

11 April 2011

Dear Sir or Madam

## **LAND ALLOCATIONS DEVELOPMENT PLAN DOCUMENT – SITES UNDER CONSIDERATION**

In response to the South Lakeland District Council public consultation on allocation of land for housing, employment land and other purposes in the Local Development Framework (LDF), I would like to submit comment for consideration.

My comments refer to sites E65, RN 169, R674K and R46 as indicated on Map 01.2 Kendal North West.

I suggest that development of this land would be unsustainable by being harmful to landscape character and quality and therefore contrary to the central principle of the Local Development Framework and Core Strategy and a number of policies contained therein.

### **Landscape Setting**

The sites lie within an area of rolling farmland at the boundary between the carboniferous limestone of the Morecambe Bay Limestones Joint Character Area and the Coniston group of slates of the Cumbria Low Fells JCA of the Character Map of England. The area is a good representative sample of both leaning perhaps more towards limestone scenery immediately surrounding the site.

At the more local scale the site is classified as being within Landscape Character Type 7 – Drumlins, Sub-type 7b - Drumlin Field. This is not a common landscape type either locally, regionally or even nationally but is well represented in this locality. The combination of drumlin landforms overlain by a geometric net of fields gives this landscape a strong identity and a sense of both our natural and cultural history. This is high quality landscape in a highly visible and accessible location providing a unique setting to the town which nestles in the Kent valley. At the northwest boundary to the town development finishes abruptly with a well defined edge. This gives way to the rolling topography of the drumlin filled valley with the field pattern of pale coloured limestone walls picked out against the bright green improved pasture. Outwith the town boundary there is a dispersed settlement pattern with small, tight groupings of farm (or converted farm) buildings before the next significant settlement of Burneside further along the valley. This makes for an attractive landscape.

The closest building to the existing development boundary is Lane Foot Farm now a residential development of barn conversions converted in the mid 1990s. The farm is of some historic interest (the National Trust has a restrictive covenant on the farm buildings and this may also apply to the farmland) and is classed as a 'single ancient farm' in the Cumbria Historic Landscape Classification. The

pattern of enclosure predates the enclosure acts and is of some historic interest also.

The elevated nature of sites, particularly E65, ensures a wide zone of theoretical visibility and development would affect the view to the town from a wide area. Development would also seriously affect distant views north and west across the sites to the Whinfall Ridge, Shap, Longsleddale and Kentmere fells from Windermere Road. The bellmouth where the access road to Lane Foot Farm leaves the A5284 Windermere Road provides a viewpoint for many photographers.

The site is prominent from a number of housing areas, public roads and public rights of way. The footpath between Hallgarth and Hollins Lane/Burneside runs through the valley and closely adjacent to the site and it is prominent in the view from public rights of way on Kendal Fell. People using these paths are sensitive receptors out walking in the countryside specifically to enjoy the landscape.

The area including the site is the gateway to the Lakes when heading north/west and the setting for Kendal when heading south/east.

### **Policy context**

The Land Allocations DPD outlines key local factors influencing the location of development (para 3.5). these include:

- *Respecting the setting of the existing and potential future extent of the **Lake District National Park** which is close to the town;*

Site E65 is within 50m of the National Park boundary juxtaposed with Kendal Fell and an important part of the setting from a wide range of viewpoints and an important approach to (and exit from) the town.

- *Maintaining and enhancing the **quality of the surrounding landscape** and the need to achieve urban edges which maintain or enhance the character and appearance of the town when viewed from key approaches by road and rail and from important viewpoints such as Kendal Castle, The Helm, Kendal Fell, and Scout Scar/Brigsteer Road;*

Windermere Road is obviously a key approach to the town through the attractive landscape of Kendal Fell rising out of the patchwork of improved pasture overlying the distinctive rolling drumlin field portraying Kentdales glacial past. The quality of the landscape setting to this approach to the town can be judged by the number of visitors photographing the landscape from the viewpoint at the bellmouth to the access lane to Lane Foot Farm.

- Avoiding **coalescence** between Kendal, Oxenholme, Burneside and Natland and maintaining the separate identities of these settlements;

Whilst a considerable physical separation would be retained between the two settlements the elevation and perspective of the sites would result in a disproportionate visual and perceptive closing of the gap between them.

- *Safeguarding and enhancing the **River Kent Special Area of Conservation** an internationally important habitat, particularly for the seriously threatened White Clawed Crayfish;*

Sites E65, RN 169, R674K and R46 are within 170-250m from an open water course containing White Clawed Crayfish and closer still to underground water courses which feed it, all within the River Kent SAC.

In the Core Strategy:

Policy CS1.1 - Sustainable Development Principles, states that:

*2. It is vital to protect the countryside for its intrinsic beauty, diversity and natural resources and also for its ecological, geological, cultural and historical, economic, agricultural, recreational and social value;*

If each of these assets is evaluated in turn it becomes obvious that development of these sites would degrade the value of every single one.

Intrinsic beauty – interesting landform, sense of history, open views etc etc

Diversity – a major contributor to the variety of landscape in the area

Natural resources – Delivers eco-system services (water, food, sense of place etc)

Ecological, - river Kent SAC

Geological – good example of drumlin field

Cultural – field pattern, single ancient farm

Historical – as above

Economic – food production and contributor to areas main economic driver (landscape tourism)

Agricultural – good quality farmland (sheep & cattle grazing)

Recreational – visual amenity and rights of way

Social value – all of the above.

*3. There is a need to take account of and enhance landscape character and features particularly the AONB and coastal areas. The whole area's role as a setting for and gateway to the Lake District and Yorkshire Dales National Parks should be developed.*

This part of Kendal is closest to the Lake District National Park and an important part of its setting, just as the National Park is an important part of the setting for Kendal. Development of these sites threatens to degrade the setting of both.

Policy CS2 – Kendal Strategy, states that:

- *Ensure that Greenfield development is sympathetic to the landscape character of Kendal and to the historic character and setting of Kendal and may also need to address archaeological impacts.*

As outlined above I believe that the landscape character, historic character and setting of Kendal will all be harmed by development of these sites.

- *Ensure that new development safeguards and enhances the natural environment and local biodiversity – notably SSSIs and SACs within the area, including the River Kent and its tributaries – and opportunities to create new habitats.*

As outlined above I believe that there is potential for damage to the SAC and the White Clawed Crayfish habitat in particular.

Policy CS8.1 Green Infrastructure states that the Core Strategy will seek to:

- *Protect the countryside from inappropriate development whilst supporting its positive use for agriculture, recreation, biodiversity, health, education and tourism;*

For all the reasons stated above I believe that development of these sites can only be construed as inappropriate and will have a negative effect on all these elements.

## **Conclusion**

I do not believe that development of these sites stands up to scrutiny in the context of the Local Development Framework and would urge you to rule them out for the reasons stated above and which I can summarise as:

- The elevated nature of the sites and the character and quality of the receiving landscape would result in significant adverse landscape and visual effects in a substantial zone of visual influence.
- The northwest boundary of Kendal, particularly to the south of the railway line, is well defined. On the approach to the town from the northwest it is framed by the interesting, attractive and distinctive landscape described above. These sites extend this settlement edge into high quality landscape. This is not sustainable development.
- Development would erode the separation between Burneside and Kendal, adversely affect the existing settlement pattern and would damage the historic setting of Lane Foot Farm.
- Development would be contrary to a number of policies in the Core Strategy of the LDF.
- Development would be contrary to advice contained in the Sustainability Appraisal Scoping Report.
- Development would be contrary to Policy E36 of the Cumbria and Lake District Joint Structure Plan.

Yours sincerely

Chris Greenwood

Annexe1; Photographs of sites:



Photo1: The view north across site E65 to the other sites from the bellmouth where the access road to Lane Foot Farm leaves the A5284 Windermere Road looking over site E65 to Burneside and the fells. A well used photo opportunity stop.



Photo2: View east from Windermere Road showing the settlement edge. Sites E65 and RN169 occupy the field middle ground in the photograph.



Photo3: View southwest to Kendal Fell across sites RN169 and E65 from the public footpath between Burneside and Hallgarth