15th July 2019

Dear Sir or Madam

CARLISLE SOUTHERN LINK ROAD PUBLIC CONSULTATION JUNE-JULY 2019

Friends of the Lake District is the only charity wholly dedicated to protecting and enhancing the landscape and natural environment of Cumbria and the Lake District. We welcome the opportunity to comment on the proposed route of the Carlisle Southern Link Road. Our comments are set out on the attached pages.

We recognise that the proposal for a Carlisle Southern Link Road (CSLR) is closely connected to the delivery of both St Cuthbert’s Garden Village and the further development and expansion of Carlisle generally, as well as an aspiration to improve east-west connectivity. We are also aware that the project has the benefit of Government support.

We made comments in response to consultations on the proposals for St. Cuthbert’s ‘Garden Village’, which included reference to the intention to build CSLR. Those comments clarified our position that the building of significant new roads as a means of underpinning or forming the focus or framework for new development is not a sustainable strategy. This view is based on several factors and can be summarised as follows:

- Significant new road building results in harm to landscapes, biodiversity and the wider natural environment
- Studies of new road schemes have shown that creating more road capacity contributes to further growth in traffic and, in turn, more congestion and are therefore only a short-term solution
- Using roads to underpin and provide a framework and basis for new development creates and perpetuates car-based development and lifestyles and fails to encourage or support a modal shift towards more sustainable and more active travel and lifestyles
- In order to halve net carbon emissions by 2030 and reach net zero carbon emissions by 2050 significant reductions are needed urgently - transport is the largest single contributor to emissions in the UK and more traffic will contribute to increased emissions and poorer air quality, moving us away from rather than closer to this target
- Climate Emergency has been declared by Carlisle City Council, Cumbria County Council and the UK Government and evidence shows that ecosystems are under threat of collapse: new road building will not help to address, and in fact will exacerbate, these existential threats
- The purported benefits of significant new road building schemes could be achieved through other, more

sustainable means that would have fewer impacts and significantly wider benefits for both the landscape and people’s quality of life.

Our comments on the CSLR should therefore not be taken as implicit or ‘in principle’ support for the project. Rather they constitute suggestions as to ways in which the project could be made less harmful and as sustainable as possible should it proceed.

Please record our comments as those of the Campaign to Protect Rural England (CPRE-Cumbria Association). Please also ensure that we are consulted at any further stages of the development of this project.

Yours sincerely,

Lorayne Woodend Wall MRTPi
Planning Officer – Friends of the Lake District
Landscape and Visual Impact Assessment should be undertaken for the scheme as part of the wider Environmental Impact Assessment (EIA). Together with the Cumbria Landscape Character Guidance and Toolkit (CLCG), this will help to minimise impacts and inform mitigation measures for the scheme as well as enhancement opportunities.

The CLCG identifies that the proposed route lies predominantly within landscape character type 5b: Low Farmland. However, the stretch between Newby West and the B5299 Dalston Road lies within type 5a: Ridge and Valley and the proposed roundabout and works to existing roads at Newby West have the potential to lie within type 5d: Urban Fringe.

**Landscape type 5b: Low Farmland** is described as having relevant characteristics including:

- meandering river valleys such as the Caldew and Petteril, often with ribbons of woodland;
- a predominant land cover of pasture interspersed with arable land consisting of often large fields
- hedges form an interlocking matrix but often species-poor
- tree clumps, riverside and hedgerow trees are notable features
- straight roads are common
- an intensely agricultural landscape where semi-natural vegetation is scarce
- several small remnant lowland raised bogs around the Carlisle area supporting areas of birch and pine woodland, rush pasture and purple moor-grass and small areas of raised mire vegetation
- This landscape is important for farmland birds, including yellowhammer, linnet and tree sparrow. This landscape is also important for barn owl
- public rights of way provide a network of routes that enable quiet appreciation and enjoyment of the countryside.

The CLCG identifies that particular sensitivities of this type include the impact of changes in land management on the matrix of interlocking hedges and on the woodlands, trees along rivers and field edges and the impact of unsympathetic village expansion on the traditional feel of villages and farms.

The development of a significant new road will alter the use of the land directly and may also alter the management of the land it passes through. Similarly it introduces a large-scale, modern development into the area, close to villages in places and is likely to encourage further development in the future. The proposal therefore has the potential to impact upon these sensitivities. Indeed, the CLCG cites “[c]reeping urbanisation ....[that] can degrade the traditional landscape characteristics” as a force for negative change in this landscape type.

The vision set out in the CLCG for this landscape type is that “[f]urther agricultural change and development will be absorbed and combined with measures to conserve and enhance landscape, wildlife features and minimise urban intrusions. Limited field enlargement and the removal of hedges will take place but the management of retained hedges will be a key priority to maintain traditional boundary features. Trees and woodland will be managed, restored and enhanced and will be used to integrate urban intrusions into the landscape”.

**Landscape type 5a: Ridge and Valley** is described as having relevant characteristics including:

- a field pattern of oblong fields bound by straight hedges and interspersed with both native broadleaved and planted coniferous woodlands;
- roads connecting the villages along the ridge tops being generally straight, whilst roads in the valleys generally follow contours and are flanked by high hedges or banks
- ecological interest primarily lies in species-rich hedgerows and hedge banks, particularly where they are allowed to grow tall.
The CLCG identifies that particular sensitivities of this type include the impact of large scale development on the peaceful pastoral atmosphere and the impact of changes in land management to native broadleaved woodlands, shelterbelts and remnant parklands, species rich hedges and hedge banks. Open and uninterrupted views from ridge tops to the Solway Firth and Lakeland Fells are also sensitive to large scale infrastructure development.

A significant new road constitutes large scale infrastructure development and has the potential to impact upon these sensitivities. The CLCG specifically identifies “pressure to accommodate other large scale infrastructure development including...roads” as a force for negative change in this character type.

The vision set out in the CLCG for this landscape type is for “[i]mproved management of retained hedgerows and woodlands and traditional field patterns. Bold new woodland planting will provide visual contrast. In addition, harsh development edges will be softened and existing and new, peripheral development will be integrated within a stronger landscape framework. Ridge top clutter will be restricted to strengthen the rural environment and minimise the effects of urban influences”.

The CSLR is a piece of major infrastructure and will undoubtedly impact upon landscape character in both these Landscape Character Types. For example, the proposed route will cut through the field pattern and hedgerows and will introduce very modern and urban elements (the road itself, multiple new roundabouts, bridges, new/upgraded junctions) into an area that is currently very rural and pastoral, with ‘a sense of stepping back in time in places’ (CLCG). The rural character of the landscape will also be impacted through additional noise, lighting³, and the presence and movement of vehicles.

The character, sensitivities and guidelines set out in the CLCG for landscape type 5d will also need to be considered in designing the roundabout at Newby West and identifying mitigation and enhancement measures to address any impacts it has.

The proposed route also lies within the Solway Basin National Character Area (NCA). The document setting out details of this NCA strongly reflects the CLGC, and includes the need for: management interventions to support farmland birds, including the creation, protection and enhancement of species-rich hedges and roadside verges; protecting, expanding and connecting surviving areas of ancient woodland, particularly along river corridors to support biodiversity, increase resilience to climate change and to create habitat networks; encouraging access and quiet recreational activities.

It also makes specific reference to the fact that “[noise] disturbance is mainly associated with the trunk road and motorway network that cross the NCA, with a peak in disturbance around Carlisle where east-west transport routes link to and cross the north-south course of the M6..... Notable trends from the 1960s to 2007 are a 10 per cent move from undisturbed to disturbed associated with increased traffic”.

It goes on to cite road development as a force for negative landscape change in this area, stating “[d]evelopment pressure has caused some changes to parts of the Solway Basin, including increases in residential development in and around urban areas. The transport network has seen the upgrading of a number of routes, most significantly the M6 corridor which crosses the NCA just to the east of Carlisle. Routes around Carlisle have also been upgraded in recent years including a bypass to the north of the city”.

³ https://www.nightblight.cpre.org.uk/maps/
It is clear therefore that road-building has already begun to compromise the character of this area and measures to reduce this, mitigate any residual impacts and to provide enhancements are therefore of great importance and must be employed.

However, it does seem likely that the development ambitions for Carlisle will result in areas of landscape types 5a, b and d to the south of the city being compromised significantly and ultimately reclassified as ‘urban’ in the not too distant future, with the development of St Cuthbert’s ‘Garden Village’ and further future development implied by the development of CSLR (including multiple new roundabouts that would seem unnecessary unless further roads were expected to connect onto them).

Biodiversity & wider environment

National Planning Policy now requires all new development to result in net gains for biodiversity. The Government’s 25-year Environment Plan also seeks net gains for the wider environment and this is expected to be transposed into a new Environment Bill in due course.

The proposed route crosses the River Caldew and the River Petteril. The River Caldew is part of the River Eden and tributaries Site of Special Scientific Interest and the River Eden Special Area of Conservation. As such, Habitats Regulations Assessment and, if necessary, Appropriate Assessment, should be undertaken for the scheme as part of/alongside the wider EIA.

Deciduous Woodland Priority Habitats south of Peastree Wood, at Tarn Plantation and immediately west of Junction 42 of the M6 appear to be directly (crossed by the route) or indirectly (close to the route meaning disturbance could be an issue) affected by the proposed route. Other areas of woodland are similarly affected.

The proposed route will lead to the loss and fragmentation of hedgerow and it will create a barrier to the movement of wildlife and a major hazard to individuals who try to cross it. It will fragment habitats, breeding, feeding and resting sites and the routes used by wildlife to access and move between these. The importance of the creation of wildlife corridors as part of wider Green Infrastructure networks is identified in documents such as Natural England’s Green Infrastructure Guidance and the Government’s 25-year Environment Plan⁴.

Light pollution caused by the new road (street lighting and vehicle lights) will not only impact on landscape character and visual amenity but on wildlife and habitats, for example, through disturbance and confusion over when is day/night, leading to feeding, resting and breeding problems.

At this critical time for biodiversity, and given our own reliance on the health of ecosystems, the scheme must clearly demonstrate how it will deliver genuine and measurable net gains for biodiversity, in addition to demonstrating how it will minimise and mitigate specific impacts, in order to meet national policy requirements.

Sustainable transport and active travel

A traffic-free stretch of the National Cycle Network and the Cumbria Way will both crossed by the proposed road as they wind through the Caldew valley. Public Rights of Way (Footpaths) are crossed five times.

This will have a negative impact on users of these routes by altering their character and traffic-free nature and therefore the experience and benefits they provide. These impacts, including cumulative impacts with other detractors, should be taken into account in the EIA.

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New road building does not principally support sustainable transport and active travel and there is evidence to suggest that in fact it increases traffic and car-use\(^1\). In the context of climate emergency and a need to address a range of other issues including health and well-being challenges, opportunities should be taken as part of the scheme to reduce mitigate this impact as far as is possible.

Local air quality is likely be affected by the proposed development through additional quantities of traffic passing through the area but also because vehicles will be travelling at greater speeds than on existing roads.

**Cumulative effects**

The cumulative impacts of the CSLR along with St. Cuthbert’s ‘Garden Village’ and other major plans in Cumbria, such as the proposed upgrading of the A66, need to be properly assessed and taken into account. This includes impacts on Cumbria’s landscape, biodiversity and carbon footprint.

**Measures to address these issues and enhance the scheme**

Reflecting the particular characteristics of these types, the sensitivities and the vision, and informed by the guidelines set out in the CLCG, opportunities should be taken to include in the development appropriate measures to help conserve and enhance the landscape character and strengthen green infrastructure. Designed imaginatively, this approach could also have benefits beyond landscape conservation and enhancement. For example, these measures could create and improve links between urban areas and the wider countryside through the provision of green corridors from and between settlements and there are also clear potential benefits for biodiversity, carbon sequestration, water, soil and air quality, health and well-being, noise mitigation and flood risk management, if carefully considered.

This could include:

- **Planting**, including planting of mixed woodland, either new woodland areas or to extend and enhance existing areas of woodland; management and enhancement of areas of semi-natural and ancient woodland and the planting of deciduous tree groups and lines on garths, around farm buildings, along farm access roads and main entrances. Woodland could be used to help to contain and soften areas that are affected by the development to improve it’s setting in the landscape, including roadside planting and planting close to the M6 corridor. Hedgerows that are lost or compromised as a result of the development should be compensated for, including through the replanting of hedgerows already degraded or replaced with fencing elsewhere. Native species should be carefully chosen to reflect the local character and support relevant species, including farmland bird populations.

- **Creation of green networks** of vegetation using native trees and shrubs to form ‘ecological corridors’ as well as to enhance the river valleys. This should include addressing qualitative and quantitative gaps in existing habitat/green infrastructure networks (such as degraded or fragmented hedges and woodlands) as well as creating additional sections to existing networks. Areas of semi-natural habitat should be created.

- **Protecting and enhancing important features** The final choice of route should minimize impacts on traditional field patterns wherever possible. The retention of features such as traditional stone gateposts and kests (hedge banks) is also important

- **Maintaining and enhancing public rights of way** and quiet recreational areas and facilities in ways compatible with the pastoral character of this sub type, including planting and other measures to avoid or minimise impacts on affected routes.

- **Highway structure and design** should be carefully considered to complement the local vernacular and landscape. Wildlife tunnels and bridges should be included in the scheme, informed by local biodiversity evidence and ecological surveys to help mitigate the fragmentation of habitat caused and the impact of the
creation of a barrier and hazard to wildlife. Verges should be planted with and managed for wildflowers informed by the current project between Cumbria Wildlife Trust and Highways England to improve biodiversity and support pollinators.

- **Encouraging sustainable and active travel** through making connections with existing routes and addressing any qualitative or quantitative gaps within existing routes. New routes should also be added to enable sustainable, active travel between settlements and to provide connections with particular services and facilities, including railway stations. Consideration should be given to the inclusion of bus stops and bus lanes and separate (off-road) provision for new cycle routes and footpaths in the area.

- **Aiming to reduce light pollution** overall based on measured existing levels or at least to maintain current levels. This can be achieved through removal of existing light sources along and around the route or, where necessary, replacement with less polluting versions, along with ensuring new lighting is minimised and designed appropriately where it is absolutely necessary. The location, type and brightness of new lighting should be informed by specialist advice and best practice, for example, from South Downs National Park and the International Dark Sky Association.

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