

## Clutton Neighbourhood Plan –

### Appendix 28 Consultation Record & Strategy

Consultation is a vital part of any Neighbourhood Planning process. For a plan to be a real shared vision the community must be

- kept fully informed of what is being proposed
- able to make their views known throughout the process
- have opportunities to be actively involved in shaping the emerging neighbourhood plan
- be made aware of how their views have informed the draft neighbourhood plan

To meet all these objectives the consultation strategy needed to be a two way process and multi channelled.

To encourage as many people as possible to come to events and to give us their views it was decided at the start not to ask for full names and addresses, but only names and postcodes. In this way it was hoped that nobody would feel able to give their views without feeling that their privacy was being invaded.

**Steering group** – Ensuring that the composition of the steering group (see appendix 27) was as representative as possible of the area, (geographically, demographically, interest and occupation wise) was part of the strategy. One of the most effective ways of disseminating, and collecting, information is via the “grapevine”. It was felt that by having steering group members who were truly part of the community they would be able to engage with people who might not otherwise give us their views.

**Website** The parish council has its own website, but it was decided to have a dedicated Neighbourhood Plan website, as this would enable us to make more material available without the danger that it would be lost in amongst deluge of Parish Council minutes, standing orders, road closure notices, etc. etc.

The website not only publishes information but also has a contact form so that visitors can let the steering group have their views & comments.

Problems have been encountered with the website as it has been periodically subject to hacking attacks. The company hosting website do keep up to date backups and have always able to restore the site quickly once they are aware that it has been hacked.

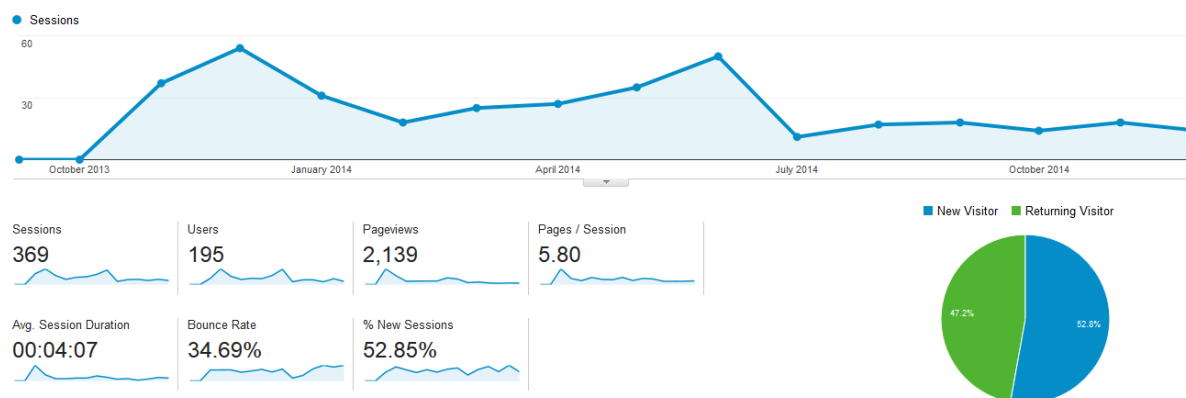


Table 1 Website usage

Table 1 contains the statistics for the usage of the website, taken at the beginning of Dec 2014, just before the final consultation. The peaks on the graph correspond with other consultation activities such as Open Days, mailings, showing how the different approaches used supported each other.

The most viewed page was the home page ( 592 views) followed by The process (193 views) closely followed Results ( 187 Views) and Surveys and Forms (182 views). The remaining 6 pages accounted for only 28% of the views.

**Housing Needs Survey** An independently conducted Housing Needs Survey (HNS) was carried out as a first step. An introductory letter was sent with the survey explaining what a Neighbourhood Plan was and the purpose of the Housing Needs Survey. The HNS was sent through Royal Mail to every residential address on the electoral roll. Extra paper copies were made available at the village post office, and electronic copies could be downloaded from the website. A reply paid envelope was supplied to send the completed forms directly to the company for analysis. The HNS was analysed by a marketing research company, Worcester Research, in Worcester who had a track record of doing surveys for social organisations. This company was chosen partly because of its track record but also because it was properly registered with the Data Commissioner and because of its location we hoped that villagers would be reassured that their details would remain confidential.

**General Village Survey** A more general survey was hand delivered to all houses in the village in the first week in January 2014, and villagers were invited to complete and return this at an Open day in the Village Hall on 11<sup>th</sup> January. If they couldn't come to the Open Event there was an address in the village where they could send their completed forms. Again extra copies were made available in the Post Office and on line.

**Open Information events** Three events were held that were dedicated "Neighbourhood Planning events". Two other information sessions were "piggy backed" on Parish Council meetings.

All of these events were published with notices on the website, articles submitted to local papers, and mention in the Parish Council meetings and therefore in the minutes which are posted on the Parish council website as well as being sent to subscribers to the Parish Council e-news.

### **11/01/2014 Introductory Event**

For this event the emphasis was on explaining what a Neighbourhood Plan could address and what it couldn't do. All those attending were asked to "sign in" – again names and post codes only were asked for, though even then some people refused. As well as the collection of the general village survey forms feedback was invited, using a "graffiti roll" (see photo below). This was a complete roll of wall paper lining paper hung on a roller on the top of a board. It proved very popular.



On-the-day feedback on the "graffiti" roll

All the feedback from the general survey and on the comments can be found at appendix 6B

### **21/06/2014 Presenting the Options**

This event was held to present the options or "first draft policies" that had emerged from the information collection and sustainability appraisals. Residents were also invited to enter a competition showing their favourite view of the neighbourhood, either as a drawing/painting or a photo. These were judged on for their artistic merit, but people attending were also asked to vote for their favourite image (The People's Vote). This information was used to inform the choices for Open Green Spaces and Landmark Structures.

This event was extremely well publicised before hand – due to the presence of Maisie Williams, a local girl, who stars in the very popular TV series "Game of Thrones". Before the day BBC local radio mentioned it, as well as all the local press, and on the day BBC TV was present for the whole event. The attendance was high.

### **15/01/2015 & 17/01/2015 Pre submission event**

The purpose of this event was to make available the final plan and policies, together with all appendices, before the plan was submitted to the local authority, with members of the steering group available to answer questions. This event was actually stage twice, on the Thursday evening and on the following Saturday morning, so that those who worked on a Saturday would have a chance to attend, and equally so that those who might not like going out on a dark winters night would have a day light event.

### **Stalls at other events**

A stall/display was set up at the following village events, explaining what the plan was, what the progress was and inviting comments.

- Village market 30/11/2013
- Village Fun day 12/7/2014
- Flower Show 00/08/2014
- Parish Council budget consultation 4/10/2014
- Parish Council budget consultation 22/11/2014

### **Articles in newspapers and periodicals**

Before all events and on as many other occasions as possible, articles were written and submitted to the Somerset Guardian, Chew Valley Gazette and the Clutton & Temple Cloud Parish News.

The Clutton and Temple Cloud News printed everything submitted. The success rate with the other papers varied.

### **School Assembly 3/2/14**

As the life of the plan is 20 years it was felt important to involve the children now in the primary school. An assembly was held at Clutton Primary School when the concept of "planning" was explained. A brief history of the village was given - the children were surprised at how many shops there had been in the past, especially sweet shops! Lessons during the day were based on the village - past, present & future. All the children were asked to draw a map of what they thought the village ought to be. Some of the things they wanted, such as dinosaur parks, were clearly beyond the scope of a neighbourhood plan. But the many comments were made about wanting more pavements and more facilities for recreation and play. We hope to meet these desires.

### **School Book Bag 3/2/14**

After the village survey was collected and analysed it was clear that not many people under the age of 40 had replied. As this was not representative of the population the village we sent the survey out again, together with an explanatory letter, via the school book bag. Obviously this would not reach aged under 40 who did not have primary age children, but it would reach many of this age group. In addition, as this is a close knit community, we hoped that aunts/uncles/grandparents of primary school age children would be made aware by using this channel.

### **Parish Council meetings**

Updates on the Neighbourhood Plan were made a standing item on the monthly agenda. The updates were reported in the minutes, which were posted on two notice boards around the village, on the parish council website, sent to subscribers to the Parish council e-newsletter and published in the Clutton & Temple Cloud Parish News.

### **Pre Submission Consultation**

Before the final submission of the plan to the local authority it was sent out for consultation. A synopsis of the policies was send, using Royal Mail, to every residential address on the electoral roll for the area. In addition a copy of the synopsis was sent or hand delivered to all known business addresses.

Hard copies of the full plan and all appendices were made available at the village Post Office, Clutton Social Club, The Railway Inn, Country Style Hairdressers, B&NES One Stop Shops at Bath, Midsomer Norton & Keynsham and at The Parish Clerk's home, by appointment. The website also had all the documents available to view or download.

Emails were sent to the following statutory consultees

As the consultation period covered Christmas, it was from 8<sup>th</sup> Dec 2014 to 1<sup>st</sup> Feb 2015.

### **Statutory pre-submission six week consultation**

When the plan is formally submitted to B&NES hard copies of the full plan and all appendices will be made available at the village Post Office, Clutton Social Club, The Railway Inn, Country Style Hairdressers, B&NES One Stop Shops at Bath, Midsomer Norton & Keynsham and at The Parish Clerk's home, by appointment. The website will also contain all the documents available to view or download. The comments from this pre-submission consultation re in appendices, 28b, 28c, 28d, 28e, 28f.

### **Consultations with local authority and Planning Aid planners**

The neighbourhood Plan team received an allocation of an expert's time (Liz Beth RTPI) from Planning Aid. The local authority also provided guidance from one of their Strategic Planning team (Julie O'Rourke). Much communication was in the form of phone calls or emails, but the face to face meetings were held on 12 occasions with Julie O'Rourke, 3 occasions with Liz Bath and 2 occasions with both planners.

David Morrison "Windrush" BS39 5RH

Morrison Comment	Does Clutton Parish Council agree with comment	Clutton Neighbourhood Plan Steering group Response
<p>My first comment is a general one in that whilst some Policies proposed are very definitive, leaving no ambiguity as to future decisions to be taken. Others suggest that they are open to interpretation and that subjectivity alone will determine what responses from the Parish Council will be made in future to matters involving the Village and Parish</p>	<p>No</p>	<p>There are some matters where it is neither appropriate nor possible to make detailed plans at this stage. However, where possible, the Clutton Neighbourhood Plan does indicate possibilities should the need be established at some future date</p>
<p>It is important that the CNP Policies are nothing other than definitive and therefore robust in order that the prescriptions within give a clarity to the wishes of the Community for the length of the Plan.</p>	<p>Agreed</p>	<p>This has been done as far as is practical without prejudicing future actions of the Parish Council.</p>
<p>The Plan will hopefully last intact beyond the period of the current Parish Officials, who are custodians of drawing up the plan which will affect Clutton and Parish and District Council decisions for a minimum of three Parish terms. If the plan is to cover 15 years, the Plan needs to be very robust and clear. Policies must be unambiguous or they are open to interpretation and more easily challenged.</p>	<p>Agreed</p>	<p>The CNP has being produced is close co-operation and consultation with BANES Planning Department and a professional planning advisor approved by the Government. We are therefore confident that it is sound and can be robustly defended.</p>
<p>The second concerns the apparent over-sight of the importance of keeping Clutton Village as a village at the heart of the Parish</p>	<p>No</p>	<p>Clutton is an RA1 settlement and as such is planned to accommodate 50 new dwellings during the new local plan period which started in 2011. Since that time</p>

<p>Community. The emphasis of the Plan seems to be expanding and dispersing the village of Clutton rather than increasing its strength of identity and providing community infrastructure for the existing community where traditionally infrastructure for village communities would be found at the centre and that centre accessible for all.</p>		<p>permission has been granted for 60 dwellings plus 3 more which were not yet started. As a result there is no requirement for any more in addition to these and the Parish Council does not have plans to support additional housing unless it is on brownfield land or infill within the Housing Development Boundary.</p>
<p>Clutton could easily be an exemplar of community life if there were some guidance from the Parish to achieve this and where better than through a Neighbourhood plan that looks perhaps more holistically than it appears it currently does.</p>	<p>No</p>	<p>The CNP is charged with producing policies relating solely to the use of land. The CNP is not permitted to deal with social issues or even such matters as bus routes or speed limits.</p>
<p>There are interestingly no real regeneration building Policies or potential planning gain opportunities to support and enhance community infrastructure, community development or Social Cohesion. In fact much emphasis seems to be placed on moving what would be traditionally a sustainable village with amenities to providing future community infrastructure and housing outside of the true village boundary on the other side of the A37 lorry route. Yes there are clear advantages to a transport route but emphasis of the Plan should be trying to build a sustainable community for Clutton not a commuter belt town.</p>	<p>No</p>	<p>The results of the consultation showed a clear preference for little or no additional housing development. Clutton has met its housing number requirement for the local plan without the need for further development.  Only if required by BANES at some future date, would development be considered outside the current Housing Development Boundary.  The fact is that the vast majority of villagers have to travel to work and shop outside Clutton. There are very few shops and these are unable to provide the normal daily needs of residents. Services such as the doctors' surgery and secondary level schools are all distant. The use of private cars in Clutton is both higher than the average in England but also higher than the norm for BANES. This is damaging to the environment as well as choking up the roads in the village so we must ensure that, in considering the location of new dwellings, buses are as far as possible, easy to access to promote their use as an attractive alternative.</p>

<p>The sustainable employment opportunities within Clutton now exists predominately on the outskirts to the East of the Village, yet the Plan suggests housing should be built on the outskirts to the West of the village, over a mile away. It would be helpful if more consideration were given to the connectivity of new housing and work and vice versa for the Parish as a whole.</p>	<p>No</p>	<p>The majority of employed people work outside the parish of Clutton. The largest industrial employment site in the parish is in Marsh Lane. It is over 1.3 kilometres from the southern edge of Clutton HDB. Those working there almost exclusively use cars and vans to reach it and there are reported problems of congestion and conflict in traffic using Marsh Lane.</p>
<p>The draft Policy seems to have been drawn up contrary in crucial places to the results of the Parish survey in relation to future housing and there are contradictions currently in different policies proposed that would easily be challenged. For instance where 72% of respondents were in favour of development within the current village housing areas and on Brownfield sites where possible and less than 10% favoured housing along the A37 corridor. The Policy of the Neighbourhood Plan has then largely interpreted that to mean housing will be supported only where it is proposed West of the A37! How can that be anything but challengeable? It may even result in Developers being successful and succeeding with infill development in the village, where respondents to the survey say that development is most needed, regardless of where the current Neighbourhood Plan proposal might subjectively lead us to believe us, they will support housing.</p>	<p>No</p>	<p>The CNP is fully supportive of development within the Housing Development Boundary on brown field land and infill sites. The largest available brownfield site is that of the former Bromillow's Transport. This site was vigorously supported for development by the Parish Council and, subject to final agreement of the S106 payments to BANES, is expected to provide 15 dwellings of which 2 will be single bedroom.</p>
<p>For the current Parish to then go onto say that building on green field or worse Green Belt</p>	<p>No</p>	<p>The Neighbourhood Plan has to be compliant with overarching B&amp;NES policies and government guidelines.</p>



<p>land would be acceptable in certain circumstances begs the question are we to remain a rural cohesive village community? There is a danger that if Parishes show willingness to provide housing or even suggest it in their Neighbourhood Plans that they will accept green field development, then Central Government will pounce on the opportunity to realise the dream of meeting the three million new homes target and the parish will end up with housing well outside of its control. I strongly suggest that the Plan give greater emphasis to identifying where housing might go in support of the results of the survey. Further and importantly identify very clear boundaries, not just between Clutton and Temple Cloud, but around the whole of the village of where development would not go and state very robustly why.</p>		<p>The National Planning Policy Framework (NPPF) paragraphs 53 &amp; 54 strongly discourage the development of residential gardens, but Rural Exception Sites Outside the HDB are encouraged.  In the absence of available sites within the HDB of the village such as infill or brownfield, there is no alternative but to consider other sites. However, the need to build on green field sites is not envisaged under the current requirements for housing as laid down in BANES local plan. Nevertheless, it is prudent to consider possible general locations in case there were to be any, as yet unforeseen, changes in BANES policy which might require Clutton to take additional houses over the next 20 years.</p>
<p>More emphasis needs to be placed in the Clutton Neighbourhood Plan on supporting moving the Route of the A37 away from the village. Perhaps then infilling the very structurally solid new boundary created by the new road rather than locating housing west of the current A37, the other side of the current lorry "river" route. Which will only achieve the isolating of that small community from the rest of Clutton Village. And potentially puts no definitive rigid boundary to future development. For the plan not to contain definite boundaries all round then the wishes of the community to cap at between 6 to 40 houses, ideally 10 to 15, built will not be achieved. The Draft Clutton Neighbourhood Plan needs to be tightened up more if it is to</p>	<p>Agreed</p>	<p>The alternative route for the A37 has been identified as the Clutton By-Pass. This has been on the strategic plans for over 50 years and it is thought extremely unlikely that it will ever be built. It is currently under review and we may learn more of the likelihood of its coming into being in the near future.  The statement that the CNP does not contain definite boundaries is mistaken. The boundary line, outside which development is not normally permitted, is the Housing Development Boundary (HDB). This boundary is strictly enforced by BANES to prevent urban sprawl. Under the CNP, there will be no development outside this boundary.</p>

be robust and truly reflect the wishes of the Parish constituents who filled in the questionnaire.		
--	--	--

Reply Steve Drew "Head groundsman"

Steve Drew Comment	Does Clutton Parish Council agree with comment	Clutton Neighbourhood Plan Steering group Response
<p><b>CNP13</b>  <u>The Allotments</u> – The allotments at lower bristol rd are private and in the green belt, there is a suggestion that planning may be sought for dwelling?            Under Parish by law Allotments used by the parishioner must not be removed and more should be provided if there is a waiting list. I have dealings with Frampton pc and they have put allotments on private land and informed me of this. (Can we tie this up as a registered amenity or added to the minutes/ recognised as amenity us?)</p>	<p>Yes, already included in the plan</p>	<p>The parish council allotments in the process of being registered as "Assets of Community Value" see the minute 137/14 of the October 2014 parish council meeting.</p> <p>The old railway track is designated as a Sustrans route, which will be an amenity for the village, but it does not qualify as a Site of Special Scientific Interest.</p>
<p><b>CNP19</b>            Can Lower Bristol Rd be include for footways, traffic calming measures (This is a main route into the village at 60MPH with poor visibility and no footways)</p>	<p>Yes , already being dealt with</p>	<p>The neighbourhood plan can only deal with land use, not speed limits. However the Lower Bristol Road has been included in a B&amp;NES traffic Calming scheme, due to be implement within 12 months.</p>
<p><b>CNP21</b>            Yellow lighting reduces light pollution LED id brighter but downward</p>	<p>No</p>	<p>We have taken expert advice on this matter, and LED lights were thought to be the best solution. Although they are brighter than yellow sodium lighting they can be angled down to reduce light spillage, while still providing sufficient light for safety purposes. They also have the additional advantage of being more energy efficient.</p>

B&NES Response to the Turley Objection to the Draft Clutton Neighbourhood Plan Consultation (January 2015)

Turley Comment	Does B&NES agree with this comment?	B&NES Response
<p>"It appears that the Plan which is the subject of this consultation is the first draft published for formal consultation. In this regard we are surprised that there have been no 'options' for consideration by local people or interested parties."</p>		<p>On submission, the Clutton Neighbourhood Plan will be accompanied by a Basic Conditions Statement, which outlines that the Neighbourhood Plan is in general conformity with national/local policy. The draft Plan is accompanied by a draft Basic conditions statement and with a consultation statement.</p>
<p><i>"The emerging Placemaking Plan (Options document) which is currently being consulted upon, states that those villages which meet the Policy RA1 criteria will each accommodate approximately 50 dwellings (in addition to small scale windfall sites within the Housing Development Boundary) between 2014 to 2029 (Paragraph 1.345). Clutton is clearly a settlement which meets the Core Strategy Policy RA1 requirements. It has at least 3 key facilities, including shops, a post office, a primary school, public houses and a village hall. In addition, it benefits from daily, regular bus services to Bristol, Bath, Wells and Glastonbury. It appears that at this stage the emerging Placemaking Plan is proposing that the additional housing provision at Clutton should be identified through the Neighbourhood Plan. As a consequence, Clutton should therefore identify a site or sites capable of accommodating approximately 50 dwellings (in addition to small scale windfall sites within the Housing Development Boundary) between 2014 to 2029. The current draft of the Neighbourhood Plan fails to do this, although it does recognise land to the west of the A37 is appropriate to accommodate future development."</i></p>	<p>No</p>	<p>The Draft Clutton Neighbourhood Development Plan must be in general conformity with this policy in the adopted B&amp;NES Core Strategy. B&amp;NES Council considers that the approach in the Neighbourhood Plan is in line with RA1.</p> <p>Policy RA1 is a strategic policy and has been tested against the 2004 regulations during the B&amp;NES Core Strategy hearings in March 2013. It is not the role of a Neighbourhood Plan to test alternatives to a strategic policy.</p> <p>For information: Paragraph 108 of the REPORT ON THE EXAMINATION INTO BATH AND NORTH EAST SOMERSET COUNCIL'S CORE STRATEGY (June 2014) is relevant:  <a href="http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/cs_pins_final_report.pdf">http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/cs_pins_final_report.pdf</a> :</p> <p><i>"It would be for the Place-making Plan to review the housing development boundaries and allocate any additional sites needed to ensure delivery of the overall scale of development envisaged. However, a number of planning permissions have been granted for housing development in the past year or so that plan may need only to amend the housing boundary to reflect recent commitments."</i></p>
<p><i>"Policy CNP3 states that the "Housing Development Boundary will be limited to that within the area shown in Map 3, unless the developments are rural exception sites". Map 3 displays the Bath &amp; North East Somerset Local Plan, Clutton Inset Map</i></p>	<p>No</p>	<p>Clutton Parish Council has used the B&amp;NES Placemaking Plan methodology to review the Housing Development Boundaries which is in accordance with the B&amp;NES Core Strategy and the B&amp;NES Placemaking Plan Options Document.</p>

<p><i>(adopted 2007). Clearly, the Policy RA1 housing requirement of approximately 50 dwellings between 2014 and 2029 (as currently set out in the Placemaking Plan) cannot be accommodated within this current Housing Development Boundary, due the lack of suitable sites. As a consequence, Policy CNP3 will not be in conformity with the emerging Placemaking Plan.”</i></p>		
<p><i>“Within the supportive text at page 12, the draft Neighbourhood Plan states that 63 dwellings benefiting from extant planning permissions are not yet built, and they could be sufficient to meet the requirement of 50 dwellings, if required. It is argued that those 63 dwellings would not meet the requirements set out in Paragraph 1.345 of the emerging Placemaking Plan, as those developments listed at Appendix 2 (except Maynard Terrace) would be classified as windfall sites”.</i></p>	<p>No</p>	<p>Alongside small scale infilling within current housing development boundaries the Core Strategy identifies that villages will need to identify large sites (of 10+ units) to accommodate around 50 units (most in RA1). The B&amp;NES SHLAA Findings Report (December 2014) states:</p> <p>Para: 2.138:</p> <p>Clutton has also received its ‘quota’ of dwellings on large sites</p> <ul style="list-style-type: none"> <li>• In July 2013, Curo was granted planning permission for 36 dwellings at appeal at Maynard Terrance (12/01882/OUT). An application for reserved matters has been received (14/05692/RES)</li> <li>• 15 dwellings have also been permitted (subject to S106) at ‘The Wharf’ (12/00293/FUL).</li> <li>• Both sites are considered to be deliverable.</li> </ul>
<p><i>“In addition, the housing requirement stated at Paragraph 1.345 applies to the period between 2014 and 2029. Due to all of the developments listed at Appendix 2 being permitted prior to 2014 it is argued that these cannot contribute to the additional “approximately 50 dwellings” requirement as they have already been accounted for as existing commitments.”</i></p>	<p>No</p>	<p>The adopted B&amp;NES Core Strategy’s Plan period is 2011-2029 not 2014-2029 as stated.</p>

IJP Comment	Does B&NES agree with this comment?	B&NES Response
<p><i>“As you will be aware, once a draft neighbourhood plan is submitted to the local planning authority, Bath and North East Somerset Council (“the LPA”), which satisfies the preliminary requirements within paragraph 6 to Schedule 4B of the Town and Country Planning Act 1990 (“the 1990 Act”), the LPA is required to submit the draft plan for independent examination. The Examiner is unable to recommend that a draft plan be adopted unless it satisfies the basic conditions set out within paragraph 8(2) to Schedule 4B of the 1990 Act. Of particular relevance is basic condition (e) which provides that the draft plan must be in general conformity with the policies of the development plan.”</i></p>	<p>N/A</p>	<p>No comments necessary, the paragraph repeats the Neighbourhood Planning regulations.</p> <p>[For information: On submission, the Clutton Neighbourhood Plan will be accompanied by a Basic Conditions Statement, which outlines that the Neighbourhood Plan is in general conformity with national/local policy. The draft Plan is accompanied by a draft Basic conditions statement.]</p>
<p><i>“Furthermore we note that a sustainability appraisal has been undertaken and we suggest that as it is accepted that such an assessment is appropriate it must be compliant with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004.”</i></p>	<p>No</p>	<p>This is incorrect. In accordance with Regulation 32 of The Neighbourhood Planning (General) Regulations 2012, Clutton Neighbourhood Plan has been subject to a SEA and HRA screening.</p> <p>[For Information: A draft Sustainability Appraisal has been undertaken for the Clutton Neighbourhood Plan, however, this is not a requirement for a Neighbourhood Plan (as confirmed in NPPG para 026/Section 19 of the Planning &amp; Compulsory Purchase Act, 2004). The Sustainability Appraisal is useful to show how the plan can contribute towards sustainable development.]</p>
<p><i>In Bath and North East Somerset, the development plan comprises the Core Strategy for Bath and North East Somerset. Accordingly, the draft Clutton Neighbourhood</i></p>	<p>In part</p>	<p>This is not entirely correct. The NPPF, together with the Core Strategy and the saved Local Plan policies and other SPDs make up the Development Plan for B&amp;NES.</p>

<p><i>Plan cannot be adopted unless it is in general conformity with the policies contained within this Core Strategy.</i></p>		<p>[For information: The examination process will determine whether the basic conditions are met by the Neighbourhood Plan – including general conformity with the Development Plan.]</p>
<p><i>The draft plan cannot be considered to be in general conformity with the Core Strategy and therefore cannot properly be adopted in its current form. In addition the process to date is not compliant with the 2004 regulations.</i></p>	<p>No</p>	<p>[For information: The Council considers the process to date is compliant with the 2004 regulations (as above).]</p>
<p>“Specifically, the draft plan policy CNP3 (Housing Development Boundary and Types of New Dwellings) is not in general conformity with policy RA1 of the Core Strategy. In addition reasonable alternatives to that policy have not been considered contrary to the 2004 regulations.”</p>	<p>No</p>	<p>The Draft Clutton Neighbourhood Development Plan must be in general conformity with this policy in the adopted B&amp;NES Core Strategy. B&amp;NES Council considers that the approach in the Neighbourhood Plan is in line with RA1.</p> <p>Policy RA1 is a strategic policy and has been tested against the 2004 regulations during the B&amp;NES Core Strategy hearings in March 2013. It is not the role of a Neighbourhood Plan to test alternatives to a strategic policy.</p>
<p><i>“This part of policy RA1 is providing strategic guidance on two matters, namely that:</i></p> <p><i>1. The housing development boundary should be reviewed through the Placemaking Plan which is a process to be (and is in fact being) undertaken by the Local Planning Authority; and”</i></p>	<p>In part</p>	<p>This is not entirely correct. The HDB can be reviewed either through the Placemaking Plan or Neighbourhood Plans (as it is non-strategic).</p> <p>Clutton Parish Council has used the B&amp;NES methodology to review their Housing Development Boundary, this in accordance with the B&amp;NES Core Strategy and the B&amp;NES Placemaking Plan Options Document (p164-5).</p> <p>B&amp;NES are working alongside parish and town councils to review and where necessary suggest amendments to the HDB – the amendments can come forward either through the Placemaking Plan</p>

		or Neighbourhood Plans.
<i>2. Residential development on sites outside the housing development boundary will be acceptable if identified in a Neighbourhood Plan”</i>	No	This is not correct. Residential development in RA1 villages should be either through infill development or on sites currently outside the HDB (for the later, the HDB will be amended accordingly). Only rural exceptions sites will be permitted outside HDB. This approach is in line with strategic policy RA1.
<i>“Therefore policy RA1 leaves the issue of identifying development sites to meet the 1,120 units and the implications of that for the existing housing development boundary to the Placemaking Plan.”</i>	In part	This is not entirely correct. Development sites can be identified and HDB boundary reviews undertaken either in the Placemaking Plan and or in Neighbourhood Plans.
<i>“Policy RA1 leaves the issue of whether any sites should be identified outside the housing development boundary to the Neighbourhood Plan.”</i>	No	<p>This is not correct. Residential development in RA1 villages should be either through infill development or on sites currently outside the HDB (for the later, the HDB will be amended accordingly). Only rural exceptions sites will be permitted outside HDB. This approach is in line with strategic policy RA1.</p> <p>Development sites can be identified and HDB boundary reviews undertaken either in the Placemaking Plan and or in Neighbourhood Plans.</p>
<i>“This policy therefore seeks fix the housing development boundary for Clutton. Under policy RA1 identification of sites to provide around 1,120 units and the implication of this for a housing development boundary is the function of the Placemaking Plan not a Neighbourhood Plan. The function of the Neighbourhood Plan under policy RA1 is to</i>	No	<p>This is not correct. Housing development boundaries can be reviewed either through the Placemaking Plan or through a Neighbourhood Plan.</p> <p>Clutton Parish Council has used the B&amp;NES Placemaking Plan methodology to review the Housing Development Boundaries which is in accordance with the B&amp;NES Core Strategy and the B&amp;NES</p>



<p><i>identify sites outside the housing development boundary. Therefore the draft plan has wrongly sought to undertake the function of the Placemaking Plan and has also failed as part of the Neighbourhood Planning process, to assess and see whether there are any sites outside the settlement boundary that should be identified in the draft Plan. The draft Plan is therefore not in general conformity with policy RA1. Rather policy CNP3 seeks to do the opposite to that anticipated by policy RA1. In that it seeks to fix the housing development boundary and then limit development to within the housing development boundary by only allowing for infill.”</i></p>		<p>Placemaking Plan Options Document.</p> <p>[For information: Paragraph 108 of the REPORT ON THE EXAMINATION INTO BATH AND NORTH EAST SOMERSET COUNCIL’S CORE STRATEGY (June 2014) is relevant:  <a href="http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/cs_pins_final_report.pdf">http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/cs_pins_final_report.pdf</a> :</p> <p><i>“It would be for the Place-making Plan to review the housing development boundaries and allocate any additional sites needed to ensure delivery of the overall scale of development envisaged. However, a number of planning permissions have been granted for housing development in the past year or so that plan may need only to amend the housing boundary to reflect recent commitments.”)</i></p>
<p><i>“Moreover the policy its accompanying text proceeds on the erroneous assumption that the because more than 50 units have already been permitted outside the housing development boundary in Clutton that this also precludes the identification of such a site or sites outside that boundary in the draft plan. The Neighbourhood Planning process has fundamentally failed to grapple with the part of policy RA1 that is relevant to it. The Parish should have undertaken an assessment to see if there are any sites outside the housing development boundary that should be identified in its Plan. It has singularly failed to carry out such an exercise. Had such an exercise been carried out that would have revealed that suitable sites do exist. Two of these are located to the south of Maynards Terrace (see enclosed</i></p>	<p>No</p>	<p>This assumption is not erroneous – see the Report on the examination into Bath and North East Somerset Councils Core Strategy (June 2014), paragraph 108, which mentions this scenario specifically.</p>

<p><i>Site Location Plans).</i>”</p>		
<p><i>“For the reasons given above it is considered that it is not possible to remedy these fundamental failings with the draft plan and that amendments to the draft plan are not possible at this late stage. Therefore the only option available to the Parish Council is that the content of the plan needs to be reconsidered and reformulated anew to ensure that it is from the outset in general conformity with the Core Strategy and the 2004 regulations.”</i></p>	<p>No</p>	<p>This is incorrect. Policy RA1 of the Core Strategy has been tested in the Core strategy examination, and complies with the 2004 Regulations. It is a strategic policy.</p>

Litfield Land

Litfield Land	Does Clutton Parish Council agree with comment	Clutton Neighbourhood Plan Steering group Response
<p><u>Policy CNP1:</u></p> <p><b>SETTLEMENT SEPARATION</b></p> <p>We acknowledge the importance attached by the local community to maintaining the separation between Clutton and Temple Cloud. However, with reference to Map 2 'Village Buffer Zone' (Draft Clutton Neighbourhood Plan), given the configuration of the village of Clutton and the siting of the farmstead at Church Farm, we say that development to the north of Church Farm at Church Lane and Station Road would not compromise the desired separation with Temple Cloud to the south. Development here would also preserve and avoid any need to review the green belt which serves to restrict any development to the north of the village for the foreseeable future. Any buffer zone should therefore be limited to land to the south of the farmstead at Church Farm.</p>	<p>No</p>	<p>As part of the examination process of B&amp;NES Core Strategy, adopted in 2014, the Green Belt was reviewed and no change to the boundary at this point was found necessary. Should any future review of the Core Strategy or of the Neighbourhood Plan identify need for more housing, the Neighbourhood Plan has identified land west of A37 as being the most sustainable. This would not involve any need to further review the Green Belt.</p> <p>The farmstead, which does not adjoin any other residential development, is not currently included within the B&amp;NES Housing Development Boundary. The guidelines issued by B&amp;NES state that "</p> <p>b) Isolated developments which are physically or visually detached from the village (including farm buildings or agricultural buildings on the edge of the settlement which relate more to the countryside than the settlement) .</p>
<p><u>Policy CNP3</u></p> <p><b>HOUSING DEVELOPMENT BOUNDARY AND TYPES OF NEW DWELLINGS</b></p> <p>Limiting any new housing development to the limited opportunities for infill within the existing development boundaries would not assist in sustaining the existing level of services necessary to support the vision of a thriving community which we understand underpins the purpose of preparing the Neighbourhood Plan. It would also, in our view, be contrary to the vision and objectives and Policy RA1 of The Core Strategy.</p>	<p>No</p>	<p>The Draft Clutton Neighbourhood Development Plan must be in general conformity with this policy in the adopted B&amp;NES Core Strategy. Clutton Parish Council and its advisors consider that the approach in the Neighbourhood Plan is in line with RA1. Policy RA1 is a strategic policy and has been tested against the 2004 regulations during the B&amp;NES Core Strategy hearings in March 2013. It is not the role of a Neighbourhood Plan to test alternatives to a strategic policy</p>

<p>We note the acceptance that should the need for more housing be established as a result of a review of the Core Strategy by B&amp;NES or a new HNS, housing development would be supported, but we do not see that extending the village to the west of the of the A37 would serve to promote the use of public transport or achieve a cohesive community with the significant barrier that the A37 presents. The support given to the location of new business close to the A37 (Ref Policy CNP8), makes more sense to us.</p> <p>We note the findings of the Clutton Parish Council Housing Need Survey (January 2013) which was responded to by 29% of households in the parish. This should not, however, be confused with an objective assessment of need for market and affordable housing as referred to in the NPPF (paragraph 47).</p> <p>Targeted small scale development for housing in reasonably accessible village communities is clearly appropriate if related to local need (market, affordable and specialist elderly accommodation). Clutton is just one such village. The 2011 census records it as having a population of 2,537 and 962 households. It also benefits from a bus service.</p> <p>Even on a net-nil migration scenario (i.e. balance between in-migration and out-migration), Clutton will need more housing development over the period to 2029 in order to sustain current population levels and, crucially, the proportion of those living within the community being within an age range that would be economically active.</p> <p>On any analysis, however, new residential development is clearly needed in order to sustain the current range and choice of services currently enjoyed and the thriving village community envisaged in the draft Neighbourhood Plan.</p> <p>Moreover, in seeking to meet newly arising housing need (affordable and market), it would be more sustainable to accommodate that which is, and will continue to arise in and</p>		<p>The level of car ownership in Clutton is nearly twice the national and the level of commuters using private transport is equally high. It thus makes sense to site new housing as close as possible to sustainable public transport routes.</p> <p>The independently conducted Housing Needs Survey conducted in Dec 2013/Jan 2014 (not January 2013) set a baseline. When the B&amp;NES Core strategy is reviewed it will include proper strategic and objective assessments as referred to in NPPF para 47. It also no doubt take into consideration NPPF Para 50 when local authorities should identify size, type, tenure &amp; range of housing in <u>particular locations, reflecting the local demand</u>".</p>
--	--	---

<p>around the village, where it arises i.e. in and around the village and not to the west of A37 or elsewhere in the District.</p>		
<p>Paragraph 5.09 of the adopted Core Strategy recognises that: <i>“In the central part of the District, the extensive plateau from Hinton Blewett to Newton St Loe includes the key villages of Clutton, Temple Cloud, High Littleton, Timsbury and Farmborough. The form of the villages in this area tends to be either centred around a village core (such as Clutton) or in linear form (such as Temple Cloud). Edge of settlement development during the post war period lacked the well-integrated characteristic of the original villages and has had a significant impact on views.”</i> Development on land to the north of the farmstead at Church Farm would integrate well with the core of the village.</p>	<p>No</p>	<p>This is not historically correct. Clutton developed on linear lines, along a right angle of the Upper Bristol Road and down Cooks Hill. It was only since the widening of the A37 in the 1960’s that developments have grown off these main arteries. Despite these edge of settlement developments, like Maypole Close, Burchill Close, Carlton Close and Kings Oak Meadow, all built since the 1960’s, the “core” of the village has not developed further.</p>
<p>Policy RA1 of the adopted Core Strategy is clear that in respect of villages such as Clutton <i>“development sites will also be identified in the Placemaking Plan and the housing development boundary will be reviewed accordingly to enable delivery during the Plan period of the 1,120 dwellings identified on the Key Diagram. Residential development on sites outside the Green Belt adjoining the housing development boundary at these villages will be acceptable if identified in an adopted Neighbourhood Plan.”</i></p> <p>Paragraph 1.345 of the draft BATHNES Placemaking Plan is clear that villages such as Clutton will each accommodate</p>	<p>No</p>	<p>The adopted B&amp;NES Core Strategy’s Plan period is 2011-2029 not 2014-2029 as stated.</p> <p>Alongside small scale infilling within current housing development boundaries the Core Strategy identifies that villages will need to identify large sites (of 10+ units) to accommodate around 50 units (most in RA1). The B&amp;NES SHLAA Findings Report (December 2014) states: Para: 2.138:</p>

<p>approximately 50 dwellings over the Core Strategy period of 2014 to 2029 in addition to development already committed and small scale windfall sites (including in-fill development) within the existing settlement boundary.</p> <p>Land to the north of the farmstead at Church Farm is available, accessible, unconstrained, developable, and deliverable and is situated in a sustainable location.</p>		<p>Clutton has also received its 'quota' of dwellings on large sites</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> In July 2013, Curo was granted planning permission for 36 dwellings at appeal at Maynard Terrance (12/01882/OUT). An application for reserved matters has been received (14/05692/RES)</li> <li><input type="checkbox"/> 15 dwellings have also been permitted (subject to S106) at 'The Wharf' (12/00293/FUL).</li> <li><input type="checkbox"/> Both sites are considered to be deliverable.</li> </ul>
<p><u>Policy CNP14</u></p> <p>LOCAL GREEN SPACE</p> <p>We object to the designation of site 3 Gastons as Local Green Space (Ref Map 7).</p> <p>The National Planning Policy Framework (NPPF) Paragraph 76 confirms that:</p> <p><i>“Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.”</i></p> <p>Paragraph 77, however, is equally clear that:</p> <p><i>“The Local Green Space designation will not be</i></p>	<p>No</p>	<p>In application 11/ 04955/FUL Charles Potterton (B&amp;NES Landscape architect) mentions the importance of this field as the setting for the listed buildings of St Augustine's and Church Farm farmhouse. He also said mentions "the value of this green space and has not properly assessed the impact that its loss would have on the character of the village."</p> <p>The importance to current villagers was demonstrated in replies to village survey as this area was mentioned specifically by many villagers as an important.</p> <p>From the plan 5.3.2.2  <i>"[I] Would not like any change to the fields and avenue of trees that goes to the Church."</i> and  <i>"I think the avenue of trees and fields, church, village green, playing field and leisure area need to be protected as iconic places of Clutton".</i></p> <p>Historically this area has been used since the Iron Age and the very name of the field derives from the Norman word for stranger/guest, indicating that this area was set aside as an area that for the use of strangers/guests to the area to graze their horses. An area such as this, together with the medieval dovecot in the field, would have been of significant importance to the community.</p> <p>Rural Landscapes of Bath North East Somerset LCA</p>

*appropriate for most green areas or open space. The designation should only be used:*

*where the green space is in reasonably close proximity to the community it serves;*

*where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*

*where the green area concerned is local in character and is not an extensive tract of land.”*

We would accept that, by definition, the field in question which lies adjacent to the current settlement boundary at Station Road, would fall within the scope of being “*in reasonable proximity to the community*”. We do not, however, agree that either of the second two requirements is fulfilled.

We do not agree that a convincing case has or can be made such that all of this agricultural land holds genuine local significance in terms of its *beauty, historic significance, recreational value* (there is no authorised public access outside the public footpaths), *tranquillity or richness of its wildlife* (Ref: NPPF paragraph 77).

This is, moreover, unequivocally, part of an extensive tract of land and clearly not the type of “local green space” that the NPPF had in mind.

Supplementary Planning Document (2003) specifically mentions “Undulating open valley and plateau landscape” and areas of open farmland and parkland as being typical characteristics of the local landscape.