

Corston Parish Council

Consultation Response to Bath and North East Somerset Council Local Plan 2022 – 2042 Options Document

Introduction

Corston Parish Council members have carefully reviewed the Unitary Authority's (B&NES) Options Document and in response to high levels of local interest held a very well attended Extraordinary Parish Meeting on Wednesday 20th March 2024.

The points raised at the Extraordinary Parish Meeting and correspondence sent in by residents to the Parish Council has been most helpful in the development of this response. Those attending were also encouraged to make personal representation of their views and concerns using the appropriate area of the B&NES website.

<https://beta.bathnes.gov.uk/local-plan>

Overview

It is recognised that the Options Document is a comprehensive piece of work that invariably will in future be a point of reference in terms of infrastructure development, housing requirements and travel options, particularly during the early years covered by the document.

The guided questioning employed in the document, although providing a structured approach to obtaining directed responses, can be limiting so additionally a broader assessment has been adopted in this response.

Housing Affordability and the Economy

Corston Parish Council (CPC) recognises and fully supports initiatives that, within recognised planning policy, realistically address the critical lack of affordable housing and the requirement for smaller dwellings, both for smaller households wanting to access their first home, as well as for older people that are seeking to downsize.

Community led development of shared ownership and affordable properties, notably in rural areas and small villages, is seen as essential to prevent communities from developing unbalanced demographics, which result in a higher proportion of older residents and little or no younger residents and families to contribute to making a diverse, active and rewarding community.

Recent local experience has shown that proposing a development of even a small number of community led dwellings can generate a hostile and antagonistic situation, which has the potential to divide a small community. More work is required to create a deeper understanding and acceptance of these valuable initiatives.

The Parish Council supports the assumption that building 11 community led dwellings over the plan period is a realistic objective.

The development of additional housing by extending existing conurbations is supported, particularly as existing utilities, services and facilities can more easily be extended proportionate to the increases in the local population. This is provided appropriate funding to improve services is made available at the time the development is being considered and undertaken.

When considering the various proposals in the plan for extending existing conurbations, some options offer more effective solutions but generally as presented, most do not closely align or identify with increased opportunities for employment in the development's catchment area. It is considered that the Local Plan would benefit by making this association with greater emphasis.

Validation of the actual numbers of new dwellings required during the Local Plan period is difficult to accurately ascertain from the document. A greater provenance and explanation of how the required numbers have been established would be helpful.

Transport and Connectivity

For the village of Corston, being situated between two exceptionally busy highways, the A39 and A4, the issues of traffic congestion and being able to easily access attractive walking and cycling opportunities/infrastructure, as well as frequent and reliable public transport on the A39 are key issues.

This is true across much of the district, particularly in the rural areas where improvements are needed and the effective development of facilities to improve the connectivity of villages to the cities and towns in Bath and North East Somerset district and the surrounding area is essential.

It appears that this revision of the Local Plan places much emphasis on the development of walking and cycling opportunities/infrastructure to reduce carbon impact from traffic and address the climate emergency. This has the feel that this issue is not due to traffic congestion but traffic volumes. More emphasis in the plan on how traffic congestion is to be addressed is essential.

This strategy fails to recognise the Government initiatives to increase ownership numbers and the use of battery electric vehicles during the review period. Which in themselves will significantly address the carbon issues of concern.

Increasing community acceptance of walking and cycling together with improved public transport links is commendable but does not recognise the general public's continuing need for independent travel by car. This should not be overlooked or excluded.

The cost of ownership of battery electric vehicles will almost certainly help to reduce traffic volumes, but the existing well-known areas of traffic congestion and tailbacks will remain. Highway improvements are required early in the period to improve highway infrastructure effectiveness and reduce the loss of unproductive resources caught up in these traffic jams.

Previous versions of the Local Plan realistically recognised the need for the longer-term uptake of battery electric vehicle charging arrangements, particularly for new developments. The plan would benefit from a suitable addition to include this aspect.

Also, there is limited reference to the benefits of the park and ride facilities. These facilities are considered essential to reducing traffic congestion in towns and cities, but little is included in this version of the Local Plan on how their use can be enhanced for the benefit

of the independent travelling public. Improved battery charging facilities for electric vehicles and extending the operating periods when buses run between the park and ride and the city centre are options that may encourage increased use.

Green Belt Impact

Corston being a village that is swept over by the Green Belt and having a designated Conservation Area is fully in support of the National Policy for the Green Belt and the associated five recognised purposes. Notable points are, to assist in safeguarding the countryside from encroachment and, to preserve the setting and special character of historic towns and villages.

Any future examples of where the new Natural England GI Framework (2023) and the council's associated updated Green Infrastructure Strategy is being used inappropriately to remove areas from the Green Belt will be strongly challenged.

Within the West of England Green Belt assessment map on page 42 there are a significant number of Farms and agricultural business that exist and operate in a most effective manner to produce high quality food and drink for national consumption. Considering the Government initiative for the United Kingdom to become increasingly more self-sufficient in the production of locally produced food, it is judged that this important local industry needs greater prominence in the Unitary Authority's Local Plan.

Site Allocations - South of Burnett, adjacent to the A39

As stated in the consultation document

"This location has been identified as a potential long-term opportunity for a standalone development or new community that could help to address objectively assessed needs either towards the end of the Local Plan period or beyond the plan period as part of a longer-term spatial strategy. The council is seeking views on whether stakeholders consider it should be explored."

As a significant area of this proposal falls within the Civil Parish of Corston, the Parish Council has received much interest and comment, generally adverse in nature and focused on how the proposal runs counter to many recognised planning policies and the current effective use of this productive farmland.

Inclusion of this proposal is considered unhelpful as it is seen as diversionary and focusses attention on one very controversial aspect of the plan while the benefits of other more realistic options are overlooked. The statement that it is to be objectively assessed either towards the end of the Local Plan period or beyond misses the point that affordable housing is required to be available within the next five to ten years and not for a future generation in twenty to twenty-five years time.

As a major stakeholder the Parish Council considered that this option should be removed and not be explored further for the following reasons.

- The proposed development will deprive the district and destroy productive farmland where the agricultural business responsible manages their operation in an effective and cost-effective manner. Also, for the foreseeable future this enterprise will have a sound long term business plan that already includes agricultural crop diversification.

- It would require removal and loss of important Green Belt land, close to the heritage landscape feature of Stantonbury Hill and a section of the Wansdyke which is a series of early medieval defensive linear earthworks in the West Country of England.
- As a standalone countryside development there are no significant employment opportunities that are within reasonable walking or cycling distance and limited public transport. Consequently, it is envisaged that many of these new residents would need to use independent car transport daily.
- Any additional traffic on the main routes from outlying villages and the Chew Valley to the main employment centres in Bath, Bristol and east in Wiltshire is already problematic. Currently during peak weekday travel times, the A39 the B3116, are already at capacity with long tailbacks caused by traffic congestion. Notably at the Globe Inn roundabout where the A39 meets the A4 and the New Inn roundabout where the B3116 joins the main route into Keynsham. Should this proposal be adopted, then to effectively manage the increased traffic and associated congestion, considerable additional expenditure on significant road improvements will be required involving more destruction of the Green Belt.
- The impact of this proposed development on the remarkable views from this location, because of its elevation, must be counted along with the likely harm to the local ecology and wildlife that development will cause. Also, to the City of Bath as a World Heritage Site (WHS), particularly to the attribute of 'the green setting of the city'. Additionally, the destructive impact it will have on the wider panoramic views east and west of the proposed location is unacceptable.
- The Local Plan states at 5.96 "One of the potential benefits of this location is that a significant portion of this area is owned by the Duchy, who have a proven track record of delivering high quality, sustainable and mixed-use development." When considering the Duchy's development at Poundbury and proposed developments at Nansledan and Faversham they are urban extensions using the same planning philosophy as B&NES has throughout the Local Plan. This proposal is a standalone development in open countryside with no local utilities, services or infrastructure where connections can be made in a cost-effective manner. Paragraph 5.96 is a superficial and misleading statement.

Public Realm

The proposals associated with changes to traffic flow, movement and priority require careful consideration and wide consultation. Lessons learned from experimental Low Traffic Neighbourhoods in other towns and cities should be carefully examined before decisions are made.

Conclusion

- Carefully considered and well-planned urban extensions with investment to improved traffic management, community services and close employment opportunities is essential and should become the prime objective.
- The need for realistically increasing the number of new build home with an appropriate ratio between market properties, affordable homes and shared ownership, essentially in a timely manner, is a critical issue to be urgently addressed.

- The addition in the Local Plan of a recognition that the increase of battery electric vehicle use for independent travel by the General Public is realistic and planning provision made to actively support this together with walking and cycling initiatives.
- Proposals to removal of land from the Green Belt for development to be widely consulted upon and only considered feasible in very exceptional circumstances.
- The Local Plan to include a greater emphasis on the national benefits of West Country agriculture from the local farming enterprises.
- Site Allocations - South of Burnett, adjacent to the A39.
As a major stakeholder the Parish Council considered that this option should be removed and not be explored further.

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11th April 2024