Mr Simon Fawcett  
South Lakeland District Council  
South Lakeland House  
Lowther Street  
Kendal  
Cumbria  
LA9 4DL  

13 June 2017

Dear Mr Fawcett

SL/2017/0425 AND SL/2017/0426, ENERGY DEVELOPMENTS, Land directly to the north of the existing Old Hutton Substation Old Hutton KENDAL LA8 0NT

Friends of the Lake District is the only charity wholly dedicated to protecting the landscape and natural environment of Cumbria and the Lake District.

We have assessed the above proposals both individually and cumulatively and consider these developments to be inappropriate in the open countryside. Therefore, we object to the proposals on the basis of detrimental impact to landscape character and visual amenity. In addition we wish to raise our concerns regarding the impact of construction traffic on the rural road network and the removal of diverse hedgerow to enable access to the site.

Landscape and Visual Impact

The proposals lie within landscape character sub type 7b – Drumlin Field as categorised in the Cumbria Landscape Character and Guidance Toolkit (CLCGT) and the sites display the key characteristics of this sub type.

The vision for this landscape character type states that ‘this is a well composed landscape which will be conserved and enhanced to retain its distinctive characteristics.’ And continues ‘The intrusion of new farm buildings will be minimised, field patterns maintained and strengthened and natural features restored through careful conservation.’

Given that it is necessary to minimise intrusion for agricultural buildings which are related to the character of the landscape it would be highly inappropriate to site additional incongruous industrial elements within this pastoral landscape.
This agricultural landscape has a limited capacity to accommodate development which is not related to agriculture.

The guidelines for development associated with this landscape character type include:

- Ensure that all developments are of a high quality and well related to the distinctive grain and scale of this landscape.
- Avoid siting large scale wind energy, other vertical structures such as telecommunications masts, pylons and overhead transmission lines in open and prominent areas where they degrade the rural character of the area.

FLD consider that the proposed developments are not well related to the grain and scale of this landscape and do not reflect the surrounding agricultural character of the area. Furthermore, we consider that the siting of these developments would be inappropriate given the open nature of the surrounding landscape and that they would further degrade the rural character of the area by exacerbating the negative impacts brought about by the existing substation.

The siting of such large-scale infrastructure and intensifying the energy related development within this landscape is clearly contrary to South Lakeland District Council Core Strategy Policy CS8.2 which states:

‘Proposals for development should be informed by, and be sympathetic to, the distinctive character landscape types identified in the Cumbria Landscape Character Guidance and Toolkit.......Development proposals should demonstrate that their location, scale, design and materials will protect, conserve and, where possible, enhance:
The special qualities and local distinctiveness of the area;
The pattern of distinctive features such as hedges, walls, traditional buildings, woodlands, hay meadows, wetlands, valleys, fells and rivers, and their function as ecological corridors for wildlife;’

The concentration of these large scale energy infrastructure proposals will not only give rise to unacceptable adverse landscape and visual impacts in their own rights but also cumulatively, as highlighted, by exacerbating the negative impacts of the existing infrastructure. FLD do not consider that this has been fully considered in the accompanying LVIA’s.

Furthermore, we so not support the conclusion that the new development would not be visible from The Helm and we are disappointed that SLDC did not request that the applicant provided viewpoint analysis from this vantage point. Given the scale of the proposed infrastructure and its potential dominance within the local landscape and beyond we would have expected the application to have been accompanied by photomontages illustrating the impacts of the proposals. In this regard we are particularly concerned over the landscape and visual impacts of proposal SL/2017/0426 which we consider would be visible across longer distance views.

As well as conflicting with local policy CS8.2 we consider that the proposals conflict with National Planning Policy Framework paragraph 17 which states that planning should:
'take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, **recognising the intrinsic character and beauty of the countryside** and supporting thriving rural communities within it;’.

These proposals do not recognise the intrinsic character and beauty of this area of countryside and would serve to cause harm to the distinctive features which make up this landscape character type.

**Traffic Impacts**

Aside from the adverse landscape and visual impacts arising from the proposals we also wish to raise concerns regarding the transport impacts on the rural road network during the construction of these developments. The applications state that construction traffic will come from the M6 and utilise the B6254 to reach the site. However, no information is provided on the route to the B6254 or the impacts that this traffic will have on the capacity of the rural road network and the current users. We ask that the Authority requires the applicant to clarify this information.

Notwithstanding this additional information being provided we have grave concerns regarding the capacity of the rural road network to support the volume of construction traffic (average 30 HGV movements per day for 6 months). This volume of HGV traffic will give rise to detrimental impacts on the amenity, character and tranquillity of the surrounding area. As such we consider the proposal to be contrary to **South Lakeland District Council Core Strategy Policy CS10.2**.

**Hedgerow removal**

The applications state that the proposals would entail the loss of diverse hedgerow in order to enable access to the site. We are concerned over the removal of diverse hedgerow and the implications of fragmentation of habitats in the area. **South Lakeland District Council Core Strategy Policy CS8.4** states that all development proposals should:

‘Minimise fragmentation and maximise opportunities for restoration, enhancement and connection of natural habitats (including links to habitats outside South Lakeland).’

We do not consider that the proposals outlined in these applications pay cognisance to the principle of this policy.

**Application Errors**

Whilst assessing the application we have noted a number of errors within the documentation, some of which relate to the scale of the proposals. For example the Design and Access Statement for SL/2017/425 states that there would be 12 single storey steel shipping containers yet ‘Masterplan SL_152_101’ clearly shows an arrangement of 40 such containers.

As previously highlighted the information relating to the transport movements is incomplete and misleading.

We would request that SLDC do not determine this application until clarification, and any subsequent additional information, has been obtained from the application regarding the issues raised in this representation and the representations of other stakeholders as read on the SLDC planning portal.
Conclusion

In summation, the proposed energy developments are located within an open pastoral landscape which is sensitive to large scale infrastructure. The current substation detracts from the overall quality of the local landscape and there is limited capacity to accommodate further development without significant detriment to the landscape character of the area. FLD consider that the proposal will have further reaching adverse impacts on the visual amenity than the accompanying LVIA suggests. We are particularly concerned regarding the landscape and visual impacts from The Helm in Kendal. This is a well utilised recreational route and, as such, the impacts will be experienced by many.

The transport impacts during the construction period of the proposed developments have not been adequately assessed in the applications and there would be significant impacts upon the rural road network during this time. Furthermore, given the volume of HGV traffic it is possible that there could be lasting negative impacts on the road infrastructure.

The perceived benefits of these developments do not outweigh the detrimental impacts of these proposals. Both proposals present a range of conflicts with both local and national planning policy and, as such, they should be refused.

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.

Yours sincerely,

Laura Fiske
Planning Officer