

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

***COUNCIL'S RESPONSE TO ID/3: MATTER 23 – HOUSING IN THE RURAL AREAS***

***Issue 1: Whether the approach to development in the rural areas is justified and positively prepared.***

***Q1. Will the Placemaking Plan provide sufficient housing in the rural areas?***

1. The site allocations and development management policy framework set out in the Draft Placemaking Plan will enable sufficient housing to be provided in the rural areas as required by the Core Strategy. The Adopted Core Strategy directs a limited proportion of the overall housing requirement to the rural areas. It establishes a requirement of around 1,120 dwellings for the rural areas between 2011 and 2029. The Housing Land Supply Trajectory (CD/PMP/S3) shows that through the policy framework anticipated delivery of more than 1,180 dwellings.

2. The housing supply in the rural areas can be broken down as follows:

<b>Source</b>	<b>Number of dwellings</b>
Completions 2011-2016	398
Large sites with planning permission	202
Allocated sites (without planning permission)	85
Small sites with planning permission	197
Small windfall sites	300
<b>TOTAL</b>	<b>1,182</b>

3. The allocated sites included in the trajectory are consistent with the proposed Policy RA1/Policy LCR3A approach relating to the presence of a primary school with capacity or the physical scope to expand in order to accommodate children generated by development (see statement in response to matter 2, issue 1; document BNES/PMP/002/2). No sites are allocated in villages where either spare capacity is not available and there is currently no deliverable physical scope to expand.

4. The situation in respect of available school capacity or expansion potential may be subject to change during the plan period e.g. this can be influenced by population changes within the existing dwelling stock or changes to the status of a school such as becoming an academy. Whilst this introduces a degree of uncertainty in respect of future housing supply it should be noted that with regard to small windfall sites the allowance relates to the rural areas as a whole and that as such the contribution from individual villages is limited. Furthermore, individual small windfall sites only

generate a small number of additional children (although this may become more significant in cumulative terms). Therefore, it is unlikely that school capacity issues will prevent the overall small windfall element of supply (300 dwellings) from being delivered. Delivery of housing and the impact of the primary school capacity policy approach will be carefully monitored and taken into account in preparing the strategy for future housing delivery through Core Strategy review.

***Q2. Is there tension between Policy RA1 and the Clutton Neighbourhood Development Plan and The Stowey Sutton Neighbourhood Plan in so far as Policy RA1 supports residential development of a greater scale than in-fill and without any requirement to accord with the most recent Housing Needs Survey?***

5. The Council considers that there is no tension between Policy RA1 and the Clutton Neighbourhood Development Plan and the Stowey Sutton Neighbourhood Plan in so far as Policy RA1 supports residential development of a greater scale than in-fill and without any requirement to accord with the most recent Housing Needs Survey.
6. The Clutton Neighbourhood Plan and the Stowey Sutton Neighbourhood Plan have been through the examination process to determine whether the basic conditions are met by the Neighbourhood Plan, including general conformity with the Development Plan. Both Plans have been formally 'made' by the Council and brought into force.
7. The Adopted Core Strategy seeks to enable housing development of around 50 dwellings in addition to small windfalls at each of the villages that meets the criteria of Policy RA1 during the period 2011-2029. At the start of the Core Strategy plan period both Clutton and Bishop Sutton (main village in Stowey Sutton) both met Policy RA1 criteria.
8. Clutton and Bishop Sutton have exceeded their housing requirement. Clutton village has planning permission for 63 dwellings on large sites and Bishop Sutton has planning permission for 76 dwellings on large sites. Therefore neither Neighbourhood Plan allocated any further development outside of the housing development boundary (HDB).
9. This is in accordance with the views of the Core Strategy Inspector's Report (June 2014) (CD/PMP/G26), paragraph 108, which mentions this scenario specifically:

*"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 so that plan may need only to amend the housing boundary to reflect recent commitments."*

10. National policy emphasises that Neighbourhood Plans should seek to plan for growth. Both Neighbourhood Plans have sought to provide for sustainable growth by supporting infill housing within the HDB in addition to the commitments referred to above.

***Q3. No development is proposed in some settlements meeting the definition of Policy RA1 villages (i.e. High Littleton) and less than 50 in others. Is this inconsistent with the strategy set out in the CS to enable housing developments of around 50 dwellings in these villages?***

11. As a part of the Placemaking Plan site allocations process all villages meeting the criteria of Policy RA1 were subject to investigation to assess potential development sites and to identify and allocate suitable and deliverable sites for development. The fact that for some settlements no development is proposed and for others sites are allocated which are likely to provide less than 50 dwellings is not considered to be inconsistent with the strategy which is aimed at directing development attributed to the rural areas to the most sustainable villages. The reasons for this are explained below for the relevant villages. It should also be noted that this has not prevented the Placemaking Plan from facilitating the delivery of the overall rural areas housing requirement established in the adopted Core Strategy (see also response to Q1 above and statements relating to Matter 2, Issue 1).

**Farrington Gurney and High Littleton**

12. As explained in the Council's statement relating to Matter2, Issue 1 the Council has proposed to change Policy RA1 in the Placemaking Plan so that the criterion refers to the village having a primary school and two of the three other key facilities. Allied to this the Placemaking Plan proposed Policy LCR3A requires that residential development should only be permitted where the primary school has the capacity to accommodate additional children generated by the development or has the physical scope to expand. This policy approach is proposed for sustainability reasons and to ensure the timely delivery of necessary infrastructure to provide for balanced and self-contained communities. The villages of High Littleton and Farrington Gurney have schools which have no spare capacity and there is currently no demonstrably deliverable opportunity for further expansion or re-configuration to permit further places within the school. However, this situation may change during the Plan period e.g. changes to the school's status or land owner discussions. This means that these villages, whilst meeting the criteria of Policy RA1, do not meet the requirements of proposed Policy LCR3A. As such no sites are allocated to provide additional housing and no allowance is therefore made in the Housing Land Supply Trajectory (CD/PMP/S3).

**Batheaston, Bathford and Bathampton**

13. There are a number of larger villages that are 'excluded from the Green Belt' where a Green Belt inset boundary is defined. Housing development can come forward within the Housing Development Boundaries (HDBs) at these villages. Opportunities outside the HDB are limited and will be considered in the context of Green Belt policy. Through the process of preparing the Core Strategy it was demonstrated and agreed by the Examination Inspector (see paragraph 110 of his Report – CD/PMP/G26) that there are currently no exceptional circumstances to change the Green Belt boundary to allocate sites for housing development. These villages are unlikely to be able to deliver the number of dwellings envisaged through Policies RA1 and therefore, no such allowance or expectation is included in the housing land supply trajectory.

**Timsbury**

14. As stated in Matter 23, issue 2, paragraph 1.1 the Council have worked with the RA1 village parish councils to identify sites for development. As a part of this process the Council worked with Timsbury Parish Council to review potential sites and to address issues in order to enable allocation of the most suitable sites. A number of sites were reviewed by the Council and three sites were included in the Placemaking Plan Options document and subject to public consultation. These sites were then subject to further assessment and investigation into deliverability. One of the sites (SR13) was shown to be undeliverable as suitable vehicular access cannot be provided (see CD/PMP/RA8). Two sites (SR14 and SR15) were included in the Draft Placemaking Plan which will provide around 45 dwellings over the Plan period. This figure which is broadly in line with the Core Strategy allowance will ensure that the development and design principles can be met on both sites and will facilitate protecting the character of the village.