

Appendix 2d – Location of Development

Comment No.	KBC Response
<p>Id 31 - We object to the omission of settlement boundaries from Category C villages. It is proposed that this may be addressed by defining settlement boundaries for those villages in accordance with 'Settlement Boundary Defining Principles'.</p>	<p>By the nature of category C villages, they are scattered settlements because the buildings do not follow a typical, organised or clustered plan form (linear, rectilinear, etc) and instead follow a spread out and irregular layout. As a result, development within these settlements is strictly controlled because a settlement boundary cannot be easily defined without including large areas of undeveloped land which would then be at risk from further development owing to their inclusion within a settlement boundary.</p>
<p>Id 120 - In Site Specific Proposals LDD Issues Paper 2009, at Appendix 1 the stated Principles for drawing village boundaries looked very different to what is shown in Box 1 today. The changes are subtle, and may easily pass without notice, but can have a very significant impact on village boundaries.</p> <p>Readers' attention should be drawn to the fact that in 2009, Principle 3 excluded new allocations from village boundaries, whereas today Principle 2 includes such new allocations, and thus surreptitiously redraws the village boundaries.</p> <p>This is relevant in a village (for example, Braybrooke) where the Parish Council and the overwhelming majority (over 95%) of all responses from villagers strongly opposed on legitimate planning grounds a new allocation that was proposed in 2009 (for example, RA128) and yet not only is such new allocation still being proposed in today's document despite all reasoned opposition, but this proposed new allocation, if it were now to be adopted, would also encompass a "fait accompli" re-drawing of the village boundary.</p>	<p>It is correct that criteria 2 (2009) has now been amended to only relate to affordable housing, and that open market allocations are now included within settlement boundaries in accordance with defining principle 2(d). The February 2012 Background Paper: Settlement Boundaries reports on page 5 that 4 comments were received in response to the SSPLDD Issues Consultation Paper, seeking for settlement boundaries to allow for limited growth in villages. This is the basis for changing the defining principles, as set out in the officers response to these comments.</p> <p>In 2009, Principle 3 (3) sought to exclude "Isolated development which is physically or visually detached from the settlement (including farm buildings or agricultural buildings on the edge of the village which relate more to the countryside than the</p>

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<p>This appears to be turning on its head the purposes of and the responses to the 2009 consultation.</p> <p>Similarly, large gardens or other open areas which were "visually detached from the settlement" were excluded from the village boundary in 2009, by exception from a curtilage that otherwise would be included under Principle 2, whereas today, if that same element of that same curtilage could instead be said to be "visually separated from the open countryside" it would now be able to be included under Principle 2.</p> <p>Self-evidently, in relation to any open space or large garden element of curtilage which has an identifiable visual feature along both its boundary separating it from the settlement and its boundary separating it from the open countryside (for example, RA128 in Braybrooke) these re-worded Principles will make it much easier to argue for the inclusion of such open space on the edge of the settlement within a re-drawn village boundary.</p> <p>These surreptitious changes, enabling development to be "eased in by the back door", must not be allowed to go unchallenged.</p> <p>Especially in the circumstances where **** has a known vested interest in the re-drawing of a village boundary (for example, Braybrooke) to include a particular proposed new allocation to a part of which the above considerations would almost certainly apply (for example, RA128).</p>	<p>village)". Principle 2(c) only allows for curtilages to be included where they are contained and visually separated from open countryside. However, principle 3(d) still prohibits large gardens and visually open areas which relate to open countryside rather than the settlement. This carries forwards the original aims in principle 3(3) in 2009.</p>
<p>Id 208 - In defining the respective settlement boundaries our client would request that the local planning authority include within the settlement boundary of Desborough an area of land which extends to approximately 1.5ha and which is situated to the east and south of</p>	<p>The proposed site is separated from the residential development site in Desborough known as 'The Grange' by a rural road. Defining principle 2(c) would not apply in this instance, as although the site itself has</p>

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<p>Stoke Road, Desborough as edged red on the attached location plan.</p> <p>The site is located immediately to the north of the housing area which benefits from the extant outline planning permission KET/2011/0235, the northern boundary of which is currently proposed as the extent of the settlement boundary in this location. There is an existing public right of way along the eastern boundary of the site area which extends through into the proposed housing development to the south and as such a pedestrian link from the housing development connecting to the public right of way through the site was identified on the indicative master plan submitted in support of the housing development (KET/2011/0235). This pedestrian link provides the opportunity for the site to be well connected with the local facilities which are proposed to be provided as part of the housing development as well as to Desborough town centre.</p> <p>With reference to the settlement boundary defining principles set out in the draft local plan and in particular Principle 2(c), the site benefits from strong tree and hedge boundaries to the north, east and west which result in the site being a visually contained area of land within the landscape.</p> <p>The site is currently occupied by a number of buildings which it is understood were historically associated with the former airfield and which have subsequently been used for other commercial purposes. As such the site can be considered to be previously developed land in accordance with the definition set out in the NPPF Annex 2 and therefore could offer the opportunity as a potential residential development, subject to other relevant policies of the plan.</p> <p>The location and relationship of the site with the housing development to the south; its relative containment together with it</p>	<p>established hedgerow/tree boundaries, it is these boundaries which separate it from the built form. Inclusion of the site would cross Back Lane which the settlement boundary currently follows in accordance with defining principle 1).</p>
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<p>being previously developed land would be considered justification to support the sites inclusion within the settlement boundary.</p>	
<p>Id 236 - Comments made on behalf of Desborough Town Council</p> <p>Section 3&4 - Q1 & 2 - Definitely need detailed ideas on how to identify and provide housing for elderly and disabled residents, for example single story dwellings - how to insist on new housing developments providing these? There are none currently provided on the Grange and 2 bungalows on Weavers mead. With a demographic like ours this housing is essential.</p>	<p>Your comment is noted. We will explore ways in which the aims of questions 1 and 2 can be achieved.</p>
<p>Id 268 - Paras 3.11 and 3.12 appear to contradict each other. 3.11 says "there is a policy vacuum regarding ... conversion of existing buildings for new buildings not linked to diversification..... " yet 3.12 says "there is no need for SSP2 to include ...". The 2012 Background Paper proposed very good and strict criteria on this subject. If such policy is not now entirely superceded by legislation, it should be reinstated as local policy. Otherwise there could be a loophole allowing residential development that bypasses planning controls.</p>	<p>Thank you for your comments. Para 3.7 - 3.11 of the draft SSP2 Local Plan highlights changes to Local Policy (JCS), National Policy (NPPF) and legislation (Part Q of the GDPO) since the publication of the Background Paper – Options for Re-Use and Redevelopment of Rural Buildings and Farm Diversification (February 2012); this is the basis for not including specific policies within the SSP2 Local Plan to address issues raised through the Background Paper referred to.</p> <p>The updated NPPF (2018) was published during the SSP2 Local Plan consultation exercise, and could therefore, not be taken into account at the time. The NPPF (2018) is more explicit in terms of offering support to proposals for rural housing which involves amongst other things, the re-use of heritage</p>

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	<p>assets, the development of redundant or disused buildings and enhancement of its immediate setting, and the subdivision of existing residential dwellings. The policy vacuum referred to in the draft SSP2 Local Plan is very narrow and limited to: 1) replacement dwellings in open countryside (through the demolition of an existing dwelling), and; 2) the conversion of existing buildings for use as new dwellings where these are not linked to diversification of a rural business.</p> <p>With respect of scenario (1), where such proposals are located in open countryside, it would be considered unacceptable in principle, although this could still be weighed against the sustainability benefits of higher environmental performance, or more efficient use of floorspace. As a result, further policy criteria is not required as policy control mechanisms are already available within the North Northamptonshire Joint Core Strategy in terms of energy efficiency and design.</p> <p>With respect of scenario (2), the statement refers specifically to existing buildings in general (not being restricted to agricultural buildings which is the focus of the Part Q GPDO) and proposals not linked to</p>
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	<p>diversification (as rural business diversification proposals are addressed through Policy 25 of the North Northamptonshire Joint Core Strategy) which result in new dwelling. This policy vacuum will be present only within the Development Plan, but the issue remains covered at a national level through the NPPF (2018) (para 79(c)) which gives clear support for rural dwellings which a) fulfils an essential need for a rural worker; b) the optimal re-use of heritage assets; c) the development of redundant or disused buildings which enhancement of its immediate setting; d) the subdivision of existing residential dwellings; and e) is of exceptional design quality. On this basis, it is considered that there has been a sufficient policy shift at a national level since publication of the original background paper for there to no longer require further policy on the matter.</p>
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