

**Matter 2
Issue 1, Q1, (a)
Representor No 6426
Persimmon Homes
Severn Valley**

BATH PLACEMAKING PLAN EXAMINATION

August 2016

Statements for the Bath Placemaking Plan Examination

Matter 2 – Overall Approach

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

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

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

Persimmon Homes Severn Valley are of the view that not only is the change to RA1(a) not necessary it is also contrary to National Guidance. NPPG 50-001 (Rural Housing) helpfully identifies those parts of the NPPF which set out the *'role of housing in support the broad sustainability of villages and smaller settlements.'* This specifically refers to paragraph 17 of the Core Planning Principles, paragraph 28 on Supporting a Prosperous Rural Economy and paragraph 54 on housing. It is also important to emphasize this guidance applies generally to villages and smaller settlements (so not just the larger RA1 villages) and that *'all settlements can play a role in delivering sustainable development in rural areas.'*

Therefore the narrower approach set out in the change to paragraph 67, that access to a primary school is necessary *'to secure and maintain balanced and more self-contained communities and reduce the need to travel'* is not supported by this guidance. In particular, the requirement to reduce the need to travel is not necessary to achieve sustainable development in rural areas. Indeed we repeat and emphasize our original comments paragraph 55 of the NPPF, which is also highlighted in NPPG 50-001, (*'where there are groups of smaller settlements, development in one village may support services in a village nearby'*). This encourages a positive approach in rural areas rather than preventing homes in a particular settlement because it does not have a primary school and then looking at facilities in a group of villages, which encourages, rather than discourages travel between villages within a group. Indeed there was previously a positive recognition of this concept in the settlement classification of the former adopted Local Plan (Policy SC1) which grouped the neighbouring villages of Clutton and Temple Cloud together.

As well as being contrary to National Guidance, the proposed change has negative impacts on the ground. It will result in acceptable development being directed away from sustainable locations, potentially further reducing the sustainability of facilities in villages without a primary school and reducing housing opportunities in the rural areas.

A good example of this is provided by a recent planning application in West Harptree prior to the change. Application 14/05899/OUT for outline planning permission for 17 (net 16) new dwellings at Leacroft House, Bristol Road, West Harptree was eventually approved, following a committee site visit, by the Development Management Committee on 29th July 2015. Copy of Committee Report of 1st July 2015 and minutes of 29th July attached as Appendix 1. The Officer's Report for this application said *'West Harptree meets the criteria of Policy RA1 in the adopted BANES Core Strategy.'*

Regarding the principle of development, the report said *'West Harptree, due to the level of facilities within the village, is considered to meet the criteria of Policy RA1 of the Core Strategy meaning that housing developments of around 50 dwellings could meet the criteria of the policy.'*

In addition to the above the conclusion to the report also included the following:

'Whilst the Placemaking Plan has limited weight at this time the application site is identified as one of the total of 3 potentially appropriate sites all of which are located outside the existing Housing Development Boundary. The proposed development is also considered to meet the development principles stated within the Placemaking Plan.'

'Furthermore, as a significant part of this intended developable area of the land, is within the Housing Development Boundary (HDB) with the remaining area outside, but adjacent, in the absence of any other identified harm, there is no in principle objection to the residential development of this site.'

'From this we comment as follows:

1. West Harptree does not have a primary school.
2. Despite this the committee report confirmed in three places that the level of facilities in West Harptree met the criteria for development.
3. This was based on the level of facilities generally not an assessment of specific facilities or the suitability of each facility.
4. The decision was made on the basis of the policy in the adopted Core Strategy. Any changes to that policy should be made in the context of a review of the Core Strategy and the Settlement Strategy not on the basis of a single factor.
5. Clearly the Core Strategy has changed without such a review because without its own primary school such an application in West Harptree would no longer be acceptable.
6. Therefore it is clear the proposed Placemaking Plan substantially alters the adopted Core Strategy Policy and in this respect we refer to our comments on Matter 1(a), which the proposed revision would prevent.
7. There was acceptance that West Harptree could accommodate up to 50 new dwellings on three potentially appropriate sites all outside the defined settlement boundary.
8. The approval of the application accepted the principle of development outside but adjoining the development boundary, within a designed AONB.
9. Despite this and the lack of a primary school the proposal was found to be acceptable on the basis of a normal planning assessment which was identified no harm and no objection in principle to the residential development of the site.
10. Therefore otherwise acceptable development which would support services is now being prevented.
11. The proposed change results in recognised opportunities for new housing to meet needs in rural areas is being denied at least in West Harptree and potentially elsewhere.

Therefore in conclusion we consider the proposed deletion of paragraph (a) of Core Strategy RA1 (and the changes to paragraphs 67) are not necessary because they are contrary to National Guidance and fundamentally change the operation of Policy RA1 to the detriment of meeting housing needs in rural areas.

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Appendix 1

Committee Report and Minutes.