Batheaston Parish Council B&NES Local Plan – Preparation of Response to the Formal Consultation

Introduction

The Local Plan is one of the foundational documents for planning. It sets out the areas for development of housing, but also infrastructure and services.

Council will recall that there were conversations about a revised Local Plan during 2023 and 2024. As a result of the change of Central Government, Bath and North Est Somerset has been set a significantly higher target to housebuilding (approximately double), which has caused it to reset the process for adopting a Local Plan.

While this takes place, B&NES do not have a current a robust "5-year housing land supply", weakening its ability to challenge developments that are seen as unsuitable.

More detail is here: https://bathnesplaces.co.uk/localplan/index.php.

Proposed Process for Developing the Parish Council's Response

Public consultation on the Reset Local Plan Options document opened on 3rd October and runs until 14th November. There are two Parish Council meetings in this period, on 14th October and 11th November, and I propose the following:

- This document forms the basis for the Council's response, setting out its initial feedback and priorities, and the areas for further discussion and development.
- In parallel, we circulate a <u>survey</u> to collate residents' views on Local Plan priorities for distribution as widely as possible.
- I propose to maintain the core of this document as a draft response, possibly extending its scope beyond that of the consultation to serve as a "plan for Batheaston".
- The Consultation Response will be presented to the 11th November meeting for approval and submission to B&NES.
- Subsequently, Council could decide to develop the "plan for Batheaston" for its own purposes, specifically as a starting point for developing a Neighbourhood Plan.

Background – the Parish Council's Previous Response

In April 2024, before the change of Central Government and the change to housing targets that led to the "reset", BPC submitted this response to the consultation undertaken by B&NES:

"The council is concerned that there are few obvious, acceptable locations for development of housing within the Parish. The redevelopment of the CURO garages, on the Elmhurst Estate, is one exception that might provide much needed affordable homes.

There are options to the east of the village, along the A4. Many routes within the village are very congested, with very little parking and are not suitable for more traffic.

While the village does have a good range of amenities including a good school and surgery, some of the retail services appear to be commercially precarious, and we would welcome measures to help protect them. In particular, preschool provision is sorely needed."

Context – Demographic Data about Batheaston

See appendix 1 for an outline of findings from the Office National Statistics Census and other information (https://www.ons.gov.uk/visualisations/customprofiles/build/#E04000951).

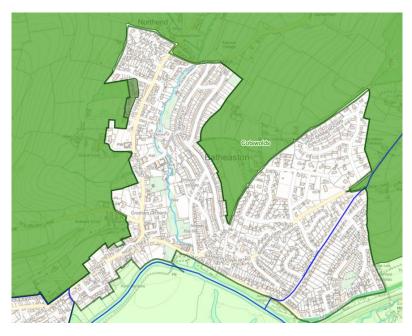
Current status of Batheaston in the Draft Local Plan

My summary of the expectations for Batheaston is:

- 1. The general context is that B&NES have been set a significant target, which will be difficult to achieve, particularly given the constraints that apply in the city of Bath; its topography and World Heritage status.
- 2. Batheaston is classified as one of the more "sustainable villages" in B&NES, with reasonably good transport links and a reasonable range of local services (within the Parish or within reach)
- 3. The <u>current</u> "Housing Development Boundary" for Batheaston is as below, but note that this is reviewed as part of the Local Plan Reset:



4. All of the Parish apart from the village itself are designated as Green Belt and Area of Outstanding Natural Beauty, and within the Cotswolds National Landscape.



Priorities the Parish Council may wish to express in the Consultation Response

The Parish Council does not have a Neighbourhood Plan nor a Housing Needs Assessment (see below) and will therefore be starting from a "blank sheet of paper".

To provide a basis for discussion, I summarise here what I believe are consensus views of Councillors and the wider community:

- Road transport within the village is a major constraint; apart from the London Road, none of the main arteries have capacity for more traffic.
- Similarly, there is inadequate on-street parking for current demand in most of the central parts of the Parish.
- Bus services, are limited in frequency and coverage of the day; they also suffer from congestion into and out of Bath, and sometimes within the village, on the Elmhurst Estate.
- There is a reasonable range of public services and amenities, including a primary school and a doctors' surgery and pharmacy. The village lacks pre-school provision.
- There is a reasonable range of Retail and Hospitality and commercial services, although some
 of these struggle to remain viable
- There are few local employers: most employment is out of the Parish, with a substantial amount of working from home.

In summary therefore, I suggest that the Parish Council might make comments to the effect:

- There is little or no opportunity for substantial development apart from along the London Road.
- Any development should be accompanied by investment in local services, to support those already existing and ideally to help to establish a pre-school nursery.

The B&NES Consultation Options Document

See Appendix 2 for the relevant sections. My summary of the key points is:

- The Plan refers to Bathford and Batheaston as "closely linked"
- There is recognition of the quality of the countryside in the Parish, and reference to the Cotswolds NL and Green Belt (as above)
- The plan proposes two quite substantial developments to the north of the Box Road, for a total of ca. 100-130 homes. These are in Bathford Parish, but would have some impact on Batheaston our residents, businesses and infrastructure.
- There is a reference to "previously developed land within the 351 Category Details Housing Development Boundary enables modest infill housing and supports local aspirations for improved recreational facilities" in Batheaston; I am seeking to clarify where this is.
- There is a comment to the effect that Primary school capacity in Batheaston "is identified as having limited primary capacity".

Possible Extensions to the Housing Development Boundary

There are two areas for additional housing that have been identified in previous discussions and which the Parish Council may wish to put forward.

The Garages and Netball Court

Parish Council and CURO land on Coalpit Road, to the north of the Football Pitch.



Notes:

- This is considered as a possible location for a replacement to the Rhymes Pavilion
- Any development would require the collaboration of CURO, and it is assumed would include replacement of the existing garages
- Similarly, the Parish Council might commit to replacing the Netball (/All-weather Court) and Skate Ramp in another location.

The privately-owned land to the north of the High Street, between 131 And 153



Note:

• This is perhaps the only un-developed space with easy access to a good transport and bus route.

Further Actions

Council might subsequently consider:

- Commissioning a Housing Needs Assessment (without, or with, wide consultation)
- A project to develop a Neighbourhood Plan

Richard Maccabee

Parish Clerk and Responsible Finance Officer

Appendix 1: Demographics of the Village

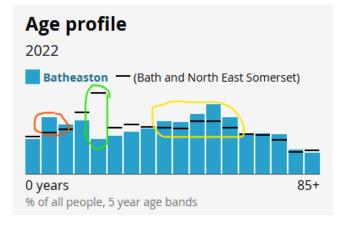
Based on the Office National Statistics Census and other data: https://www.ons.gov.uk/visualisations/customprofiles/build/#E04000951

All figures are from the 2021 Census, unless otherwise indicated.

Batheaston has a population of approximately 2,800 people (2022 figure) and 1,200 households.

The age profile shows differences with B&NES:

- More children aged 5 to 9; 6.9% vs 5.1%
- Substantially fewer 20-24-year-olds: 4.3% vs 9.9%
- More adults from 40- to 64-year olds, a total of 35.6% vs 30.0%



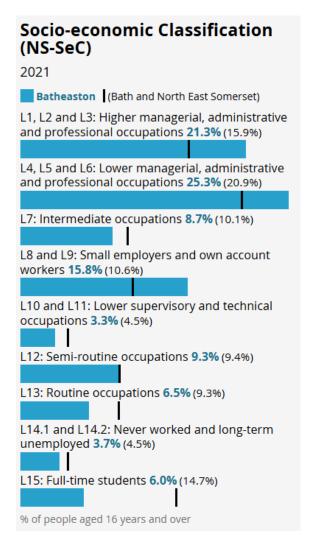
More adults work from home than in B&NES: 47.2% vs 38.5%

Distance travelled to work



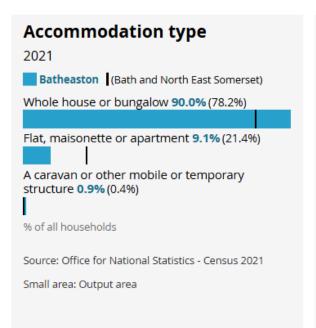
More adults in the managerial and self-employed categories than B&NES: 62.4% vs 47.4% (in categories L1-6, 8 & 9)

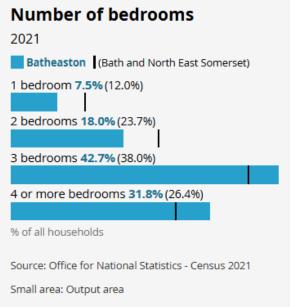
Many fewer students: 6% vs 14.7%

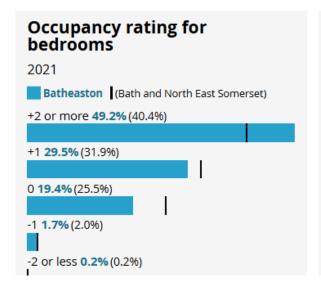


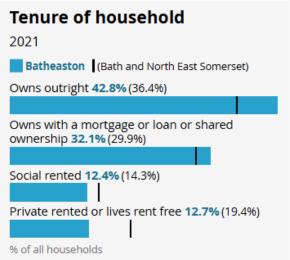
In respect of housing:

- More "whole houses", 90% vs 78.2%
- More owned outright, 42.8% vs 36.4%
- Larger households, 3 or more bedrooms, 74.5% vs 64.4%
- Less crowded, as measured by spare / un-needed bedrooms, 2 or more: 49.2% vs 40.4%









Appendix 2: B&NES Local Plan - Consultation Options Document - Extract

In the "Rural Areas: Approach to Options", B&NES assess Batheaston as follows:

5% Growth	Ор	portunities	Со	nstraints	Opti ons pres ente	Rationale
63 dwellings over the Plan Period	•	High connectivi ty score Broad range of services & facilities	•	The village is surrounded by the Green Belt and lies within a National Landscape. Allocation of greenfield sites would require exceptional circumstances to justify Green Belt release. However, land that may qualify as Grey Belt under the revised NPPF could be considered for development, subject to further assessment. Within indicative extent of the setting of the World Heritage Sites Limited primary school capacity	d No	While no suitable sites have been identified within Batheaston itself due to significant constraints, adjoining land within Bathford parish—functionally part of the wider Batheaston settlement—may offer opportunities for mixeduse or economic development. These will be considered under Bathford's growth strategy.

Bathford and Batheaston - Village Context

Bathford and Batheaston are closely linked villages located to the east of Bath, forming part of the wider Bath urban fringe. Both villages benefit from high connectivity, including proximity to the A4 and public transport links into Bath, and a broad range of local services and facilities. The area is characterised by its attractive landscape setting, with the River Avon to the south and surrounding hills forming part of the Cotswolds National Landscape. The villages also lie within the indicative setting of the Bath World Heritage Sites, which adds further sensitivity to development proposals.

Batheaston, while constrained by Green Belt and landscape designations, functions as a key service centre for the area. Bathford, slightly more detached, has a moderate range of services and some primary school capacity. Together, the settlements present a complex planning context where growth must be carefully balanced against environmental and heritage constraints."

Bathford and Batheaston Site Options

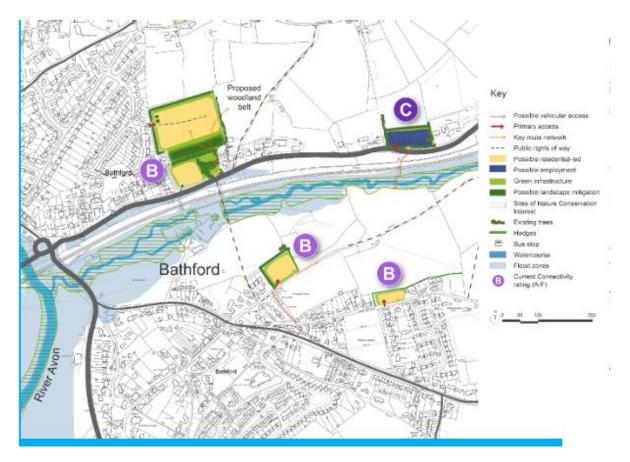
"Options presented – Opportunities for development have been identified on the edge of the village, including land along Box Road that may be suitable for mixed-use or economic development. Smaller sites within Bathford are also being considered. Some of this land adjoins Batheaston and may contribute to meeting wider settlement needs."

"Two areas on Box Road, within Bathford parish but on the edge of Batheaston, are identified as options for housing development. The lower parcel (Bathford Nurseries South) could accommodate 45-60 homes, while the upper parcel (Bathford Nurseries North), with proposed access from Meadow Park, has capacity for 55-70 homes. Both sites are within the Green Belt and National Landscape, and assessment will need to be undertaken of the impact on the Green Belt of possible development and whether either of the sites would meet the definition of 'Grey Belt' under the revised NPPF. Overall capacity would be guided by infrastructure capacity, landscape mitigation (including a new woodland belt to the north), and biodiversity enhancement. Pathways are proposed to connect the sites with existing employment zones and residential areas, improving permeability and access to services. Further along Box Road, a separate site is identified for economic use, supporting local employment opportunities.

(Within Bathford itself, two small-scale sites ...)

In Batheaston, no larger-scale site options have been identified due to significant environmental and heritage constraints. However, a small area of previously developed land within the village is included within the Housing Development Boundary (adopted Placemaking Plan, 2017). While not allocated due to limited capacity and deliverability concerns, its inclusion enables modest housing to come forward in future. This presents an opportunity to make more effective use of underused land and to support local aspirations for improvements to the surrounding area, including enhanced recreational facilities.

Connectivity scores shown in the site options plan below are based on the Department for Transport's A–J grading, where A is the highest within B&NES."



Bathford and Batheaston Site Options – Key information

Element	Description				
Development	All sites				
opportunities					
	 High connectivity to Bath and regional transport network 				
	Potential for mixed-use development				
	 Proximity to services and employment zones 				
	Bathford Nurseries North and South (centre left of plan)				
	 Two areas on Box Road (Bathford Nurseries South: 45-60 homes; Bathford Nurseries North: 55-70 homes, access from Meadow Park), subject to infrastructure capacity and landscape mitigation 				
	Box Road (top right of plan)				
	The site further along Box Road is identified for Economic Use, supporting local employment				
	Bathford Village: Land North of the Recreation Ground (centre of plan)				
	 The Land North of the Recreation Ground/adjacent to Titan Drive is promoted for affordable housing (15–20 homes, subject to access) 				
	Bathford Village: Ashley Road (bottom of right of plan)				
	The land at Ashley Road could accommodate up to 10 dwellings as an infill site (access constraints apply)				
	Batheaston				
	 Previously developed land within the Housing Development Boundary enables modest infill housing and supports local aspirations for improved recreational facilities 				
Constraints	Green Belt and National Landscape designation				
	Within setting of Bath World Heritage Site				
Mitigation	Landscape buffering through woodland planting				
	 Sensitive design to respect heritage setting 				
	Infrastructure upgrades to support growth				
DfT current	B to C – well to fairly connected				
connectivity rating					
Further evidence	Green Belt and landscape impact assessment				
required	Heritage setting appraisal				
	Transport and access feasibility				
	 Primary school capacity review – noting that the evidence currently 				
	shows some primary school capacity for Bathford, however				
	Batheaston is identified as having limited primary capacity				

This section to be shortened, by editing out less relevant sections

Rural Areas: Vision and Strategy

Under "Strategy Overview"

The current approach to rural development, as delineated in the Placemaking Plan and Core Strategy, categorises our villages as follows:

- RA1 Villages: Non-Green Belt villages boasting primary schools and, crucially, at least two of
 the following essential amenities within the village a post office, community meeting space,
 and convenience store. Furthermore, they benefit from at least a daily Monday-Saturday
 public transport service to major centres. Policy RA1 required allocation of sites to deliver
 around 50 dwellings in each village.
- RA2 Villages: Non-Green Belt villages that fall outside the RA1 scope, characterised by site allocations to deliver around 10-15 dwellings in each village.
- **GB2 Villages:** Villages washed over by the Green Belt, where development is restricted to infill only.

Under "Key Issues"

- It is becoming increasingly evident that the current strategy is leading to the relative dispersal of development across a wide range of settlements. This is an unintended consequence of the approach outlined above and has led to a number of issues this Local Plan needs to address.
- Many of these issues have been picked up from feedback received to the both the 2024
 Options and Launch Consultation as well as Workshops with parish councils and other community representatives. These key issues can be summarised as:
- Lack of affordable housing to meet local needs that may impact on the social sustainability of the rural areas and exacerbate difficulties for an ageing population.
- For much of the rural area poor access to public transport affects the functionality of the rural economy and leads to isolation for those without access to private transport.
- Access to cultural infrastructure, including community and social facilities, services and shops.
- Importance of maintaining and enhancing the character and local identity of our rural areas and communities.
- Reliance of the rural economy on farming, the self-employed and small businesses that require support to flourish.
- Potential opportunities to diversify the rural economy e.g. centred around local food production, sustainable rural and eco-tourism, renewable energy, or the natural resources sector.
- Poor digital connectivity continues to be a barrier to business growth, home working, and access to services, and must be addressed to support economic and social inclusion.
- The ageing population in rural areas presents specific challenges for housing, healthcare, and service provision, requiring more adaptable and accessible infrastructure.

- Climate change resilience and adaptation must be embedded in rural planning, including flood risk management, sustainable land use, and energy efficiency. Protection and restoration of natural capital and ecosystem services is essential to support biodiversity, climate goals, and the long-term sustainability of rural communities.
- Rural areas are not a single place they encompass varied geographies and identities, and strategies must be flexible and locally responsive

Under "Emerging Vision and Priorities"

The following list sets out the key priorities for the Rural Area. Many of the priorities can be addressed through development, either Local Plan-led or by communities through Neighbourhood Plans. However, there are some issues that won't be addressed through new development but will be addressed through other policies in the Local Plan, or by strategies or initiatives undertaken by the council or by other stakeholders.

- Create vibrant, inclusive rural communities where people of all ages can live, work, and thrive, supported by affordable homes, accessible services, and strong social infrastructure.
- Champion a green rural economy that supports local enterprise, sustainable tourism, and innovation in food, energy, and land-based industries.
- Transform rural connectivity by delivering a network of safe, accessible walking, cycling, and wheeling routes, and by improving public transport and digital infrastructure.
- Empower communities to shape their future, supporting locally-led development through Neighbourhood Plans, community land trusts, and rural exception sites.
- Plan for climate resilience and environmental recovery, embedding nature-based solutions, low-carbon design, and flood adaptation into all aspects of rural growth.
- Unlock the potential of strategic rural development, where appropriate, to deliver wider benefits such as employment land, new services, and infrastructure that sustain long-term community wellbeing.
- Celebrate and protect the unique character of rural places, ensuring that growth enhances rather than erodes the landscapes, heritage, and identities that define them.
- Respond to national challenges with local solutions, using the Local Plan as a springboard for bold, place-based planning that meets housing need while respecting local distinctiveness.

The Government's Unleashing Rural Opportunity report sets out a framework to support rural communities across the UK. Since its publication, progress has been made in areas such as digital connectivity, transport, and rural economic diversification. However, access to funding for rural areas remains limited and uneven. In B&NES, the UK Shared Prosperity Fund (UKSPF), administered through the West of England Mayoral Combined Authority (WECA), has provided support to rural communities.

The council's Economic Strategy is also seeking to support the diversification of the rural economy and realising opportunities to facilitate moves towards a greener economy, including growth in environmental services and natural resources sectors, as well as sustainable rural and eco-tourism. Improvements in digital infrastructure and changing work practices also creates opportunities to diversify and enhance the rural economy. A stronger rural economy, providing opportunities for local

residents to access good jobs, is a vital component of more sustainable rural communities, alongside efforts to retain and improve local services and facilities.

Under "Transport Opportunities"

Improving connectivity is also a key priority for rural communities. The Active Travel Masterplan sets out a 20-year vision to make walking, wheeling, and cycling the natural choice for more journeys across the district. It proposes a holistic network of safe, accessible, and interconnected routes that link rural settlements to key services, employment, and public transport hubs. By reducing reliance on private vehicles, the Masterplan supports climate goals, improves air quality, and enhances health and wellbeing. For rural areas, it offers the opportunity to address isolation, improve access to services, and strengthen local economies through better physical connectivity.

Enhancing public transport is also a key priority for rural communities in B&NES. The council's approach focuses on a simple, dependable and integrated rural bus network that links villages to key services, employment and town centres via well located mobility hubs, supported by bus priority on strategic corridors such as the A37, A367 and A362. WECA's forthcoming work on bus ownership options will help to inform how rural services are specified and delivered. Some key rural public transport services, particularly buses, are currently WECA grant funded and it is vital that this funding remains in place in order to support existing rural communities, as well as potential additional development. However, the future of this funding is uncertain and subject to periodic review, which should be taken into account when considering options for allocation in the Draft Local Plan.

Green infrastructure

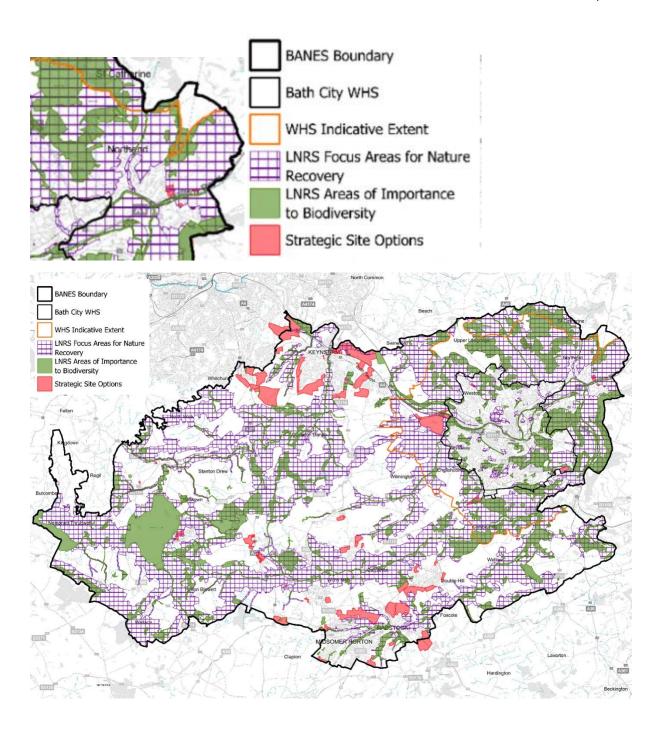
Green infrastructure is a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, and communities. Opportunities to enhance and extend the Green Infrastructure network should be central to the design of new developments, and development proposals should demonstrate strong links to the wider green infrastructure network.

The WECA Local Nature Recovery Strategy and Toolkit (LNRS) was published in November 2024. The LNRS identifies the following areas:

- Areas that are already of importance to biodiversity. These are sites that are nationally are
 designated for their value to nature, such as Sites of Special Scientific Interest (SSSIs), Special
 Areas of Conservation (SACs) and Special Protection Areas (SPAs),.It also includes sites that
 are designated as Local Nature Reserves; ,sites that are locally designated as 'Sites of Nature
 Conservation Interest' (SNCIs), and/or are irreplaceable habitat, including ancient woodland.
- Focus Areas for Nature Recovery. This is where action to recover nature will have the biggest
 impact and is most feasible. These have been mapped to reflect the priorities for nature
 recovery, and include all of the mapped measures for nature recovery. The focus areas for
 nature recovery are referred to as 'areas that could become of particular importance' in
 regulation.

The plan below shows where these areas are located in the Rural Area, and the relationship between these areas and the Site Options under consideration in this Options consultation. Constraints and opportunities are referenced for each Site Option where appropriate.

WECA LNRS areas and district wide strategic site options



Proportionate Growth

Central to the vision and priorities for the rural areas is the need for proportionality to growth, ensuring that development aligns with the unique characteristics and needs of individual communities. Without a deliberate focus on proportionality, development can risk overburdening smaller villages or inadequately serving larger ones. However, as a result of changes to national policy and the Government's proposed revised housing figure, aimed at tackling the country's acute housing crisis and stimulating economic growth, the council reset the Local Plan in February 2025. This reset discussed the increased housing pressures across the district, including in rural areas. While proportionality remains a guiding principle, there is now a need to consider whether some comparatively sustainable rural locations may be suitable for larger-scale development.

Pathway 1: Community-Led Growth

Under this pathway, local communities take the lead in shaping and advancing their growth initiatives. Emphasising community involvement, this approach offers a flexible framework, enabling residents to propose growth projects that align with their local aspirations. Using a range of tools, including rural exception schemes, community land trusts, and Neighbourhood Planning, empowering communities to initiate growth projects.

Pathway 2: Local Plan-Led Growth

Including rural exception schemes, community land trusts, and Neighbourhood Planning, empowering communities to initiate growth projects.

Pathway 2: Local Plan-Led Growth

As communities contemplate the pursuit of their growth proposals, it is essential to maintain efforts in preparing the new Local Plan to ensure the certainty of delivering new developments, especially housing and employment opportunities.

Taking these steps is vital to:

- Positively plan and reduce the possibility of speculative developments.
- Facilitate the development of new affordable, market, and specialised housing to meet the needs of rural communities.
- Support existing services and facilities.
- Enable investment in new infrastructure, including employment space, schools, and transport improvements, where larger-scale development is appropriate

In opting for a Local Plan-led/site allocation approach to rural growth and development, there are several inherent benefits that prioritise the holistic well-being of our villages. Unlike speculative large site development, which can introduce unforeseen challenges for essential functions like schools, transport, and community facilities, a Local Plan provides a structured and comprehensive framework.

Pathway 2 focuses on a Local Plan-led approach that provides a clear direction for growth and change, adhering to the NPPF's principles of sustainable development. This approach is essential in helping to meet our overall housing, job, and infrastructure requirements and provides certainty for both communities and developers. The principle of "proportionality" is central to this approach, ensuring that growth aligns with the unique needs and character of each community. However, proportionality must now be considered in the context of increased housing requirements and the need to deliver development that brings meaningful benefits to rural communities.

Pathway 2 focuses on guiding new development in rural areas by identifying relatively sustainable villages. Instead of adhering to the rigid distinctions of RA1 and RA2 villages, a more flexible and proportionate approach will be taken.

As part of the Local Plan process, we are also separately consulting on amended Housing Development Boundaries (HDBs) for rural settlements. This includes an option for a revised methodology for defining HDBs, primarily to ensure they reflect changes on the ground and address known inconsistencies. While the main purpose is to provide clarity and alignment with current circumstances, the amended boundaries may also enable a limited amount of small scale

'windfall' growth in appropriate locations. This consultation runs alongside the site options process and complements the identification of relatively sustainable villages, helping to ensure that all forms of rural growth, whether plan-led or windfall, are managed in a coordinated and locally responsive way.

The strategy for rural growth is based on an assessment of a village's sustainability, considering factors such as connectivity through sustainable modes of transportation (public transport, walking, cycling and wheeling) and the availability of essential services and facilities.

In conjunction with this approach, place profiles have been prepared for our villages and parishes. These profiles incorporate an analysis of past growth since the start of the Core Strategy plan period, demographics, connectivity, facilities audit, and other key issues. The outputs of this work are outlined in a Topic Paper (published alongside the Options document) and the associated identification of relatively sustainable villages for consideration are set out in the following pages.

The villages identified as relatively sustainable compared to others are proposed to become the focus of attention for some Local Plan led rural growth. Our commitment is to engage with the community and parish council in these villages to explore the potential for growth, its location and the associated benefits that such development could bring e.g. meeting local housing needs or providing employment opportunities, helping to keep villages viable and sustainable. We have met with parishes that have engaged with us, and as a result, we have identified site options within these areas to set out our thinking on the most appropriate locations and scales of potential growth. If taken forward this development would be on large sites that would then be allocated for development in the Draft Local Plan and would be additional to any small windfall sites (often sites for one or two dwellings) that might come forward within the Housing Development Boundary for each village during the plan period. In preparing the draft Local Plan we will also need to consider whether there are opportunities to phase development in the villages in the context of the need to maintain a five-year housing land supply across B&NES. Opportunities outlined in the Housing and Economic Land Availability Assessment (HELAA) were considered as a starting point for potential locations. In addition, the February 2025 Call for Sites has provided further opportunities to assess land availability and suitability across the district.

As part of this process, parish councils were offered training on site assessment, and many have reviewed HELAA opportunities within their areas. Through this collaborative approach, at some villages previously identified for proportionate growth no site options are identified at this time due to either a lack of development opportunities or the high levels of harm that could result from Local Plan scale growth. We continue to work with these parishes and encourage them to pursue Pathway 1 (Community-Led Growth) as an alternative route to meet local needs. We will continue to work closely with community representatives as the plan progresses to ensure that any development aligns with their aspirations while preserving the distinct character and vitality of each rural area.

Should other villages wish to be considered for further growth then there is the opportunity for them to respond through this consultation. Comments received during the Spring 2024 Options consultation, as well as those from this consultation and ongoing engagement with rural communities and stakeholders, will all be considered together in shaping the Draft Local Plan. There is no need to resubmit previous comments unless you wish to add new information or context.