

## **Bath & North East Somerset Placemaking Plan**

### **COUNCIL'S RESPONSE TO ID/3: MATTER 2 - OVERALL APPROACH**

**Issue 1: Whether the changes to the CS are necessary and appropriate having regard to policies contained in the Placemaking Plan and its purpose.**

**Q1 – Is the nature and scale of any of the proposed changes to the CS such that they materially change the strategic approach and strategy established in the CS? If so, which ones?**

**In particular:**

**Policy RA1 and RA2 were found to be sound**

**(a) Why is the change to Policy RA1 (a) considered necessary?**

1. For adopted Core Strategy Policy RA1 to apply, a village must have at least 3 of the following key facilities: post office, school, community meeting place and convenience shop and there is at least a daily Monday-Saturday public transport service to main centres.
2. Since the adoption of the Core Strategy, an issue in implementing Policy RA1 has arisen in relation to the presence of a primary school being effectively an option and not a requirement of the policy. This means that a village could meet the RA1 criteria - where around 50 dwellings may be accommodated within the Plan period - without an existing primary school. Allowing residential development in these villages would not only put pressure on neighbouring schools but would increase the need to travel and is therefore contrary to the sustainability principle of securing and maintaining balanced and more self-contained communities that underpins the policy approach.
3. It has also emerged through the preparation of the Placemaking Plan and consideration of planning applications that some primary schools are at capacity. In some cases, such as at Farrington Gurney, there is currently no deliverable scope for any physical expansion. This means that some villages, whilst meeting the Policy RA1 criteria, may have primary schools which do not have the capacity to meet the pupil needs arising from development. In these cases sites for residential development should not be allocated in the Placemaking Plan. In some instances this also has implications for the RA2 settlements which also rely on rural primary schools in the larger villages to accommodate the pupil needs arising from new housing development. The

cumulative impact on nearby primary schools of allowing successive residential schemes also needs to be taken into account.

4. To address these practical concerns relating to the implementation of Policy RA1 it was considered necessary to amend Policy RA1 to make a primary school a key qualifying requirement and also to include a new policy in the Placemaking Plan which would ensure that residential development will only be allowed within RA1/RA2 villages where the nearby schools have capacity/ability to expand to enable the needs arising from those developments to be accommodated. This resulted in the introduction of Policy LCR3A specifically relating to Primary School Capacity (Placemaking Plan, Volume 1, page 160 - CD/PMP/G1/1) to be used in conjunction with Policies RA1 and RA2. Please also see response to Q1(c) below. The proposed change to Policy RA1 and introduction of Policy LCR3A is consistent with and necessary to ensure compliance with Policy CP13 of the Adopted Core Strategy that requires new development must be supported by the timely delivery of the required infrastructure to provide balanced and more self-contained communities.

**(b) What assessments have been carried out to establish whether the number of villages that would satisfy Policy RA1 would be reduced as a result of the suggested change and the likely reduction, if any on the supply of housing?**

5. Table 1 below lists the villages that meet the criteria of Adopted Core Strategy Policy RA1 (as set out in the 2015 Rural Facilities Audit, CD/PMP/RA11) and the villages that would currently meet the criteria of Policy RA1 as proposed to be amended through the Placemaking Plan.

Village name	Adopted Core Strategy Policy RA1	Proposed Policy RA1 (Placemaking Plan)
Bathford	✓	✓
Bathampton	✓	✓
Batheaston	✓	✓
Bishop Sutton	✓	✓
Clutton	✓	X (no longer meets Policy RA1 criteria because Post Office has closed, not due to change in Policy RA1 criteria)
Temple Cloud	✓	✓

High Littleton	✓	✓
Timsbury	✓	✓
Whitchurch	✓	✓
Farrington Gurney	✓	✓
West Harptree	✓	X

From the above table it is evident that the number of villages meeting the Policy RA1 criteria will be reduced by two. However, Clutton no longer meets the criteria of Policy RA1 due to the closure of its Post Office and not the proposed policy criteria. In terms of housing land supply Clutton will provide the around 50 dwellings envisaged through the Core Strategy due to planning permissions granted on two large sites at the village (see rural areas tab of Housing Land Supply Trajectory 2011-2029, CD/PMP/S3). West Harptree is the only village that met the Adopted Core Strategy Policy RA1 criteria but would not meet the proposed Placemaking Plan policy criteria. However, this has no impact on meeting the rural areas housing requirement because in preparing the Core Strategy and calculating housing land supply only 10-15 dwellings were relied upon at West Harptree as it lies within the Mendips Hill Area of Outstanding Natural Beauty (AONB) which could inhibit opportunities for residential development.

6. In relation to the supply of housing proposed Placemaking Plan Policy LCR3A (primary school capacity) should be used in conjunction with Policy RA1. The proposed policy approach means that two villages meeting the Policy RA1 criteria (High Littleton and Farrington Gurney) will not be providing the around 50 dwellings envisaged by the Core Strategy as the primary schools do not have the capacity to accommodate additional children. This is reflected in the Housing Supply Trajectory (CD/PMP/S3). The trajectory shows that there is still sufficient supply to meet the Core Strategy requirement for the rural areas of 1,120 dwellings between 2011 and 2029. The supply trajectory shows that the anticipated total supply is 1,182.

**(c) Does the change to the list of facilities required to meet criteria (a) of Policy RA1 when assessing which villages outside the Green Belt are appropriate for residential development, present a material change in strategy from that contained in the adopted CS?**

6. The Adopted Core Strategy only plans for limited development in the rural areas (most development is focussed at Bath and the towns within the District). With regard to the rural areas the Core Strategy policy approach is

based on directing this limited overall development towards the most sustainable villages (particularly in terms of minimising the need to travel by car) i.e. those with a better level of locally available services and facilities and public transport access to Bath and the towns. This is reflected in the criteria of Policy RA1. A more limited amount of development is directed to the less sustainable villages outside the Green Belt (via Policy RA2) to help meet local needs.

7. The proposed change to the list of facilities required to meet the Policy RA1 criteria does not alter this strategic approach. Primary schools are considered to be one of, if not the main trip generating facility in that for families this journey is made on a daily basis. The presence of a primary school within the village will therefore minimise trips undertaken by a car. This is consistent with the strategic approach set out in the Core Strategy. As set out above proposed Policy RA1 also accords with and supports other elements of the Core Strategy (Policy CP13 on infrastructure) and does not prevent the rural area housing requirement being delivered.

**(d) How do the changed criteria relate to the SA that accompanied the CS?**

8. The Sustainability Appraisal of the Rural Delivery Strategy in the Draft Core Strategy<sup>1</sup> (which includes Policies RA1 and RA2 which were not separately appraised) noted that new housing development would be directed to villages that meet the criteria set out in Policy RA1 and in respect of the potential for cumulative effects resulting from applications for housing developments on social infrastructure / community facilities it concluded that these could be mitigated by the Infrastructure Provision Core Policy (CP13). This policy requires new development to be supported by the timely delivery of the required infrastructure to provide balanced and more self-contained communities.
9. The Sustainability Appraisal of the Draft Placemaking Plan (Annex F: Core Strategy Amendments Screening - CD/PMP/G9/8) acknowledges that the change to clause (a) of Policy RA1 would have an impact on the sustainability criteria and therefore that part of the policy should be appraised. In appraising the change to Policy RA1 Annex G: Core Strategy Amendments Appraisal Matrices (CD/PMP/G9/9) concludes:

*The policy, by requiring a settlement to have a primary school with sufficient capacity (or ability to expand) will ensure the educational needs of the*

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<sup>1</sup> [Annex D: Submission Core Strategy Policy Appraisal Matrices](#), November 2011

*existing population and those arising from a residential development proposal in that settlement can be accommodated. This should result in a major positive impact on Objectives 1 (health and well-being) and 3 (stronger more vibrant and cohesive communities) and a minor positive impact on Objective 2 by helping ensure housing is accommodated in sustainable locations.*

10. In conclusion it is considered there are no significant differences in outcomes between the Sustainability Appraisal of the Rural Delivery Strategy (which included Policy RA1) in the Core Strategy and the Sustainability Appraisal of Policy RA1 as proposed to be changed through the Placemaking Plan as any adverse impacts on the Sustainability Objectives can be mitigated.

**(e) Is the change in approach justified and consistent with national policy?**

11. The Council believes that the change in approach is justified for the reasons set out in the response to Q1 (a) above and represents the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. In this context as currently worded Policy RA1 is not properly aligned with the Core Strategy Policy CP13 which requires all new development to be supported with the necessary infrastructure. It is not in the interests of sustainability for the Council to support the delivery of new housing in villages where a key component of infrastructure (a primary school) is either at capacity or with no scope for any physical expansion thus increasing the need to travel further afield.
12. This approach is supported by the NPPF (para 37) in that *planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.*(emphasis added).

**(f) What is meant by 'limited residential development' in the context of Policy RA2?**

13. The Council is not intending a change to the first paragraph of adopted Core Strategy Policy RA2 which includes reference to 'limited residential development'. Nevertheless, para 68 of the Placemaking Plan (Volume 1, page 33 - CD/PMP/G1/1) explains that for those villages which do not meet the Policy RA1 requirements, Policy RA2 applies and 'limited residential development' of around 10-15 dwellings is considered acceptable in principle in those villages. This level of development at RA1 (around 50 dwellings) and

RA2 villages (around 10-15 dwellings) is in addition to small windfall sites within the housing development boundary and will enable delivery of the 1,120 dwellings for the Rural Areas during the Plan period.