

# MATTER 4



**JohnsonMowat**

Planning & Development Consultants

## Response to Craven District Council Local Plan Examination Inspector's Questions

September 2018

### **MATTER 4**

### **Spatial Strategy and Housing Growth**

CLIENT: KCS DEVELOPMENT LTD

SITE REFERENCE NO: GA025 – LAND OFF SKIPTON ROAD, GARGRAVE



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## **1.0 INTRODUCTION**

- 1.1 This statement should be read alongside previous representations submitted on behalf of KCS Development Ltd in relation to the emerging Craven Local Plan.
- 1.2 A planning application for the residential development of 44 dwellings was submitted to the Council in February 2017 (application reference 30/2017/71778). The application was recommended for approval by Officers however refused consent at Planning Committee in June 2018. A Section 78 Written Representations appeal has been submitted against the refusal of planning permission (APP/C2708/W/18/3210048).
- 1.3 It should be noted that we do not consider it necessary to answer all of the Inspector's Questions. For the avoidance of all doubt those that we do wish to respond to have been set out.
- 1.4 It is not the intention of KCS Development or Johnson Mowat to appear in person at the Matter 4 session; the contents of this Statement should therefore be relied upon.

## **2.0 RESPONSE TO INSPCTOR'S MATTER 4 QUESTIONS**

### *Issue 1 – Settlement Hierarchy*

#### **Q3. Have settlements been appropriately identified in the hierarchy?**

- 2.1 We support the inclusion of Gargrave as a Local Service Centre. We feel this is an appropriate recognition of the level of services and facilities available with the settlement.
- 2.2 Local Service Centres were identified based upon their accessibility to the surrounding area and location relative to employment centre and other service villages, the availability of community services and facilities, the ability of the village of accommodate additional development without detriment to its form and character, the ability of existing services to cater for additional growth and the consistency with policies concerning agricultural land and the environment.
- 2.3 It should be acknowledged that Gargrave has good access to public transport facilities including a train station and bus services connecting the settlement to the wider District. Furthermore Gargrave is well located to employment opportunities with the Systagenix complex located to the east of the Village. The settlement is not located within the Yorkshire Dales National Park and is not restricted by any other landscape designations.



*Issue 2 – Housing Growth*

**Q3. Are the levels of growth appropriate and justified having regard to the size, role, function, and accessibility of each settlement to employment services and facilities?**

- 2.1 We consider that the stringent distribution of housing growth across the district does not provide the flexibility to identify the best housing sites for development. We do not consider it necessary to provide guidelines for housing distribution as set out in the table at pages 51 and 52 of the draft Local Plan. It is our view that the settlement hierarchy as set out in Policy SP 4 criterion A-K will adequately distribute housing across the district to the most appropriate locations.
- 2.2 In the very least, whilst it is clear in Policy SP1 that the District’s housing target is a “minimum provision and equates to an annual average housing requirement of 230 net additional dwellings per annum”, we consider that the wording of Policy SP4 requires amending to reiterate that the guidelines for the distribution of new dwellings should be viewed in the context of the housing requirement being a minimum (underlining our emphasis).
- 2.3 Should the Inspector be minded to retain the guidelines for housing distribution Johnson Mowat are of the view that given the range of services and facilities available within Gargrave, its proximity to employment opportunities and accessibility to the District Centre of Skipton, the settlement is able to take a greater level of growth than currently apportioned.

**Q5. How will the spatial distribution of housing support sustainable communities in the Local Service Centres and Villages? Is Policy SP4 consistent with paragraph 55 of the Framework? Will there be enough growth in small, medium and large villages to help support sustainable rural communities.**

- 2.4 It is our view that the very prescriptive distribution as set out in Policy SP4 may not facilitate the necessary growth to maintain the viability and vitality of rural communities. The Council’s approach does not provide for flexibility allowing homes to be built in the most sustainable of locations and supporting local services and facilities.
- 2.5 It is noted that Gargrave as a Local Service Centre will serve as a hub to other rural settlements in proximity, such as Broughton, Eshton and Coniston Cold. It is therefore important that the distribution allows for appropriate growth for Gargrave to serve this role.

**Q6. What is the justification for the very prescriptive levels of housing growth between tiers 2 -4? For example, why is each of the Local Service Centres attributed 3.5% growth?**

- 2.6 It is agreed that the housing distribution between the tiers, and those settlements within the tiers, is very prescriptive. We do not agree with the stringent distribution of housing and do not consider that it results in the most sustainably located development across the District.



We see no justification within the Evidence Base documents for such a prescriptive distribution.

- 2.7 Whilst it is appropriate and logical that the Principle Town of Skipton should be the main focus for development we consider that a blanket approach to the Tiers 2 and 3 of the hierarchy does not take into account each settlement on its own merits and the services and facilities available.
- 2.8 We consider that the Local Service Centres are able to facilitate higher levels of growth than apportioned which will assist in their roles as hubs for other rural villages and settlements within the North and South of the District.
- 2.9 Policy SP4 should be amended to remove the guideline distributions. Policy SP4 criterion A-K fulfil the aims of the settlement hierarchy without needing to set out individual settlement numbers. Such an amendment would not compromise the soundness of the plan.
- 2.10 Again it is reiterated that should the Inspector be minded to retain the guidelines for housing distribution, greater development should be apportioned to the Local Service Centres.

**Q9. Where is the proposed level of housing growth going to come from in the ‘Other village and Open Countryside’ (6%)? How will it be distributed?**

- 2.11 In line with our comments above we do not consider that a specific distribution to the tier 5 settlements is necessary. Development in other villages and open countryside is sufficiently dealt with through criterion F – K of Policy SP4 and the general principle of the settlement hierarchy.
- 2.12 We take the view that such proposals will constitute as windfall development and therefore should be considered over and above the **minimum** housing requirement of SP1 in line with the Framework’s aim to significantly boost housing.
- 2.13 The currently apportioned 6% (14 dwellings per annum) of total housing growth should be redistributed towards the Local Service Villages.