

Note on Methodology for Selection of Local Service Centres

1. Introduction and Context

In commenting on the submission version of the Eden Core Strategy, the Government Office for the North West (GONW), have expressed a view that the number of Local Service Centres contained within the Core Strategy requires further justification.

This note has been prepared to assist the understanding of the Inspector examining the Core Strategy (CS), of the basis for the identification of Local Service Centres (LSCs) in the Core Strategy Document and hopefully to establish that this is sound within the context the requirements of Central Government.

The rural nature of Eden District is well evidenced in the Core Strategy document itself and in much of the supporting evidence base. In any case this is not disputed by GONW. What does appear to be of concern to GONW is that the application of the selection criteria contained at paragraph 5.7 of the Core strategy document produces, on the basis of current service provision a total of 42 village communities (this is on the basis of Sockbridge and Tirril and Brough and Church Brough each being considered as one village community each.)

Paragraph 5.7 states as follows:

“The Local Service Centres have role to play in accommodating new development but on a scale in keeping with their character and community need. These are defined as settlements with a range of services and public/community based transport facilities where sustainable development can take place. The services required to be declared a Local service Centre are:

1. To have a public/community transport link to a larger centre.

And to have two out of three of the following:

1. A shop or post office.
2. A primary school.
3. A village hall or pub.

It will be seen that rather than identify a number of LSCs on the basis of size or function, the above approach is criteria based. It follows that the number of LSCs may decrease, if services cease to exist or increase if new services are provided, for example as part of development proposals, most probably, though not exclusively housing development.

The approach has been pioneered, because of the intense concern that was felt in communities and by elected representatives of communities over the very small number of village communities that would have been identified as LSCs were a conventional approach to have been undertaken. It is important to bear in mind in this context that had the number of LSCs been restricted to only twelve larger villages as was the case at the issues and options stage of the CS, then over 150 villages and hamlets would have been consigned to an effective moratorium on development. (There are some 185 such villages and hamlets in the whole of the District of Eden, inclusive of the Lake District National Park.)

2. The Transport Dimension

It is important to appreciate the importance of the transport dimension in considering Eden's approach to the identification of LSCs in its Core Strategy. The most strongly stated and perhaps the most obvious strand to the government's sustainability agenda for the

guidance of development rural areas is to reduce dependence on the private motor car. The rationale for this, essentially to seek reductions in CO2 emissions and reliance on fossil fuels is understood. It is nevertheless the case that in an area such as Eden District, with a very dispersed settlement pattern, small but vital rural communities and a general paucity of public transport – there has been and will continue to be a practical need for reliance on the private car. At the issues and options stage of the Core Strategy, the transport criterion was essentially limited to services which were able in some sense to provide for journeys to work in Penrith, Appleby, Kirkby Stephen, Alston, Carlisle or Kendal. This meant only those villages with relatively regular bus services and/or that had stations on the Carlisle Settle line. In all this meant twelve of over one hundred and eighty villages and hamlets. The approach, and moreover the consequences for communities of its applications was correctly, perceived as draconian, overly restrictive and unsustainable in the broader social and economic sense of the term.

The Council has supported and pioneered several innovative public transport and community transport initiatives. These include co-operative working and financial support for the following:

- The Upper Eden Plus Bus. A Community based bus service running scheduled services linking the villages in the southern part of the District with Kirkby Stephen and integrated with the Carlisle –Settle railway services.
- The Fell Runner bus service. A Community based bus service serving the East Fell side villages in the north eastern part of the District and linking these with Penrith and Alston.
- Penrith Community Transport. A Penrith based Community bus service also providing transport for people in need in villages around the town.
- Cumbria Rural Wheels Service. This is a scheme operated by the Cumbria County Council and has been extended to cover

the whole of rural Eden with additional financial contributions from the District. People can book car trips in advance and the service is used particularly by the elderly and those with access difficulties.

The Council is an active participant in the County led Area Transport Advisory Group (ATAG), which *inter alia* seeks integrated and innovative solutions to local transport problems and also feeds into the Area Transport plans which are produced by Cumbria County Council.

3. Discussions with GONW and the I&DeA

The Council has liaised closely with GONW on the production of its Core Strategy and has been appreciative and cogniscent of the advice received throughout the process. It is however fair to acknowledge that there has been a particular tension in respect of the locational strategy and in particular on the approach taken to the definition of LSCs. This has taken place in the routine day to day informal liaison between planning policy officers and the more formal meetings arranged through the Cumbria Development Plan Officers Group (DPOG). Additionally however there have on two occasions been visits to GONW offices by the Deputy Leader of the Council, the Chief Executive and the Director of Policy and Performance to meet with the Deputy Director of GONW, to discuss emerging Core Strategy policies and particularly the approach taken to the definition of LSCs. planning policy officers from both sides were present at both sets of discussions.

The Council has understood the GONW position that the locational strategy contained in the Core Strategy should conform to higher tier planning policy including national planning policy as set out in Planning Policy Statements (PPSs). It has appeared to the Council attendees at the meetings that GONW were however sympathetic to

the need to take account of the particular circumstances of Eden District namely its extreme rurality and of the heartfelt and strongly expressed views of local communities and elected members in support of limited and proportionate development opportunities for those communities. Furthermore the Council attendees were of the impression that GONW would be supportive of innovative and flexible approaches and of Core Strategy policies that reflected “local distinctiveness”.

In parallel though distinct from the production of the Core Strategy as part of the LDF, Eden District Council took part in a Rural Excellence Programme on Affordable Housing. This event was sponsored by the I&Dea and afforded opportunity for members and officers to benefit from studying the approaches taken to rural housing by other rural local authorities who had experienced similar issues to Eden and who had pioneered innovative approaches. These included Tynedale, South Shropshire and Stratford-upon-Avon districts. At a workshop attended by members and officers of several of the participating authorities as well as GONW and IDeA representatives the issue of rural locational strategies that met the needs and aspirations of rural communities as well as conforming to higher tier planning policies and sustainability requirements was discussed and favourable consideration shown towards a more flexible and innovative approach as contained within the submission version of Eden’s Core Strategy.

4. Changing Perceptions – The Taylor Report and the Government Response

The Council took an active role in assisting the work of Mathew Taylor M.P in producing the Taylor Review of the Local Economy and Affordable Housing – “Living Working Countryside” officers attending both the round table discussion chaired by Mathew Taylor on his visit to Cumbria and responding to the “Call for Evidence”. The Core Strategy was clearly well advanced by the time of the publication of

the report in July 2008 but there is a notable resonance between the themes contained in both documents and particularly in respect of the locational strategy of the Core Strategy favouring continued development opportunities for smaller settlements and the recurring theme in the Taylor Review for such approaches to be supported by government. Even more importantly perhaps there has now been the opportunity to study the Communities and Local Government (CLG) response to the Taylor Review published in March 2009.

The forward to the CLG response, by Rt. Hon Hilary Benn M.P Secretary of State for Environment Food and Rural Affairs and Rt. Hon Margaret Beckett M.P Minister for Housing and Planning, hopefully heralds changes in the government's stance:

“Much of what Mathew (Taylor) proposes requires subtle but important changes in approach by Government Departments and Government Offices, by rural planning authorities and by other Agencies, particularly to get the balance right between protection and development in the countryside.”

The Executive summary of the CLG response concedes that a “one size fits all” approach “cannot do justice to the diversity of rural communities and experiences and, in responding to the Review’s recommendations, emphasises that sustainability is not about choosing the environment over development but about recognising both and striking a balance.

The executive summary also makes supportive references to ‘rural proofing’ all domestic policies, rural enterprise hubs, live/work units and the involvement of communities in housing delivery. The Council welcomes this recognition of the opportunities open to rural communities and government support for them, but would contend that this is incompatible with opposition by GONW to the approach set out in Eden’s Core Strategy.

At the end of the introduction to its response to Mathew Taylor , CLG states:

“Accordingly, the Government’s response to the published findings of the Taylor review needs to be seen in this wider, dynamic context.

Our principal policy considerations for the countryside are:

- The need to create and maintain sustainable communities
- The need to encourage ways to encourage sustainable economic growth in rural areas
- The need to encourage an increase in the supply of housing in the long term, and particularly that of affordable housing; and
- The need to plan for economic recovery, in which a streamlined planning system will be a significant factor.”

The references to both housing and economic development in the above are apposite. Many of the responses to consultation, particularly at the issues and options stage of the Core Strategy drew attention to the functional links between a limited amount of housing development being allowed in village communities and the broader economic health of those communities. These linkages were seen to operate in a number of ways. Firstly the provision of some additional homes, both affordable and market led were seen to support services both public such as schools and private such as shops or pubs, thus creating a “virtuous circle” rather than a pattern of decline. Secondly, the provision of some market led houses would enable cross subsidy of affordable homes either directly through mixed developments or indirectly through contributions to a housing fund thus providing homes for younger, local working people who were in housing need. A third strand of support for the locational strategy in relation to LSC eligibility is that one vital sector of the local economy in Eden is itself the house building industry as represented by smaller volume builders, who offer directly and indirectly higher wage skilled

employment. This sector, vital to the improvement of local wage levels, one of this Council's key priorities, is wholly dependent on a reasonable and proportionate amount of housing development in villages.

It has been central to the Council's approach to LSC definition that a narrow interpretation of sustainability would be inappropriate. Rather, the economic and social components of sustainability must be recognised alongside the issue of environmental sustainability. The approach to LSC selection scores well in terms of Sustainability Appraisal which accompanies the CS.

It is heartening to observe that the CLG response to Mathew Taylor is aligned with the Council's methodology. At recommendation¹ Mathew Taylor states:

"Planning policy (the Planning Policy Statements) should be reviewed by the Government as a body to create a more coherent set, reducing apparent conflicts between interpretations of sustainability and the means by which competing priorities are assessed, and by doing so aid consistent interpretation and application at the local and regional level."

In its response CLG states:

"The foreword to the Government's Rural Strategy said in 2004 that the Government recognised that change was part of rural life but that, to be sustainable, change had to balance economic, social and environmental interests. It added that the vision of a living, working, protected and vibrant countryside remained at the heart of rural policy, as this response to the Review's recommendations confirms."

The Secretary of State for the Environment, Food and Rural Affairs is directly quoted:

“He (Hilary Benn) referred to the concerns set out in the Taylor Review about the impacts of denying development to small villages that have been characterised as “unsustainable.” He said that there is no such thing as an unsustainable place – only unsustainable ways of doing things.”

At recommendation 6 Mathew Taylor makes direct reference to Core Strategy policies and to their relationship to Local Strategic Partnerships (LSPs)

*“LSPs should be encouraged to develop a long term vision for their community which includes its physical shape and sets out plans for change and growth in their economic, environmental and social context. **LDF Core Strategies should, as they are intended to do, set out this vision** in more detail for the time period which they cover.*

CLG appears to wholly endorse this view:

“We agree with this recommendation: the empowering communities white paper outlines our thinking, and ‘Planning Together’ will remind authorities about the importance of their strategic leadership role, working through local strategic partnerships.”

There is much to support the Council’s methodology for LSC selection in the CLG response to the Mathew Taylor Review. The above instances of this support have been identified very sparingly. Paragraphs 46 and 47 are perhaps as powerful statements of government intent as any.

“We have given local authorities greater flexibility to determine how and where new homes should be built in their areas, but we have also given them a greater responsibility to ensure those new homes are built: we want them to be proactive in identifying suitable sites that can be brought into development.

We have given local authorities responsibility to decide, taking into account such issues as housing need and demand in their areas, whether or not a site is in a suitable location to contribute to the creation or maintenance of a sustainable mixed community, even in very small villages.”

The Council is confident in adopting the approach that it has in relation to LSC selection as part of its overall locational strategy within the CS, combined with the completed SHLAA and ongoing work on its Housing Development Plan Document (DPD) currently moving towards the preferred options stage that it is effectively taking advantage of the “freedom” conferred on it and “responsibility” delegated to it by the Communities and Local Government.

5. Conclusion

It is hoped that this short paper will be of assistance to the Inspector, the Government Office for the North West of England and other interested parties to understand the Council’s approach to Local Service Centres and to acknowledge it as rational, responsive, flexible, robust and in accord with a more enlightened view of rural development issues that is emerging from central government in the light of the Mathew Taylor review.

One final reflection on proportionality: The annualised Housing target for Eden is some 270 dwellings, the proportion of this indicated as being for the Local Service Centres-larger villages in the District is 20%. This is a figure of 54 dwellings per annum, which if further disaggregated between the 40 or so settlements that would qualify under the criteria set out, would on average result in slightly over one dwelling per year for each. This is not considered to be unreasonable.