

Englishcombe Parish Council's response to the Core Strategy Spatial Options Consultation

In our covering letter we will recognize the importance of the Core Strategy Spatial options consultation and its long term effects for B&NES.

We will say that we recognize the difficulty that B&NES have in having to plan on imposed, and in our opinion, unrealistic and unsustainable targets.

We will complement B&NES Planning Department and Staff on the work they have done in producing the Option Document; their excellent help organizing the workshops, Drop-in sessions and willingness to attend numerous formal and informal events.

We will comment on jobs targets and housing targets set not on the basis of reasonable expectation, but by political motivation through the now defunct South West Regional Assembly.

We will be emphasizing our support of the principle of Plan, Monitor, Manage.

Below are replies to the questions (using the document numbers and page of the consultation document) I feel we are qualified to answer, and are based on Parish Council discussions and opinions put forward by Councilors and public alike.

All recipients are welcome to comment, add, subtract or approve what has been said – **I would sincerely welcome any such input.**

Deadline for responses to B&NES is Friday 15th January 2010.

DW1-P20: Spatial vision for B&NES – Add to vision the fact that a substantial proportion of Bath residents are students and their needs should be better recognized, during and after their courses.

DW2-P24: Spatial Objectives – The provision of student housing provided must be included in the overall dwelling numbers for Bath. In providing Economic Prosperity as outlined in Strategic Option #5 P23, keep the talents we have attracted to Bath Universities in Bath by providing “Science Park” Business areas with starter units at competitive rents and highly flexible tenures to allow rapid growth, and where appropriate, contraction.

DW4-P35: District-Wide spatial strategy options – We would support B&NES Preferred Option 2, but adopt from Option 1.

1. The principle of Brownfield Land before Greenfield/Greenbelt Land.

2. The development of Western

Riverside as a major priority – it is an absolute must and every avenue of seed funding must be explored to bring it forward. It is an appalling scar of dereliction which seems to be taken for granted.

3. The MOD sites must be made available in the short to medium term for development of housing.

4. Within the MOD sites provide high quality office facility, working with MOD to bring back Bath employees

transferred to the already overcrowded Abbeywood and Neighbourhood 5 sites in Bristol.

5. Infrastructure first not as an afterthought.

DW7-P39: Renewable Energy Production: We (is it “we” not just “I”?) are opposed to Wind Turbines as proposed, regarding them as inappropriate to a World Heritage City and its Environs: but as important highly inefficient.

We are more in favour of Solar Photovoltaic and Water Heating; but much preferring Ground Source heat pumps, all expensive to retro-fit, but a fraction of the cost when incorporated into housing developments – demonstrably more sustainable than Wind Turbines or Biomass.

DW8-P39: Retro-fitting: Retro-fitting (as a house owner with a solar panel) is sensible and sustainable in the case of Solar and Heat Recovery, but expensive, with a long pay-back period. A policy to financially encourage house holders and landlords to up-grade properties would be desirable and sensible.

DW10-P40: Thresholds for on-site renewables: We do not agree that New Developments on site Requirement should be restricted to “large scale developments” housing and non-residential; but that all new development should be covered by the Policy – including self-build.

DW13-P41: Sustainability Checklist: We feel that the Checklist should be required as part of Planning Applications.

DW14-P41: Checklist discretionary: The Checklist should not be discretionary.

DW16-P44: Infrastructure Provisions: We would support the Proposed Policy Framework, especially the use of Brownfield sites and spare space in existing buildings (i.e. space over City Centre shops and businesses) before any allocation of new/Greenbelt/AONB land is contemplated.

Especially we welcome the provision of funding for initial infrastructure.

DW19-P51: Policy Parameters for Meeting Housing Needs: We are concerned that yet another report is going to be necessary to justify the housing mix; also that B&NES Strategic Housing Market Assessment – a copy of which has not been seen by Parish Councils – appears to demonstrate a need for 116% of the RSS target as Social Housing across the district.

This Parish Council acknowledges that there is a need for Social and Affordable Housing in Bath, but not at the expense of Greenbelt Land some distance outside the City and employment areas.

There is a real danger that getting this wrong could entirely alter the character of Bath.

DW21-P55: Policy for High Quality Urban Design: Whilst the policy for High Quality Urban Design appears sound, B&NES record in approving Development Designs is not encouraging – Poultney View on Rush Hill and Western Riverside do not meet what we would feel is “Innovative Design” and fall a long ways short of what is appropriate to a World Heritage City.

This Parish Council would expect the highest standards set, with Developers being left in no doubt of what is required in providing the best of ideas in attractive, not necessarily more expensive, designs.

These designs should ensure that private, affordable and social dwellings are indistinguishable and seamless –Poundbury is a good example of where this has been achieved; Poultney View the exact opposite.

DW22 – P56: Nature Conservation: Support

DW23-P58: Core Policy for Landscaping: The policy needs to recognize the equal landscaping importance of the area to the South/South West of Bath, not included in the AONB. In many respects this area is more deserving of protection than some parts of the AONB and must be preserved.

This includes the area to the West of Twerton currently being considered under SWB1, and is an integral part of the Englishcombe and Newton Valleys.

DW24-P59: Core Policy for Historic Environment: Support as drafted.

DW25- P61: Protection of the Setting World Heritage Site: We would support the formation of a “Buffer Zone” to protect the AONB and the non-AONB quarter of Bath; fully accepting that development of Foxhill, Ensleigh and Warminster Road could (and should) be carried out within the Zone – subject to DW21.

DW26-P65: Framework for Prosperous Economy: The recognition of the need for “Incubation and/or Managed Workplaces” and “Studio Workspace” to enable new business startups. Management of such facilities needs to be imaginative using Enterprise Zone principles and flexible tenures in the form of short rolling leases, as opposed to more traditional FRI leases. This should not lead to premium rents.

Within the designs for dwellings should be the recognition of a large element of home working, therefore including in the infrastructures provision of high speed Broadband links.

B3-P75: Identified Spatial Issues for Bath and Challenges: In supporting the Summary of Needs we would emphasize the importance of the development of the Western Riverside and the River Corridor. It is felt that we have got used to the appalling state it is in and do not see the Scar of Dereliction along the western side of the river in the same way as visitors to Bath do. It is vital therefore that priority be given to development of this area as a matter of urgency.

The integration of new dwellings into the city is vital making the bringing forward the development of Foxhill especially, the more important – far

better than the remote location of the two options for the proposed “New Neighbourhoods”

The Universities are a major asset to Bath, but the problem of accommodating students has been neglected. Firstly the new accommodation provided must be included in B&NES District target figures. Secondly if Greenbelt land is to be built upon, let it be on the campuses to provide sustainable accommodation for students, taking steps in the medium to long term to free-up the houses in areas like Oldfield Park – houses which are ideally suited to first time buyers and renting. In recent years these houses have been priced out of the reach of these buyers/tenants by landlords who can get two to three times the single occupier rent from students. In the process running down these properties and destroying neighbourhoods and communities.

B4-P77: Themes and ideas that should guide the future development of the City: The vision fails to recognize that SWB1 and SWB2 will not integrate with the City due to natural barriers; both would be isolated from neighbouring settlements.

B5-P78: Specific Goals against which to evaluate a strategy for Bath. We welcome and support provision of Office and Industrial Enterprise; welcome also the recognition that Affordable and Social Housing be provided in the City and its immediate area – here again the importance of The Western Riverside, Foxhill and the other MOD sites.

We have already identified that the two Urban Extension sites as being difficult, if not impossible to integrate with neighbouring settlements and are thus not ideal locations for high percentages of Affordable/Social Housing – proving the point made in the previous paragraph.

B15-P104: Vision for New Neighbourhood: The recent Workshop clearly demonstrated that any hope of a West Bath Development “supporting regeneration of relatively deprived areas” was unlikely to be realized. The SWB1 neighbourhood would be isolated from Twerton by a natural barrier.

B17-P110: View of Preferred Option SWB1 West Twerton: There are a number of factors which make this option unattractive.

- 1. From a visual point of view, looking down from Kelston, the view, the setting of our World Heritage City, over the site to the Englishcombe, Newton St. Loe valley is spectacular – to take out the 80Ha site would ruin this entrance to Bath. The same can be said for the A4 Bristol Road.**
- 2. The site cannot, given constraints, accommodate the 2000 dwellings without unacceptable density levels.**

These constraints are: 2.1. Archaeological. A Roman burial ground to the West of the site, a Roman Villa to the North East of the site,

Iron Age remains to the South, and as yet unevaluated geophysical traces over a large area at the Southern side of the site.

2.2 Topography. The site slopes steeply at the Northern and Eastern edges.

2.3 The site is undermined by tunnels from the old Newton coal mine. We have not seen any study which would suggest that it would be prudent to build on the site without the risk of subsidence.

3. Much of the land involved is Grade 1 agricultural land, actively farmed by a Duchy of Cornwall tenant. We have been told as recently as this week (w/c 04/01/2010) that farmers must be more productive and the need for home grown food – vegetables, cereals meat and milk- is paramount. We are faced with a proposal to take out 80Ha of good productive land?

4. Much has been made of the importance of integrating the Urban Extension/Neighbourhood. This site due to the physical barrier at the Eastern end of the site cannot integrate with Twerton. There is a real danger of the extension becoming isolated, almost a separate village on the outskirts of Bath

5. As stated elsewhere, the figures on which the RSS targets were set are highly suspect. B&NES should postpone a decision on SWB1 & 2, move forward with Brownfield regeneration in the shape of Western Riverside, MOD X 3, free-up Oldfield Park and use vacant space in the City. Plan – Monitor – Manage the way forward and only consider Greenfield when the projects have been completed and occupied. Then, if the case can be proven for further growth, consider the limited release of the lands in SWB1&2.

B18-P114. Odd Down/South Stoke Option: Factors which make Option SWB2 as unattractive and as impractical are in many respects similar to points made in SWB1.

These are: 1. From a visual point of view the entrance to the World Heritage City of Bath would be similarly compromised and seen from a greater distance.

2. As with West Twerton SWB1 the site cannot accommodate the 2000 dwellings proposed at an acceptable level of density – a point already acknowledged in the CSSO document.

3. Again there are archaeological factors to consider. The site is bounded to the North by The Wansdyke “of equal archaeological importance to the Roman Baths” (Richard Sermon) which must not be compromised. Similarly there are believed to be, as yet not subject to geophysical examination, further ancient remains.

4. Whilst this site does not have the topographical disadvantages of SWB1, the triangle of land to the west, bounded by the A367 and

Kilkenny Lane (Duchy owned, in Englishcombe Parish and farmed by a local farmer) is highly suspect, having been used as a dumping ground following the two Bath floods – and is prone to “movement”. Added to which the land was extensively worked by The Fullers Earth Company. A map showing the extent of these workings has been passed to Richard Sermon for his evaluation.

- 5. As with SWB1 all this land is farming land, with potential uses similar to SWB1.**
- 6. The site has many of the of the same integration problems as SWB1, with the Wansdyke the barrier.**
- 7. As stated elsewhere, the figures on which the RSS targets were set are highly suspect. B&NES should postpone a decision on SWB1 &2, move forward with Brownfield regeneration in the shape of Western Riverside, MOD X 3, free-up Oldfield Park and use vacant space in the City. Plan – Monitor – Manage the way forward and only consider Greenfield when the projects have been completed and occupied. Then, if the case can be proven for further growth, consider the limited release of the lands in SWB1&2.**

RA1-P164: Vision for the Rural Areas. We agree with the Vision or the Rural Areas as far as it goes. By the very definition these villages are set in farming areas; we would like to see greater recognition of the part agriculture has to play within the community and the employment opportunities that could stem from such activity.

Sympathetic housing infill of these villages would go a long way to meeting local requirements and national targets and could be achieved within a realistic time frame.

Planning policies have a large part to play in this and the views and recommendations of Parish Councils, and through them, the community, should be given a leading role in providing such housing.

RA2-P168: Identifying the Most Suitable Villages: Given greater reliance and authority to Parish Councils; Option 2 a more extensive list would be preferable.

RA3-P168: Inclusion of Green Belt Villages: Accepting the principles in RA1 & RA2 inclusion of the Green Belt Villages would be an advantage.

RA4-P169: Rural Exceptions Policy; Given the views expressed I RA2 & 3, subject to Parish Council views being the driving force, there is a need for a Rural Exceptions Policy.

RA5-P169: Apply only to Villages with Housing Development Boundary: Subject to Parish Council recommendations being the driving force, it should apply to all villages

**NOTE: In our replies to RA1 – 5 references are made to the role of the Parish Council. This assumes that Parish Council has previously demonstrated its competence to deal with such matters – the listed Parishes do. This is not to be confused with the Parish achieving “Quality Parish Council” standing. It should be clearly understood that many Parishes meet the standard of “Quality Parish”, but due to the time available to Clerks in small Parishes have not formally qualified.
(I will work this into one of our formal replies!)**

RA6-P170: Policy on Rural Diversification. We would support inclusion of all elements listed should be included.

RA7-P170: Additional Elements needed to be included: Press for improved and reliable Broadband to the Rural Areas, to assist Businesses and Home-working projects. We have current National Government Ministers saying how important it is – let them bring pressure to bear to ensure this happens.