

SETTLEMENT BOUNDARIES AND POLICY OV1

1. The introduction to the July 2016 *Settlement Boundary Review* states on page 3 that:

'The Local Plan defines settlements which are "sustainable" and this is justified by this Settlement Boundary Review. By implication any other settlements (or parts of settlements currently defined by a settlement boundary) are unsustainable (or less sustainable).'

2. As set out in my general representations on rural housing, there is no robust evidence to support the use of blanket policies which seek to restrict housing growth in certain settlements and prevent other settlements from expanding. National policy is explicit in confirming that all settlements can play a role in the delivery of sustainable development and that opportunities should be facilitated even in those areas where sustainable transport solutions, services and facilities are limited.
3. At no point does the methodology applied in the *Review* seek to establish housing needs arising within a specific village and/or Parish. The *Review* also excludes consideration of sites with an area of less than 0.24ha /which would deliver fewer than five dwellings despite these being invited through the Call for Sites process. Justification for this is sought in the NPPG relating to housing land availability assessments, however there is nothing within either the NPPF or NPPG which states or implies that sites excluded from the SLAA process will be inappropriate for development. Indeed, it is essential in my view to facilitate a range of development opportunities, large and small, to ensure choice and competition in the market for land, and to safeguard against a shortfall in delivery in the event of unforeseen economic, environmental and/or infrastructure constraints which might delay or negate the development of strategic sites.
4. LPAs are required to plan positively for development to meet identified rural needs and this involves creating strategic and non-strategic opportunities for growth. For rural settlements in particular, housing needs are often best addressed through small extensions to settlement boundaries to create infill and rounding-off opportunities, small groups of dwellings and self-build plots. This type of exercise has not been undertaken as part of

the *Settlement Boundary Review* which for the majority of Sustainable Settlements and Other Villages recommends:

- no changes to the settlement boundary;
 - deletion of the settlement boundary, or part thereof; or
 - allocation of one or more medium-large sites, but no other changes;
5. Finally, in the absence of any positive provision in Other Villages, Policy OV1 allows for some limited development in the form of rural affordable exceptions housing. However, for the reasons set out in my general representations, I dispute that development delivered under this policy, if any, will be sufficient to meet rural needs for market and affordable housing in full.