



**STANWIX RURAL PARISH COUNCIL**

## **RESPONSE TO CONSULTATION IN RESPECT OF:**

**Appn Ref: 25/0313**

**Location: Land South of Ellengrove, Linstock, Carlisle, CA6 4QD**

**Proposal: Erection Of 10no. Dwellings & Associated Infrastructure**

### **OBJECTION**

**This response constitutes the Parish Council's objection to the above application for planning consent.**

**The Parish Council reserves the right to amend its response, and to submit any supplementary comments, observations or recommendations that it may consider necessary.**

**The Parish Council reserves its right to speak at the Planning Committee and or any other committee, sub-committee or working group of Cumberland Council where that right may be exercised.**

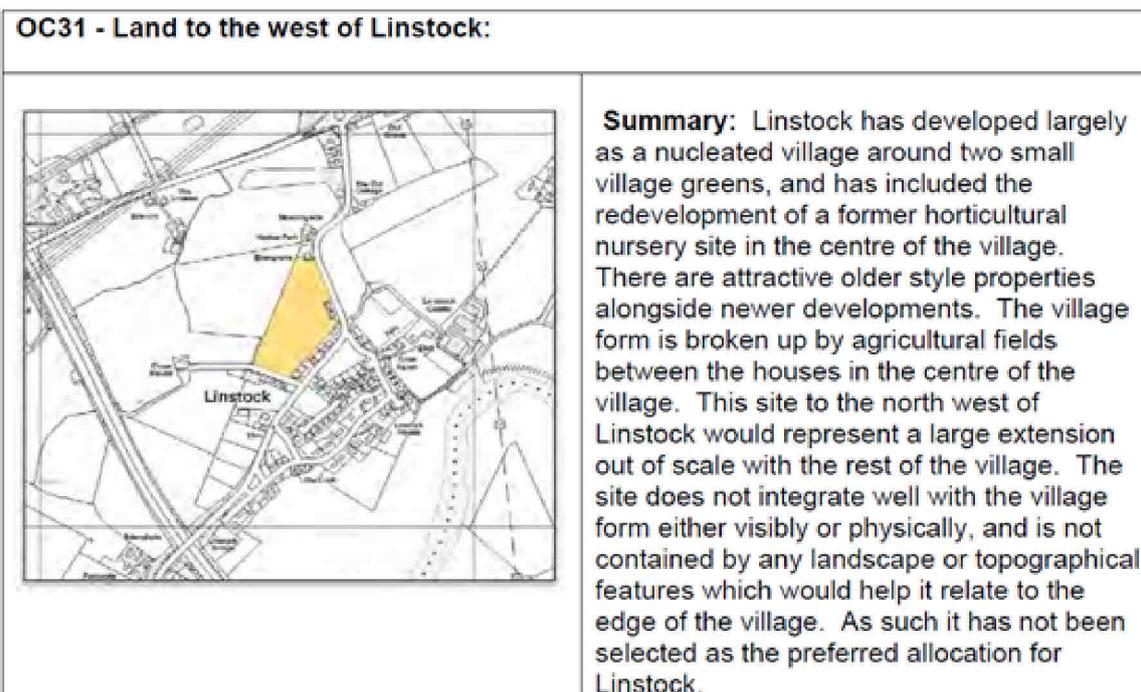
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**Location:** Land South of Ellengrove, Linstock, Carlisle, CA6 4QD  
**Proposal:** Erection Of 10no. Dwellings & Associated Infrastructure

1. In considering this application and its potential impacts on the settlement, it is important to first ascertain the status of Linstock, as a village or a hamlet. The application refers to Linstock as a village whereas it is more correctly defined as a hamlet.
2. In this the Parish Council cites Planning Appeal Ref: APP/B3438/W/18/3211000 - Land off Tongue Lane, Brown Edge ST6 8UH; similarly concerning infilling development in the hamlet of Ridgeway. Inspector Andrew McGlone BSc MCD MRTPI, relied upon the Oxford Dictionary definition, stating: *'The Oxford Dictionary defines a village as a group of houses and associated buildings, larger than a hamlet and smaller than a town, situated in a rural area. It defines a hamlet as a small settlement, generally one smaller than a village, and strictly (in Britain) one without a Church.'*
3. As Linstock has no facilities or amenities other than the Women's Institute Hall, it certainly embraced by the Oxford Dictionary definition of a hamlet.
4. **NOTE: When referring to Linstock, this submission uses the 'Village' as the descriptor only when quoting others. In all other cases the term 'Hamlet' is more correctly used by the Parish Council.**
5. Planning law requires that applications for planning permission be determined in accordance with the development plan. All decisions on planning applications should be made in accordance with the policies and proposals in the plan unless there are strong material considerations that indicate otherwise.
6. *'A Development Plan consists of planning policies relating to a variety of land uses (e.g. housing, employment, retail, minerals and waste) which and to provide protection from development where necessary (e.g. for environmental safeguarding).'* [2.1 Cumberland Consolidated Planning Policy Framework March 2025]
7. *'Until the new Development Plan for Cumberland is prepared and subsequently adopted, the planning policy documents prepared by the former authorities will combine to form the Consolidated Planning Policy Framework for Cumberland.'* [1.4 Cumberland Consolidated Planning Policy Framework March 2025]
8. The Carlisle District Local Plan 2015-2030 therefore remains in force until superseded by the Local Plan for Cumberland currently under development – not expected to be

9. adopted before March 2028. [Cumberland Local Development Scheme (LDS) 2025 - March 2025 to March 2028]
10. Policies in the CDLP which *'Seek to guide development to the most appropriate locations and to provide protection from development where necessary'* [Para. 2.1 Cumberland Consolidated Planning Policy Framework, March 2025]; have been subject to extensive scrutiny and *'assessed against SA (Sustainability Assessment) objectives, to determine the likely effects of the policies and any reasonable alternatives.* [Final Inspectors Report on The Examination Into the CDLP, para 16]
11. *'The conclusion of the SA is that the CDLP is robust in terms of its sustainability and that its policies provide certainty and clarity.'....'I am satisfied that the SHMA [Strategic Housing Market Assessment] provides a robust and justified evidence base for the plan's housing provisions.'* [Final Inspectors Report on The Examination Into the CDLP, paras. 16 &28]
12. Having been *'assessed to determine the likely effects'* and, *'any reasonable alternatives.'*; and seeking to *'guide development to the most appropriate locations'*. Policy HO 1 - Housing Strategy and Delivery, of the Carlisle District Local Plan 2015-2030 (CDLP), includes a table setting out 20 Urban Sites and 20 Rural Area sites allocated for housing. These sites are detailed at Appendix 1, of the CDLP, which provides individual site profiles, alongside some of the primary issues associated with them.
- 13. Nowhere in the tables, or indeed anywhere else in the CDLP, is any site allocated for housing development in Linstock.**
14. The applicant's Planning and Affordable Housing Statement (P&AHS) notes comments regarding the site, then identified as OC31, contained in Carlisle City Council's Strategic Housing Land Availability Assessment – December 2014, which states *'Not yet established whether Linstock will be allowed growth in the Local Plan. Future policy may rule this site out. Scale of acceptable development in village will be limited.'*
15. Despite acknowledging that: *'there are limited services in the village which comprises of the village hall;'*, the P&AHS asserts that the unallocated site is located in a sustainable location, and *'would maintain and potentially enhance the vitality of the community.'*
16. The following submission clearly demonstrates that this is belief is far removed from reality. It is also important to note that the *'village hall'* referred to in the P&AHS is not actually a village hall, but a privately owned Women's Institute Hall.

17. The proposal site, indicated by the red line boundary of the Location Plan, formed a significant part of a discarded site omitted from the CDLP following its Preferred Options Stage 2 Consultation, when it was considered as only as an alternative option, 'OC31 - Land to the west of Linstock'.
18. Site OC31 was assessed, 'against a standard range of factors including location; landscape impact; biodiversity; impact on heritage assets; highways issues; flooding; other deliverability issues such as ownership; etc.', [Carlisle District Local Plan 2015-2030 Preferred Options Consultation- Stage Two Spring 2014]. The Stage 2 Consultation then states of OC31: 'This site to the north west of Linstock would represent a large extension out of scale with the rest of the village. The site does not integrate well with the village form either visibly or physically, and is not contained by any landscape or topographical features which would help it relate to the edge of the village. As such it has not been selected as the preferred allocation for Linstock. – Figure 1 below.
19. Although the current application site, of 1 Ha, is smaller than OC31 of which it forms part, it proposes the same number of dwellings, i.e. 10, as did the Strategic Housing Land Availability Assessment (SHLAA) update September 2012 – Figure 2 below. The SHLAA update notes, of the site: '**Not yet established whether Linstock will be allowed growth in the Local Plan. Future policy may rule this site out. Scale of acceptable development in village will be limited.**' [Emphasis added]

**Figure1:** Extract of Carlisle District Local Plan 2015-2030 Preferred Options Consultation- Stage Two Spring 2014



**Figure 2: Strategic Housing Land Availability Assessment (SHLAA) update Sept 2012**

Ref	Site	Street	Settlement	Area (Ha)	Deliverable Capacity	Developable Capacity	Type	Comment
OC31	South Ellengrove		Linstock	3.24	10		Green	Not yet established whether Linstock will be allowed growth in the Local Plan. Future policy may rule this site out. Scale of acceptable development in village will be limited.

20. The 10 dwellings now proposed would inevitably generate exactly the same environmental and social impacts on the hamlet and it's community as the 10 given exhaustive consideration when assessing the site OC31 *'against a standard range of factors including location; landscape impact; biodiversity; impact on heritage assets; highways issues; flooding; other deliverability issues such as ownership; etc.'* [CDLP Stage 2 Consultation]
21. Development of the site currently proposed by Appn Ref 25/0313 would therefore remain inappropriate to the character of Linstock, through its failure to *'integrate well with the village form either visibly or physically,'*. Nor would it be any more *'contained by any landscape or topographical features which would help it relate to the edge of the village.'* [Stage 2 Consultation].
22. Policy HO 1 - Housing Strategy and Delivery requires developers to demonstrate that their proposals contribute *'...the development of mixed and sustainable communities'*.
23. The applicant's Design & Access Statement (D&AS) identifies Linstock a small *'village'*, *'with a mix of agricultural land and green spaces that contribute to its picturesque setting'*. The proposed development would infill one of these agricultural spaces that currently provides a valuable natural break between the hamlet's centre, around the green, and the few dispersed dwellings to the north along the C1015. It's occupation by housing development would be significantly prejudicial to the hamlet's picturesque setting mentioned in the D&AS.
24. The D&AS also states: *'Linstock is a small hamlet with no shops or many amenities, although it does have a small hairdressers, but is handy to local villages.'* The amenities offered by these *'handy'* local villages are situated in Houghton over 2 miles distant via the B6264 or A689; or at Crosby on Eden again 2 miles distant via the A689 and U1118. In the absence of direct public transport links, reaching each destination from the proposal site requires the use of a handy private motor vehicle, a handy 10-15 minute bicycle ride, or a handy 45 minute walk. The Parish Council has no knowledge of a hairdressers in Linstock, or of any consent for the operation of such a business.
25. The closest GP surgery, dental surgery and pharmacy are approximately 3 miles distant and have no direct public transport link to Linstock.

26. The D&AS refers to 2 bus services, the 680A and BR1. The 680A is operated by Telford’s Coaches on Mondays and Wednesdays only. The stop referred in the D&AS as at Old Grove, lies 110m east of the Linstock roundabout, almost 600m from the proposal site and requires users to cross the very busy A689. A further westbound stop lies on the B6264, 80m west of the A689 Linstock roundabout, approximately 560m from the site.

27. These stops, neither of which has a shelter, are subject to significant traffic spray in wet weather and are not listed on the timetable shown on the operator’s website Figure 3 – below. The above 680A service days and approximate times were confirmed by Telford’s in an email, of 24/09/2025, to the Parish Council, which stated: *‘This service still runs on a Monday and Wednesday, the time for Crosby is 10:30 so just after that and the return is leaving West Tower Street at 12:50 and Crosby at 13:00 so just before then.’*

**Figure 3: 680A Extract Bus Service Timetable – Telford’s Coaches Website Sept 2025**

Monday and Wednesday					
Brampton, Market Place	10:20	14:55	Carlisle, West Tower Street	*	12:50
Crosby-on-Eden	10:30	*	Crosby on Eden	*	13:00
Carlisle, West Tower Street	10:40	*	Brampton, Market Place	08:35	13:10

**28. The only public bus service to stop in the Linstock is the BR1, Border Rambler. This is a community service operated by volunteers which serves the hamlet only on Tuesdays and Fridays, departing Linstock for Carlisle at 10:55 and returning at 14:15.**

29. In consideration of the above the proposal is clearly non-compliant with the sustainability objectives of Policy HO1, in that it fails: *‘to promote sustainable growth’* and/or to provide *‘good access to existing services and public transport’*.

30. The applicant’s Planning and Affordable Housing Statement refers to Policy HO2 – Windfall Housing Development. Although this policy identifies several settlements by name Linstock is not one of them.

31. It has been clearly shown above that the site has been assessed by the LPA *‘against a standard range of factors including location; landscape impact; biodiversity; impact on heritage assets; highways issues; flooding; other deliverability issues such as ownership; etc.’* [CDLP Stage 2 Consultation]. These assessments found that *‘The site does not integrate well with the village form either visibly or physically, and is not*

*contained by any landscape or topographical features which would help it relate to the edge of the village.'*

32. This assessment of the unallocated site being part of the evidence base described as *'robust and justified'* in the Inspectors Final Report, which also found that CDLP Policies *'provide certainty and clarity.'*

The proposal is therefore patently at odds with Policy HO2 – Windfall Development, of the CDLP, in that (based on the policy's criteria):

- the scale and design of the proposed development are inappropriate to the scale, form, function and character of the existing settlement;
- the development fails to enhance or maintain the vitality of the of the rural community within the settlement where the housing is proposed;
- the site is not well contained within existing landscape features, fails to integrate with, the settlement leading to an unacceptable intrusion into open countryside;
- there are no services in the hamlet where the housing is being proposed, nor is there good access to services within other settlements.

33. Policy HO2 further states: *'Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community.'* However, it must be noted that no level of community engagement has been entered into by the applicant.

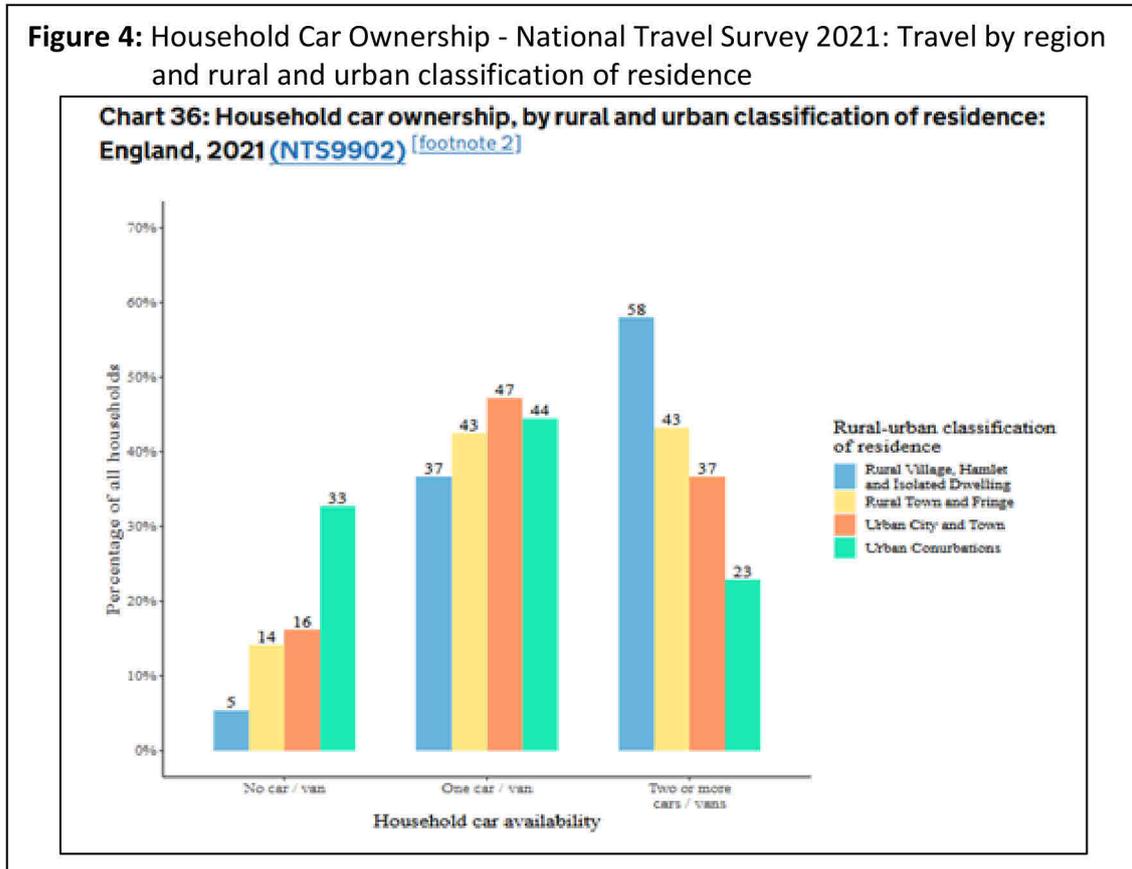
34. Policy SP 1 - Sustainable Development states: *'When considering development proposals Carlisle City Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF).'*

35. In turn, the NPPF states at that planning decisions should take into account: *'the availability and capacity of infrastructure and services, both existing and proposed – as well as the scope to promote sustainable travel modes that limit future car use.'* And: *'the desirability of maintaining an area's prevailing character and setting'* [NPPF 129]. It further states that applications for development should *'give priority to pedestrian and cycle movements'*; and facilitate, *'access to high quality public transport, encourage public transport, and appropriate facilities that encourage public transport use'*.

36. The Proposal has clearly been shown to be almost entirely reliant on private car use, even to access 'local' amenities. The *'availability and capacity of infrastructure and services'* local to the site is non-existent or, at best, severely limited; it has no scope whatsoever for promoting *'sustainable travel modes that limit future car use.'*; and is incapable of *'maintaining'* the area's *'prevailing character and setting'*. The proposal is therefore contrary to the principles of sustainable transport outlined in the NPPF.

37. Policy SP 6 - Securing Good Design, states that proposals should *'respect local landscape character; ensure a scheme which is attractive and well integrated with its surroundings.'*; and *'respect local character and distinctiveness'*. It has been shown above that development of the site would *'not integrate well with the village form'*, which is *'broken up by agricultural fields between the houses in the centre of the village.'* [Stage 2 Consultation]
38. The proposal is, therefore, patently contrary to Policy SP 6, Securing Good Design, of the CDLP.
39. Policy IP 2, Transport and Development, of the CDLP states: *'Development likely to generate significant levels of transport within isolated and poorly accessible areas will be resisted unless a clear environmental, social or economic need can be demonstrated.'* And that new development will be required to: *'take opportunities to contribute to the creation and enhancement of an integrated and continuous sustainable transport network.'*
40. It further states: *'Travel Plans and Transport Assessments: Development which through Reference to national guidance requires the submission of a Transport Assessment and/or Travel Plan, should, in addition to responding to national guidance, demonstrate how:*
- 2. the development will help to reduce the need to travel, particularly by private motor car;*
  - 4. the site will safely and conveniently connect to public and green transport routes, and contribute to creating a multifunctional and integrated green infrastructure network;'*
41. Appendix 3 of the Cumbria Development Design Guide specifies the thresholds for Travel Plans and Transport Assessments stating, under the heading Other Considerations: *'Any development proposed in a location where the local transport infrastructure is inadequate for example, substandard roads, poor pedestrian/cyclist facilities and inadequate public transport provisions.'*
42. The proposal site has been shown to be poorly accessible by public transport and no clear environmental, social or economic need can be demonstrated. The proposal will not *'help to reduce the need to travel, particularly by private motor car'*, and fails to *'safely and conveniently connect to public and green transport routes'*. The development is, however, proposed for a location with *'inadequate public transport provisions.'*; and which fails to *'contribute to creating a multifunctional and integrated green infrastructure network'*.

43. The Application Form states that parking for 20 vehicles will be provided. However, The National Travel Survey 2021: Travel by Region and Rural and Urban Classification of Residence, 31 August 2022, shows that 58% of households living in rural villages, hamlets and have 2 'or more' cars, while 43% of households in a rural town, or fringe, also have 2 'or more' vehicles [Figure 4, Survey Chart 36 - below].

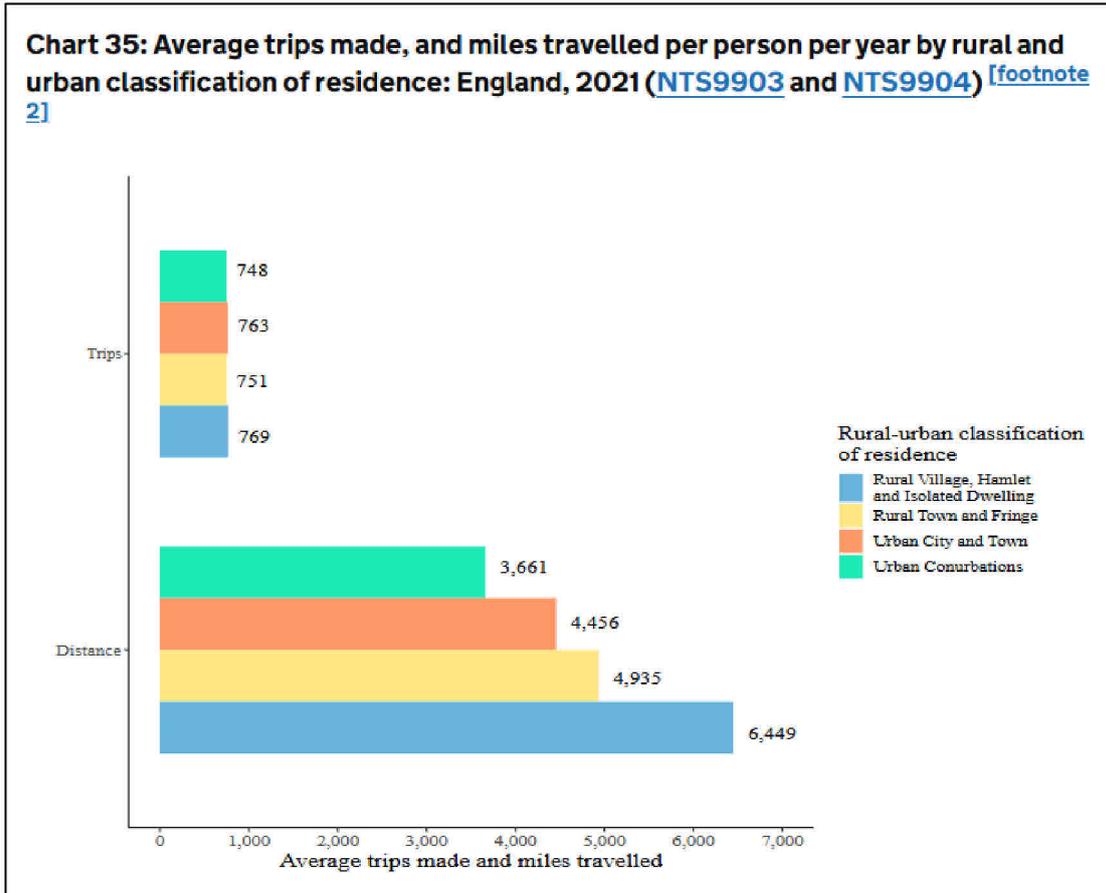


44. The application form proposes 5 x 2 bedroom dwellings and 5 x 3 bedroom dwellings. All 3 proposed dwelling types show all bedrooms as being double. A total development occupancy of 60 persons is therefore possible.

45. The National Travel Survey shows that on average a person living in a rural villages or hamlets makes 769 trips per year, while those resident in a rural town or fringe make 751 trips per year [Figure 5, Survey Chart 35 - below]

46. In view of the paucity of public transport, and using only the lower figure and as few as 45 additional residents, the proposal could therefore generate an absolute minimum increase in Annual Average Daily Flow (AADF) of 33,795 vehicle movements in Linstock. This does not include trips by any additional household vehicles, visitors or service/delivery vehicles.

**Figure 5: Average Trip Generation - National Travel Survey 2021: Travel by region and rural and urban classification of residence**



47. No attention is paid in application documents to traffic generation; its impact on the hamlet; or the quality of life of the existing community. Therefore In consideration of potential impacts of an additional 33,795 vehicle movements, the requirements of Policy IP2 of the CDLP, and of Appendix 3 of the Cumbria Development Design Guide, a Transport Assessment is therefore required.

48. It has been shown above that the site has been fully and robustly assessed, by the LPA and public examination, through several stages of detailed appraisal over a period of several years.

49. This process found the site to be out of scale with the rest of the hamlet, and not well integrated with its form, either visibly or physically; and not contained by any landscape or topographical features which would help it relate to the edge of the hamlet it was ultimately discarded and omitted from the CDLP.

50. In consideration of the foregoing examination the Parish Council holds the view that the proposal is contrary to:

- Policy HO1 Housing Strategy and Delivery, in that it fails to:
  - to promote sustainable growth and/or to provide 'good access to existing services and public transport, and or;
  - contribute to the development of a mixed and sustainable communities within the hamlet.
- Policy HO2 – Windfall Development, in that:
  - the scale and design of the proposed development are inappropriate to the scale, form, function and character of the existing settlement;
  - the development fails to enhance or maintain the vitality of the of the rural community within the settlement where the housing is proposed;
  - the site is not well contained within existing landscape features, fails to integrate with, the settlement leading to an unacceptable intrusion into open countryside;
  - there are no services in the hamlet where the housing is being proposed, nor is there good access to services within other settlements.
- Policy SP 1 Sustainable Development, in that:
  - the Proposal is almost entirely reliant on private car use, even to access 'local' amenities; and
  - would generate a significant increase, 33,795 or higher, in vehicle movements through the hamlet.
- Policy SP 6 - Securing Good Design, in that:
  - it would not respect local landscape character or integrate well with its surroundings; or
  - integrate well with the village form, which is broken up by agricultural fields between the houses in the centre of the village.
- Policy IP 2, Transport and Development, in that:
  - it will generate significant levels of private transport;
  - no environmental, social or economic need can be demonstrated;
  - *it increases rather than reduce the need for travel by private motor car;*
  - *it fails to connect safely and conveniently to public transport routes.*
- The Sustainable Transport Objectives of the NPPF, in that:
  - the location is almost entirely reliant on private transport. This high car dependency increases rather than limits future car use and fails to limit the need to travel, or offer a genuine choice of transport modes; and that
  - it fails to minimise the scope for conflicts between pedestrians, cyclists and vehicles, by generating a significant increase in motor vehicle movements directly onto Hadrian's Cycleway, National Cycle Route 72;

The Parish Council therefore objects to the proposal and strongly recommends that consent be refused.