Dear Mr Richards

7/2018/2011 - Dual purpose aerial wire for extraction of stone and tourism use, Honister Slate Mine, Honister Pass, Borrowdale, Keswick, CA12 5XN

1. Thank you for consulting Friends of the Lake District on the above application. Friends of the Lake District is the only charity wholly dedicated to protecting the landscape and natural environment of Cumbria and the Lake District.

2. Having reviewed the application it appears that the proposal remains largely unaltered from the previous applications. The structure of the development is the same as proposal 7/2012/2243 which was refused. The difference in this application is that both lines are intended to also be used for the movement of stone and the shorter line is to be accessible for all. The applicant contends that these new uses outweigh the detrimental impacts of the proposal.

3. However, Friends of the Lake District do not consider this to be the case and therefore strongly object to the proposal on the basis of detrimental impacts on landscape character, visual amenity, tranquillity and conflict with:
   - The Environment Act 1995
   - The National Planning Policy Framework paragraph 115
   - The Lake District National Park Core Strategy, specifically the following policies: CS01, CS04, CS11, CS14, CS24 and CS25

4. Our detailed objections relating to these policies are set out below. However, we consider it important to highlight areas of concern regarding the limited information within the application relating to both the transport of slate and tourism uses. The application is lacking in detail and in our opinion does not fully assess the potential impacts of the development.
Transportation of Stone

5. The slate transportation statement contained within the application is intended to provide information on this new element of the proposal. However, the statement contains contradictory information by stating firstly that the provision of the aerial flight will provide environmental benefits ‘in terms of less vehicle movements transporting slate’ and then stating that ‘currently there is no economically viable way for slate to be extracted from these mine openings which the aerial flight will support. The only way which this can currently be extracted is by hand and with the slate being walked down the incline to Honister Hause in rucksacks’.

6. The statement continues by stating that extraction will continue to be done by hand and that slate will then be transported to the aerial flight by a ‘muck truck’ before being sent down to Honister Hause up to 100kg at a time. However, the application does not provide detailed information on this aspect of the development to enable a robust assessment of the impacts. We consider the following specific information should be included in the application:

- Details of the ‘muck truck’ specifications
- Details of the route the ‘muck truck’ will take in order to access the slate
- How often is this element of the proposal likely to be utilised in comparison to the recreational use?
- How much stone will be moved using this method per year?

7. Whilst it is commendable that the applicants continue to strive to find ways of bringing their high quality product to market we do not consider that this provides any additional justification for the scheme as a whole. The link between the historical uses of the aerial flight at Honister relates to the industrial use and we do not consider that this translates to the provision of a zip wire for tourism purposes on this site.

8. A business plan has not been submitted as part of the application, this lack of information makes it extremely difficult to assess the need for such a development. In the absence of such a plan consideration of the need should be given little weight. Where the issue of need is discussed in the application the information is contradictory. Page 14 of the Design, Access and Heritage Statement states that ‘Although the proposal is not required to ensure the Honister Slate Mine stays open it will help to allow for improvements that if were totally funded by the Mine production would take many more years to achieve.’ However, page 19 of the same document states ‘the slate side of the business is at risk’

Tourism Use

9. The principle purpose of this development is to provide a zip wire for recreational use on the site. As previously highlighted the lines proposed are identical to those of refused application 7/2012/2243. The main difference is in the proposed use whereby the secondary line, accessed at the intermediate point, will be accessible for all ages and abilities. The provision of activities for less abled users in the Lake District National Park is, of course, an important and commendable aim. However, this does not outweigh the material planning considerations of the case.
10. Furthermore, the Visitor Management Plan included in the application states that ‘the fundamental aim of the provision of the new Aerial Flight will be to ensure that visitors completing the existing Via Ferrata will have an additional sense of achievement on the return journey.’ This statement reflects the fact that the main purpose of the wire remains unchanged from previous applications.

11. The provision of the secondary line is likely to become an attraction in its own right, not only for less abled users and children under 10 but also those who do not wish to complete the Via Ferrata first. The application does not provide information regarding the operating hours or anticipated usage figures for this secondary line.

12. Whilst usage of the primary line would be limited to those using the Via Ferrata there does not appear to be any such restriction on the shorter secondary line. The application quotes an estimated maximum of 57 descents per day but it is not clear if this figure only relates to the main line or both lines together. There is also no evidence as to where this figure has come from.

13. It should be noted that zip wires, similar in nature to the secondary line in this application, already exist at Grizedale, Whinlatter and Brockhole and so this activity is already readily available for those who seek it. It is our understanding that these facilities can also accommodate less abled visitors subject to pre-arrangement.

**Detrimental Impacts of the proposal**

14. **Conflicts with National Park Purposes** –

The statutory purposes of the National Park are at the core of decision making within the Park. These purposes are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Parks.
- To promote opportunities for the public understanding and enjoyment of the special qualities of the National Park.

The Environment Act 1995 is clear in stating that:

‘If it appears that there is a conflict between those purposes, [the National Park Authority] shall attach greater weight to the purpose of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area.’ (The Sandford Principle).

15. The proposals would introduce a new and incongruous element to this highly sensitive open and rugged high fell landscape. The high speed movement and associated noise of participants and spectators would cause harm to the surrounding landscape by detrimentally impacting upon the remoteness and tranquillity currently enjoyed there. Landscape and visual impacts will be discussed subsequently but we consider that the proposal does not conserve or enhance the National Park and would cause detriment to the Special Qualities of the National Park. In this regard the proposal is contrary to **Policy CS01** of Lake District National Park Core Strategy.

16. As a point of clarification regarding this type of development in National Parks we note that on numerous occasions in the application the applicant refers to the ‘Zip World’ attraction as being
located with Snowdonia National Park. It is our understanding that, whilst the company own some attractions within the park, the large-scale zip wire is out with the Park boundary. Therefore, no direct comparison can be made between any proposal of this nature within the Lake District National Park and the Zip World zip wire located in North Wales.

The NPPF paragraph 115 affords the highest level of protection to the landscapes within our National Parks. This policy recognises that the landscapes of our National Parks are the most unique and valued in the country and must be protected to ensure the special qualities they possess are not compromised by inappropriate development such as this.

17. Landscape and Visual Impacts –

We recognise that Honister Slate Mine is a working site; however, that in itself does not provide a justification for further development. The impacts associated with the zip wire attraction would be entirely different to those experienced and accepted as part of the mining business. The location and layout of the proposal remains unchanged from the previous refused application. Therefore, the detrimental impacts on the surrounding landscape character and visual receptors which led to refusal also remain unchanged. Indeed FLD consider that these could be exacerbated by the provision of the secondary line, which as previously mentioned would become an attraction in its own right.

18. The applicant is seeking to intensify tourism use on an industrial site. This will give rise to an increase in the levels of activity and noise currently experienced on site. This directly conflicts with the ethos of Policy CS24: Delivering Sustainable Tourism which only allows for tourism development out-with rural service centres where it will not introduce inappropriate activities or levels of use.

19. As previously highlighted The National Planning Policy Framework affords the highest level of protection to the landscapes of our National Parks. This Principle is reflected in the Lake District National Park Core Strategy Policy CS25: Protecting the Spectacular Landscape which states:

‘The type, design and scale of development, and the level of activity, should maintain, and where possible, enhance local distinctiveness, sense of place and tranquillity. In assessing development proposals the highest level of protection will be given to the landscape.’

20. This proposal would introduce a new and incongruous high speed moving element to the landscape. The impacts of high speed movement and associated noise will be highly perceptible to receptors in the area; particularly those using the Public Right of Way Network in the locality, and will fundamentally alter their experience of the landscape.

21. Policy CS25 also references the need to have regard to the Lake District Landscape Character Guidance Supplementary Planning Document which recognises the distinctive characteristics of the Landscape Character Types and the Areas of Distinctive Character (ADC) in the National Park.

22. The proposed development site lies within ADC 13: Buttermere and Crummock Water. The description of this ADC notes the strong sense of remoteness and tranquillity as a distinctive feature of the area. The dominant peaks of Grasmoor, Fleetwith and Haystacks are highlighted for providing instantly recognisable landscape features and contributing to a strong sense of place.
23. These key features are identified as sensitive landscape attributes of the area and the need to protect the sense of openness and tranquility throughout, and the strong sense of remoteness on top of the fells from inappropriate development is recognised in the guidelines for managing landscape change in this area.

24. This landscape has a high visual sensitivity overall as a result of the strong sense of openness, uninterrupted skylines and lack of built development. There is limited capacity to accommodate change without compromising the key characteristics of the area. We consider that due to the scale and nature of the proposed development it would negatively impact upon the sense of tranquillity and remoteness in the area.

25. The experiential impacts of frequent high speed movement and noise as well as an increase in traffic would erode the sense of tranquility. The current buildings and car park at Honister Slate Mine do impact upon the sense of remoteness although these impacts are largely accepted as part of the working mine site. However, the intensification of activity on the site by the development of the zip wire would result in the negative impacts of the site being magnified and would encroach on previously undeveloped fell.

26. **Transport Impacts**

   It is our view that the traffic impacts associated with this development have not been fully assessed in the submitted application documentation. The ‘Cumbria County Council Transport Form’ provides a brief overview of the transport situation; however, we consider the information lacks detail.

27. The document states that the number of visitor journeys would be 165 per day. This figure has been calculated as an average from the existing 60,000 visitors to Honister divided by the 365 days of the year. The information provided is misleading given that on some occasions, such as recently, Honister Pass is closed and the Mine will receive no visitors and in the peak season the mine will receive far greater numbers of visitors than the figure given. No attempt has been made to provide additional information regarding the numbers of visitor journeys at these peak times. The document states ‘please see other submitted documentation for weekly breakdown of visitor numbers.’ However, this information does not feature in any of the documentation available relating to this application.

28. Furthermore, the document states that ‘it is considered that the proposal will only have minimal impact on the existing transport infrastructure and facilities as it is considered to be an additional attraction to those already offered at Honister Slate Mine giving visitors alternative activities to add to their options and extend the time they are at Honister’.

   Given that throughout the application the proposals are described as an opportunity to strengthen the local economy by drawing new visitors to the Lake District National Park, who currently have to visit Snowdonia National Park to experience this type of activity, we consider it is unrealistic to expect that there would not be a significant increase in the number of visitors to Honister. Furthermore, as previously stated, the reference to this type of activity in Snowdonia National Park is incorrect.

29. The application does little to encourage sustainable transport to the site and it is clear the vast majority of users will continue to travel by car to the site. The Visitor Management Plan quotes abundant parking on site but no plans have been submitted to support this. In our view the development would attract significant numbers of visitors in its own right, the majority of whom will arrive by car accessing the site
via Honister Pass. We consider that the additional traffic will exacerbate the detrimental landscape impacts of the proposal particularly the impacts on tranquillity.

30. As submitted we consider the proposals are contrary to Lake District National Park Core Strategy Policy CS04 – North Distinctive Area which supports initiatives to reduce car based travel between Keswick and surrounding attractions including Honister. This attraction will draw additional car borne visitors to an unsustainable location.

31. Furthermore, the proposal does not comply with the requirements of Policy CS14 – Sustainable Transport Solutions. We believe the applicant could do more to encourage customers to travel to the site by sustainable transport such as offering a discount for those who travel via the ‘Rambler Service’ or providing a shuttle service from the nearest Rural Service Centre Keswick.

32. Impacts upon open access land –

As with previous applications at Honister we are concerned regarding the impact upon the open access land in the area. Those using the public rights of way and open access land will experience the greatest level of detrimental impact from the proposals. They will experience clear views of zip wire users and the associated high speed movement and noise.

33. The Lake District National Park provides the ‘freedom of the fells’, free access for a range of pursuits for everyone to enjoy, a breathing space away from the pressures of modern life, and an opportunity to experience unique wild landscapes. At present this open access designation enables unrestricted free access to the fells for all. If this were to be restricted for commercial gain there would be a clear conflict with the second purpose of the National Park.

34. There are already zip wires in the Lake District, in appropriate locations with the landscape capacity to absorb the impacts, for those who seek this type of experience. There is no justification to site this man-made attraction in this highly sensitive high fell landscape. If permitted these proposals would deprive people of the opportunity to enjoy the Special Qualities of the National Park currently afforded to them for free.

35. Furthermore, the application does not provide any information regarding security of the zip wire apparatus. The King Kong Method Statement briefly mentions the need for the Car Park Landing Site to be fenced off to stop members of the general public from ‘straying’ in to the landing site. They suggest this could be achieved by timber fencing yet the submitted plans do not show any such fencing. Our concern is that, if permitted, the operation of the zip wire could lead to wider restrictions on access in proximity to the zip wire both when it is operational and out of working hours.

36. Impacts on World Heritage Site Status

In terms of planning policy the main difference from previous applications is that the Lake District National Park is now also designated as a World Heritage Site (WHS). The proposal is located within the Borrowdale and Bassenthwaite Valley. The Valley is described in the WHS nomination documents as demonstrating ‘strongly the attributes for all three intertwining themes of Outstanding Universal Value of the English Lake District’.
Whilst it is clear that Honister Slate Mine contributes strongly to the ‘Outstanding Universal Value Theme 1 of Continuity of traditional agro-pastoralism and local industry in a spectacular mountain landscape’ through the mining activity on site the proposal for the recreational use of the zipwire would have a negative impact upon ‘Outstanding Universal Theme 2: Discovery and appreciation of a rich cultural landscape’. Page 33 of the Design, Access and Heritage statement acknowledges that the proposal will have a negative impact upon ‘Opportunities for quiet enjoyment and spiritual refreshment’.

The applicant considers that the proposal will provide a unique experience which will improve the relationship between people and the environment. However, the proposal would have detrimental impacts upon the tranquillity, visual amenity and landscape character of the area. Therefore, we consider the proposal will detrimentally impact upon the relationship between people and the environment for the reasons set out previously.

Furthermore, as previously stated, it is difficult to fully assess the impacts of the proposal on the World Heritage Site designation given the limited information contained in the application.

37. Conclusion

The proposal outlined in this application does not differ significantly from the previously refused scheme (ref 7/2012/2243) and, as such, there is no difference in terms of the principle of this development and the landscape impacts being unacceptable in this location. Whilst the two proposed new uses of the wire are admirable in their intent they do not outweigh the detrimental impacts of the scheme. The proposal conflicts with a number of local and national planning polices and is at odds with the statutory purposes of the National Park. If permitted these proposals would deprive people of the opportunity to enjoy the Special Qualities of the National Park currently afforded to them for free. Friends of the Lake District consider there is no justification for this development in this highly sensitive location and it should be refused.

38. Please record these representations as those of the Campaign to Protect Rural England (CPRE-Cumbria Association). We reserve the right to make additional comments on this application in the event of new or additional information being submitted by the applicant. We wish to register our intention to address the Development Control Committee when this application is brought before them.

Yours sincerely,

L. Fiske
Laura Fiske
Planning Office