

Town and Country Planning Act 1990 (As Amended)

Local Plan Examination Hearing Statement

Matter 4 - Spatial Strategy and Housing Growth (Policy SP4)

CLIENT: Glusburn Holdings Limited

REF: GLU3/1/HS/M4

DATE: September 2018

Knights plc The Brampton Newcastle-under-Lyme Staffordshire ST5 0QW

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# 1. INTRODUCTION

- 1.1 This statement is provided in response to the Inspector's Matters, Issues and Questions for Examination in connection with the Craven Local Plan and should be read in conjunction with our representations regarding the emerging Local Plan on behalf of Glusburn Holdings Limited.
- 1.2 This statement has been prepared in connection with Matter 4 and separate statements have been prepared in connection with Matter 5 and Matter 14.
- 1.3 We have not considered it necessary to respond to all of the Inspector's questions in connection with Matter 4, but have set out our response to those questions we wish to comment on in section 2 below.
- 1.4 We and Glusburn Holdings Limited do not intent to appear in person at the Matter 4 hearing session and therefore the content of this Hearing Statement and our previous representations to the emerging Local Plan should be relied upon.

# 2. **RESPONSE TO MATTER 4 QUESTIONS**

# Issue 1 - Settlement Hierarchy

# **Question 3**

- 2.1 There is general agreement to the position of settlements as identified in the hierarchy and we support the inclusion of Glusburn and Crosshills as a Local Service Centre, which is a settlement with a good range of services/amenities and good public transport access and connectivity including to higher order settlements. Glusburn and Crosshills is also outside the Yorkshire Dales National Park and is considered suitable for a reasonable level of growth in the plan period, not least to help sustain the existing good level/range of local amenities and in turn maintain and enhance the sustainability of Glusburn and Crosshills in the coming years.
- 2.2 However, the level of growth proposed for a number of settlements (including the Local Service Centre of Glusburn and Crosshills) is not commensurate with their status, and this matter should be revisited as set out in our previous representations and again below.

#### Issue 2 - Housing Growth

# Question 3

2.3 We consider that Policy SP4 is overly prescriptive in terms of the distribution of housing and that greater flexibility should be provided in the Local Plan to enable suitable housing sites/sustainable development to come forward for development, which would in turn enhance the role and sustainability of settlements in the rural area/rural communities.

- 2.4 In line with the requirement to boost significantly the supply of housing, housing requirements should be expressed as a <u>minimum</u>.
- 2.5 As mentioned in response to Issue 1, Question 3 above, we also consider that the Local Service Centre of Glusburn and Crosshills can and should accommodate a greater level of growth over the plan period than the emerging Local Plan currently allows for.
- 2.6 Constraining growth in a large village such as Glusburn and Crosshills throughout the plan period would not support the vitality and viability of rural communities as required by the Framework (both the original Framework and the revised Framework), and would also result in reduced delivery of affordable housing.

# **Question 5**

2.7 As set out in response to Issue 2, Question 3 above, in our view more flexibility is required than the prescriptive approach to the distribution of housing set out in Policy SP4. It is considered that a more flexible approach to housing distribution in established, sustainable rural communities and a greater level of growth in Glusburn and Crosshills specifically would be a more appropriate approach and help to support and enhance sustainable rural communities such as the local community in Glusburn and Crosshills and increase the delivery of affordable housing.

# Question 6

- 2.8 Further to the comments above concerning Question 5, we agree that Policy SP4 features *very prescriptive* levels of housing growth between tiers 2-4. Moreover we do not consider that such an approach would enable the most suitable housing sites overall (when considering all factors including all elements of sustainable development in the round) to come forward or take the opportunities available to maintain and enhance the sustainability of rural communities.
- 2.9 We assert that a more flexible and positive approach is required including to take greater account of the combination of the accessibility of and range of services within each Tier 2 and 3 settlement and potential development opportunities within those settlements; and that the Local Service Centre of Glusburn and Crosshills can and should accommodate a greater level of growth that would generate knock-on benefits for its sustainability including to maintain and enhance the existing range of local services and deliver more affordable housing. We consider that such an approach would result in a more positively prepared and effective policy/Local Plan.

#### Issue 3 - Housing Growth on Non-allocated sites

#### Question 1

2.10 In the event it is deemed appropriate in due course to define the boundaries of settlements on the Policies Map, the settlement boundary for Glusburn and Crosshills should be drawn to include all of our client's land at Hayfield Mills i.e. both the existing factory buildings and all of the adjoining land/curtilage (including omission site SC014 in its entirety). Doing so would result in the settlement boundary following the northern edge of Glusburn Beck which would be entirely appropriate given the characteristics of our client's site and its surroundings.

#### **Question 2**

2.11 We confirm our support for the proposed approach within Policy SP4 (at part H) to support proposals for additional housing growth on non-allocated previously developed land within Tier 1-4 settlements. This approach presents the opportunity to boost the supply of housing by way of the redevelopment of previously developed land that is an inherently sustainable form of development.

#### **Question 5**

2.12 Further to our comments in response to Issue 3, question 1 above, we consider that inclusion of settlement boundaries on the Policies Map would avoid confusion over the *"continuous built form"* of settlements and ensure that Policy SP4 is more easily interpreted and more effective.

#### **Question 10**

2.13 Further to our response to Issue 3, Question 2 above, we consider that part H of Policy SP4 does indeed encourage the effective use of previously developed land - subject to ensuring that other applicable policies in the Local Plan are sufficiently clear and flexible to enable such development opportunities to come forward and in turn deliver sustainable development that can be a valuable means of supporting sustainable rural communities.

#### Knights plc

September 2018