

HEARING STATEMENT re: EXAMINATION OF ALLERDLAE LOCAL PLAN SETTLEMENT HIERARCHY

This statement is submitted by Bill Finlay. I have been an Allerdale councillor since May 2011 and have sat on its Development Panel since that time.

I represent Aspatria which is a predominantly urban Ward. In addition I currently chair the Aspatria Rural Partnership which is a voluntary partnership of nine Parishes including and surrounding the town of Aspatria. These surrounding parishes are essentially rural in character containing both larger and smaller villages, hamlets and more scattered individual dwellings including farmhouses.

I hold two degrees in Town and Country Planning and have been a member of the Royal Town Planning Institute since 1988. I am presently negotiating a change of membership class from Full to Retired Member.

My comments here relate to **Policy S3 Spatial Strategy and Growth**.

- 1 Para 64 outlines the Council's approach to the scale, location and distribution of growth. It defines the settlement hierarchy, which sets out the role of settlements, including the form and scale of development that would be expected within the towns and villages and what is acceptable in the open countryside.
- 2 It notes that:
"New development will be located in accordance with the spatial strategy and will be concentrated within the towns and villages identified in the settlement hierarchy. The scale of development proposed will be expected to be commensurate to the size of the settlement and reflect its position in the settlement hierarchy."
- 3 "Proposals outside of defined settlements, including those adjacent to Infill/Rounding Off Villages, will be limited to:
 - a) Housing essential for rural workers in the operation of a rural based enterprise;
 - b) Housing following the rural exceptions policy;
 - c) An appropriate diversification of an existing agricultural or land based activity;
 - d) The optimal viable use of a heritage asset or appropriate enabling development to secure the future of heritage assets;
 - e) A recreation or tourism proposal requiring a countryside location;
 - f) Facilities essential to social and community needs;
 - g) The replacement of an existing dwelling;
 - h) A suitably scaled extension to an existing building;
 - i) The conversion or reuse of a suitable existing building;
 - j) Other development requiring a countryside location for technical or operational reasons."
- 4 However, para 65 introduces an element of contradiction when it notes:
"Allerdale is a predominantly rural area and all its communities have a role in sustainable growth." (my emphasis)... In order for smaller rural settlements to remain sustainable there needs to be opportunities for appropriate small-scale development in order to help meet the local need for housing and employment outside the main centres.

- 5 The contradiction begins to become more apparent at para 66 **Role of Settlements** which outlines five tiers of settlement hierarchy namely:
- a) Principal Service Centre
 - b) Key Service Centres
 - c) Local Service Centres
 - d) Rural Villages
 - i) Limited Growth Villages
 - ii) Infill/Rounding Off Villages
- 6 In amplification, the Plan states at para 71 **Rural Villages** that:
 “In the settlements identified as villages, a limited level of development will be supported in order to help retain the vitality of these communities. This level of the hierarchy is split into two further categories; Limited Growth Villages and Infill/Rounding Off Villages;
- Limited Growth Villages: New housing and employment will be restricted to small-scale development within the designated settlement boundary.
- Infill / Rounding Off Villages: Very small scale development may be appropriate to respond to local needs and to contribute to the vitality of rural communities. For this level of the hierarchy settlement limits will be removed and development will be directed by criteria in Policy S5 for very small scale rounding off and infill plots. These plots are expected to be appropriately sized, unless the proposal is to deliver affordable housing in accordance with Policy S9 (Rural Exception Sites).”
- 7 The issue that emerges is that many settlements below village level have not been accorded settlement boundaries, and are therefore de facto not regarded as being sustainable settlements in their own right.
- 8 This is at odds with the patterns of settlement that have evolved in Cumbria, which is the second largest county by area in England whilst simultaneously having the second lowest population density. Outside of urban areas i.e. the three tiers of Service Centres outlined above, typical and widespread settlement patterns include hamlets and scattered housing – farmhouses and residential properties – as well as identifiable villages.
- 9 Yet below village level, the Plan types the balance of Allerdale as being **The Countryside** as Para 74 notes:
 “In an exception to the spatial strategy, Policy S3 allows for certain types of development in the open countryside and villages/hamlets not named in the above hierarchy. The specific cases are listed in the policy and further detail provided throughout the Local Plan “ (my emphasis)
- 10 These exceptions are listed in para 64 above, and are predicated on circumstances that permit residential development that relate either to the predominant economic activities perceived to take place in the countryside i.e.
- farming
 - recreation
 - tourism
- or to the beneficial retention of existing redundant buildings.

- 11 There is no explicit or implicit acknowledgement that rural settlements at sub-village level may function partly or essentially as residential settlements, nor indeed that if this was not the case many would have become derelict and abandoned long ago.
- 12 In defining this 'cliff edge', Allerdale planners use a test of 'sustainability' which relies on the local availability of key services such as public transport, shopping, a village pub and hall etc.
- 13 My concern is that we know that social and technological changes already in progress have brought the robustness of this 'test' into doubt, and assuming the trajectory of those changes continues and perhaps accelerates over the 15 year life of the Local Plan once adopted, I suspect there will be an increasing conflict between the plan and what is desirable and deliverable over time.
- 14 For example, online shopping is becoming increasingly popular. This not only challenges the viability of existing shops in lower-order service centres, but also in higher-order centres. So if this test continues to be applied through to 2029, at what point will Limited Growth Villages and perhaps even Local Service Centres now assumed to be sustainable have to be reconsidered as being unsustainable?
- 15 And conversely, many residents living throughout Allerdale from urban centres to rural rely on the home delivery of e.g. weekly groceries ordered on-line. As this is a universal service, how can its availability in urban and rural settlements be judged as if having different outcomes – in the urban supporting sustainability while in the rural making no positive contribution?
- 16 Another example of discordance between proposed policy and real life relates to the roll-out of Superfast Broadband across Cumbria, with at least 93% of residents predicted to have access to minimum speeds of 16mbs upon completion in two years time. As the 7% not expected to achieve superfast speeds will be determined by geography as much as population density, as well as by distance from existing exchanges, it does not follow that even scattered communities will be excluded from enjoying the social and economic benefits of superfast broadband.
- 17 I therefore feel that some flexibility needs to be accorded to permit the organic and balanced housing and associated economic development e.g. home-working of communities living in hamlets as opposed to villages.
- 18 As each hamlet will have unique needs and opportunities, I do not feel that this should be factored in by redistributing the housing growth targets for larger settlements already proposed, but rather that it be left to 'windfall' projects, each one to be determined on its merits and with its potential contribution to achieving sustainability weighed, rather than assuming as the draft Plan does that sustainability is already a lost cause below village level.
- 19 If we do not make this provision, we risk the unintended consequence of gradually degrading the viability of those settlements in predominantly rural areas which in many ways define the essential character of Allerdale, despite and in opposition to social, technological and economic trends which have the potential to deliver greater and not less sustainability there.

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