

LAKE DISTRICT NATIONAL PARK LOCAL PLAN REVIEW

COMMENTS TO LDNPA BY COLTON PARISH COUNCIL

Executive Summary

The overall strategic objectives on the Plan (being Prosperous Economy, Vibrant Communities, Visitor Experience, Spectacular Landscape, Wildlife and Cultural Heritage, Health and Wellbeing, Connectivity and Infrastructure, World Heritage and Local Character, Climate Changes and Resilience) would appear to provide a positive and engaging vision for the future of the Park.

However, this wider strategic vision is not, in our view, reflected in the actual policies that form the core of the Plan. We believe the Plan is overly focused on attracting additional visitor numbers to the Park without adequate consideration of the impact on the environment, infrastructure, local communities and the farming community who are the creators of the spectacular cultural landscape and who are often struggling to make a living.

We believe that the Plan has lost sight of the National Park's primary purpose according to the Sandford principle: to attach the greatest priority to conservation, natural beauty, wildlife and cultural heritage over public enjoyment.

We are concerned that many of these previously submitted comments, concerns and proposals (submitted in July 2017 during the previous consultation phase) appear to have been ignored or dismissed without due consideration.

Our key concerns (which are further detailed in the core of this document) are as follows:

- a. The Plan will not result in sustainable tourism in our local area. In fact, it will significantly degrade it, which is in complete opposition to both the strategic objectives and the Sandford principle
- b. The inclusion of part of the Parish in the Windermere Showcase Area is wholly inappropriate given the limited and already fragile infrastructure that exists there
- c. In previous plans large parts of the Parish were designated 'quiet' areas. This designation appears to have been completely removed without adequate explanation
- d. Landscape and biodiversity will be ~~destroyed~~ significantly damaged, not maintained and improved
- e. The needs of core farming activities and local employment other than tourism have been ignored
- f. Changes to development planning aims risk leading to development that will harm the unique nature of the Parish in terms of its landscape and its community

Where our community plan policies are referred to in this document, details of the policies are listed in Appendix 1.

We would request that our views are reviewed and that we are given a formal reply to the issues and proposals raised in this document.

Colton Parish Council

1. Sustainable Tourism

We recognise and support the value of tourism to the Lake District National Park and to our own Parish. However, tourism is only one part of the overall holistic approach that is needed to ensure the Park keeps its unique nature and complies with its primary aim (Sandford principle) that greater weight be attached to conservation over public enjoyment. LDNPA policy 01 also states 'we want the extraordinary harmony and beauty of the Lake District Landscape, its Special Qualities, including attributes of Outstanding Universal Value, to be conserved and enhanced) along with its vibrant local communities.

We feel that the plan is overly skewed towards increasing tourism without addressing key local needs such as:

- Maintaining vibrant local communities by ensuring a high percentage of local year-round occupancy of housing
- Sustaining local businesses other than tourism related jobs (which by nature are often low paid, seasonal or temporary)
- Addressing the need to restore, protect and improve of the natural landscape and its biodiversity so it can be enjoyed by all now and in the future
- Supporting the key agricultural economy that maintains and shapes so much of the Park

The impact of what we believe is a plan for 'non-sustainable' tourism in our parish will place a huge strain on an already fragile network of minor roads, infrastructure, and local services. This has to be both managed and paid for by the local community and we cannot find anywhere in the document how the inevitable additional costs from an increase in tourist visitors would be met. The current infrastructure is already unable to cope with current visitor numbers.

Proposal: we note that some highly visited tourist areas have implemented a tourist tax via hotel charges or similar. We would ask if this has been considered as part of the strategy to increase numbers here and would suggest that it should form part of any long-term plan to increase visitor numbers. Otherwise vital maintenance and upgrades of infrastructure will not happen and without planned and costed investment we risk even more gridlocked roads, a further increase in road accidents for motorists, cyclists and walkers together with the risk of further loss of local residents who make the Park what it is today.

Within our community plan policies PE3, PE4, PL1, PL3, PH5, PH7 reflect the policies to ensure '**low impact**' tourism as developed from the views of our parish residents.

2. Transport and Infrastructure and Plan Policy 15 - Windermere Showcase Area

This LDNPA Plan contains proposals for development that cannot be achieved by LDNPA as they are not within their control but are the responsibility of other organisations such SLDC for Highways and Traffic and CCC for other local infrastructure. It is entirely inappropriate for such policies to be

included on a totally uncostered basis with no comment from the organisations who would have to implement them.

The extent of the Windermere Showcase Area, which is a significant part of Colton parish overstates the nature and resilience of the road infrastructure within the Newby Bridge/Lakeside/Ferry Nab area as well as the roads in the parish that lead to Hawkshead, Coniston and Grizedale.

To suggest that any of the minor C and unclassified roads from the A590 related to the 'mass transport hubs' and showcase areas can act as a practical or sustainable southern entry point for mass tourism is both unrealistic and in conflict with Plan Policies 01, 03, 05, 06 and 08 as well as our community plan policies PE3, PL1 and PR1.

Proposal: In summary we do not believe that the area at the Southern end of the showcase area is practical or sustainable for development and do not believe it should be included in the plan. We would ask that the proposal the area on the West side of Lake Windermere acts as designated southern entry point be removed

In particular we would draw attention to the following specific facts:

- a. the road (C5026) that takes traffic beyond Newby Bridge up the western shore of Windermere is entered via a narrow bridge that is single way and not suitable for heavy traffic. This route is frequently gridlocked with traffic backing up dangerously on the A590, at current tourist levels, before any increase is considered. Once over the narrow bridge the road is not of a size to cope with current number and size of coaches going to the Lakeside Pier area and we do not believe the Lakeside Pier area is an appropriate transport node. There is very limited scope to increase parking and development at this area to accommodate any additional volume. Local residents are already adversely impacted by the increased level of traffic and there is existing and significant danger on this road for walkers and cyclists. In our view this road is not suitable for further development and is already over-stretched in its capacity.

Proposal: as a council we are opposed to the suggested development of the Lakeside Pier/Aquarius complex and would like this to be removed. The development is impracticable and likely to degrade the area (in conflict with Plan Policies 01, 03, 05, 06 and 08) and in conflict with our community plan policies PE3, PL1, PH5 and PR1

- b. With regard to the Ferry Nab proposal this site is again not, in our view, suitable for increased traffic to 'serve as a launch pad for adventure and exploration on the western shore of Windermere). It cannot function as a 'mass visitor transport hub' in any sense.

Proposal: as a council we are opposed to the suggested development as impracticable and likely to degrade the area (in conflict with Plan Policies 01, 03, 05, 06 and 08) and in conflict with our community plan policies PE3, PL1, PH5 and PR1

- c. With regard to the Grizedale centre development, similar access problems exist as stated above and any development can only be viable if it is not in conflict with Policies 01, 03, 05, 06 and 08 and where small-scale transport linkages can be established to ensure that large buses do not travel along totally unsuitable roads. We can see no costed proposal for this ensuring this.

Proposal: as a council we are opposed to this development which is in conflict with Plan Policies 01, 03, 05, 06 and 08. Further development risks were specifically identified in the previous Local Plan policy CS09 for the South distinctive Area (reference 3.25.4 – ‘we want to reduce pressures from volumes of traffic on the minor roads leading to Grizedale Visitor Centre, thus alleviating issues for communities in Satterthwaite, Rusland and Bouth’). it is also in conflict with our community plan policies PE3, PL1, PH5 and PR1

- d. With regard to the Graythwaite Estate proposal we can find no practical costed suggestion to restrict private car use so intensification of leisure users can only increase road congestion.

Proposal: as a council we are opposed to this development which is in conflict with Plan Policies 01, 03, 05, 06 and 08 and in conflict with our community plan policies PE3, PL1, PH5 and PR1

3. Quieter Areas and Retaining Vibrant Rural Communities

Both the existing (2010) and previous (1998) Local Plans formally protected large parts of the parish (and other areas of the Park) as ‘quiet areas’. With increasing visitor numbers, this designation is required more than ever. However, it appears this protection has simply been dropped without adequate explanation (‘we have proposed to minimise or avoid noise pollution’ is a wholly inadequate aim and only a small part of maintaining the peace and quiet of the parish) and previous requests to maintain it have been ignored.

Apart of its South-East corner (Lakeside to Newby Bridge), Colton Parish is characterised by small scattered communities, woodland and an agricultural economy. There is currently relatively little tourist activity and what there is, makes a selling point of the relative peace and quiet of this particular corner of the National Park. Please see our specific comments below in section 2 regarding our concerns of the impact of the Windermere showcase Area detailed in Policy 15.

Prior to the last Local Plan Review, parts of our parish were, as we stated above, formally classified as ‘quiet areas’. For example, the Rusland Valley and contiguous Dale Park (part of Satterthwaite Parish). This specific designation appears nowhere in the new local plan review. We assume that ~~we~~ Colton Parish remains designated as ‘open countryside’ (Plan Policy 03) but no mention is made of this fundamentally quiet rural aspect of the area. Our Community Plan demonstrates that the quiet nature of our parish is clearly highly valued by our residents as it was identified as the second greatest concern (after general support for farming with conservation of ecology and landscape). Our local tourist businesses frequently report how much their visitors appreciate the tranquillity of the area. This is supported by our Community Plan policies PE3 and PC1 PH5 and PH7

We previously noted that the Coniston Neighbourhood Plan includes policies which refer to quieter areas which are defined as “restful, tranquil areas, free of loud noise, and also natural areas with no developments.” This sets a precedent and correlates highly with our own residents’ views of the area.

We believe the desire to allow tourists to enjoy the Park must, for our parish, be at a level suitable for the local landscape and infrastructure.

We do not believe an aspiration of the plan to develop year-round tourism (Plan Policy 19) is suitable for a designated quiet area as it allows no time for the landscape and smaller roads to recover. Both are particularly susceptible to damage during the winter season due to the level of rainfall.

Proposal: our council would like to understand why this quieter area protection has been removed and would ask that it be reinstated as a designation and that LDNPA liaise with parish councils as to where these should be. This is a repeat proposal from our first response and is designed to ensure we can be confident the unique character of our parish can be maintained in line with Policy 01

4. Local Landscape Conservation and Biodiversity

Colton Parish prides itself on the work undertaken by the community and support organisations to conserve and improve the landscape for all and support Policy 05. We have a high proportion of ancient semi-natural woodlands as well as a number of SSSIs including Hay Bridge Nature Reserve.

Entities working within the Parish include Heritage Lottery Funded Landscape Conservation projects: 'Coniston and Crake Catchment Partnership' and 'Rusland Horizons'. Rusland Horizons covers the whole of Colton Parish and was one of very few community-led bids to HLF to be successful, winning a £1.3M award. This was due in huge part to the voluntary efforts of the local community.

Rusland Horizons is helping bring back local apprentice employment, traditional coppicing to restore ancient woodland and the teaching of local craft skills as well as to create opportunities for low impact tourist visits. The Greenwood trails are an example of encouraging low-impact tourist access but with appropriate parking at start and end points that limits traffic congestion. The routes are also designed around existing small tourist businesses so they can benefit from money spent.

Examples of its success for the long term beyond the project end include regular voluntary working parties managing community woods at Bouth, dry stone walling projects and meadow planting near Hay Bridge, coppicing work to restore ancient woodland, wildlife conservation work (red squirrels, dormice, butterflies and moths) and cultural heritage projects gathering local histories of working the landscape. This restores the landscape and records its heritage for locals and visitors both to enjoy as well as building community cohesion.

In its Report on the Lake District World Heritage Site Designation, ICOMOS stated: Lake District National Park Local Plan Review: Focus on Tourism 7 'The IUCN raised concern over tourism pressure and potential adverse impacts from tourism that may affect the balance of culture-nature in the Lake District, in particular erosion produced by heavily impacted walking trails in forested areas. IUCN reinforced the need for the State Party to implement long-term monitoring of tourism impacts (among other threats to the cultural landscape and specifically its natural components)'.

Our community activities outlined above would seem to us to align perfectly with the Sandford principle and the aims of the World Heritage Site designation, but which ironically is directly threatened by the National Park's own proposed Local Plan.

We believe a large increase in tourist traffic that has no appreciation of the efforts of the local community in maintaining its cultural and wildlife heritage would run counterproductive to the valuable and important work and hard effort undertaken in the past few years and is in conflict with Plan Policies 01, 05, 06, 07 and 08 as well as our Community Plan policies PE1, PE2, PE3, PE4, PL1, PL5, PS1 and PS2.

Proposal: our council would propose the reinstatement of the designation of the Rusland Valley as a 'Quiet Area' as previously so that due regard can be given to preserving the unique, largely unspoilt nature of the valley's landscape.

5. Agricultural Business Needs and Local Employment

We recognise that tourism is an important employer in the parish but it is not our major employer. The LDNPA plan must better address the need to grow and sustain permanent employment opportunities in more detail and we believe it is overly focused on tourism-related employment. Previously under South Distinctive Area policy stated CS09 3.25.3 stated 'we want to broaden the economic base by supporting a range of local employment opportunities that do not rely on the tourism industry'.

Local permanent residents are essential to pay for the services used by visitors in the Park and also contribute to the non-tourist retail economy as well as keeping alive vibrant communities. In particular we believe that the Plan needs to address how to:

- a) Ensure farms remain sustainable so jobs can be retained and the landscape managed sustainably. The farming landscape is a key attraction for visitors to the area and if the majority of farms in the area become more tourist destinations than working farms they will lose their unique character. Fields will become empty of the animals that shape the landscape that people come to visit- This unintended result will be in conflict with Policies 01, 03, 05 and 06 and our Community Plan policies PE1, PE2 and PE4
- b) Ensure that residents have the practical tools they need to live permanently in the parish including supporting wider coverage of superfast broadband and 4G to support remote working
- c) Support local, affordable housing needs

One of the key pulls for people to come and visit the Park is to see a living working landscape. It is therefore essential that the needs of local farms and rural communities are taken into account alongside the desire to share this unique landscape with visitors.

We welcome policy 20 that seeks to sustain the long-term operation of farm businesses but this deals only with rural based diversification not the need to support core farming activities.

We are very disappointed that we can only find only one actual reference in the broader strategic objective to the importance of core farming as an activity in the plan which seems wholly inadequate. This is a particularly striking omission in view of the Sandford principle and the Lake District's World Heritage Site status being awarded for its cultural landscape, produced principally through traditional farming activity.

6. Development in the National Park

LDNPA are well aware of the fact that there is a relentless upward percentage of holiday lets and second homes in the Park. This means limited availability and high house prices which prevent younger local people staying or moving into the parish. We continue to have an ageing permanent

population with consequent increased demands on healthcare and other services. Inevitably a high percentage of holiday homes and holiday lets fractures the local community. Pushing for increased year-round tourism without controls on housing ownership and use can only put additional strain on local infrastructure, drive local residents out of the area and thus degrade current sustainable local communities.

Whilst we are relieved to see that existing policies to prevent the construction of open market housing in the Park have been maintained, we are concerned that no further steps are being taken to restrict the number of second homes, nor to restrict development to smaller housing units appropriate to need in the parish (per Colton Parish Housing Surveys). Colton Parish has one of the highest proportion (30%) of second homes in the Lake District, with the consequent huge impact on the sustainability of vibrant communities and on local young families who cannot afford to live in their home area.

Proposal: at a practical level we observe that adherence to current local occupancy clauses is increasingly flouted. Homes initially converted for personal use all too often become holiday lets later. This creates further reduction in local housing stock. We would like the plan to address how local occupancy clauses can be better enforced particularly where greater visitor numbers are being suggested.

We would again invite LDNPA to consider policies PH1, PH2, PH3, PH4, PH5 and PH7 already provided from the Colton Community Plan attached to this document in the context of the wider Local Plan Review.

Farming Specific Development Issues

Over the past 10 years or so, the pressures on farming have meant that more and more farms have been sold and split up, with the main farmhouse being a residence only (often a second home) and the land being sold as separate units. This has resulted in a disaggregated patchwork of field ownership with no farmstead. The new owner then requires a form of development (for storage or shelter). This leads to the erection of temporary buildings (e.g. sheds and polytunnels) in the open countryside which are often of poor quality, brightly coloured and to the detriment of the landscape and are contrary to Policies 01, 05, 06 and 08.

We are concerned that these can lead to a basis for permanent developments through a number of years of unchallenged use. There appears to be no policy, nor enforcement action, to cover this type of creeping development in the open countryside. Indeed, the proposed policy 03 which states that conversions of barns to residential or commercial use will be supported, might well exacerbate the problem.

Farms sold in the parish are sadly often no longer of sufficient size to be commercially practical.

Proposal: Per our previous submission our council would like to see:

- (a) the rules on the placement of temporary buildings tightened up; and
- (b) proper policing of such buildings to ensure that they are removed within a reasonable timescale

Conclusion

We are both disappointed and gravely concerned that the Local Plan as written:

- a) Places too much emphasis on the tourist trade to the detriment of the landscape, wildlife, local community and employment needs
- b) Will further degrade the already fragile infrastructure in our parish
- c) Fails to explain why the 'quiet area' designations have been dropped.
- d) Does not take into account the critical need to support core farming activities that are an integral part of why people visit and love both the Park and our local parish
- e) May encourage further holiday lets and second home purchases to support additional visitors. This will inevitably impact on the retention of vibrant sustainable local communities in our parish
- f) Risks the loss of World Heritage Status if the landscape is degraded by excessive development, congestion, over-use and pollution of our lakes and waterways.

We would request that you acknowledge receipt of this document and advise us how you intend to respond to our submission.

Appendix 1 – Colton Parish Council Community Plan Policies

Policy No	Description
PE1	We will encourage and support small businesses and self-employed opportunities that are based within the parish, but with due regard to other policies
PE2	We will encourage and support local farming (and related) activity, especially where this relates to appropriate sizes of holding, traditional types of agricultural activities and primary sources of income. In general, we will discourage disaggregation of farm holdings
PE3	We will support tourist activity only if low-level and low impact, where there is capacity for such development and where it contributes to the local economy
PE4	We will encourage and support any initiatives which help to conserve crafts and skills traditional to the parish
PE5	We will encourage and support initiatives which improve electronic communications in the parish
PL1	We will support the maintenance of peace and quiet in the parish as a key principle when considering other policies, actions and planning applications
PL2	We will promote and support the development of services and community facilities, for example village halls in and around the parish
PL3	We will support the retention of services in and around the parish, particularly those on which older and more vulnerable residents rely, for example health services
PL4	We will support and encourage developments that improve communications, and seek to identify and resolve issues of social isolation
PL5	We will promote and support self-help initiatives within the parish, such as resilience planning
PL6	We will encourage the maintenance of rights of way and the potential for extensions to the footpath network within the parish
PH1	We will support the principle of LDNPA Housing Policy CS18: that ‘new dwellings’ will only be permitted where they contribute towards meeting an identified local housing need or local affordable need’, and where this need is supported by evidence in the Colton Housing Needs Surveys. However, exceptions may be made according to policy PH2
PH2	We would consider supporting the re-use or extension of existing buildings for holiday letting only purposes where a) the income supported the local economy (i.e. a person with main residence in the parish) and b) the building did not utilise a site suitable for local residential need, local affordable residential need or employment purposes (LDNPA Policy CS22a.) Exceptionally we may support proposals for holiday use where it can be demonstrated that the associated business would thereby provide significant local employment opportunities
PH3	In addition to PH1, we will consider supporting housing development only if on a small-scale, located on brownfield, ‘in-fill’ sites and not adversely impacting landscape or environment
PH4	We will encourage planning authority policies that attempt to bring second homes back into permanent use. We will support LDNPA’s initiative to restrict the number of second homes. We will also support full council tax for second homes and initiatives to turn empty homes into local need housing

PH5	We will only support other developments where they contribute to the local economy and are of an appropriate scale, having due regard to environmental and social impacts including peace and quiet
PH7	We will consider developing a Neighbourhood Plan in due course, possibly in association with neighbouring parishes and when resources allow
PH7	We will oppose year-round occupation of caravan sites in order to preserve some seasonal respite for the local community [the new policy runs totally contrary to this by aspiring to the Park being a 365 day a year attraction]
PR1	We will continue to press for improvement in the condition of Colton's rural road network, including 'green lanes' (UUCRs and BOATs)
PR2	We will continue to press for improved winter maintenance of roads in the parish
PR3	We will press for speed monitoring and speed reduction measures on highway 'black spots'.
PR4	We will encourage the provision and use of public transport and community transport schemes in the parish in relation to demand for these services
PS1	We will encourage and support appropriate local initiatives which will increase sustainable living (including reducing energy use, sourcing local produce and recycling)
PS2	We will encourage and support community based 'share-schemes' which will benefit sustainable living
PS3	We will encourage and support appropriate 'green energy' development in the parish, particularly those that benefit the community and that are sensitive to local conditions, having due regard for the potential impact on landscape, peace and quiet, environment and wildlife