

Plan for the Borough of Wellingborough – Part 2 Local Plan Examination

Matter 3 – Village Boundaries: Policy SS1

Date: March 2018

1. Introduction

- 1.1 This statement provides the response of the Borough Council of Wellingborough (BCW) to the following issues and questions raised by the Inspector relating to Matter 3 of the examination into the Plan for the Borough of Wellingborough.

Matter 3 – Village Boundaries: Policy SS1

3.1 Criteria for determining the proposed village boundaries:

(i) Is the principle of using village or settlement boundaries, to control or manage the distribution of development within the Borough, sound? How would it work in relation to rural exception sites? Is there a conflict with either national planning policy (for example paragraph 47 of the Framework or the JCS, e.g. policies 11 and 13?)

(ii) Are the criteria, as set out in Table 4.2 and referred to in policy SS1, appropriate to define the extent of the areas within the village boundaries to accommodate the necessary development, so as to enable the delivery of the objectively assessed housing requirement for the Borough of Wellingborough, as set out in the JCS?

(iii) Are the village boundaries drawn in accordance with these criteria?

- 3.2 Overall capacity within the proposed settlement boundaries:** *Is the overall capacity for new housing within the proposed village boundaries, together with the proposed allocations in the Plan, having regard to the latest housing land supply situation, and taking into account constraints such as areas of importance for nature conservation, tree preservation orders and other environmental considerations, sufficient to satisfactorily accommodate the objectively assessed housing requirement for the Borough of Wellingborough, as set out in the JCS?*

- 3.3 Flexibility within the proposed settlement boundaries:** *Is there a case for flexibility within the proposed settlement boundaries in the light of the likely delivery of the housing requirement as set out in the Plan? If the answer is yes:*

(i) What should the appropriate level of flexibility be for the plan area?

(ii) Do the proposed settlement boundaries provide for this level of flexibility?

(iii) If not, which settlements should have their boundaries extended to provide the required level of flexibility and where/by what amount?

- 3.4 Specific settlement boundaries:** *In the light of the above considerations, are any of the proposed settlement boundaries inadequately drawn? If so, which of the following settlement boundaries should be redrawn, in terms of specific sites and development capacity?*

1.2 References used in this statement (e.g. CON 1) relate to documents held in the examination library available on the council website on the [examination page](#).

2. Response of the BCW to the specific questions relating to Matter 3

3.1 (i) ***Is the principle of using village or settlement boundaries, to control or manage the distribution of development within the Borough, sound? How would it work in relation to rural exception sites? Is there a conflict with either national planning policy (for example paragraph 47 of the Framework or the JCS, e.g. policies 11 and 13?)***

2.1 The BCW justification for determining village boundaries is set out in paragraphs 4.5 to 4.8 of [CON 9](#) and the village boundaries background papers produced at each stage of the plan. As set out in Policy SS1 the purpose of the village boundaries is to interpret whether sites are 'within' or 'adjoining' villages for the purposes of Policies 11 and 13 of the Joint Core Strategy (JCS). This is considered to provide helpful certainty and clarity for the development management process. The identification of a village boundary does not add any additional control to development in the borough. The overall development strategy is set out in the JCS.

2.2 Whilst Policy 11 of the JCS does not specifically require the identification of boundaries, paragraph 5.18 of that plan states:

'In order to clarify the application of the criteria 2b and 2c of Policy 11, Part 2 Local Plans and/or Neighbourhood Plans may define village boundaries or more detailed village boundary criteria, taking account of the character of the villages. Village boundaries can provide a tool to plan positively for growth and to prevent ad-hoc encroachment into open countryside, particularly for villages located close to larger settlements where coalescence is a concern...'

2.3 At the issues and options stage of the plan, Issue 18 posed three options: no additional guidance to the JCS; identifying criteria for defining whether a site was within or adjoining a village; or defining boundaries on a map. The advantages and disadvantages of boundaries were identified in table 1 of the [Village Boundaries Background Paper, Dec 2014](#). The majority of respondents at that stage considered that boundaries were the most appropriate response. The sustainability assessment included in Appendix C of the [Villages Boundaries Background Paper, April 2016](#) which accompanied the emerging plan also concluded that identifying boundaries was the most sustainable option. The approach is therefore justified, having been tested against the reasonable alternatives.

2.4 The overall strategy of the JCS, as set out in Policy 11, is that development in the rural areas will be limited to that required to support a prosperous rural economy or to meet a locally arising need, which cannot be met more sustainably at a nearby larger settlement. Within the village boundaries suitable small scale infilling will be permitted, together with conversions and change of use. The boundaries at Finedon have been drawn to accommodate the housing requirements identified in Table 5 of the JCS as required by Policy 11(2c). The housing requirements for Earls Barton, Wollaston and Irchester have been addressed through Neighbourhood Plans and all those plans identify sites within identified village boundaries to meet the JCS requirements.

2.5 Village boundaries do not unreasonably restrict development, as JCS Policy 13 permits development to meet identified needs adjoining these boundaries. Rural exceptions sites

will be defined as any site outside the defined village boundary. The council has a proactive approach to identifying local need through the production of housing needs surveys and works with Parish Councils and delivery partners to identify suitable sites. A rolling programme of housing needs surveys has been identified and is updated to reflect any changing circumstances. The current programme is included as Appendix A. In addition, a new Policy (H6) is proposed to enable single self-build exception sites. This is a positive approach to meeting housing need in the rural area and ensuring that the level of growth accords with the spatial strategy as set out in the JCS. Table 1 of the JCS clearly identifies that villages should be providing for their own locally identified needs, unless these needs can be met more sustainably at a nearby larger settlement. The use of housing needs surveys is a pragmatic and systematic way of identifying that need. The use of the housing needs surveys also ensures that the development matches the locally identified need in terms of scale and tenure as closely as possible rather than relying on more speculative development. In addition the use of housing needs surveys provides flexibility over the plan period, as these surveys are updated every 3-5 years so the changing needs of a settlement can be understood and sustainably accommodated. The council intends to produce an SPD to provide further guidance to support the delivery of rural exception sites.

- 2.6 There is no conflict with either national policy or the JCS. The boundaries are defined as an implementation tool to determine whether Policy 11 or Policy 13 applies to a particular proposal. This is an effective policy approach which provides consistency, certainty and clarity.

3.1 (ii) Are the criteria, as set out in Table 4.2 and referred to in policy SS1, appropriate to define the extent of the areas within the village boundaries to accommodate the necessary development, so as to enable the delivery of the objectively assessed housing requirement for the Borough of Wellingborough, as set out in the JCS?

- 2.7 The criteria set out in Table 4.2 have evolved over the preparation of the plan and have taken account of comments received at each stage. The village boundaries background papers, prepared at each stage of the plan, show how the criteria have evolved and responses to individual representations have been included in [CON 6](#), [CON 7](#) and [CON 8](#). The boundaries broadly aim to define the main built up area of the settlements. As referred to above the purpose of the boundaries is to interpret whether sites are 'within' or 'adjoining' villages for the purposes of Policies 11 and 13 of the JCS. It is not anticipated that all of the development in the rural area will be within these boundaries; development will be permitted adjoining the boundaries to meet local needs, consistent with Policies 11 and 13 of the JCS. The extent of the area within the village boundaries will not therefore be expected to accommodate all the necessary development to enable the delivery of the objectively assessed need as set out in the JCS.

3.1 (iii) Are the village boundaries drawn in accordance with these criteria?

- 2.8 The Village Boundaries Background Paper, Sept 2017 ([ENV 1](#)) sets out the justification for each of the village boundaries. For each village a justification is provided against each of the relevant criteria for any changes from the adopted Village Policy Lines (from the saved

Borough of Wellingborough Local Plan), any specific areas excluded from the boundaries and a response to any representations received.

2.9 In response to representations received to the publication plan the council would support the following main modifications to the village boundaries to ensure they are in accordance with the criteria:

- Rep ID 146 – DLP Planning Consultants on behalf of Hampton Brook Ltd – modification to Great Doddington Village Boundary at Top Farm as set out in [CON 8](#) page 121
- Rep ID 38 – Henry H Bletsoe & Son on behalf of Executors of J Bowers Deceased – modification to Grendon Village Boundary at Hill Farm off Chequers Lane as set out in [CON 8](#) page

3.2 Overall capacity within the proposed settlement boundaries: *Is the overall capacity for new housing within the proposed village boundaries, together with the proposed allocations in the Plan, having regard to the latest housing land supply situation, and taking into account constraints such as areas of importance for nature conservation, tree preservation orders and other environmental considerations, sufficient to satisfactorily accommodate the objectively assessed housing requirement for the Borough of Wellingborough, as set out in the JCS?*

2.10 As referred to above, at paragraph 2.7, it is not anticipated that all rural housing development will be accommodated within the village boundaries. It is not therefore necessary to attempt to determine the capacity within the proposed settlement boundaries. Development will occur on infill plots, as a result of conversions, on sites allocated in Neighbourhood Plans and on sites adjoining the village boundaries. The existing housing land supply in the rural area is set out in the Wellingborough Rural Housing Allocation Methodology and Background Paper ([HOU 3](#)) (pages 5 – 6). The table on page 6 identifies that as at 31 March 2017, there is a residual requirement of 275 dwellings in the rural area outside of the four named villages or a need for 20 dwellings per year for the remaining 14 years of the plan period. Appendix 1 of that paper shows that on average 24 dwellings per year have been completed in these villages since 2001. None of these have been on allocated sites; they have all arisen as a result of infill plots, conversions and exceptions sites. Most of these villages have Village Policy Lines identified in the adopted saved local plan which are not too dissimilar from the village boundaries proposed in this plan. The environmental constraints and considerations within the rural area are also unchanged. There is therefore nothing to suggest that this past level of windfall development will not continue.

2.11 When considering overall rural supply it is notable that Earls Barton is providing for a level of development significantly in excess of the JCS requirement. This housing is therefore likely to be meeting needs arising from the wider rural area outside of Earls Barton and it is necessary to consider rural housing supply in this context. The overall rural housing land supply is set out in the table below.

Rural Housing Land Supply 2011-2031 as at 31 March 2017

	JCS Requirement	Net Completions	Commitments	Lapse Rate	Allocations	Residual Requirements
Earls Barton	250	-133	-358	+4	0 ¹	-237
Finedon	150	-80	-31	+2	-90	-49
Irchester	150	-9	-12	+1	-150	-20
Wollaston	160	-39	-12	+1	-84	26
Remaining rural area	540	-101	-168	+4	0	275
Total	1250	-362	-581	12	-324	-5

2.12 This table shows that only 5 additional dwellings need to be provided in the rural area of the borough in the next 14 years to meet the JCS rural requirement. This level of growth can most certainly be met, within and adjoining the village boundaries taking account of rural constraints and the fact that there is nothing to suggest that past windfall levels will not continue.

3.3 Flexibility within the proposed settlement boundaries: *Is there a case for flexibility within the proposed settlement boundaries in the light of the likely delivery of the housing requirement as set out in the Plan? If the answer is yes:*

(i) What should the appropriate level of flexibility be for the plan area?

(ii) Do the proposed settlement boundaries provide for this level of flexibility?

(iii) If not, which settlements should have their boundaries extended to provide the required level of flexibility and where/by what amount?

2.13 There is no need for flexibility within the proposed settlement boundaries. The JCS through Policies 11 and 13 already provides sufficient flexibility to ensure that rural housing needs are met. The purpose of village boundaries is only to interpret whether sites are within or adjoining villages. As identified above the level of rural housing development is considered likely to meet the rural housing requirement set out in the plan. Any additional development, other than small scale infilling or 'rural exceptions' schemes or agreed through a Neighbourhood Plan to meet a particular local need or opportunity, would be contrary to the spatial strategy of the JCS. Wider issues of housing delivery are set out in the response to Matter 4.

¹ The allocations in the Earls Barton Neighbourhood Plan now have planning permission and are therefore counted in the commitments.

3.4 Specific settlement boundaries: *In the light of the above considerations, are any of the proposed settlement boundaries inadequately drawn? If so, which of the following settlement boundaries should be redrawn, in terms of specific sites and development capacity?*

- 2.14 As referred to above in paragraph 2.9 the council would support main modifications to Great Doddington and Grendon village boundaries in response to representations received. These are minor modifications, but would potentially provide additional capacity for infill or conversions within the village boundaries.