

St Cuthbert Without Parish Council

Parish Clerk: Nick Phillips

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Minutes of the St Cuthbert Without Parish Council meeting held on Thursday 24 September 2026 at 7.30pm at Wreay Village Hall.

Present: I Stewart (Chair), S Bird, M Bowman, B Graham, C Rutherford, M Turnbull,

Also present: N Phillips (Clerk/RFO), Cumberland Councillors Gareth Ellis and Josh Kirkwood, 32 members of the public one member of the press

Minutes

52. **APOLOGIES FOR ABSENCE** - received apologies and approved reasons for absence From Cllrs Reed, Nanson, Stringfellow, Bradford, Wallace and Hayton.
53. **MINUTES OF THE COUNCIL MEETING held on 23 July 2026** - authorised the chair to sign, as a correct record, the minutes of the meeting held on 23 July 2026.
54. **DECLARATIONS OF INTEREST/REQUESTS FOR DISPENSATION**
 - a. Register of Interests: Councillors are reminded of the need to update their register of interests
 - b. To declare any personal interests in items on the agenda and their nature
 - c. To declare any prejudicial interests in items on the agenda and their nature (Councillors with prejudicial interests must leave the meeting for the relevant items) Cllr Bird and Turnbull declared that they had been present at external meetings where application 26/0497 had been discussed.
 - d. To make any requests for dispensation
55. **Exclusion of Press and Public (Public Bodies Admission to Meetings Act 1960)**

To decide whether there are any items of business which require exclusion of the press and public
56. **PUBLIC PARTICIPATION** one member of the public attended as the representatives of the applicant for 26/0497 and made the following points: Explained the background to the scheme, the application has now been submitted and the applicant is already responding to comments made by consultees at earlier stages, for example an alternative route for vehicles. The application is for a 49.9 MW solar farm. They understand the main issues that concern residents to be loss of farmland, traffic (which will be during the construction phase only) and they are looking to have alternative routes to minimise the disruption and or improve the roads as mitigation. They understand the landscaping issues that are concerning residents and will look to implement earlier screening measures if possible.

A number of members of the public attended to voice their objections to the application and made the following points via spokespeople: the local residents have had 3 years of disruption due to the CSLR construction and this project would mean an additional two years. That the application was for a green field site rather than brownfield as per national guidelines. They were concerned that it was not likely to be returned to greenfield site at the end of the project despite assurances from the applicant. The area was seen as Carlisle's green belt when the Garden Village is built. Amenity issues including glare from panels and loss of biodiversity were raised. They stated that this was not just an emotional response but a concern about loss of amenity and the change in the local landscape. There

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was an understanding that solar energy and other renewable sources are needed but there was a feeling that this was not the correct location and combined with the potential construction disruption had resulted in the strong feelings evident at the meeting. There was also a human cost for people in the village.

Concern was raised that this would be a development on agricultural and grazing land and the resulting loss of food security. The suitability of the road infrastructure. The roads regularly flood and the increased speed of run off from the panels may exacerbate this. The Impact on wildlife including Curlews and Hares. There has already been a loss of agricultural land for the CSLR and the planned garden village.

The road width of the lanes through Burthwaite are unsuitable for large goods vehicles and they claimed a higher possibility of safety issues arising due to an increase in heavy vehicle usage. Verge damages have already occurred where large vehicles have had to mount the verge to pass each other and there is a lack of pavement along the road and therefore the issue of the possibility of pedestrians having to share the carriageway with large vehicles. The loss of residential amenity due to traffic issues, noise, pollution etc. Walking routes in the countryside will be lost. A concern was raised about whether the existing grid would be able to take the power generated.

57. **CUMBERLAND COUNCILLOR REPORTS**—received the following items for information Cllr Ellis: spoke about the expansion to the National Grid and how option B might become an issue and whether the Parish Council might be involved with Wetheral Parish Council to form and opposition to the plan.. Cllr Kirkwood highlighted the issues of E-bikes in the area and is working with the Police to tackle the issue.

58. **POLICE MATTERS** —resolved not to submit any matters to the Local Focus Hub.

59. PLANNING APPLICATIONS -

- a. resolved to submit d observations on the following applications as detailed

26/0497	Land at and to the south west of Greenlands Equestrian Centre, Wreay, Carlisle, CA4 0PY	Erection Of A Solar Photovoltaic Farm With A Generating Capacity Of Up To 49.9MW, Together With Associated Infrastructure & Landscaping
The Parish Council objects to the application on the following grounds – Loss of best and most versatile land Landscape and local amenity including visual effects, glare and noise and other disturbances during the construction phase. There was also the concern about loss of habitat and hedgerows and trees, use of narrow rural lanes for construction traffic along with a lack of information regarding heritage assets and buried archaeology. (The full response is attached as an addendum to these minutes.)		
26/0502	Ravenside Lodge, Wreay, Carlisle, CA4 0RJ	Change Of Use Of Former Dog And Cat Boarding Kennels To 4no. Holiday Let Units
Supportive as improves the rural economy.		

- b. noted the following applications that were delegated to the Clerk for decision following consultation with councillors and the comments below made online.

26/0424	401 Durdar Road, Carlisle, CA2 4TR	Erection Of Single Storey Side Extension To Provide Utility Room, W.C. & Double Garage/Workshop	No observations
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- c. To Note the following applications were granted approval

26/0424	401 Durdar Road, Carlisle, CA2 4TR	Erection Of Single Storey Side Extension To Provide Utility Room, W.C. & Double Garage/Workshop
26/0141	Eden Valley Hospice, Durdar Road, Carlisle, CA2 4SD	Redevelopment Of Existing Disused Greenfield To Provide New Sensory Garden & Staff Car Parking Bays

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26/0288	Howgill Farm, Carleton, Carlisle, CA4 0BS	Change Of Use Of Agricultural Building To Use Class B2/B8
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60. FINANCE

a. Payments- authorised schedule of payments totalling £6074.90 (VN 33-46)

VN	Inv. Date	PAYEE	CHQ. NO/ Ref no	Purpose of Expenditure	AMOUNT £	VAT INCLUDED £	NET AMOUNT £
Already paid							
36	22/07/2026	SSE Energy Solutions	0	Footway lighting	41.27	2.06	43.33
33	30/07/2026	Green Team Garden Services	00000750	Grass contract	380.00	76.00	456.00
37	22/08/2026	SSE Energy Solutions	0	Footway lighting	45.82	2.29	48.11
34	01/09/2026	Royal mail	Reimburse N Phillips	PO Box	416.50	83.30	499.80
35	02/09/2026	Green Team Garden Services	00000832	Grass contract	380.00	76.00	456.00
To be paid							
38	25/09/2026	Parish Noticeboard Company	12886	Noticeboards	1,165.00	233.00	1,398.00
46	25/09/2026	Moore	52257/979	Audit	210.00	42.00	252.00
42	25/09/2026	Nick Phillips	0	Expenses	20.80	0.00	20.80
40	25/09/2026	Nick Phillips	0	Salary	1,112.12	0.00	1,112.12
39	25/09/2026	HMRC	0	PAYE	467.93	0.00	467.93
41	30/09/2026	Unity Trust Bank	0	Bank charges	7.00	0.00	7.00
44	26/10/2026	Nick Phillips	0	Salary	941.33	0.00	941.33
43	26/10/2026	HMRC	0	PAYE	365.48	0.00	365.48
45	31/10/2026	Unity Trust Bank	0	Bank charges	7.00	0.00	7.00

- b. **Monthly reconciliation (July and August 2026) –received and noted** the reconciliation and balances checked by Cllr Stringfellow.
- c. **Monthly budget update- received and noted**
- d. **Receipt –noted** receipt from Church Commissioners R05, Grass cutting, £1241.
- e. approved change to bank mandate for address details change
- f. noted that the annual pay award has been agreed and therefore will result in changes to the Clerk's October pay and HMRC payment.

61. **HIGHWAY MATTERS:** Received the following information for the clerk to report: A request for a footpath outside the village hall in Wreay. Drains in Wreay and on The Coppice need to be emptied.

62. Autospeedwatch reports- received the latest figures from the roadside cameras.

63. External Audit –noted that the audit has now been completed and has been provided for members and uploaded to the website.

64. Clerk and Councillors' reports/items for future agenda

Bus Stop on Cumwhinton Drive – to note that the land owner is currently unable to provide permission as they are conducting internal reviews but will re examine the proposal at a later date.
Planning meeting – new national rules mean that more applications will be determined by officers rather than planning committees and the ability to request an application is determined by committee has been lost.

Grit Bins on The Coppice- still need replenishing.

Adoption of Cumwhinton Drive and the Coppice – where are we – a question for Cllr Kirkwood

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65. Date of next meeting

The next meeting of the Parish Council will take place on Thursday 26 November 2026 in Carleton Day Centre at 7.30pm.

Agenda items to be submitted to the Clerk by 12 noon on 12 November 2026.

meeting ended at 21.10

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ST CUTHBERT WITHOUT PARISH COUNCIL

Formal Planning Objection – Application 26/0497

Proposal: Erection of a solar photovoltaic farm with a generating capacity of up to 49.9MW, together with associated infrastructure and landscaping

Site: Land at and to the south-west of Greenlands Equestrian Centre, Wreay, Carlisle, CA4 0PY

Application: 26/0497

St Cuthbert Without Parish Council wishes to submit a **formal objection** to planning application 26/0497.

The Parish Council recognises the important contribution that renewable energy can make towards reducing greenhouse gas emissions and improving energy security. However, support for renewable energy does not remove the requirement for individual developments to be appropriately located, properly designed and capable of being accommodated without unacceptable environmental, landscape, highway, heritage, drainage or amenity impacts.

The application is for a very substantial development, with a generating capacity of up to **49.9MW**, and the application documentation confirms that the proposal includes extensive solar arrays together with associated infrastructure, fencing, CCTV, substations, access infrastructure and landscaping. The Council considers that the scale and location of the development give rise to significant adverse impacts which have not been demonstrated to be capable of being satisfactorily addressed.

The Parish Council therefore objects to the application for the following reasons.

1. Principle and Location of the Development

The Parish Council accepts that renewable energy is supported in principle by both national and local planning policy.

However, the adopted Carlisle District Local Plan does **not** provide an unconditional presumption in favour of renewable energy development. Policy CC1 requires renewable energy proposals to identify and thoroughly appraise their individual and cumulative effects and demonstrate that associated impacts are, or can be made, acceptable.

Policy CC1 specifically requires consideration of:

- visual impact arising from the scale of development;
- the character and sensitivity of the immediate and wider landscape;
- the historic environment and its setting;
- local amenity;
- noise and other nuisance;
- the effect on highway infrastructure;
- accessibility and suitability of the road network; and

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- appropriate removal of structures and restoration of the site when it becomes non-operational.

The policy also expressly recognises the need to consider **cumulative effects**.

The Parish Council considers that these requirements are particularly important in this case because of the scale of the proposal and its location within an open rural landscape.

The fact that the development would generate renewable electricity is therefore a significant consideration, but it must be weighed against the identified and evidenced adverse effects of the particular proposal.

2. Best and Most Versatile Agricultural Land

The Parish Council has significant concerns regarding the proposed use of agricultural land, including land identified as **Grade 3a**, which falls within the definition of Best and Most Versatile (BMV) agricultural land.

The current national framework defines BMV agricultural land as Grades **1, 2 and 3a**. The NPPF requires planning decisions to recognise the economic and other benefits of BMV agricultural land, while current Government guidance states that, where development of agricultural land is necessary, areas of poorer-quality land should be preferred to higher-quality land.

The Government's current Solar Roadmap similarly states that planning protections for BMV agricultural land should be maintained and that, where agricultural land is required, lower-quality land should be preferred.

The application includes an **Agricultural Land Classification & Soil Resource Assessment**, together with a substantial number of appendices.

The Parish Council therefore considers that the applicant should be required to demonstrate clearly:

1. why the use of this land is necessary;
2. what alternative sites involving lower-grade agricultural land were considered;
3. whether previously developed, brownfield, industrial, commercial or other non-agricultural locations were considered;
4. why those alternatives were rejected; and
5. what measures will be taken to protect the soil resource throughout construction, operation and decommissioning.

The Council does **not** consider the fact that parts of the land are currently used for horse grazing to mean that the land has no agricultural value or future agricultural potential.

The current Government guidance specifically identifies agricultural land and soil as important considerations and states that the planning system should protect BMV agricultural land from inappropriate or unsustainable development.

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The Council is particularly concerned about the cumulative loss of agricultural land in this locality arising from other major developments, including the Carlisle Southern Link Road and the proposed St Cuthbert's Garden Village.

The cumulative loss of agricultural land should therefore be given proper weight when considering whether this is an appropriate location for a development occupying a substantial area for potentially several decades.

3. Landscape Character and Visual Impact

The Parish Council considers the landscape impact to be one of the most significant concerns arising from this application.

The proposal would introduce an extensive area of photovoltaic panels and associated infrastructure into open countryside. The development would not comprise simply a collection of solar panels; it would include extensive fencing, CCTV infrastructure, substations, access infrastructure and other ancillary equipment.

The application includes a **Landscape and Visual Appraisal**, associated figures and photomontages.

The Council considers that the assessment must be judged against the actual scale and character of the development and not merely against whether individual panels can be screened from selected viewpoints.

Adopted Policy GI1 states that all landscapes are valued for their intrinsic character and should be protected from excessive, harmful or inappropriate development. It requires proposals to be assessed against the relevant landscape character area's key characteristics, local distinctiveness and capacity for change.

Policy CC1 also specifically requires the scale of renewable energy development and its effect on the immediate and wider landscape to be considered.

The Parish Council considers that a development of this scale represents a substantial change in land use and landscape character.

The proposed landscape mitigation also requires careful scrutiny.

Where mitigation relies upon new tree and hedge planting, the visual effect cannot reasonably be considered solely on the basis of what the planting may look like after many years of growth. There will necessarily be a significant period during which the proposed development remains substantially more visible.

The Council therefore requests that the Planning Authority gives particular weight to:

- the landscape impact during the establishment period;
- the effectiveness of screening during winter;

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- the height and density of proposed planting;
- the extent to which panels remain visible above or through planting;
- views from public rights of way;
- views approaching and leaving Wreay;
- views from surrounding residential properties;
- cumulative landscape effects; and
- the visual effect of ancillary infrastructure rather than considering the panels in isolation.

The Council considers that the scale of the proposal is such that landscaping cannot reasonably be expected to eliminate all of its landscape impact.

4. Cumulative Landscape Impact

The Council considers that cumulative impact deserves particular attention.

Policy CC1 expressly requires cumulative effects to be considered. The adopted Local Plan states that assessments should take account of singular and cumulative development, including known proposals, extant permissions and other renewable energy developments.

The area around Wreay and south-east Carlisle is already subject to substantial development pressure, including major infrastructure and housing proposals.

The proposed solar farm should therefore not be assessed as though it were an isolated change to an otherwise static landscape.

The Council requests that the Planning Authority considers the cumulative effects of the proposal alongside:

- the Carlisle Southern Link Road;
- St Cuthbert's Garden Village;
- other committed development;
- other renewable energy proposals in the wider area; and
- associated infrastructure and grid connections.

The cumulative effect on the rural setting of Wreay is a material consideration and should be given significant weight.

5. Impact on Local Residential Amenity

The Parish Council has concerns regarding the impact of the development upon nearby residents.

These concerns arise from the combination of:

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- visual intrusion;
- the scale and extent of the development;
- construction activity;
- construction traffic;
- noise;
- loss of the existing rural outlook;
- screening requirements; and
- the presence of security fencing, CCTV and other infrastructure.

The Council acknowledges that private views from individual properties are not normally a material planning consideration in themselves. However, the **effect of development on residential amenity and the character of the surrounding area is a material planning consideration.**

Policy CC1 specifically requires renewable energy proposals to avoid unacceptable impacts on local amenity and to successfully mitigate noise, nuisance and other pollutants likely to affect nearby occupiers.

The Council therefore considers that the impact upon residential amenity should be assessed collectively rather than simply considering individual viewpoints.

6. Construction Traffic and Highway Safety

The Parish Council has serious concerns about the ability of the existing rural highway network to safely accommodate construction traffic.

The application includes both a **Transport Statement** and a **Construction Traffic Management Plan**.

The roads serving the site are narrow rural roads, with limited passing opportunities and no continuous pedestrian footways.

The Council is concerned that the movement of HGVs and other large construction vehicles will create conflict with:

- pedestrians;
- cyclists;
- horse riders;
- agricultural vehicles;
- local residents; and
- ordinary traffic using the rural road network.

The absence of dedicated footways is particularly important because pedestrians and other vulnerable road users share the carriageway with vehicles.

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The Parish Council considers that the suitability of the route must be assessed in terms of **actual road geometry and passing opportunities**, rather than simply whether vehicles can technically reach the site.

The Council also notes the existing collision history in the study area, including injury collisions and a fatal collision, and considers that this should be given appropriate weight when assessing the additional risk associated with HGV movements.

Policy CC1 expressly requires renewable energy proposals to demonstrate that the road network is suitable and that there is no unacceptable effect on highway infrastructure.

The Council is therefore not satisfied that the application has demonstrated that the proposed construction traffic can be accommodated without unacceptable highway safety and amenity impacts.

7. Stoneraise Primary School and Alternative Construction Routes

The applicant has considered alternative routing arrangements intended to reduce disruption in Burthwaite.

However, the Parish Council considers that routing substantial construction traffic through **High Burthwaite** would create its own significant problems, particularly given the proximity of **Stoneraise Primary School**.

The Council does not consider that simply transferring HGV movements from one unsuitable rural route to another constitutes an adequate solution.

If the alternative route is relied upon as mitigation, the applicant should provide clear evidence demonstrating:

- the number of HGV movements;
- the timing of deliveries;
- the dimensions of the vehicles;
- the ability of vehicles to pass safely;
- the arrangements around the school;
- arrangements for pedestrians and cyclists;
- the condition and width of the carriageway;
- the availability of passing places; and
- how compliance with the proposed routing arrangements would be monitored and enforced.

8. Construction and Decommissioning Noise

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The application includes a **Noise Impact Assessment**, but the Parish Council considers that the construction phase requires particular attention because of the rural character of the surrounding area.

Construction activity will involve HGVs, plant, deliveries, ground works, installation of panels and associated infrastructure.

The Council is concerned that the duration and intensity of construction activity could result in significant temporary disturbance to nearby residents and users of the surrounding countryside.

There is an additional concern regarding the eventual **decommissioning of the installation**.

A solar development of this scale will ultimately require removal of a substantial amount of infrastructure and associated construction traffic.

The Council therefore requests that decommissioning noise and traffic are assessed with the same degree of detail as the construction phase.

Policy CC1 specifically requires appropriate measures to be put in place for removal of structures and restoration of sites when they become non-operational.

9. Hedgerows, Trees and Biodiversity

The Parish Council remains concerned about the loss and alteration of established vegetation and habitats.

The application includes both a **Preliminary Ecological Appraisal**, a **Statutory Biodiversity Metric Report** and an **Arboricultural Impact Assessment**.

The Council understands that the proposal involves removal of one hedgerow and parts of a number of other hedgerows.

Before determining the application, the Council considers that the Planning Authority should establish whether any affected hedgerows qualify as **important hedgerows under the Hedgerows Regulations 1997**.

The Council also considers that biodiversity net gain should not be treated simply as a numerical exercise.

The loss of established habitat can have immediate ecological consequences, whereas newly created habitat may take many years to develop equivalent ecological value.

Adopted Policy GI3 states that biodiversity assets should be protected and, where possible, enhanced. It provides that permission should be refused where significant harm cannot be avoided, adequately mitigated or, as a last resort, compensated for. It also requires species and habitat surveys where development has the potential to affect biodiversity.

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The Council is particularly concerned about the reported presence of **Curlew and other wildlife**, including hare habitat.

The Planning Authority should therefore ensure that the ecological assessment properly considers not only the calculated biodiversity net gain but also:

- the loss of established habitats;
- the ecological value of existing hedgerows;
- nesting and breeding habitat;
- disturbance during construction;
- fragmentation of habitat;
- the effect of fencing;
- the time required for replacement habitat to mature; and
- the long-term management and monitoring of mitigation.

10. Archaeology and the Historic Environment

The Parish Council considers that archaeology requires further careful consideration before permission is granted.

The application includes a **Heritage Desk-Based Assessment**, and the application material identifies archaeological potential within the site, including **HER reference 19906**, a possible ring ditch and linear features associated with geophysical anomalies.

The Council also notes the presence of designated heritage assets in the wider area, including Scheduled Monuments.

The potential for ground disturbance arises from:

- panel supports;
- cabling;
- access tracks;
- compounds;
- substations;
- fencing;
- drainage infrastructure; and
- other ancillary works.

The Council therefore considers that archaeological investigation should be completed to an appropriate standard before any ground-disturbing works commence.

The fact that archaeological remains may not be visible above ground does not mean that they have no planning significance.

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The Council also notes that a **Historic Environment Officer response was published on 16 September 2026**, and requests that the Planning Committee gives full weight to that specialist consultation response when determining the application.

11. Surface Water Drainage and Flood Risk

The Council recognises that the site is identified as being within Flood Zone 1 and that the application includes a **Flood Risk & Drainage Assessment**.

However, Flood Zone 1 does not mean that a site is free from all forms of flood risk.

The Parish Council has significant local knowledge of surface-water flooding in the area. During periods of heavy rainfall, water flows from surrounding fields onto local roads, with some locations becoming difficult or impossible to pass.

This local evidence should be considered alongside the formal flood mapping.

The Council is particularly concerned about changes to the pattern of rainfall runoff arising from extensive arrays of sloping solar panels.

The relevant issue is not simply whether the panels are "permeable" or whether a small proportion of the site is physically occupied by foundations. The critical question is **where rainfall falling on the panels subsequently travels, at what rate, and whether runoff becomes concentrated in locations which currently experience surface-water problems**.

The adopted Local Plan's Policy CC4 requires flood risk assessments to consider whether development will increase flood risk elsewhere or interfere with flood flows and to take account of current and future flood risk.

The Parish Council therefore requests that the drainage assessment specifically addresses:

- existing local surface-water flow paths;
- existing flooding of surrounding roads;
- rainfall events beyond the basic design assumptions;
- climate-change allowances;
- runoff from the panels;
- concentrated discharge points;
- soil infiltration capacity;
- field drainage;
- cumulative effects; and
- arrangements for inspection and maintenance of the drainage system.

The Council does not consider that the absence of significant fluvial flood risk is sufficient to demonstrate that the development will not worsen local surface-water flooding.

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12. Public Rights of Way and Recreational Amenity

A public bridleway crosses the application site and is used by local residents for walking and recreation.

The Council considers that the impact upon the bridleway should not be assessed solely on the basis of whether physical access is retained.

The **quality and character of the recreational experience** are also relevant.

The existing route provides access through an open rural landscape. Introducing extensive rows of photovoltaic panels, fencing and associated infrastructure would materially change the character of the experience.

Adopted Local Plan policy recognises the importance of green infrastructure and interconnected recreational networks. The Council therefore considers that the effect of the development upon the public right of way should be assessed in landscape and amenity terms as well as in terms of continued physical access.

13. Agricultural Land, Food Security and Cumulative Development

The Parish Council considers that the agricultural land issue should also be considered in the context of the wider pattern of development around southern Carlisle.

The Government has recently reinforced the importance of protecting BMV agricultural land and has specifically stated that solar deployment should make use of suitable brownfield, industrial and lower-quality land where possible. It has also emphasised the need to consider cumulative impacts where several solar projects or major developments come forward in an area.

The Council therefore considers that the loss of agricultural land should not be assessed in isolation.

The cumulative effect of the proposed solar development alongside major infrastructure and housing development in the area is a legitimate planning consideration.

14. Benefits of the Renewable Energy Proposal

The Parish Council acknowledges that the proposal would generate renewable electricity and contribute towards decarbonisation.

Those benefits should be given appropriate weight.

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However, the adopted Local Plan's approach is not that renewable energy benefits automatically outweigh local environmental impacts. Policy CC1 requires the individual and cumulative impacts of renewable energy proposals to be thoroughly appraised and requires those impacts to be acceptable or capable of being made acceptable.

The Parish Council therefore considers that the renewable energy benefits must be balanced against the actual impacts of this particular development.

The issue is not whether solar energy is beneficial in principle, but whether **this scale of development in this location** represents an acceptable planning balance.

15. Overall Planning Balance

The Parish Council considers that the following matters weigh materially against the proposal:

- the use of BMV Grade 3a agricultural land;
- the absence of demonstrated justification for using higher-quality agricultural land rather than poorer-quality alternatives;
- the scale and visual prominence of the development;
- the effect upon landscape character;
- the cumulative landscape impact;
- the impact upon residential amenity;
- the suitability of the local rural highway network for construction traffic;
- highway safety and conflict with vulnerable road users;
- the potential impact of HGV movements near Stoneraise Primary School;
- construction and decommissioning disturbance;
- loss and alteration of established habitats and hedgerows;
- archaeological potential;
- surface-water drainage and flooding concerns;
- impact upon the public right of way and recreational amenity; and
- the cumulative impact of major development in the surrounding area.

These matters should be considered collectively rather than individually.

The Parish Council considers that the cumulative effect of the impacts means that the proposal does not satisfactorily demonstrate that it can be accommodated in this location without unacceptable harm.

CONCLUSION

St Cuthbert Without Parish Council **strongly objects to planning application 26/0497.**

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The Council fully recognises the importance of renewable energy generation and does not object to solar energy in principle. Its objection is to the **scale, location and resulting impacts of this particular proposal**.

The Council considers that the application has not demonstrated that:

1. the use of BMV agricultural land is necessary;
2. poorer-quality agricultural land and other potentially suitable alternatives have been adequately considered;
3. the landscape can accommodate a development of this scale without significant adverse effects;
4. proposed landscaping will provide effective mitigation throughout the operational life of the development;
5. the local highway network can safely accommodate the proposed construction traffic;
6. adequate protection can be provided for pedestrians, cyclists and horse riders;
7. the impact upon established habitats and species is acceptable;
8. archaeological interests have been adequately addressed;
9. the development will not increase surface-water flood risk elsewhere;
10. the impact upon the public right of way and recreational amenity is acceptable; or
11. the cumulative impacts of the proposal and other development in the area have been adequately addressed.

The Parish Council therefore respectfully requests that **Cumberland Council refuse planning application 26/0497**.

If the Planning Committee is nevertheless minded to approve

If, notwithstanding the above objections, the Council is minded to grant planning permission, the Parish Council requests that approval is not granted until all outstanding technical matters have been satisfactorily resolved and that comprehensive, enforceable conditions and, where necessary, planning obligations are imposed.

In particular, the Parish Council requests conditions or obligations covering:

Construction Traffic

- a final Construction Traffic Management Plan;
- specified HGV routes;
- enforceable restrictions on alternative routes;
- delivery time restrictions;
- restrictions around Stoneraise Primary School;
- provision for safe passing;
- protection of pedestrians, cyclists and horse riders;
- protection and reinstatement of verges;

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- road condition surveys before construction;
- monitoring and enforcement of agreed routes; and
- road repairs resulting from construction traffic.

Landscape

- a detailed Landscape and Ecological Management Plan;
- minimum planting sizes;
- planting densities;
- maintenance requirements;
- replacement of failed planting;
- rapid replacement of gaps;
- long-term management arrangements; and
- retention of mitigation throughout the operational period.

Ecology

- protection of retained hedgerows;
- appropriate nesting-season restrictions;
- protection of Curlew and other priority species;
- ecological monitoring;
- delivery of biodiversity enhancements;
- long-term management of habitats; and
- monitoring of biodiversity net gain.

Drainage

- approval of detailed drainage calculations;
- incorporation of appropriate attenuation;
- protection of existing flow paths;
- measures to prevent increased runoff onto roads or neighbouring land;
- inspection and maintenance arrangements; and
- monitoring following significant rainfall events.

Noise

- agreed construction working hours;
- restrictions on noisy operations;
- noise monitoring;
- controls on construction traffic;
- appropriate controls over decommissioning activity; and
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Archaeology

- archaeological investigation before ground disturbance;
- an agreed archaeological mitigation strategy;
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- a detailed decommissioning and restoration plan;
- removal of all panels and associated infrastructure;
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- **appropriate financial security to ensure that the Council is not left with the cost of restoration should the operator cease trading or fail to undertake decommissioning.**

The Parish Council would expect any such conditions to be **specific, enforceable and secured before commencement of development**, rather than relying upon future agreements or informal commitments.

For the reasons set out above, St Cuthbert Without Parish Council respectfully requests that planning permission for application 26/0497 be refused.

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ST CUTHBERT WITHOUT PARISH COUNCIL

Formal Planning Objection – Application 26/0497

Proposal: Erection of a solar photovoltaic farm with a generating capacity of up to 49.9MW, together with associated infrastructure and landscaping

Site: Land at and to the south-west of Greenlands Equestrian Centre, Wreay, Carlisle, CA4 0PY

Application: 26/0497

St Cuthbert Without Parish Council wishes to submit a **formal objection** to planning application 26/0497.

The Parish Council recognises the important contribution that renewable energy can make towards reducing greenhouse gas emissions and improving energy security. However, support for renewable energy does not remove the requirement for individual developments to be appropriately located, properly designed and capable of being accommodated without unacceptable environmental, landscape, highway, heritage, drainage or amenity impacts.

The application is for a very substantial development, with a generating capacity of up to **49.9MW**, and the application documentation confirms that the proposal includes extensive solar arrays together with associated infrastructure, fencing, CCTV, substations, access infrastructure and landscaping. The Council considers that the scale and location of the development give rise to significant adverse impacts which have not been demonstrated to be capable of being satisfactorily addressed.

The Parish Council therefore objects to the application for the following reasons.

1. Principle and Location of the Development

The Parish Council accepts that renewable energy is supported in principle by both national and local planning policy.

However, the adopted Carlisle District Local Plan does **not** provide an unconditional presumption in favour of renewable energy development. Policy CC1 requires renewable energy proposals to identify and thoroughly appraise their individual and cumulative effects and demonstrate that associated impacts are, or can be made, acceptable.

Policy CC1 specifically requires consideration of:

- visual impact arising from the scale of development;
- the character and sensitivity of the immediate and wider landscape;
- the historic environment and its setting;
- local amenity;
- noise and other nuisance;
- the effect on highway infrastructure;
- accessibility and suitability of the road network; and

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- appropriate removal of structures and restoration of the site when it becomes non-operational.

The policy also expressly recognises the need to consider **cumulative effects**.

The Parish Council considers that these requirements are particularly important in this case because of the scale of the proposal and its location within an open rural landscape.

The fact that the development would generate renewable electricity is therefore a significant consideration, but it must be weighed against the identified and evidenced adverse effects of the particular proposal.

2. Best and Most Versatile Agricultural Land

The Parish Council has significant concerns regarding the proposed use of agricultural land, including land identified as **Grade 3a**, which falls within the definition of Best and Most Versatile (BMV) agricultural land.

The current national framework defines BMV agricultural land as Grades **1, 2 and 3a**. The NPPF requires planning decisions to recognise the economic and other benefits of BMV agricultural land, while current Government guidance states that, where development of agricultural land is necessary, areas of poorer-quality land should be preferred to higher-quality land.

The Government's current Solar Roadmap similarly states that planning protections for BMV agricultural land should be maintained and that, where agricultural land is required, lower-quality land should be preferred.

The application includes an **Agricultural Land Classification & Soil Resource Assessment**, together with a substantial number of appendices.

The Parish Council therefore considers that the applicant should be required to demonstrate clearly:

1. why the use of this land is necessary;
2. what alternative sites involving lower-grade agricultural land were considered;
3. whether previously developed, brownfield, industrial, commercial or other non-agricultural locations were considered;
4. why those alternatives were rejected; and
5. what measures will be taken to protect the soil resource throughout construction, operation and decommissioning.

The Council does **not** consider the fact that parts of the land are currently used for horse grazing to mean that the land has no agricultural value or future agricultural potential.

The current Government guidance specifically identifies agricultural land and soil as important considerations and states that the planning system should protect BMV agricultural land from inappropriate or unsustainable development.

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The Council is particularly concerned about the cumulative loss of agricultural land in this locality arising from other major developments, including the Carlisle Southern Link Road and the proposed St Cuthbert's Garden Village.

The cumulative loss of agricultural land should therefore be given proper weight when considering whether this is an appropriate location for a development occupying a substantial area for potentially several decades.

3. Landscape Character and Visual Impact

The Parish Council considers the landscape impact to be one of the most significant concerns arising from this application.

The proposal would introduce an extensive area of photovoltaic panels and associated infrastructure into open countryside. The development would not comprise simply a collection of solar panels; it would include extensive fencing, CCTV infrastructure, substations, access infrastructure and other ancillary equipment.

The application includes a **Landscape and Visual Appraisal**, associated figures and photomontages.

The Council considers that the assessment must be judged against the actual scale and character of the development and not merely against whether individual panels can be screened from selected viewpoints.

Adopted Policy GI1 states that all landscapes are valued for their intrinsic character and should be protected from excessive, harmful or inappropriate development. It requires proposals to be assessed against the relevant landscape character area's key characteristics, local distinctiveness and capacity for change.

Policy CC1 also specifically requires the scale of renewable energy development and its effect on the immediate and wider landscape to be considered.

The Parish Council considers that a development of this scale represents a substantial change in land use and landscape character.

The proposed landscape mitigation also requires careful scrutiny.

Where mitigation relies upon new tree and hedge planting, the visual effect cannot reasonably be considered solely on the basis of what the planting may look like after many years of growth. There will necessarily be a significant period during which the proposed development remains substantially more visible.

The Council therefore requests that the Planning Authority gives particular weight to:

- the landscape impact during the establishment period;
- the effectiveness of screening during winter;

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- the height and density of proposed planting;
- the extent to which panels remain visible above or through planting;
- views from public rights of way;
- views approaching and leaving Wreay;
- views from surrounding residential properties;
- cumulative landscape effects; and
- the visual effect of ancillary infrastructure rather than considering the panels in isolation.

The Council considers that the scale of the proposal is such that landscaping cannot reasonably be expected to eliminate all of its landscape impact.

4. Cumulative Landscape Impact

The Council considers that cumulative impact deserves particular attention.

Policy CC1 expressly requires cumulative effects to be considered. The adopted Local Plan states that assessments should take account of singular and cumulative development, including known proposals, extant permissions and other renewable energy developments.

The area around Wreay and south-east Carlisle is already subject to substantial development pressure, including major infrastructure and housing proposals.

The proposed solar farm should therefore not be assessed as though it were an isolated change to an otherwise static landscape.

The Council requests that the Planning Authority considers the cumulative effects of the proposal alongside:

- the Carlisle Southern Link Road;
- St Cuthbert's Garden Village;
- other committed development;
- other renewable energy proposals in the wider area; and
- associated infrastructure and grid connections.

The cumulative effect on the rural setting of Wreay is a material consideration and should be given significant weight.

5. Impact on Local Residential Amenity

The Parish Council has concerns regarding the impact of the development upon nearby residents.

These concerns arise from the combination of:

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- visual intrusion;
- the scale and extent of the development;
- construction activity;
- construction traffic;
- noise;
- loss of the existing rural outlook;
- screening requirements; and
- the presence of security fencing, CCTV and other infrastructure.

The Council acknowledges that private views from individual properties are not normally a material planning consideration in themselves. However, the **effect of development on residential amenity and the character of the surrounding area is a material planning consideration.**

Policy CC1 specifically requires renewable energy proposals to avoid unacceptable impacts on local amenity and to successfully mitigate noise, nuisance and other pollutants likely to affect nearby occupiers.

The Council therefore considers that the impact upon residential amenity should be assessed collectively rather than simply considering individual viewpoints.

6. Construction Traffic and Highway Safety

The Parish Council has serious concerns about the ability of the existing rural highway network to safely accommodate construction traffic.

The application includes both a **Transport Statement** and a **Construction Traffic Management Plan**.

The roads serving the site are narrow rural roads, with limited passing opportunities and no continuous pedestrian footways.

The Council is concerned that the movement of HGVs and other large construction vehicles will create conflict with:

- pedestrians;
- cyclists;
- horse riders;
- agricultural vehicles;
- local residents; and
- ordinary traffic using the rural road network.

The absence of dedicated footways is particularly important because pedestrians and other vulnerable road users share the carriageway with vehicles.

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The Parish Council considers that the suitability of the route must be assessed in terms of **actual road geometry and passing opportunities**, rather than simply whether vehicles can technically reach the site.

The Council also notes the existing collision history in the study area, including injury collisions and a fatal collision, and considers that this should be given appropriate weight when assessing the additional risk associated with HGV movements.

Policy CC1 expressly requires renewable energy proposals to demonstrate that the road network is suitable and that there is no unacceptable effect on highway infrastructure.

The Council is therefore not satisfied that the application has demonstrated that the proposed construction traffic can be accommodated without unacceptable highway safety and amenity impacts.

7. Stoneraise Primary School and Alternative Construction Routes

The applicant has considered alternative routing arrangements intended to reduce disruption in Burthwaite.

However, the Parish Council considers that routing substantial construction traffic through **High Burthwaite** would create its own significant problems, particularly given the proximity of **Stoneraise Primary School**.

The Council does not consider that simply transferring HGV movements from one unsuitable rural route to another constitutes an adequate solution.

If the alternative route is relied upon as mitigation, the applicant should provide clear evidence demonstrating:

- the number of HGV movements;
- the timing of deliveries;
- the dimensions of the vehicles;
- the ability of vehicles to pass safely;
- the arrangements around the school;
- arrangements for pedestrians and cyclists;
- the condition and width of the carriageway;
- the availability of passing places; and
- how compliance with the proposed routing arrangements would be monitored and enforced.

8. Construction and Decommissioning Noise

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The application includes a **Noise Impact Assessment**, but the Parish Council considers that the construction phase requires particular attention because of the rural character of the surrounding area.

Construction activity will involve HGVs, plant, deliveries, ground works, installation of panels and associated infrastructure.

The Council is concerned that the duration and intensity of construction activity could result in significant temporary disturbance to nearby residents and users of the surrounding countryside.

There is an additional concern regarding the eventual **decommissioning of the installation**.

A solar development of this scale will ultimately require removal of a substantial amount of infrastructure and associated construction traffic.

The Council therefore requests that decommissioning noise and traffic are assessed with the same degree of detail as the construction phase.

Policy CC1 specifically requires appropriate measures to be put in place for removal of structures and restoration of sites when they become non-operational.

9. Hedgerows, Trees and Biodiversity

The Parish Council remains concerned about the loss and alteration of established vegetation and habitats.

The application includes both a **Preliminary Ecological Appraisal**, a **Statutory Biodiversity Metric Report** and an **Arboricultural Impact Assessment**.

The Council understands that the proposal involves removal of one hedgerow and parts of a number of other hedgerows.

Before determining the application, the Council considers that the Planning Authority should establish whether any affected hedgerows qualify as **important hedgerows under the Hedgerows Regulations 1997**.

The Council also considers that biodiversity net gain should not be treated simply as a numerical exercise.

The loss of established habitat can have immediate ecological consequences, whereas newly created habitat may take many years to develop equivalent ecological value.

Adopted Policy GI3 states that biodiversity assets should be protected and, where possible, enhanced. It provides that permission should be refused where significant harm cannot be avoided, adequately mitigated or, as a last resort, compensated for. It also requires species and habitat surveys where development has the potential to affect biodiversity.

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The Council is particularly concerned about the reported presence of **Curlew and other wildlife**, including hare habitat.

The Planning Authority should therefore ensure that the ecological assessment properly considers not only the calculated biodiversity net gain but also:

- the loss of established habitats;
- the ecological value of existing hedgerows;
- nesting and breeding habitat;
- disturbance during construction;
- fragmentation of habitat;
- the effect of fencing;
- the time required for replacement habitat to mature; and
- the long-term management and monitoring of mitigation.

10. Archaeology and the Historic Environment

The Parish Council considers that archaeology requires further careful consideration before permission is granted.

The application includes a **Heritage Desk-Based Assessment**, and the application material identifies archaeological potential within the site, including **HER reference 19906**, a possible ring ditch and linear features associated with geophysical anomalies.

The Council also notes the presence of designated heritage assets in the wider area, including Scheduled Monuments.

The potential for ground disturbance arises from:

- panel supports;
- cabling;
- access tracks;
- compounds;
- substations;
- fencing;
- drainage infrastructure; and
- other ancillary works.

The Council therefore considers that archaeological investigation should be completed to an appropriate standard before any ground-disturbing works commence.

The fact that archaeological remains may not be visible above ground does not mean that they have no planning significance.

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The Council also notes that a **Historic Environment Officer response was published on 16 September 2026**, and requests that the Planning Committee gives full weight to that specialist consultation response when determining the application.

11. Surface Water Drainage and Flood Risk

The Council recognises that the site is identified as being within Flood Zone 1 and that the application includes a **Flood Risk & Drainage Assessment**.

However, Flood Zone 1 does not mean that a site is free from all forms of flood risk.

The Parish Council has significant local knowledge of surface-water flooding in the area. During periods of heavy rainfall, water flows from surrounding fields onto local roads, with some locations becoming difficult or impossible to pass.

This local evidence should be considered alongside the formal flood mapping.

The Council is particularly concerned about changes to the pattern of rainfall runoff arising from extensive arrays of sloping solar panels.

The relevant issue is not simply whether the panels are "permeable" or whether a small proportion of the site is physically occupied by foundations. The critical question is **where rainfall falling on the panels subsequently travels, at what rate, and whether runoff becomes concentrated in locations which currently experience surface-water problems**.

The adopted Local Plan's Policy CC4 requires flood risk assessments to consider whether development will increase flood risk elsewhere or interfere with flood flows and to take account of current and future flood risk.

The Parish Council therefore requests that the drainage assessment specifically addresses:

- existing local surface-water flow paths;
- existing flooding of surrounding roads;
- rainfall events beyond the basic design assumptions;
- climate-change allowances;
- runoff from the panels;
- concentrated discharge points;
- soil infiltration capacity;
- field drainage;
- cumulative effects; and
- arrangements for inspection and maintenance of the drainage system.

The Council does not consider that the absence of significant fluvial flood risk is sufficient to demonstrate that the development will not worsen local surface-water flooding.

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12. Public Rights of Way and Recreational Amenity

A public bridleway crosses the application site and is used by local residents for walking and recreation.

The Council considers that the impact upon the bridleway should not be assessed solely on the basis of whether physical access is retained.

The **quality and character of the recreational experience** are also relevant.

The existing route provides access through an open rural landscape. Introducing extensive rows of photovoltaic panels, fencing and associated infrastructure would materially change the character of the experience.

Adopted Local Plan policy recognises the importance of green infrastructure and interconnected recreational networks. The Council therefore considers that the effect of the development upon the public right of way should be assessed in landscape and amenity terms as well as in terms of continued physical access.

13. Agricultural Land, Food Security and Cumulative Development

The Parish Council considers that the agricultural land issue should also be considered in the context of the wider pattern of development around southern Carlisle.

The Government has recently reinforced the importance of protecting BMV agricultural land and has specifically stated that solar deployment should make use of suitable brownfield, industrial and lower-quality land where possible. It has also emphasised the need to consider cumulative impacts where several solar projects or major developments come forward in an area.

The Council therefore considers that the loss of agricultural land should not be assessed in isolation.

The cumulative effect of the proposed solar development alongside major infrastructure and housing development in the area is a legitimate planning consideration.

14. Benefits of the Renewable Energy Proposal

The Parish Council acknowledges that the proposal would generate renewable electricity and contribute towards decarbonisation.

Those benefits should be given appropriate weight.

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However, the adopted Local Plan's approach is not that renewable energy benefits automatically outweigh local environmental impacts. Policy CC1 requires the individual and cumulative impacts of renewable energy proposals to be thoroughly appraised and requires those impacts to be acceptable or capable of being made acceptable.

The Parish Council therefore considers that the renewable energy benefits must be balanced against the actual impacts of this particular development.

The issue is not whether solar energy is beneficial in principle, but whether **this scale of development in this location** represents an acceptable planning balance.

15. Overall Planning Balance

The Parish Council considers that the following matters weigh materially against the proposal:

- the use of BMV Grade 3a agricultural land;
- the absence of demonstrated justification for using higher-quality agricultural land rather than poorer-quality alternatives;
- the scale and visual prominence of the development;
- the effect upon landscape character;
- the cumulative landscape impact;
- the impact upon residential amenity;
- the suitability of the local rural highway network for construction traffic;
- highway safety and conflict with vulnerable road users;
- the potential impact of HGV movements near Stoneraise Primary School;
- construction and decommissioning disturbance;
- loss and alteration of established habitats and hedgerows;
- archaeological potential;
- surface-water drainage and flooding concerns;
- impact upon the public right of way and recreational amenity; and
- the cumulative impact of major development in the surrounding area.

These matters should be considered collectively rather than individually.

The Parish Council considers that the cumulative effect of the impacts means that the proposal does not satisfactorily demonstrate that it can be accommodated in this location without unacceptable harm.

CONCLUSION

St Cuthbert Without Parish Council **strongly objects to planning application 26/0497.**

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The Council fully recognises the importance of renewable energy generation and does not object to solar energy in principle. Its objection is to the **scale, location and resulting impacts of this particular proposal**.

The Council considers that the application has not demonstrated that:

1. the use of BMV agricultural land is necessary;
2. poorer-quality agricultural land and other potentially suitable alternatives have been adequately considered;
3. the landscape can accommodate a development of this scale without significant adverse effects;
4. proposed landscaping will provide effective mitigation throughout the operational life of the development;
5. the local highway network can safely accommodate the proposed construction traffic;
6. adequate protection can be provided for pedestrians, cyclists and horse riders;
7. the impact upon established habitats and species is acceptable;
8. archaeological interests have been adequately addressed;
9. the development will not increase surface-water flood risk elsewhere;
10. the impact upon the public right of way and recreational amenity is acceptable; or
11. the cumulative impacts of the proposal and other development in the area have been adequately addressed.

The Parish Council therefore respectfully requests that **Cumberland Council refuse planning application 26/0497**.

If the Planning Committee is nevertheless minded to approve

If, notwithstanding the above objections, the Council is minded to grant planning permission, the Parish Council requests that approval is not granted until all outstanding technical matters have been satisfactorily resolved and that comprehensive, enforceable conditions and, where necessary, planning obligations are imposed.

In particular, the Parish Council requests conditions or obligations covering:

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For the reasons set out above, St Cuthbert Without Parish Council respectfully requests that planning permission for application 26/0497 be refused.