Hedgehogs Field (Policy 5.13): Chew Stoke Parish Council response

Chew Stoke Parish Council (CSPC) Response to B&NES Draft Local Plan 2025 – 2043 (Regulation 19) consultation. October 2026

As stated in its response to the Regulation 18 Options consultation on this Local Plan in November 2025, Chew Stoke Parish Council supports the principle of housing development on Hedgehogs Field. The Parish Council's view has not changed in this regard.

The reasons for the Parish Council's support of development on Hedgehogs Field are as follows:

- The Parish Council recognises that the development of additional houses in the village will help to support the maintenance and improvement of sustainable community services and living in the village. Village amenities that could benefit from additional population in the village include a primary school, secondary school, village shop, pub, community buildings and green open spaces as well as supporting social and sporting societies.
- The 38-unit Dairy Way development that occurred approx. 15 years ago was a great success for the village injecting new life, community cohesion and new amenities to the village. The Parish Council would hope that some further residential development in Chew Stoke could replicate this success.
- The Parish Council considers that Hedgehogs Field represents the best location for additional housing in the village due to its proximity to Schools, GP surgery and good potential access to the road network via Chew Lane.
- The Parish Council considers development on Hedgehogs Field should bring the opportunity to address the following: a new community building; car-parking that could be used for the above facilities as well as overflow for the medical practice, rugby club and secondary school and therefore reducing the existing parking problems along Chew Lane; improvements to walking and cycling routes along Chew Lane and Pagans Hill.
- The Parish Council understands that both the primary School and Secondary School can accommodate more local pupils via displacement of pupils that currently travel by car or bus from surrounding areas. Chew Stoke Parish Council therefore believes that the development will be positive for sustainability and environmental reasons in this regard.

Chew Stoke Parish Council believes that there are important areas where the Draft Local Plan 2025 – 2043 (Regulation 19) is <u>not sound</u> in relation to Chew Stoke Hedgehogs Field development and the nearby villages. The following section of this response details these and where appropriate suggests how these can be addressed.

As an overarching issue Chew Stoke Parish Council would like to register that there is considerable community concern, which is shared by the Parish Council, around the significant increase in proposed housing numbers compared to the previous Local Plan (moving from 20 -30 houses in the previous plan to 100 houses in this revised plan). From Chew Stoke Parish Council's perspective this concern is exacerbated by the cumulative impact of potential new houses at Chew Stoke (100 units), Bishop Sutton (280 units) and Chew Magna (20 units), as well as the current Bristol Airport expansion proposals. This gives a total of 400 potential new houses nearby as well as extra airport traffic all relying on a rural road network and services.
With no evidence provided by B&NES as to why this significant increase has been applied, then Chew Stoke Parish Council would consider this plan <u>not Sound</u> on this basis alone.

Chew Stoke Parish Council's specific concerns and suggestions around each item of policy 5.13 are detailed below in Table 1. In addition, Table 2 also points out overarching concerns:

1. *Whilst CSPC support some development, an increase in size (as measured by dwelling numbers) of 25% in a small rural village will have an impact on the character and distinctive nature of the village. There is no evidence from the local plan that this has been taken into account and any mitigation measures considered. For this reason, we consider the plan <u>not Sound</u>.*

2. *The cumulative effect of 400 houses in the Chew Valley area has not been considered in terms of a Traffic Impact Assessment. As such Chew Stoke Parish Council consider the plan to be not Sound. We would consider it essential that such a Traffic Impact Assessment and a consequent Valley wide highways and infrastructure plan demonstrating how 400 extra houses could be accommodated should be completed before this plan can be adopted.*
3. *Chew Stoke Parish Council requests to take part in the hearing sessions held by the Planning Inspector during the examination of the Draft Local Plan 2025–2043, in relation to Policy 5.13 (Hedgehogs Field) and the matters raised in this response. The Parish Council wishes to be notified of the examination timetable, the hearing sessions and the Inspector's questions.*

Table 1 takes each of the 23 requirements of Policy 5.13 in turn and shows the CSPC view: "Supported – no change", or "Not sound" and detail of the test it fails: these are **positively prepared, justified, effective,** or **consisten**t with national policy. Proposed wording: where CSPC proposes a change to a Policy 5.13 requirement, proposed additions are in bold. Other text in this column is CSPC comment.

Table 2 sets out points raised by CSPC that are not tied to a single requirement of Policy 5.13 but bear on the soundness of the allocation. It follows the format of Table 1. "What CSPC asks for" states the action requested of B&NES. Superscript numbers refer to the sources list at the end of the document.

Table 1: Policy 5.13 requirements

No.	Policy 5.13 text (BANES)	CSPC view	Evidence	Response / Proposed amendments - additional or replacement text in bold.
1	Residential development of around 100 homes, including a mix of dwelling types and sizes in line with requirements in the Local Housing Needs Assessment.	Not sound – justified.	HDE5a[1] requires the mix to follow the most recent Housing Needs Survey for the parish or the whole Plan Area. The Neighbourhood Plan notes larger detached homes make it hard for downsizers and young adults to stay[1]. The number rose from 20–30 at the last consultation[8] to around 100.	CSPC considers that the 'around 100 homes' in the Draft Local Plan is not justified by the evidence. BANES proposed 20–30 homes at Regulation 18, and CSPC has not found published evidence explaining the increase. Paragraph 5.114 of the Draft Local Plan states that the site 'could accommodate approximately 100 homes', but gives no supporting evidence for this figure. CSPC believes that a housing needs survey should be undertaken which can then inform this process. **Residential development needs to be justified by evidence of site capacity, landscape impact, infrastructure capacity and local housing need, including a mix of dwelling types and sizes that meets the needs of the community: a high proportion of affordable and social housing, 2 and 3 bedroom homes for younger people who wish to remain in the village, and homes for older people wanting to downsize, informed by the Local Housing Needs Assessment and the most recent Chew Stoke Housing Needs Survey, in accordance with Neighbourhood Plan Policy HDE5a[1].**
2	Deliver 40% affordable housing on-site, in accordance with the provisions and tenure split specified in Policy 6.14.	Not sound – justified.	HDE5b[1] gives first priority to people with a Chew Stoke connection. Green Belt sites coming forward through planning applications must provide 50% (Policy 6.13)[2]; sites released through the Local Plan, including Hedgehogs, are set at 40%. Para 6.179[2] justifies this by the significant infrastructure costs of strategic development; it does not say whether this applies to a village site of around 100 homes.	Deliver 40% affordable housing on-site, in accordance with the provisions and tenure split specified in Policy 6.14[2], **with priority given to people with a local connection to Chew Stoke, in accordance with Policy HDE5b[1]. The tenure, mix and local priority for homes must be led by a Housing Needs Survey.**

No.	Policy 5.13 text (BANES)	CSPC view	Evidence	Response / Proposed amendments - additional or replacement text in bold.
3	Financial contributions towards early years, primary, secondary and Special Educational Needs and Disabilities (SEND) provision where required to accommodate growth arising from the development.	Supported – no change	BANES's study projects a shortfall at Chew Stoke primary and judges a permanent expansion "unfeasible"[3]. It did not cover the secondary school.	Support with comment: Both schools in Chew Stoke can accommodate more children from the village. Although they are currently at capacity, priority would be given to pupils from Chew Stoke.
4	Public open space, green infrastructure and children's play provision appropriate to the scale of development.	Supported – no change	—	No change
5	Improvements to community and recreational infrastructure serving both existing and future residents, including measures that safeguard and enhance the role of the cricket club.	Not sound – effective	The site now includes the cricket club (Chapter 5, para 5.113)[9]. BF3a[1] supports improving community facilities. The Green Belt paper lists only general benefits for this site[5].	Improvements to community and recreational infrastructure serving both existing and future residents, including **a new multi-purpose Community Building (for example a village hall if needed in the future, also incorporating facilities for the cricket club/sports amenity area or other general community space, plus ancillary facilities, space and accessibility) with car parking for this facility. This can also provide overflow parking for the medical practice, rugby club and secondary school,** and measures that safeguard and enhance the role of the cricket club**, including retention of the existing cricket ground (playing area, outfield and pavilion) at no less than its current size**.
6	A comprehensive, nature-based sustainable drainage strategy (SuDS) that manages surface water through natural processes, integrates with the site's green and blue infrastructure network, and includes robust measures for the management of soils during construction to prevent sediment runoff and maintain water quality.	Supported – with comments	At the Parish Council meeting on 1 October 2026 as detailed in the minutes, it was reported that residents, including those with professional environmental and hydrological backgrounds, have identified that there is a temporary flood stream from Hedgehogs across Chew Lane.	The Parish Council is particularly concerned given the well-documented history of both fluvial and surface water flooding within Chew Stoke. The proposed development site naturally drains southwards across Chew Lane towards Chew Stoke Brook, and during prolonged rainfall events a temporary but substantial surface water flow route forms across the landscape. Considering predicted increases in rainfall intensity associated with all climate change scenarios, any development would require extensive above-ground attenuation features capable of managing runoff while maintaining or improving existing greenfield discharge rates.
7	Adequate utilities infrastructure to support the scale and phasing of development through engagement with relevant service providers.	Supported – no change	—	No change

No.	Policy 5.13 text (BANES)	CSPC view	Evidence	Response / Proposed amendments - additional or replacement text in bold.
8	Provide safe and suitable vehicular access from Chew Lane.	Not sound – effective	HDE7[1] requires a Traffic Impact Assessment; HDE8b[1] sets minimum parking standards.	Provide safe and suitable vehicular access from Chew Lane, **informed by a Traffic Impact Assessment covering pedestrians, cyclists and public transport, in accordance with Policy HDE7[1]. Development must not exacerbate the existing parking problems and congestion along Chew Lane, and must provide parking in accordance with Policy HDE8b[1], including off-road parking along its Chew Lane frontage (the north side of Chew Lane). The parking must be separated from the carriageway by a continuous green boundary of native hedgerow or planted verge, with defined access points, so that it is not visible as a hard edge from the road.**
9	Deliver pedestrian and cycle connections to village facilities, schools, healthcare facilities, bus stops and surrounding public rights of way.	Not sound – effective	None of the highway safety measures in the Transport Topic Paper (Table 6-1)[4] is in Chew Stoke. Local evidence (CSPC): Pupils walking to the primary and secondary schools must cross Chew Lane and the junction at Top Cross. Speed limits are frequently not observed and the additional traffic from the development would increase risks to pedestrians and cyclists. Neighbourhood Plan[1]: Policy HDE7 requires a Traffic Impact Assessment that covers pedestrians and cyclists.	Deliver pedestrian and cycle connections to village facilities, schools, healthcare facilities, bus stops and surrounding public rights of way, **including traffic calming and road crossing facilities on Chew Lane and around Top Cross to ensure safe walking routes to both the Primary School and Secondary School, and improvements to walking and cycling routes along Chew Lane and Pagans Hill. Speed limits are already not observed and increased traffic will exacerbate the dangers.**
10	Improve permeability within the village and connections to the wider green infrastructure network.	Supported – no change	—	No change
11	Provide financial contributions towards sustainable transport measures where required.	Not sound – effective	Chew Stoke is not named in the Transport Topic Paper's proposed bus improvements. The paper forecasts the highest car use of any Local Plan sites for the "Bishop Sutton, Chew and Pensford" sites: 82.9% of daily trips before transport mitigation (Table 5-5, p. 48)[4].	Sustainable transport measures are required. Provide financial contributions towards sustainable transport measures, **including improvements to the current bus routes and provision serving the village.**
12	Deliver a minimum 20% biodiversity net gain, secured either on-site or through appropriately located off-site measures. Proposals must demonstrate that the mitigation hierarchy, as set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015, has been applied.	Supported – no change	—	No change
13	Provide a minimum of one nest or roost site per residential unit, in the form of integrated bird and bat boxes within new buildings and/or as standalone features within the public realm.	Supported – no change	—	No change

No.	Policy 5.13 text (BANES)	CSPC view	Evidence	Response / Proposed amendments - additional or replacement text in bold.
14	Retain, restore and enhance existing trees, hedgerows and boundary vegetation, with habitat buffers provided where necessary to protect ecological features.	Supported – no change	—	No change
15	Protect and strengthen ecological connectivity within the site and to the wider green infrastructure network.	Supported – no change	—	No change
16	Deliver a landscape framework that reinforces local character and contributes towards nature recovery.	Supported – no change	—	No change
17	Respond to the site's location within the SAC Bat consultation zones (Greater Horseshoe Bat C; Lesser Horseshoe Bat A) including avoiding direct or indirect loss of and/or harm to juvenile foraging habitats and the retention, protection and/or provision of key commuting and foraging habitats for wider SAC bat populations, with focus on lighting issues.	Not sound – effective	HDE15[1] (Dark Skies) and Policy 6.8[2] both control lighting. Item 17 mentions lighting only for bats.	Add to the end of item 17: **Lighting must be designed to maintain the village's dark skies and minimise light spill beyond the site, in accordance with Policy HDE15[1] and Policy 6.8.** [2, 7]
18	Deliver a comprehensively planned extension to Chew Stoke that integrates successfully with the existing settlement.	Supported – with comments	—	Add to the end of item 18: **The design and density of the development must be in keeping with the current housing stock in Chew Stoke. A 25% increase in housing will have a significant social and character impact and must be actively considered and mitigated.**
19	Optimise density across the site whilst ensuring that the scale, form and character of development respond positively to village character, landscape setting and the existing settlement pattern.	Not sound – justified	HDE1 and HDE2[1] protect landscape setting and local scale. Local check: the site is visible in Important View D9E (HDE3[1]) and, on the visual prominence map, is land next to main routes seen by many people. There is concern amongst villagers that the character and amenity of the village will be adversely affected by both the size of the house number increase (representing approximately a 25% increase) and the style/type of house, as indicated by villagers' statements noted in the CSPC minutes of the 1 October 2026 meeting, along with correspondence received by CSPC.	Optimise density across the site whilst ensuring that the scale, form and character of development respond positively to village character, landscape setting and the existing settlement pattern, **in accordance with Policies HDE1 and HDE2[1], avoiding an over-urban appearance. Proposals must be supported by a landscape and visual impact assessment, including the effect on Important View D9E (Policy HDE3[1]).**
20	Create a strong and defensible settlement edge informed by landscape character and existing green infrastructure features.	Not sound – justified	BANES says the new Green Belt boundary "would not be defensible" except along Chew Lane and needs strengthening[5].	Create a strong and defensible settlement edge informed by landscape character and existing green infrastructure features, **including a green margin along Chew Lane so that housing and development do not encroach right up to the road boundary.**

21	Create a network of green spaces and pedestrian connections linking the development with schools, community facilities and the wider village.	Supported – no change	—	CSPC supports Active Travel
22	Retain and incorporate existing landscape features as defining components of the development.	Supported – no change	—	No change
23	Deliver a high-quality residential environment with strong green infrastructure, attractive public spaces and clear connections to the existing village and surrounding countryside.	Supported – no change	—	No change

Table 2: Points not tied to a single requirement in Policy 5.13

Ref	Point	Our view	Evidence	What CSPC ask for
A	Area-wide traffic and highways plan	Not sound – justified / effective	**CSPC Findings:** Around 700 new homes using roads in and around Chew Stoke (100 Chew Stoke, 20 Chew Magna, 280 Bishop Sutton, 300 Clutton), plus the Bristol Airport expansion application, and there is no credible highways plan. **Transport Topic Paper[4]:** the "Bishop Sutton, Chew and Pensford" sites (400 households) have the highest forecast car use of any Local Plan sites: 82.9% of daily trips before transport mitigation (Table 5-5, p. 48). Congestion in Bristol will push extra traffic through the Chew Valley, with the B3130 through Chew Magna a key affected route. Chew Stoke is not named in the rural improvements (section 6.3.3) or the highway safety measures (Table 6-1).	An area-wide, comprehensive traffic and highways infrastructure plan for the Chew Valley.
B	Connectivity rating (Tier 3)	Not sound – justified	**Sustainability Appraisal[6] (para 2.6.2):** describes Tier 3 settlements as "relatively less accessible". **Options Document 2025[8] (para 8.54 and Figure 71):** Chew Stoke has a "comparatively low connectivity score" and the site is rated D. The draft's wording therefore needs adjusting. By contrast, the Site Identification Topic Paper[10] (Table 2) defines Tier 3 settlements, including Chew Stoke, as having "good connectivity". BANES's own evidence on Chew Stoke's connectivity is therefore inconsistent.	An explanation of the inconsistency between BANES documents on Chew Stoke's connectivity, and a consistent assessment. Evidence that Chew Stoke is a Tier 3 village. Evidence of how connectivity will be improved to support the allocation.
C	GP surgery capacity across the valley	Not sound – effective	**CSPC Findings:** Capacity can be provided in Chew Stoke, but there is no plan for the impact of growth in Chew Magna (20 houses), Bishop Sutton (280 houses) and Clutton (300 houses), or for extra patient car journeys. None of the BANES documents reviewed covers GP capacity. The Infrastructure Delivery Plan, which should, is listed on the BANES consultation site but currently has no download link.	A plan for valley-wide healthcare impact and provision. Evidence of dentistry provision

Ref	Point	Our view	Evidence	What CSPC ask for
			None of the documents reviewed covered dentistry provision.	
D	Green Belt paper names Chew Magna	Not sound – justified	**Green Belt Exceptional Circumstances Topic Paper[5]:** The Chew Magna wording is confirmed (Appendix A, p. 111). The site is also labelled "PDL/grey belt" (p. 112), although para 4.17 of the same paper says only the Old Tennis Courts in Chew Magna is previously developed land. It refers to "the document setting out the Green Belt Exception Evidence for Hedgehogs", which describes the site as an incursion "relative to the size of Chew Magna".	A corrected, site-specific Green Belt assessment.
E	Site described as "partly enclosed"	Not sound – justified	**Green Belt Exceptional Circumstances Topic Paper[5]:** quote confirmed (Appendix A, p. 111). Green Belt Exception Evidence; the site has development along part of one side only.	
F	Green Belt "hole"	Not sound – consistent with national policy	**CSPC Findings:** removing the site leaves one part of a washed-over village outside the Green Belt, which is illogical. **Green Belt Exceptional Circumstances Topic Paper[5]:** "hole" quote confirmed (Appendix A, p. 111). The same appendix says the new boundary "would not be defensible" except along Chew Lane (p. 112).	BANES to explain how the new boundary will work. CSPC would suggest that all land in CS remains washed over by the Green Belt, even if development is allowed on Hedgehogs as per the local plan.

Sources

[1] Chew Valley Neighbourhood Plan, referendum version (November 2016). Available at: https://westharptreeparishcouncil.co.uk/wp/wp-content/uploads/2024/11/CVNP-ReferendumVersion2LowRes.pdf

[2] BANES Draft Local Plan 2025–2043 (Regulation 19), Chapter 6 – Development Management Policies. Available at: https://haveyoursay.bathnes.gov.uk/localplan/documents/Chapter%206_DMPolicies_Reg19_publication.pdf

[3] School Expansion Feasibility Report, BBA Architects (April 2026). Available at: https://haveyoursay.bathnes.gov.uk/localplan/documents/4597-2-Feasibility%20Study-Existing%20School%20Sites%20FINAL.pdf

[4] BANES Transport Topic Paper v1.0 (September 2026). Available at: https://haveyoursay.bathnes.gov.uk/localplan/documents/Transport%20Topic%20Paper%20B%26NES%20v1.0.pdf

[5] BANES Green Belt Exceptional Circumstances Topic Paper (September 2026). Available at: https://haveyoursay.bathnes.gov.uk/localplan/documents/Green%20Belt%20Exceptional%20Circumstances%20Topic%20Paper%20Final.pdf

[6] BANES Sustainability Appraisal, Regulation 19, v3.0. Available at: https://haveyoursay.bathnes.gov.uk/localplan/documents/BaNES%20LP%20SA_SA%20Report_v3.0_consultation%20version.pdf

[7] BANES Habitats Regulations Assessment (September 2026). Available at: https://haveyoursay.bathnes.gov.uk/localplan/documents/BANES%20Draft%20Local%20Plan%20HRA_For%20Consultation%2016.09.26.pdf

[8] BANES Local Plan Options Document 2025 (Regulation 18), Chapter 8 – Rural Areas. Available at: https://bathnesplaces.co.uk/localplan/chapters/Rural%20Areas%20-%20Options%20Document%20Chapter%208.pdf

[9] BANES Draft Local Plan 2025–2043 (Regulation 19), Chapter 5 – Rural Areas (Policy 5.13). Available at: https://haveyoursay.bathnes.gov.uk/localplan/documents/Chapter5.pdf

[10] BANES Site Identification for Allocation Topic Paper (September 2026). Available at: https://haveyoursay.bathnes.gov.uk/localplan/documents/Site%20Identification%20for%20Allocation%20Topic%20Paper.pdf