

**Statement by Richard Gravil in Response to the Inspector’s Question:
‘Is there is a justification for 28?’
(Policy LS1 Locational Strategy / Key Hubs)**

SD019 *Revised Settlement Hierarchy* justified an increase from 20 to 28 key hubs by two remarks: first that “we now think it is better that development is more evenly spread” and second that this would “help reduce the risk of our development strategy not being fulfilled”. Neither remark seems to be supported by any evidence, proportionate or otherwise.

The division of an estimated 472 units of housing between now and 2032 between 28 ‘hubs’, at the rate of one unit per hub per year, is likely to result in only a random selection of those 28 hubs (if any) being materially helped towards sustainability. Such a scattergun approach may well condemn all 28 hubs to decay, rather than helping some to thrive. Therefore, as argued in detail by Respondent 46, fulfilment of several specified objectives of the strategy could be impeded rather than assisted.

The EDC view is that Respondent 46’s objections would condemn settlements to the Taylor Report’s much cited ‘sustainability trap’ (see EDC responses 79 and 81). This seems to be based on a misunderstanding of Matthew Taylor’s argument. Taylor argued overtly that a simplistic ‘tick box’ approach to sustainability (the approach employed in Paragraph 3.1.4 of SD001) hampers good rural planning and should be replaced or tempered by a holistic approach and proactive neighbourhood planning.

In any case, as Taylor points out, relying on ‘incremental, developer led’, housing development, even in market towns, will not deliver the improvement in services required for sustainability. To Taylor, also, a community of anything up to 3,000 is ‘a small rural community’. Only one of Eden’s market towns reaches this level (just): the other two market towns, like the larger ‘key hubs’, have populations of half this level, while several of Eden’s designated key hubs have populations well below 700. Moreover, if Taylor is considered to be significant it is surprising how little attention is paid in the Plan to his primary argument regarding ‘Living Working Villages’, namely that their real need is for 100% affordable, perpetually affordable, community-led housing provision, for local people.

The eleventh core principle of the **NPPF** advises succinctly that plans should ‘focus significant development in **locations which are or can be made sustainable**’. This would suggest that a sound Local Plan should first, seek to support settlements that are already sustainable; and next, actively identify (a) those settlements that urgently need a greater population to support an existing range of facilities, and (b) those that need more facilities to serve an existing population. Such a process requires a flexible, holistic examination of real conditions and real prospects. As it stands, Paragraph **3.1.4 of SD001**, classifying a village as a ‘hub’ if it can place a tick against any three out of seven somewhat arbitrarily chosen facilities, would designate a settlement whose services comprise a church with eight worshippers, an unpopular pub, and a rarely used village hall, as a ‘key hub’, even if it is in no meaningful sense a ‘hub’. It would also deny this status to a village with a primary school, a GP surgery, and several other services such as a garden centre or a swimming pool, and which serves as a genuine ‘hub’ for other communities.

It is regrettable that the final draft of SD001 (following SD019) set aside the logic of SD026 (*Technical Paper – Housing Distribution*, April 2014). Para 2.12 of SD026 emphasised the primacy of education and healthcare in defining key hubs, presumably because of their

importance to the very young (and their parents) and the very old (and their carers). Paragraph 6.4 of SD026 opted realistically for either a school or a GP surgery in selecting key hubs. A major weakness of LS1 3.1.4 is that neither a primary school nor a GP surgery is now required.

The logic of the proposal by Respondent 65 that key hubs should have six or seven of the identified facilities, if they are to be regarded as sustainable, seems overwhelming. However, reducing the number of hubs to thirteen might exclude a number of settlements with a realistic chance of achieving sustainability and (equally important in view of Objective 17) an established community desire for inclusion.

Proposal:

A simple amendment to **Para 3.1.4**, as italicised below, would increase the likelihood of the Council's vision and objectives being fulfilled by returning the number of hubs to 20 or 21.

Villages are identified as hubs if they contain more than one hundred properties, a primary school, and three further services out of a post office, shop, village hall, pub, GP surgery and church, which also serve surrounding villages.

This simple amendment (subject no doubt to appeals from any smaller settlements objecting to reclassification), would require the consequential editing of the lists of Key Hubs and Smaller Villages and Hamlets, but no change to SD001's arguments and objectives. The final phrase also reintroduces the meaningful use of the term 'hub' which has been lost sight of in the final draft of the Local plan. Both Pooley Bridge and Askham are, for example, hubs for Sockbridge & Tirril, a fact which the boundary of the National Park tends to obscure.

Reduction to 20/21 hubs would increase by 25% the development envisaged for each hub, thus addressing, though in a small degree, the second of the Inspector's questions. Naturally, requiring a primary school and *four* further services would be better still, in this respect, producing 16 hubs with enhanced development prospects, but this might be considered an impracticable reversal at this late stage.

Tests of Soundness

1. LS1 is flawed in that its criteria for selecting of key hubs are not consistent with achieving sustainable development. Therefore it is not positively prepared.
2. Compared with reasoned alternatives suggested by respondents Para 3.1.4 is not justified.
3. By ignoring the requirement that development should be focused on settlements that are or can be made sustainable, the policy is not consistent with the National Planning Policy Framework.