



Response to Story Homes Submission

August 2016

1. Introduction

- 1.1 This paper sets out the Council's response to the submission made by Story Homes on the 19 August 2016 in relation to the revised Key Hub Strategy.
- 1.2 Many of the points raised in the submission were discussed at the July hearing sessions, and as such we will focus our response on any additional concerns raised or comments which have not already discussed.
- 1.3 This paper has been structured to mirror the sections contained within the submission made by Story Homes.

2. Response to BW Comments on the Revised Methodology

- 2.1 Story Homes are concerned that the Council has not reviewed the principles (previously agreed) in sufficient depth as part of its revised assessment.
- 2.2 Story Homes place particular emphasis on threatened Key Services and those services in need of protection such as Primary Schools or well stocked local shops. They consider these factors should be given appropriate weight in comparison to less important facilities in the overall selection criteria.
- 2.3 The Council considers that the revised methodology already achieves this, the methodology used contains an overall assessment of the number of facilities and then places an additional weighting on the more important services (as identified throughout the hearings sessions), which are GP Practices, Schools and Shops. Each of these services, where they exist, are given an additional score of 5 points for each service.
- 2.4 The Council therefore considers that appropriate weight is afforded to the services most in need of protection in the rural areas. We acknowledge that no individual assessment of threat has been undertaken for each of these services, however, the Council recognises the need to support all rural services which may at any point in time be threatened by a variety of circumstances, many beyond the influence of the Council.
- 2.5 Story Homes raise concerns (paragraph 2.12) regarding the overall spatial planning within the methodology, suggesting that some Key Hubs are within close proximity of each other, they raise concern that there are no Key Hubs identified within the area to the North of the A66 and to the west of the M6.
- 2.6 Within this particular area, the Council considered the following settlements for inclusion on the revised list of Key Hubs:
 - Greystoke
 - Skelton
 - Newton Reigny

- 2.7 The reasoning for not including any of the above Key Hubs is detailed in the Revised Key Hubs Paper¹.
- 2.8 We have taken the decision to discount potential Key Hubs on the grounds that they are within close proximity to another potential Key Hub, these include Kirkoswald and Temple Sowerby which are close to Lazonby and Kirkby Thore respectively.
- 2.9 We acknowledge that due to the routes of some of our regular public transport services, spatially some of the settlements will appear close together. This occurs in particular along the spinal route of the A6. However, all of these settlements are at least 3.5 miles away from each other, which is a distance greater than could be considered a reasonable walking distance. As previously discussed at the hearing sessions, significant emphasis has been placed upon the existence of public transport in potential Key Hub locations.
- 2.10 Story Homes also mention the consideration of employment opportunities (paragraph 2.14), which we acknowledge has not been considered in perhaps the same level of detail as other criteria. The Council acknowledges this point.
- 2.11 This concern was discussed at the recent hearings sessions and the Council has since done some further analysis of employment provision within the Key Hubs, looking in particular at the Top 100 Rateable Value Businesses and where they are located.
- 2.12 However, it is worth noting that the majority (approx. 90%) of businesses in Eden employ a very small number of people (less than 10) so it is in our view difficult to draw links between the existence of employment and choosing to live within or move to a particular Key Hub.
- 2.13 Notwithstanding this, there are a small number of large businesses² located within Key Hubs, these include British Gypsum (Kirkby Thore), Bells of Lazonby (Lazonby) and Frank Bird Poultry Ltd (Langwathby).
- 2.14 Story Homes (paragraph 2.16) suggest that greater weight should be given to villages that benefit from a Village/Rural Wheels service over the Fell Runner Service.
- 2.15 The Council contests this suggestion, the Fell Runner Service is a well-established community bus service which has been operating for over 30 years and providing a valuable service to rural communities often most affected by recent changes to the provision of County Council subsidised services. The Fell Runner currently operates three buses, offering services every Tuesday to Saturday, these services are provided by volunteers and

¹ <http://www.eden.gov.uk/EasySiteWeb/GatewayLink.aspx?allId=54691>

² Top 100 Rateable Value Businesses (2016)

unlike the Village Wheels service there is no requirement to pre-book journeys.

- 2.16 The Village Wheels service which was established in 2015, also provides a valuable service to the residents it serves, however, we do not consider this service qualifies as a public transport service in the traditional sense of the definition, where you would expect access to be available without prior arrangement.
- 2.17 However, unlike traditional public transport services this service is only available to members who have pre-booked their journey (no later than 12 noon the day before). As such, we are of the view that this service is not a traditional form of public transport in the sense that all journeys have to be pre-arranged.
- 2.18 We therefore contest the argument put forward by Story Homes that this service is somehow superior to that Fell Runner, or indeed any other service, which operates with published routes and timetables which do not need to be arranged in advance.
- 2.19 The service is not referred to on the County Council's own map of bus service, which was the primary data source for the analysis of public transport provision and the creation of a scoring system based on frequency of access to transport services. The County Council website also recognises that the Village Wheels service is not a registered bus service, and as such concessionary travel is not available on this service.
- 2.20 As such the Council remains of the opinion that Greystoke does not have access to a public transport service for the purposes of our assessment and therefore has been awarded the correct score. The same score has been awarded to Newbiggin (Dacre) which also benefits solely from the Village Wheels service.

3. Comments on BW Reassessment of Key hub Scoring

- 3.1 Story Homes highlights (paragraph 3.1) a number of errors which were included in Appendix 2 of the Revised Key Hubs Paper, the Council has subsequently amended the relevant appendix which is included as Appendix 1 of this document.
- 3.2 As discussed above, the Council disagrees with the suggestion that Greystoke has been incorrectly scored in relation to public transport provision.
- 3.3 Story Homes also highlight some discrepancies in the way distances have been scored, again these corrections can be found within Appendix 1 of this document.
- 3.4 The Council welcomes the support of Story Homes in relation to the settlements it has chosen to exclude, which are Orton, Kirkoswald and Temple Sowerby and the reasoning for their exclusion.

- 3.5 We also welcome their support for the inclusion of High and Low Hesket as a single Key Hub.

4. Response to Case for Greystoke

- 4.1 In Section 4 of their response, Story Homes put forward their case for why Greystoke should be included in the revised list of Key Hubs.
- 4.2 Once again, they refer to the public transport provision criteria, contesting the Council's view in relation to Greystoke relying upon the existence of the Village Wheels scheme (discussed above) and Rural Wheels³. On the latter, Rural Wheels is a service available to anyone outside of Penrith and without access to public transport (subject to approval from the Planning Service) and therefore not exclusive to the village of Greystoke. As this service serves the majority of Eden's residents we do not consider it to be appropriate for it to be used as justification for why a village should be included as a Key Hub.
- 4.3 Story Homes suggest that the Village Wheels service is well used, averaging 10 passengers per week.
- 4.4 However, the Council strongly contests the suggestion that the level of transport provision within Greystoke is 'superior' to that provided by the Fell Runner service. However, this is discussed in more detail in section 2 of our response.
- 4.5 Paras 4.7 to 4.9 consider Greystoke against the criteria relating to service provision, the content of which we have no reason to dispute and accords with the evidence presented in our own discussion paper.
- 4.6 Para 4.13 provides useful information on the types of businesses present within Greystoke, which again we do not have cause to dispute. However, we would dispute the relevance of the existence of such businesses in the context of selecting Key Hubs. Over 90% of businesses in Eden employ 9 or less people, such businesses are unlikely to influence a person's decision to reside in a particular location.
- 4.7 The Council has taken the view that only significant employers are likely to influence future employment based housing need in a particular Key Hub location. Further details on this consideration can be found in the mini-topic paper, Employment in Eden
- 4.8 We acknowledge the comments made in Para 4.14 in relation the smaller settlements which are located in the vicinity of Greystoke.

5. Concluding Remarks

- 5.1 Having regard to the Inspector's advice, we have devised a methodology which we consider to be fit for purpose and in placing significant emphasis

³ <http://cumbria.gov.uk/roads-transport/public-transport-road-safety/transport/commtrans/ruralwheels.asp>

on the existence of a public transport connection, we consider that we have applied the methodology consistently in reaching our conclusions.

- 5.2 The bulk of the arguments put forward by Story Homes appear to centre on whether Greystoke should be included on the revised list of Key Hubs.
- 5.3 The Council remains confident in its initial assessment, and on the basis that the Village Wheels service is not a traditional form of public transport, then we do not consider any evidence has been provided to suggest our position should be changed.

Appendix 1 – Key Hub Scoring (errors corrected)

	Size	No. of Services	Proximity to a Town	Bus Availability	Rail Availability	GP	School	Shop	TOTAL
Shap	6	6	5	2	0	5	5	5	34
Tebay	4	6	5	2	0	5	5	5	32
Brough	4	6	3	3	0	5	5	5	31
Lazonby	5	5	4	2	4	0	5	5	30
Kirkoswald	2	6	5	2	0	5	5	5	30
Armathwaite	2	5	5	2	4	0	5	5	28
Langwathby	3	5	4	2	4	0	5	5	28
Kirkby Thore	4	5	4	3	0	0	5	5	26
Stainton	4	5	3	4	0	0	5	5	26
Orton	2	6	5	2	0	0	5	5	25
Temple Sowerby	2	4	4	3	0	5	5	0	23
Greystoke	3	5	4	1	0	0	5	5	23
Plumpton	2	3	4	4	0	0	5	5	23
Nenthead	2	5	3	2	0	0	5	5	22
High Hesket	2	3	4	4	0	0	5	0	18
Low Hesket	2	3	4	4	0	5	0	0	18
Culgaith	2	4	4	2	0	0	5	0	17
Great Asby	2	4	4	2	0	0	5	0	17
Morland	2	4	4	2	0	0	5	0	17
Skelton	2	4	4	2	0	0	5	0	17
Warcop	2	3	4	3	0	0	5	0	17
Bolton	2	4	3	2	0	0	5	0	16
Clifton	3	3	3	2	0	0	5	0	16
Hackthorpe	2	3	4	2	0	0	5	0	16
Long Marton	2	4	3	2	0	0	5	0	16
Sockbridge & Tirril	3	4	3	1	0	0	0	5	16
Great Salkeld	2	3	4	2	0	0	0	0	11
Newton Reigny	2	3	3	2	0	0	0	0	10