

Lake District National Park Authority
Murley Moss
Oxenholme Road
Kendal LA9 7RL

By email to: thirlmereactivity@lakedistrict.gov.uk

20 December 2017

Dear Sir/Madam

Response from the Campaign for National Parks to Application ref: 7/2017/2298

Proposal - Thirlmere Activity Hub: Development of a zipwire attraction, a series of improvements to the round Thirlmere cycleway, improvements to car parks, access paths and the extension and development of an existing toilet block to provide reception, changing area and toilet facility

Campaign for National Parks is the independent national voice for the 13 National Parks in England and Wales. Our mission is to inspire everyone to enjoy and look after National Parks – the nation's green treasures.

We object to the application to develop a zipwire attraction and related activities on land at Thirlmere. The proposal is in conflict with the statutory purposes of the National Park and is contrary to a number of the National Park Authority's planning policies. We discuss each of these concerns in more detail below.

The proposal will have a major impact on the beauty and tranquility of a location which is considered to be the birthplace of the conservation movement. In addition to the impacts of the development itself, there would also be problems associated with increased traffic on local roads and the lack of adequate parking. We have particular concerns about the proposal to site zipwires east-west across Thirlmere as this will have a major visual impact on the area.

In principle, we would support the improvements to the cycleway. However, we do not believe that the benefits associated with this justify the negative impacts of the zipwires.

We are also extremely concerned that allowing this development to go ahead could lead to further applications for related development in Thirlmere. By calling it an 'Activity Hub' the applicants give the impression that there will be a range of different activities on offer which suggests that they have plans to propose other activities on the site and related development such as shop(s) and café(s). Furthermore, approving this application would set a precedent for further commercial activity not only in this valley, but elsewhere in the Lake District and in other National Parks. Development of this nature is completely inappropriate in a protected landscape.

Conflict with National Park purposes

National Parks are the finest landscapes which have been granted the highest level of protection. The statutory purposes of National Parks 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 Parks.

In pursuing these purposes, National Park Authorities (NPAs) also have a statutory duty to seek to foster the economic and social well-being of communities living within the National Park. The *Environment Act 1995* also states that in those cases where there is a conflict between the purposes and reconciliation proves impossible, the first purpose should take precedence. This is known as the Sandford Principle.

The development of the proposed Activity Hub would completely destroy the tranquillity of the Thirlmere Valley and would cause significant harm to the landscape of this area so is clearly in conflict with the National Park's first purpose. While we recognise the need to ensure that more people are able to enjoy the special qualities of National Parks, we do not believe that the introduction of an intrusive commercial development is the appropriate way to do that. The activities provided will only be available to those who can afford to participate in adventure experiences and, importantly, will detract from the special qualities of the area that currently attract people to go walking and cycling in the valley, including the tranquillity and the lack of modern development. For these reasons, we believe that the proposal is also in conflict with the National Park's second purpose but even if it were not, application of the Sandford Principle means that the conflict with the first purpose alone is sufficient justification for refusing consent. There is also a risk that the proposal could have a detrimental impact on the economy of the National Park if it deters tourists from visiting the area.

National Park Authority planning policies

The planning application documents include details of the advice from the NPA's planning officers to the applicants (Planning advice statement no. 2). In the words of that document: "A case has not been made that the proposal would satisfy policy as a matter principle." In other words, the proposal is contrary to a number of the NPA's planning policies. The specific policies in the Lake District National Park Core Strategy referred to in the planning advice are:

- CS02: Achieving vibrant and sustainable settlements (this seeks to restrict development in the open countryside);
- CS24: Delivering sustainable tourism; and
- CS25: Protecting the spectacular landscape.

We agree with this assessment. In addition, we would like to highlight a number of other policies from the Core Strategy which we believe the proposal is in conflict with:

- CS01: National significance and distinctive nature of the Lake District. This makes it clear that the NPA will only support development proposals which are consistent with the National Park purposes and duty and which conserve and enhance the special qualities of the Lake District National Park. As set out above, this proposal is clearly contrary to the statutory purposes of the National Park and would be detrimental to its special qualities.
- CS04: North distinctive area. This makes it clear that the only proposals that will be supported in open countryside in this part of the Lake District are ones that meet identified housing needs and small scale proposals to diversify the rural economy, particularly farm diversification schemes. It also places a strong emphasis on strengthening the landscape character of the area. As this proposal does not fall into either of the categories of development that are supported in open countryside and would be damaging to the landscape of Thirlmere Valley, it is contrary to this policy.

- CS11: Sustainable development principles. This calls for all development to be designed and carried out in a way that avoids adverse effects on the special qualities of the National Park. As set out above, this proposal would damage the special qualities of the National Park so is contrary to this policy.

In summary, we object to this planning application for the reasons set out above and urge the National Park Authority to refuse planning permission for it.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Ruth Bradshaw', written in a cursive style.

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