Mr Ben Long  
Development Control  
Lake District National Park Authority  
Murley Moss  
Oxenholme Road  
Kendal LA9 7RL  

26 February 2019  

Dear Mr Long  

7/2019/3030 ERECTION OF 8 DWELLINGS, BLEASE ROAD, THRELKELD CA12 4SD  

Friends of the Lake District (FLD) welcomes the opportunity to comment on the above application. 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 this application 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.

7/2019/3030 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. It is a resubmission of 7/2018/3121. We do not consider that the revised scheme is substantially different and our objections to 7/2018/3121 apply equally to this proposal and are set out below.

Threlkeld lies in the heart of the Lake District National Park (LDNP) and English Lake District World Heritage Site (WHS). Only 3 of the proposed dwellings are to be affordable. The proposals do not appear to be accompanied by a Landscape and Visual Impact Assessment (LVIA). The application is set in the context of other recent proposals for housing development in Threlkeld, including (but not exclusively) 7/2017/3140 for 5 local needs dwellings, behind the village hall but with access from Station Road and 7/2018/3021 west of Station Road for outline residential. 7/2017/3140 was refused. The reasons for refusal included a lack of need for the development and specifically stated that housing delivery in the area is “well ahead of profile”. Other reasons for refusal were 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. 7/2018/3021 was approved with conditions.

The application falls in landscape type H: Upland Valley and Area of Distinctive Character 12: Glenenderamackin 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 guidelines for management set out in the LCA include 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’.

7/2019/3030 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 only 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 by virtue of being 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 current 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.

The proposal would result in impacts on visual amenity and the experience of this part of the LDNP and WHS. It would compromise 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.

Cumulatively, with developments approved over the last few years, the proposals would result in over-development of Threlkeld and would have an urbanising effect on the village, including through aspects such as the provision of paving, parking, lighting and formal gardens and in the creation of new access. 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’. This proposal does not conserve or enhance the area’s landscape, scenic beauty, wildlife or cultural heritage and the scale of the proposals, cumulatively with other existing and approved development as well as individually, 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’
This proposal does not comply with these requirements and does 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 factor in its distinct character. This heritage also represents a key element of the cultural landscape designated as 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. WHSSs 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 harm should not be considered in isolation.

Cumulatively, with existing and already-approved developments, this proposal 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 proposal will also have these effects, albeit to a lesser degree. The planning statement accompanying 7/2018/3030 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 suggests the impact is limited due to featuring only weakly in distant views. Impacts on WHS attributes are not limited to impacts on the view but instead relate to harm to them and their integrity or significance, whether or not the impacts or the affected attributes are physical and can be seen. Indeed, para. 112 of the UNESCO WHS Operational Guidelines confirms that “social and cultural practices” and “intangible dimensions of heritage such as perceptions and associations” are relevant. Nevertheless, the proposal is 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 this application is approved, alongside the outline development already approved (which is indicated to be for 5 dwellings), Threlkeld will have
taken in less than two years 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 and 3 affordables. 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 (now transposed into the NPPF), 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 (given other recent development and the fact that other development has been refused on the grounds of lack of need) and therefore it would be difficult to be sure that the particular balance offered by this proposal of local need dwellings and affordable dwellings is appropriate and required at this location to such a degree as to outweigh other material considerations.

Reflecting legislation, 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, 7/2019/3030 does not achieve this, 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 proposed 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 development is 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 should enhance these. It states that landscape will be given the highest level of protection. The lack of an LVIA and the conflict with the distinctive characteristics and guidance in the LCA mean that the proposals cannot comply with this requirement.

The proposal also raises concerns relating to drainage, ecology and access/accessibility due to factors such as the site’s boggy nature, existing watercourses, location and the extent of car parking and hard surfacing proposed.
Conclusion

The key issues of concern 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 this proposal with recently approved developments in Threlkeld and regarding the lack of need for the scheme based on recent developments and existing permissions. The lack of any LVIA is also of concern.

Friends of the Lake District conclude that as a result, the proposal represents conflicts with national and local planning policy and guidance that are not outweighed by its benefits and on these grounds we urge the Lake District National Park Authority to refuse the application.

Please record these representations as those of the Campaign to Protect Rural England (CPRE-Cumbria Association).

Yours sincerely,

Lorayne Woodend Wall MRTP
Planning Officer