Dear Mr Long

7/2018/3121 ERECTION OF 8 DWELLINGS, BLEASE ROAD, THRELKELD CA12 4SD AND 7/2018/3115 OUTLINE FOR THREE LOCAL NEEDS DWELLINGS, STATION ROAD, THRELKELD CA12 4TT

Friends of the Lake District (FLD) welcome the opportunity to comment on the above applications. We are the only charity wholly dedicated to protecting the landscape and natural environment of Cumbria and the Lake District.

FLD wish to object to these applications on the basis of harm to landscape character and visual amenity, including cumulative impacts with other developments and conflict with local and national policy and guidance.

7/2018/3121 proposes 8 dwellings, along with a significant area of car parking, on the southern flanks of Blencathra and on the westernmost outskirts of the small, historic village of Threlkeld. 7/2018/3115 proposes 3 local needs dwellings on Station Road, Threlkeld. Threlkeld lies in the heart of the Lake District National Park (LDNP) and English Lake District World Heritage Site (WHS). None of the proposed dwellings are to be affordable. The proposals do not appear to be accompanied by landscape and visual impact assessments. The applications are set in the context of other recent proposals for housing development in Threlkeld, including 7/2017/3140 for 5 local needs dwellings, behind the village hall but with access from Station Road and 7/2018/3021 for outline residential. 7/2017/3140 was refused on the grounds of harm to settlement form, landscape character, views out of the settlement and the financial viability of the Village Hall and associated café business. The reasons for refusal also indicated a lack of need for the development and specifically stated that housing delivery in the area is “well ahead of profile”. 7/2018/3021 was permitted with conditions and with design, landscaping and scale as reserved matters.

These applications fall in landscape type H: Upland Valley and Area of Distinctive Character 12: Glenderamackin Valley, as set out in the recently updated LDNP Landscape Character Assessment (LCA). This document indicates that part of the character of the Upland Valley landscape type is that development on the lower valley sides is ‘scattered’, as opposed to in significant clusters or blocks.
Gradual change in the pattern of settlements is identified as a force effecting change on this landscape type and it is stated that the characteristic features of this landscape are vulnerable to the expansion of villages. Visual and ecological sensitivity within this Landscape Character Type are identified as high and it follows that this Landscape Character Type is considered to have very limited capacity to accommodate change without compromising key characteristics.

Furthermore, the document identifies that in the Glenderamackin Valley Area of Distinctive Character, the landscape is characterised by a ‘small-scale settlement pattern consisting of traditional historic, vernacular hamlets’. In order to protect and enhance the area’s character the recommendation for management set out in the LCA is that these should be retained, protected and reinforced and that the introduction of large-scale buildings, or those which do not respect local vernacular building materials, scale and character should be avoided. The area is also characterised by the fact that ‘the distinctive saddle shape of Blencathra forms a prominent backdrop in views to the north’ and by ‘strong intervisibility between Blencathra to the north and Threlkeld and Matterdale Commons to the south’.

7/2018/3121 in particular would contribute to the erosion of the characteristic nature of development due to its scale and location. Although Threlkeld is a somewhat linear settlement that has developed primarily along 3 village roads, the village is small in scale and relatively contained. Blease Road is a narrow, rural road and eventually, a dead end providing access to the Blencathra Field Centre and for walkers to Blencathra itself. The existing properties in the immediate vicinity of the proposal site are slightly separate from the rest of Threlkeld due to a level change, public and private open spaces, car parking and wooded areas and some distance uphill from the village centre.

The site itself has the character and appearance of being part of the lower slopes of Blencathra and is experienced as such, for example, as the beginning of the climb by walkers, rather than being separate from it. Development here would also have an enclosing and imposing effect in the context of the properties opposite and adjacent, particularly due to the narrowness of Blease Road at this point. The currently gradual transition from being within the settlement to being open countryside with the expansive views to Blencathra and to Great Mell Fell and beyond resulting from the staggered positioning of the existing properties would become more abrupt, again, altering the experience of the area. The addition of 8 modern dwellings in a uniform and linear fashion, stretching further up Blease Road is therefore inappropriate village expansion in terms of scale and impact on settlement and landscape character.

Individually, the proposals would each result in impacts on visual amenity and the experience of this part of the LDNP and WHS. They would compromise both shorter and longer views into and out of the village, including the views of Blencathra specifically identified in the LCA as being particularly important to the character of this area. Indeed, save for the direct impacts on the Village Hall and café, many of the reasons for refusal of 7/2017/3140 also apply to 7/2018/3115.

Cumulatively, together and with approved developments, the proposals would result in over-development of Threlkeld and would have an urbanising effect on the village, including through the provision of parking and lighting and in the creation of access points, which would result in the loss of traditional stone walls and verges. These cumulative impacts would cause harm to landscape character, visual amenity and settlement form and character.

**National Planning Policy & Guidance**

The National Planning Policy Framework para. 172 requires that ‘Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks...which have the highest
status of protection in relation to these issues’. It further requires that ‘[t]he conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks’ and that ‘[t]he scale and extent of development within these designated areas should be limited’. These proposals do not conserve or enhance the area’s landscape, scenic beauty, wildlife or cultural heritage and the scale of the proposals cumulatively (including with each other and with other approved developments), and individually in the case of 7/2018/3121, is beyond ‘limited’ in the context.

Para. 170 requires that ‘Planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes....(in a manner commensurate with their statutory status....)’. Para. 127 requires that ‘[p]lanning policies and decisions should ensure that developments...add to the overall quality of the area.....are sympathetic to local character and history, including the surrounding built environment and landscape setting’ The proposals do not comply with these requirements cumulatively or individually and do not reflect the statutory purposes of National Park designation.

Threlkeld is a historic settlement but much of its current form grew from its more recent mining heritage and this is a key element of its distinct character. This heritage also represents a key element of the cultural landscape of the wider WHS and some of the 10 attributes that give the WHS its Outstanding Universal Value are directly derived from these industrial connections with the landscape and on the concept of a cultural landscape. WHSs have the highest status of heritage significance, are an irreplaceable resource (NPPF para. 184) and great weight should be given to their conservation ‘irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance (NPPF para. 193). Any harm to or loss of the significance of a designated heritage asset requires clear and convincing justification (NPPF para. 193).

Views towards Threlkeld itself, as a settlement clearly representing the cultural connection between the landscape and industry are distinctive given aspects such as the vernacular form and materials, settlement form and Blencathra backdrop. Even small compromises to this, if perpetuated, will begin to undermine WHS attributes, the experience of them and the features that underpin them. As such, instances of even very limited harm should not be considered in isolation.

FLD considers that cumulatively, with each other and with already-approved developments, these proposals will result in harm to the attributes of the WHS as a result of impacts on landscape character, visual amenity, settlement character and thus, the cultural landscape of this part of the WHS and how it is experienced. Individually the proposals will also have these effects, albeit to slightly differing degrees. The planning statement accompanying 7/2018/3121 recognises that the proposal ‘would have some effect on attributes of the Outstanding Universal Value of the English Lake District World Heritage Site relating to the tradition of agro-pastoralism and the traditional settlement pattern’ but does not offer adequate justification for these impacts. Both proposals would be visible from the viewpoint at the Threlkeld Quarry and Mining Museum as well as further afield.

**Local Planning Policy**

Threlkeld is identified as a village in the Lake District National Park Core Strategy. Core Strategy Policy CS18 states that 60 dwellings need to be built per year across the whole of the Lake District National Park. Policy CS02 states that collectively, the villages are expected to accommodate 20% of all housing developments, equating to 12 per year. If both these applications are approved, or even if only 7/2018/3121 is approved, alongside the outline development already approved (which is indicated to be for 5 dwellings), Threlkeld will have taken in a single year more than a year’s worth
of the total development allocated collectively to all villages across the National Park. This is disproportionate and clear overdevelopment.

CS18 also states that ‘Development proposals on windfall sites for four or more houses must reflect the local affordable need. In these cases a maximum of 3 houses for local need will be allowed’. 7/2018/3121 is contrary to this in that it proposes 5 ‘local need’ dwellings. An off-site affordable contribution is offered. The LDNPA Housing Supplementary Planning Document sets out that in such situations, the Authority must take into account whether there are material planning considerations, including the Written Ministerial Statement of November 2014, that outweigh CS18. It is not clear that the level of local needs or local affordable needs is accurately reflected by this proposal or indeed that there is a need for the proposed development at all and therefore it would be difficult to be sure that the particular balance offered by this proposal of local need dwellings and open market dwellings (albeit with an off-site affordable contribution) is appropriate enough at this location so as to outweigh other material considerations.

CS01 states that development proposals will only be supported that are consistent with National Park purposes and the statutory duty and that conserve and enhance the LDNP’s special qualities. Where any conflict between purposes occurs, greater weight shall be attached to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the LDNP.

CS03 requires that development ‘be within or relate well to the form of the settlement, to existing buildings within the settlement, and to utility and community infrastructure’. It also requires that development ‘protect, maintain or enhance the local distinctiveness, character and landscape setting of the settlement’. Due to location and scale in particular, 7/2018/3121 does not achieve this but both proposals fail to meet these requirements, especially in terms of protecting and enhancing the character and landscape setting of Threlkeld. CS03 also states that development should not ‘exacerbate the adverse effects of ribbon development’. Extending development further up Blease Road and thus, further up the flanks of Blencathra in a uniform, linear fashion as 7/218/3121 cannot comply with this requirement.

CS04 specifically states that small-scale housing development will be encouraged in Threlkeld where it meets identified housing needs. Given existing approvals; other recent development in the village and the recent refusal of another development at least partly on the grounds of lack of need and the fact that housing delivery in this area is “well ahead of profile”, it seems conclusive that the proposed developments are not needed and therefore the need for them cannot possibly outweigh the harm they would cause, including to landscape and settlement character and visual amenity.

CS25 specifically states that development management will be guided by the LCA and that the type, scale of development, as well as the level of activity, should at least maintain local distinctiveness and sense of place and where possible enhance these. Landscape will be given the highest level of protection. The lack of LVIA’s and the conflict with the distinctive characteristics and guidance in the LCA mean that the proposals cannot comply with this requirement.

Proposal 7/2018/3121 in particular also raises concerns relating to drainage, ecology and access/accessibility due to factors including the site’s boggy nature, existing watercourses, location and the extent of car parking and hard surfacing proposed.

Conclusion

The key issues of concern in relation to these applications are impacts on landscape character, visual amenity, settlement form and settlement character of this part of the Lake District National Park and
the English Lake District World Heritage Site. We have particular concerns about the cumulative effects of these proposals with each other and with recently approved developments in Threlkeld. The lack of any LVIA for either proposal is also of concern.

Friends of the Lake District conclude that as a result, the proposals represent conflicts with national and local planning policy and guidance and on these grounds, we urge the Lake District National Park Authority to refuse the applications.

Please record these representations as those of the Campaign to Protect Rural England (CPRE-Cumbria Association). We would be grateful to receive a copy of the decision notice and we would also welcome the chance to comment on any relevant reserved matters application should the outline application be approved.

Yours sincerely,

Lorayne Woodend Wall MRPI
Planning Officer