

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&NES Core Strategy. B&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&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: http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Core-Strategy/cs_pins_final_report.pdf :</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 & North East Somerset Local Plan, Clutton Inset Map</i></p>	<p>No</p>	<p>Clutton Parish Council has used the B&NES Placemaking Plan methodology to review the Housing Development Boundaries which is in accordance with the B&NES Core Strategy and the B&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&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"> • 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) • 15 dwellings have also been permitted (subject to S106) at ‘The Wharf’ (12/00293/FUL). • Both sites are considered to be deliverable.
<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&NES Core Strategy’s Plan period is 2011-2029 not 2014-2029 as stated.</p>