



# BATH AND NORTH EAST SOMERSET LOCAL PLAN 2022-2042

## Options Consultation

### Representations by

April 2024

**ROCKE  
ASSOCIATES**

The representations below set out the response of ??? to the matters identified in the title banners.

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## BATH AND NORTH EAST SOMERSET LOCAL PLAN 2022-2042 OPTIONS CONSULTATION

Section	Paras	Matter
8	8.1-8.26	Rural Areas: Vision, Strategy and Options

As is evident from the Options Document, the rural areas of the district account for the majority of its land area and a significant proportion of its overall population. It is therefore imperative that the plan responds positively and effectively to the needs of the rural areas and their village settlements and their potential, and does not treat them as an afterthought to simply massage delivery of the residual housing requirement through a windfall allowance.

It is evident from the key issues that have been identified in response to feedback from earlier consultation that the current strategy based on a rigid categorisation of villages and associated apportionment of growth potential, is not working. That is reflected in the lack of affordable housing, poor access to public transport, and declining access to community and social facilities, services and shops.

The decline in facilities and rural opportunities is inversely related to growth. The current policy framework has therefore impacted negatively on non-RA1 villages, and particularly villages that are either surrounded, or washed over, by Green Belt, effectively precluding organic growth that could contribute to delivering affordable housing and sustaining local facilities<sup>1</sup>.

A much smarter and more positive approach to growth at 'all' villages is therefore imperative going forward if the Plan is to respond effectively to the key issues identified as afflicting the rural areas and settlements.

For the reasons set out in the Options Document<sup>2</sup>, it is agreed that Local Plan-led Growth is essential. This is particularly so to ensure that a balanced perspective is brought to bear given that the voices of those resisting growth are often the loudest, but may not reflect the interests of the majority, or those in greatest need for local housing and other facilities. Furthermore, given that an effective strategy may necessitate local adjustments to Green Belt boundaries to enable organic growth to sustain Green Belt settlements, those are decisions that will need to be taken through the Local Plan. Moreover, Local-Plan led growth will address the needs of 'all' rural settlements, rather than relying on a growth lottery that is dependent on

<sup>1</sup> Options Document, para. 8.7

<sup>2</sup> Ibid, paras. 8.14-8.19

whether a community is sufficiently organised and mobilised to bring forward a neighbourhood plan, and one that is positively disposed towards growth rather than construed as a vehicle to reinforce resistance against it.

Given the acknowledgement of the issues affecting the rural areas and settlements, which reflect weaknesses of the current approach which apportions growth potential having regard to existing facilities and ‘policy-on’ constraints, it is surprising, and concerning, that the emergent village options would seem to further polarise growth on a select few larger villages, effectively condemning an even greater proportion of rural settlements to planned decline. This is not considered to be a sound strategy, or one that is consistent with the Government’s requirement in rural areas that planning policies and decisions should be ‘responsive’ to local circumstances and support housing developments that reflect local needs.

The village options<sup>3</sup> set out in the consultation document are likely to compound the key issues, and make existing problems worse, rather than resolve them. Moreover, they are neither justified, nor an effective response, to the village settlement evidence base.

The table below compares the facilities audit for Hinton Charterhouse with those for the village settlements selected for growth<sup>4</sup>.

Village	Key Count	Desirable Count	Total	Weighted Score
Bathampton	8	5	13	7.1
Batheaston	10	7	17	9.1
Bathford	4	4	8	4
Chew Magna	12	8	20	10.8
Chew Stoke	6	4	10	5.4
Clutton	4	3	7	3.7
Corston	4	1	5	3.1
Farmborough	5	3	8	4.4
Freshford	5	2	7	4.1

<sup>3</sup> Ibid, para. 8.26, Table

<sup>4</sup> Topic Paper: Rural Areas, p.13, Facilities Audit – Part 2

<b>High Littleton</b>	6	2	8	4.8
<b>Pensford</b>	7	2	9	5.5
<b>Bishop Sutton (Stowey Sutton)</b>	6	5	11	4.7
<b>Temple Cloud</b>	7	4	11	6.1
<b>Timsbury</b>	8	9	17	6.1
<b>Hinton Charterhouse</b>	5	2	7	4.1

It is significant that, on the 'key facilities' count, Hinton Charterhouse betters Bathford, Clutton and Corston, and equals Farmborough and Freshford. The main facility that it lacks within the settlement itself is a Primary School. However, it shares the Primary School in the neighbouring settlement of Wellow, and therefore has good accessibility to primary education facilities. There are also alternative Primary School options in the neighbouring villages of Norton-St-Philip in Somerset (which is under-subscribed) and Freshford.

Given that Hinton Charterhouse is a Parish that shares a key community facility, then it is reasonable to include it as an additional key facility, which would elevate its key count to 6 and weighted score to 4.8. This would raise it above Farmborough and Bishop Sutton, and onto an equal footing with High Littleton.

Hinton Charterhouse has good accessibility to Bath. Its TAF score belies its accessibility by public transport, there being services (D2) to/from Bath approximately every 35 minutes during morning and evening peak hours, with journey times of approximately 20 minutes. Compared with many rural areas, this is a very good level of accessibility in terms of service frequency and journey times, and affords realistic opportunities for residents of the village to travel to the neighbouring city of Bath by modes other than the car. Moreover, as is acknowledged in the NPPF, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

Having regard to the above considerations, Hinton Charterhouse has a good level of key facilities, and is a sustainable rural settlement. It compares very favourably with those that have been selected for growth. Modest additional housing growth will help sustain the existing facilities, as well as providing much needed affordable housing in a location where house prices are high due to the amenities of the village, its

proximity/accessibility to the City of Bath, and the very restricted supply of new homes (a mere 11 permissions and completions during the period 2011-22 averaging 1 per annum<sup>5</sup>).

Taking a 'policy-off' approach, there is a strong case for Hinton Charterhouse to be apportioned a modest scale of growth to respond to the key issues affecting the village that reflect those identified in the Options Document as affecting rural settlements across the district in general. Each settlement is properly assessed on this basis to ensure that their needs and potentials are considered on an equal footing. These needs and opportunities are properly afforded very significant weight against 'policy-on' considerations such as Green Belt and AONB.

The practical outworking of the Council's approach set out in the Options Document would be to plan for the further decline of the majority of the district's rural settlements, abandoning them to those that can afford to buy a house and who have a high degree of personal mobility which will become increasingly necessary as services and facilities continue to decline due to insufficient critical mass of population to support them.

The Plan should therefore be planning for a greater scale of growth across a greater spread of village settlements that have a good range of key facilities and offer the opportunity to travel by non-car modes. The Green Belt should not be construed as an overriding constraint since many settlements offer the potential for growth without compromising the essential purpose of the Green Belt. Moreover, for similar reasons to the need to now consider removing land from the Green Belt for sustainable strategic growth at the district's main settlements, given the length of time that they have endured, Green Belt boundaries around the district's rural settlements are now anachronistic and resulting in unsustainable settlements in socio-economic terms, and therefore must be reviewed. By definition, since it is a designation primarily to maintain the separation between Bristol and Bath, the rural settlements in the Green Belt are those with the greatest proximity to the neighbouring urban areas, and therefore tend to have the greatest potential to minimise the need to travel. The Local Plan is the vehicle for making small, local adjustments to Green Belt boundaries to allow for sustainable growth at rural settlements.

In relation to Hinton Charterhouse, there is a sustainable opportunity for modest growth off Tuggy's Lane that can deliver significant benefits for the village without compromising the purposes of the Green Belt or harming the landscape quality of the AONB. The site is included in the HELAA with an identified residential capacity of 53 dwellings<sup>6</sup>, and its 'suitability' has been assessed as follows:

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<sup>5</sup> Ibid, p.12, Demographic Data

<sup>6</sup> Draft Housing and Economic Land Availability Assessment (HELAA), February 2024, Site ref. HCH02

*The site is within the Green Belt, the Cotswolds AONB and comprises Grade 3 Agricultural Land. The site is potentially suitable for development subject to a Green Belt review and the demonstration of exceptional circumstances and consideration of other identified constraints.<sup>7</sup>*

The HELAA assessment also found there to be no constraints on the site's 'availability' or 'achievability' in a 'high price point area'.

The vehicle for a Green Belt review that will enable the site to come forward is the current Local Plan. For the reasons set out above, that review is an imperative given that its boundaries are now anachronistic having been established nearly 70 years ago in the mid-1950s with little, if any, changes insofar as the rural settlements are concerned. After nearly 70 years of highly constrained growth, and in a context of socio-economic, mobility, accessibility and climate circumstances that bear little relationship to those at the time of its designation, there is a compelling need to make adjustments to ensure a sustainable future for rural settlements through re-balancing the forces of gentrification and declining facilities that is the legacy of 70 years of negligible growth.

The omission site off Tuggy's Lane has the potential to deliver significant community benefit, which can be summarised as follows:

- Market housing at an appropriate price-point, including smaller units for first-time buyers and those looking to remain in the village but to downsize.
- Affordable housing (for social rent and shared equity) to meet the needs of those unable to access market housing.
- A vernacular development with gateway buildings to define the south-western edge to the village.
- Reinforcement of woodland planting to define the village edge.
- New public open spaces, including, as required parkland, facilities for Children's play, allotments and a sports pitch.
- New Community Hall / Café.

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<sup>7</sup> Ibid

- Traffic calming to the main road through the village, and provision of off-street parking within the development for existing properties.
- Enhancement to the setting of the Horse Pond through an ecological management plan.
- New dedicated footpath link with linear woodland planting along the southern periphery of the development.

The omission site is therefore a proportionate development opportunity that can deliver significant housing and other benefits for a community that has a long legacy of negligible growth. Delivery of additional homes is now critical to sustaining the socio-economic balance of the community and maintaining it as a sustainable settlement.