probably not'. It is possible that our latest data was skewed by concerns regarding a different project rather than reflecting views on the Iron Line.

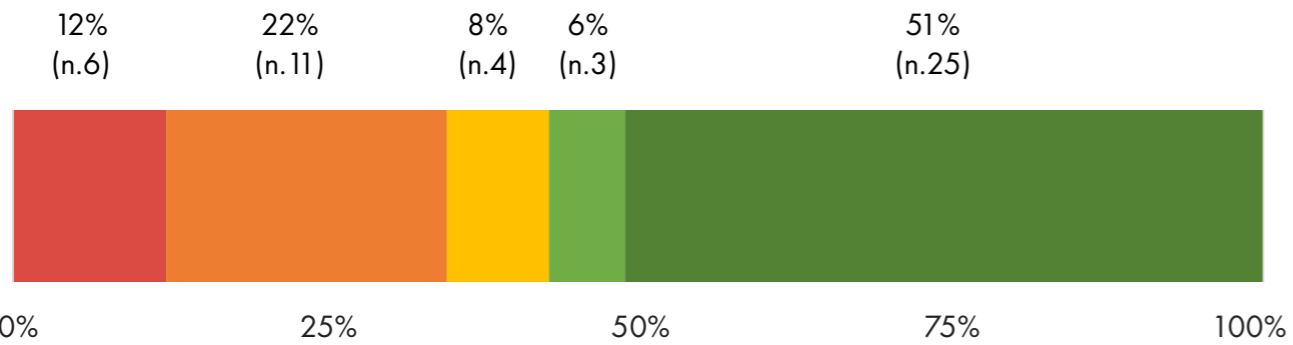
5.5 A survey was also available at the final drop-in event in June 2023 and online for a further two weeks to gauge support for all four Town Deal projects. Whilst only 34 people completed the survey question regarding the Iron Line, 41% were supportive compared with 34% who were unresponsive.

Overall, do you think the Iron Line project will be good for Millom and Haverigg?



Legend: Definitely not (red), Probably not (orange), Maybe (yellow), Probably (light green), Definitely (dark green) (total no. of responses: 70)

^ Bar chart summarising answers to the question 'Overall, do you think The Iron Line project will be good for Millom and Haverigg?' collected during the online survey.



Legend: Definitely not (red), Probably not (orange), Maybe (yellow), Probably (light green), Definitely (dark green) (total no. of responses: 49)

^ Bar chart summarising answers to the question 'Overall, do you think The Iron Line project will be good for Millom and Haverigg?' collected during the community drop-in 4 March 2023.

5.6 As part of the online engagement, we also asked people to answer the question, 'What does Hodbarrow Nature Reserve and the surrounding area mean to you?' The word cloud shows the most frequently used words in responses.

5.7 The words chosen show how important the site is for participants and how walking on site and enjoying the peace and quiet, wildlife and views are popular ways to enjoy the site.



^ Word cloud displaying the most frequent words used to answer the question 'What does the Hodbarrow Nature Reserve and surrounding area mean to you?'



^ Images of Hodbarrow Nature Reserve showing White Rock Beach and two swans on the lagoon.



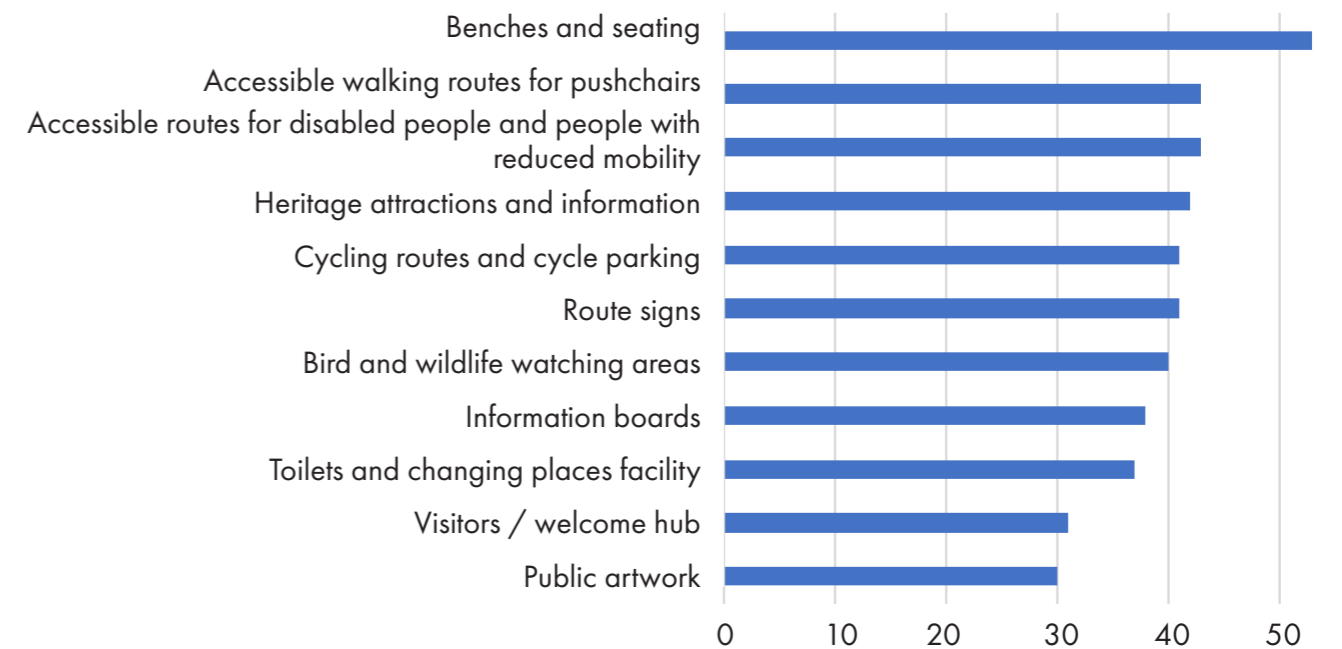
^ Image of one of the community engagement drop-in events in Millom Guide Hall.

5.8 We also asked participants what they thought the Iron Line should be like, providing a series of images to illustrate some of the possible ideas. All of the features suggested were broadly popular. Features which would make the site more accessible, celebrate the heritage of the site, and support walking and cycling were the top results. The results are displayed below.

5.9 However, a number of participants also expressed some concerns. Common concerns they wished to see addressed, included:

- The increase in visitors could disturb the wildlife and protected species that are present on the site.
- Maintenance and littering was also often brought up. Participants wished for a budget to be allocated to the long-term upkeep of the site.
- Considering how valued Hodbarrow is, participants thought the interventions should be light touch.
- Further detail on some of the common comments and concerns raised during our online and community engagement events are provided on the next page.

What should the Iron Line be like? (precedent images selection)



^ Bar chart summarising answers to the question 'What should The Iron Line be like?'

## Protecting nature

- 5.10 To protect the wildlife, participants suggested creating fenced-off areas where birds are nesting. Participants also wished to see habitats for toads and insects created and protected.
- 5.11 People asked for signage displaying rules across the site, in particular on picking up after dogs, littering, walking dogs on leads, illegal camping, and rules for where there might be cattle in the future.

## Heritage and culture

- 5.12 Heritage and culture was also a popular theme with many people requesting that the Iron Line connected to local industrial heritage and cultural figures such as Norman Nicholson.
- 5.13 Suggestions included making stone and iron replicas of buildings, machines and people or workers that would have been onsite when it was a mine, with information boards to explain the history. Existing structures should also reference their past. For example, the lighthouse could have an observatory or viewing platform.

## Welcome building

- 5.14 People would like to see interactive learning displays on nature and the site's industrial heritage presented at the welcome building.
- 5.15 The chosen location for the welcome building was considered acceptable as it is accessible and offers great views of the site and estuary. Although queries were raised about managing traffic to the household waste recycling centre and the need to consider that through design.
- 5.16 Participants would like the welcome building to have a café and both an indoor and outdoor seating.

## The Byway Open To All Traffic (BOAT) and site access

- 5.17 Traffic and the presence of motor vehicles were seen as an issue that would worsen with the increased tourism and improved pathways.
- 5.18 In general, people wished for vehicle access along the BOAT which runs through the site to be limited to blue badge holders and those fishing. When we discussed how complex closing the BOAT would be, most understood the legal difficulties but suggested that suitable measures would be needed to manage traffic to minimise the vehicles that travel through the site and along the BOAT.
- 5.19 The horse-riding community was keen to make sure horse riders were included in the designs and would still be allowed to use the site.
- 5.20 Ensuring the site supported cycling was also considered to be important requiring good smooth surfaces and related infrastructure like cycle parking.
- 5.21 The enhancement of pathway surfaces across much of the site was very popular and many people were pleased to see greater accessibility being achieved.

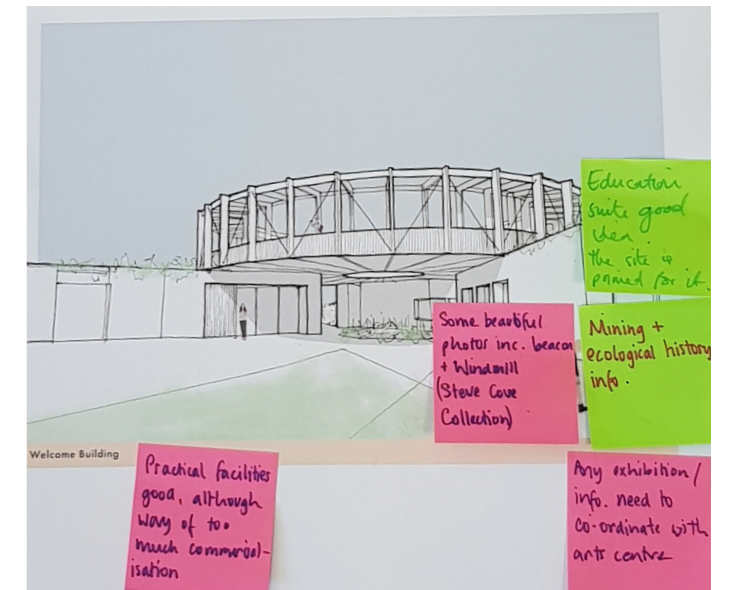
## Design preferences for surfaces, buildings and landmarks on site

- 5.22 If buildings and landmarks are restored, participants want interventions to be in keeping with existing structures.
- 5.23 Benches, litter bins, toilets, drinking water fountains, shelters, and bird hides were commonly requested.

- 5.24 Compressed gravel was the most popular material for pathways, as people thought it would make the site accessible to those who currently cannot access it due to potholes.
- 5.25 Designs, particularly the use of mounds on the sea wall, should ensure that views are not blocked, including for children and wheelchair users.

## Local transport and infrastructure

- 5.26 Several comments also related to issues outside of the scope of this project and planning application concerned with whether local sewerage infrastructure, public transport provision, and highway access to the site can support increased visitor numbers.
- 5.27 Participants also thought better connections between Millom, Haverigg and the Iron Line were crucial for the project to be successful.



^ Images of comments left by members of the public on display boards at community engagement events.

## Children and young people

5.28 Through our engagement work with children and young people we've been able to highlight their views on the Iron Line in particular.

## What is special about Hodbarrow?

5.29 Children and young people told us that they enjoyed bird watching and seeing other animals. The experience of nature that the site provides was also seen as special. They conveyed a feeling of amazement from walking and enjoying the views, going to the beach, and exploring the site.

5.30 The children and young people also thought that the sea wall, lighthouses, and the mining history made the site special.

5.31 Finally, the children and young people communicated a personal attachment to the site by seeing it as home and a local asset.



^ Image of a common lizard draw by a local primary school pupil highlighting one of the species found at Hodbarrow.

## Are there things you do not like about visiting Hodbarrow Nature Reserve?

5.32 In terms of design, the children and young people don't like that there are no shelters from the rain on the site, and don't enjoy the site when it rains. They also dislike the path, that they consider it to be too bumpy, with potholes and puddles. Some children and young people also disliked the mud and insects such as flies and midges.

5.33 The behaviour of some users was also seen as a negative, mainly the presence of cars and dog waste.

5.34 Finally, some children and young people do not like the fact that Hodbarrow lighthouse is not open to the public.

## General ideas for the site

### Enjoying the environment and nature

5.35 On nature, the children and young people wished to be able to observe and learn about the local wildlife: birds, ducks, bees, lizards, and to learn about bee orchids.

### Learning about heritage and culture

5.36 On history, the children and young people wished to learn about the iron works, the history of the sea wall, the lighthouses, and to meet the lighthouse keeper if they are still alive.

5.37 They also indicated that they would like to understand more about their heritage and culture. From their answers, it is clear that the site and its heritage is part of constructing their identity.

### Taking part in a physical activity

5.38 On the site, the children and young people wished to enjoy walking, cycling, swimming, running, along with playing games and other sports.

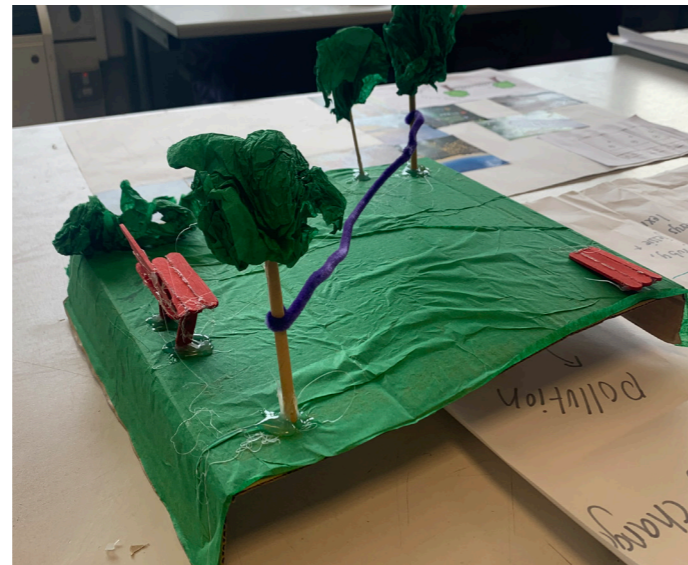


^ Cartoon images drawn by a local primary school pupils showing their ideas for virtual reality visitor information, sculpture classes at Hodbarrow, painting nature and swimming.



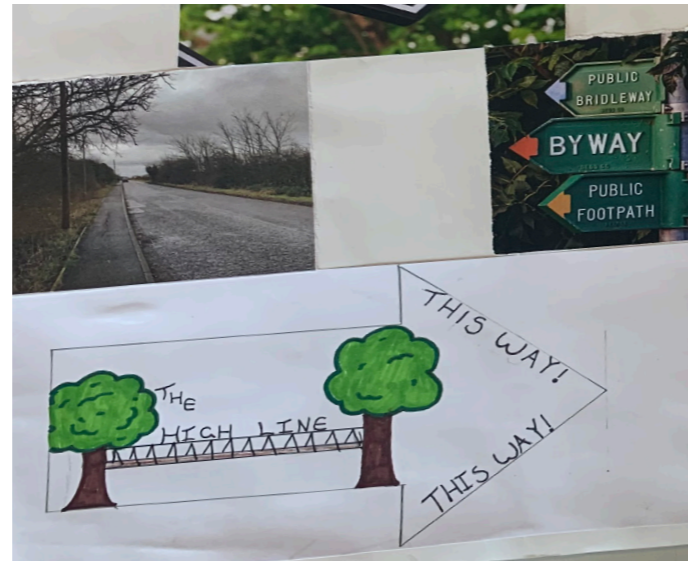
## Year 10 workshop

5.39 We also challenged a Year 10 Design Technology class at Millom School to analyse and design ideas for The Iron Line. Their work and designs highlighted the potential they saw for the site, but also how difficult it is for younger people to understand the scale of industry which occupied the site. Some also noted how difficult change could be for some who know the site well.



5.40 One of the groups, when tasked with the making of a model for the project, designed a treetop / high line walk with a zip line.

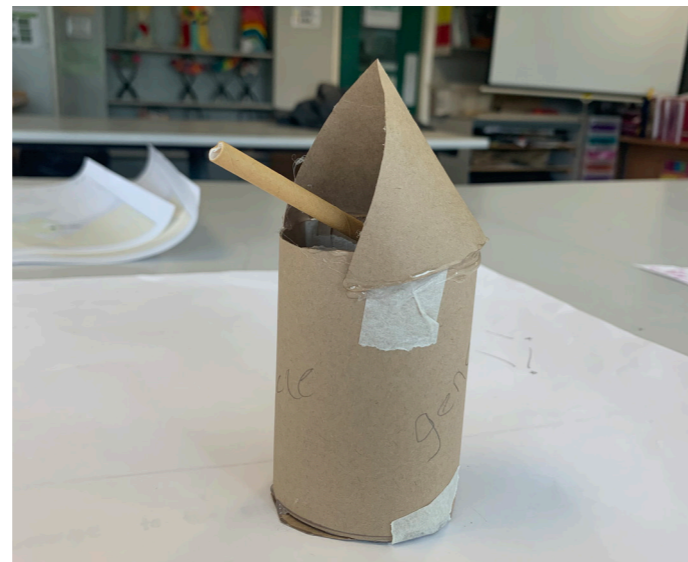
5.41 The second group developed the idea of a dark sky observatory, in keeping with the cylinder shape of the other structures on site.



5.42 The third group thought of making a miniature train of mining carts along sea wall and café at Hodbarrow.

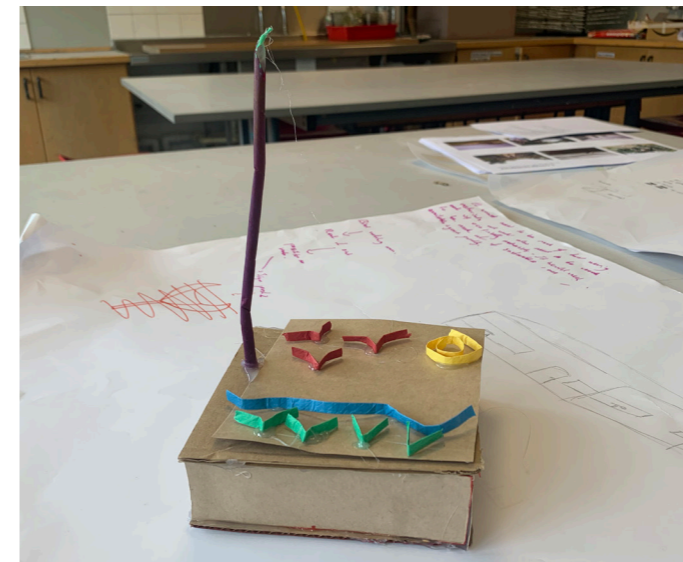
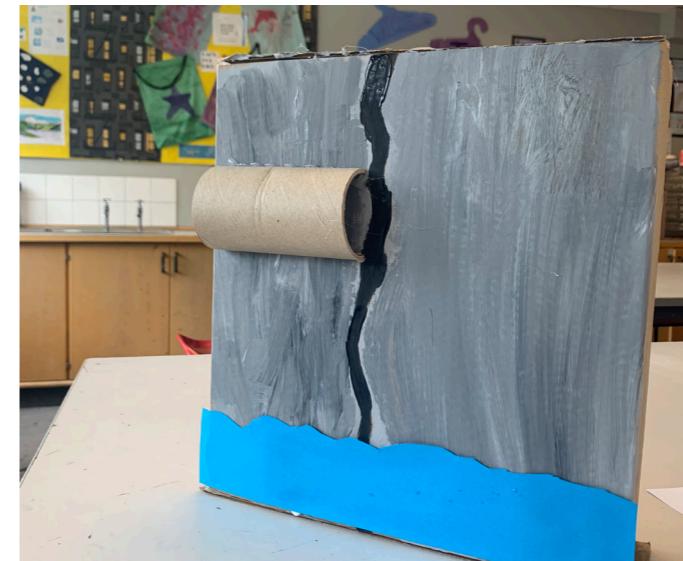
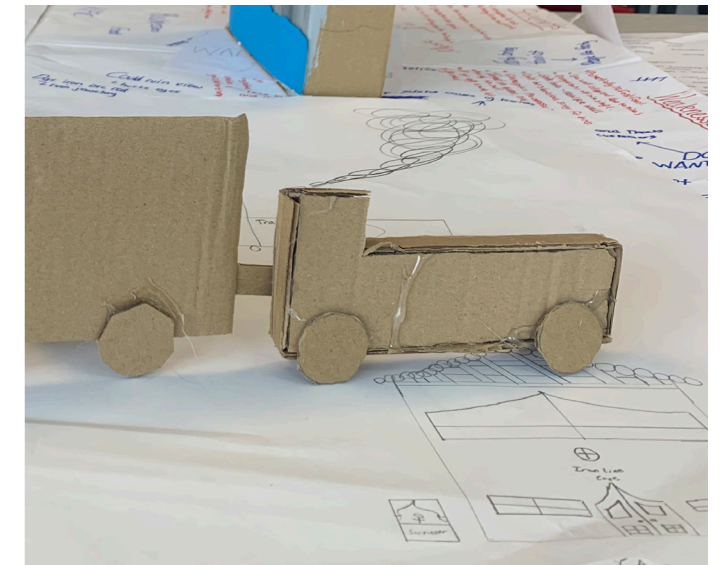
5.43 The fourth group designed a three-day tourism package consisting of:

- Day 1: Water sports,
- Day 2: Swimming/climbing and jumping from the sea wall,
- Day 3: Nature and heritage tour of Hodbarrow Nature Reserve by local people.



5.44 The final group designed a glazed bird hide which could be rented out.

Images of young people's models of a tree top walk (top), signage (middle), and observatory (bottom).



Images of young people's models of a miniature train (top), adventure jump and climbing wall (middle), and a glazed bird hide (bottom)

## 6. Engagement influence

- 6.1 Through the extensive pre-application community engagement, the designs for the site masterplan, site landmark treatments, habitat creation and management, and the welcome building and carpark have been improved to respond to community comments, concerns, ideas and support. Community comments were taken alongside technical and statutory advice provided by stakeholders and statutory consultees, including the RSPB and Natural England.
- 6.2 Through our multi-stage engagement community views have shaped the design in many ways. However, the headline comments and feedback have specifically shaped the Iron Line design in a number of ways.
- 6.3 **Protecting nature** has been a crucial part of the design process throughout the project, however, the community comments including those from young people have served to reinforce and remind the design team of the importance of protecting and enhancing nature. In particular measures to improve habitat for Natterjack Toads and butterflies.
- 6.4 **Heritage and culture** was also a key theme raised by the community. This has been incorporated into design work through references to the mining and railway heritage of the site at the welcome building viewing platform, certain pathway design features and information boards to be placed around the site.
- 6.5 The **welcome building** was something local people also took a considerable interest in and wanted to shape. Their ideas have influenced the services provided (such as the café and toilets), the provision of indoor and outdoor shelter, and the mounding which seeks to sit the building in the landscape and shelter visitors from the access road.
- 6.6 The **Byway Open to All Traffic (BOAT)** and **site access** were also common concerns for the public and their views have shaped the use of measures to manage vehicles on the BOAT and reinforce the need to provide access to the variety of users including pedestrians, cyclists, horseriders and others.
- 6.7 Comments related to **surfaces, buildings and landmarks** have also influenced designs, confirming pathway surface choices and building restoration materials. Comments related to this also emphasised the importance of providing seating and litter bins around the site.
- 6.8 Further comments from across the community engagement also reminded the design team throughout the design process how valuable the site is to local people. This has emphasised the need to maximise the beauty, views and uniqueness of the site through their designs and maintain its rugged and exposed character.



^ Image of one of the public drop-in events held in Millom Guide Hall.



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