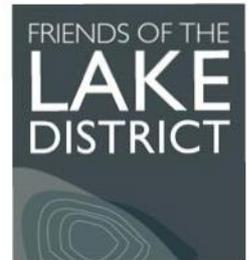


Your ref:

Our ref: LW/EdenMasterplan

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Dear Planning Policy Team

PENRITH STRATEGIC MASTERPLAN VISION TO 2050 – BEACON VILLAGES CONSULTATION

Friends of the Lake District is the only charity wholly dedicated to protecting the landscape and natural environment of Cumbria and the Lake District, representing the Campaign to Protect Rural England in Cumbria. We welcome the opportunity to comment on the Penrith Strategic Masterplan: A Vision to 2050 - Beacon Villages: A New Vision for Eden. Our comments can be found on the following pages.

We would like to be kept informed at every stage of the evolution of these proposals and would welcome opportunities to contribute informally well as being able to respond to public consultations. As more details come to light about the proposal, we will be developing our position on it further.

We understand that proposals for development on the Beacon itself have now been withdrawn.

Yours sincerely,

Lorayne Woodend Wall MRTPI
Planning Officer – Friends of the Lake District



Process and status

We are confused as to the process adopted to propose and progress the Masterplan and its relationship with other documents.

It is understood that Eden District Council (EDC) is seeking to look ahead beyond the timeframes of the Local Plan in order to develop future strategies for the town. We understand that consultation took place on a Draft Vision document in 2016/2017 and that the masterplan is an evolution of that. However, it is not clear:

- how the step from the Draft Vision document to this Masterplan document has been made;
- how, when and why other strategic and site options were put forward, considered, assessed and discounted; or
- how the document relates to the fact that Eden has a very recently adopted Local Plan and has accepted the need for its prompt review.

There is concern that the consultation undertaken up to 2nd November 2018 has not readily provided respondents with the opportunity to comment on options other than the Preferred Option. Whilst information was provided in the Masterplan document about three other options that had been assessed, these were all very similar in nature, each proposing significant development in either 3 or 4 new villages to the east of the Beacon. There is no evidence that the assessment and discounting of these options was undertaken with any public or stakeholder input. Neither is there any evidence that there has been adequate opportunity for the public or other stakeholders to put forward alternative strategies for or approaches to the future of the District.

There is a lack of clarity on the intended mechanism for preparation and status of the Masterplan. The document does not indicate whether the intention is to incorporate it into the review of the Local Plan; whether it will become a Supplementary Planning Document or separate Development Plan Document or whether it will sit outside of the statutory development plan altogether. Further adding to the confusion, EDC had intended to apply for Garden City funding but has apparently stepped back from doing so through the current round of bidding, whilst not ruling out future bids.

It is important that all these factors are made clear so that everyone understands the process being employed and future opportunities to influence the plans as well as the status of the document at any given time and how it fits in to the wider context.

Principles

Whilst we have some specific concerns about the landscape and environmental impacts of the proposals, which are covered under 'Impacts' below, we have several concerns about the principle of the proposals, including the need for this scale of development; cumulative impacts with other major development; precedent setting and future strategy implications as well as the perpetuation of reliance on roads.

It is not clear from the masterplan or associated technical documents that there is a genuine need for this scale of development, or indeed, that there a genuine need for this scale of development **at this location**. The Masterplan itself states that without it, based on current trends, it is expected that the District would grow by about 2,200 houses by 2050. It is unclear why it is "vitally important that Penrith and Eden ...grow the local population". Whilst there are undeniably many issues to be addressed, there is no evidence that other methods of doing so – which could be lower impact, more sustainable and more beneficial to existing and future residents - have been explored. In many respects, the Masterplan suggests that development that is not needed by the current population (or based on population projections) is being justified as necessary in order to resolve various issues

that Penrith and surrounding areas currently face. In fact many of the issues mentioned, such as traffic congestion, could be improved through other measures and could potentially be exacerbated by significant new development.

These concerns are compounded by the fact that there is no aspiration in the Masterplan to achieve a greater percentage than the 30% affordable housing currently required through planning policy in Eden. There is a risk that significant amounts of new housing will be built with very little of it actually contributing to meeting genuine local needs as the remaining 70% are likely to be properties of a type, size and tenure that secure the greatest profit rather than suiting the needs and being within the financial reach of local people.

There is no explanation of how the Masterplan relates to other significant development proposed in north Cumbria (Eden Local Plan; Carlisle 'Garden Village'; Lake District National Park Local Plan; A66 upgrades). Similarly, there is no evidence that proper consideration has been given to the cumulative impacts and potential implications of these developments all taking place in similar time frames, for example, cumulative impacts on landscape; biodiversity; flood risk management; demand for water and other resources and utilities; traffic flows; and infrastructure, as well as on the experience, feel and character of this part of Cumbria.

We have some concerns over precedent setting and future expansion. The Beacon currently forms a natural and defining eastern boundary to Penrith. The question has to be asked – where, and at what point in time, will development stop? Greenfield land is one of many finite resources utilised without replacement when new development takes place and at some point, an alternative strategy will become essential. There is no evidence that consideration has been given to the likelihood of future expansion of the new villages or the knock-on effects of taking this strategy now over alternatives. No measures are proposed to prevent the potential merging of the new settlements or the creation of a 'Penrith doughnut' with development surrounding the Beacon.

Related to this, although the document presents proposals for three new villages, references in the Masterplan such as 'The new housing in Penrith will involve three new Beacon Villages', 'Our vision is for Penrith to grow' and 'strong local identity will be a defining feature of the new settlements' make it unclear whether these are to be considered part of Penrith or separate from. These points need to be clarified to enable people to properly understand exactly what is being proposed and what the intentions are in terms of further expansion in the future. Somewhere that is a village in its own right and is to remain so might be expected to look, feel and work quite different to somewhere that is, or is going to become, part of a significantly expanding town.

We are also concerned about the level of reliance on new roads and road upgrading and the landscape and wider environmental impacts of these, including the proposal for a flyover at Kemplay Roundabout. New road building has been shown to simply encourage and increase car-based travel, for example in the study report '[The end of the road? Challenging the road-building consensus](#)' commissioned by CPRE and carried out by consultants Transport for Quality of Life (TfQL)¹. It is difficult to see how, through the strategy proposed, significant increases in sustainable transport and active travel will be achieved or supported.

¹ The new TfQL research shows that road schemes: induce traffic, that is, they generate an increase in traffic – often far above previous levels (background trends) over the longer term; lead to permanent and significant environmental and landscape damage; and show little evidence of economic benefit to local economies

Friends of the Lake District are unable to support a strategy based so heavily on further road development or on an assumption that increased capacity for motorised transport is what people are or should be aspiring to. A modal shift can only be supported through new development if schemes of this scale lead the way and make sustainability their true driver by prioritising genuinely attractive and accessible sustainable transport options rather than treating them as a novel sub-strategy that may or may not materialise in the final scheme. Building new roads and flyovers will not support ambitions for more sustainable transport or a safe network of active travel routes and will actively damage the environment and landscape of Penrith's hinterlands.

The three new villages would be split off from Penrith's services and facilities and potentially more accessible to Langwathby Railway Station than to Penrith's. Proposed cycling/walking routes link the new settlements but no such routes connecting the new settlements with Penrith are indicated in the Masterplan other than indirect routes requiring steep ascent and descent over the Beacon. On distance alone, it seems unlikely that the majority of people would find it easy to leave their cars at home and instead walk or cycle to visit Penrith or connect to mainline rail services.

Any development on this scale should be taken as an opportunity to innovate and do things very differently. The design and layout should be underpinned by green and blue infrastructure (GBI) networks and active, innovative, sustainable transport measures, including the improvement of existing routes in order to create highly accessible and permeable places to live that are well connected to where people need to be by means that are more convenient than the private car. It will be crucial to avoid the new settlements becoming little more than dormitory villages rather than becoming communities in their own right.

Impacts

Whilst the Masterplan documentation includes obligatory references to proposals being 'sustainable', minimising impacts on the environment, protecting ecologically and historically sensitive sites, 'not spoil[ing] the views', and a repeated insistence that the proposals will be 'integrated into the landscape', it fails to properly assess the impacts or to recognise the inevitability that even if 'minimised', the least possible impact of a proposal of this nature and scale will be significant.

It is unclear how the proposals reflect the Cumbria Landscape Character Guidance and Toolkit, which identifies the area as Landscape Type 10 Sandstone Ridge and describes it as a "visually prominent landscape". Of Type 10, the document also advises "ensure that farming-related and other development is **discretely located and designed to complement the landscape character**"; "areas of heathland and the geometric mosaic of fields are **sensitive to changes in land management and large scale infrastructure**" "[v]ernacular settlements are **sensitive to unsympathetic expansion**"; "retain the **rural character**"; "ensure development **respects the ridgeline**"; "**remaining areas of open ridge will be conserved**";. The Vision for Type 10 is "to **create a more natural character**".

Para. 4.6.5 of the Eden Local Plan explicitly lists the Cumbria Landscape Character Guidance and Toolkit as one of "several sources of design and landscape guidance available, which [sic] the Council will expect new development to comply with". Policy ENV2 states that development "will be assessed against the criteria in the Toolkit" and that "[n]ew development will only be permitted where it **conserves and enhances** distinctive elements of landscape character and function". ENV2 also requires that development **takes account of and complements** the distribution and form of settlements within their landscape setting; visually sensitive valley sides; natural elements such as hedgerows and woodland; and the tranquillity of the open countryside.

The Masterplan documents list some of the characteristics and guidelines set out in the Toolkit, and state in broad terms where the villages might be visible from and how they will be 'set in a strong woodland framework in order to mitigate the visual impact'. They fail however to explain how the proposals reflect, reinforce or indeed, impact upon the character of the landscape as proposed, or indeed, if the villages were to expand as they inevitably will in the future. It is difficult to see how the Toolkit guidelines or the requirements of ENV2 can be complied with through development at the scale and location proposed, and therefore how the character of the valued Eden valley landscape can be conserved, enhanced and complemented as required.

The documents acknowledge that development will be visible from the Lake District National Park, English Lake District World Heritage Site and the North Pennines AONB but does not provide a proper assessment of the impacts.

In terms of assessing the impacts, there is no evidence that a Sustainability Appraisal, Habitats Regulations Assessment or Environmental Impact Assessment of options has been undertaken in order to identify this option as the most sustainable or appropriate. There is no information on if or when these will be carried out. Wan Fell SSSI, which is closer to the sites of proposed development than others that are mentioned, does not appear to be mentioned in the documentation and none of the designated habitats are mentioned in the Masterplan itself, which could lead some to believe that the environmental impacts will be less significant.

The Masterplan documents offer very little in the way of a description of the existing GBI, biodiversity or habitats. Similarly there is very little assessment of impacts on or provision for enhancement of these. For example, no consideration appears to have been given to the functions and value of existing GBI or the fact that biodiversity net gains are now required by the NPPF and the Government's 25-year Environment Plan. The existing GBI that is marked on plans in the documents omits features such as hedgerows, woodlands and many other elements. Greenfield land is all part of an area's GBI and all GBI has ecosystem service functionality e.g. drainage, food production, clean air etc etc, which will be impacted upon if developed. Blue infrastructure is also omitted.

The proposals should identify how they reflect the Government's 25 year environment plan, the NPPF requirements for enhancement and net gains for the natural environment and natural capital and ecosystems services approaches. Masterplanning or any development of significant scale should start with a comprehensive GBI strategy and framework, identifying all the existing elements of GBI, their quality and functionality and then establishing where the qualitative and quantitative gaps are and where additional GBI functionality is needed. Only then can it be determined whether that quality and functionality can be maintained if certain elements of it are developed and, if development takes place, what enhancements to existing GBI are needed and where and what new GBI is required to deliver the functionality and connectivity required e.g. landscape character enhancement, flood risk management, habitat, active travel networks, health and well-being, habitat network creation and how it can be best delivered (including through what type of GBI).

For the proposed strategy for Penrith's future to be labelled sustainable, the required assessments and a proper consideration of strategic alternatives needs to be made, within a process and timeframe within which local people and others with an interest in the area can properly participate and have a say from the outset.