

**CORE STRATEGY [CS]**  
**October 2009**  
**Response from Priston Parish Council**

General Comments

*There is much repetition in the document, which could have been eliminated by more stringent final editing.*

*We are disappointed that whilst there are many laudable objectives there is little to suggest how they would be delivered.*

*Infrastructure provides the framework for much planning realisation and this is conspicuously absent from most of the sections.*

*We note that growth levels are said to be those of the draft RSS, however this is not the case for the proposed Bath Urban Extension.*

*We feel that the provisions contained within the final RSS will need to be capable of major review at 5 year intervals, to check progress achieved and how much of the assumed parameters [population growth, energy supplies, business needs etc] have changed.*

*Attached [in italics] are answers to those questions we felt relevant to our interests and/or concern.*

1. Spatial Options for the District:

(a) Proposed Spatial Vision for BANES

Question **DW1**: Do you agree with this spatial vision for BANES?

*Laudable, but later detail does not show how this will be delivered.*

**DW2**: Is this the right set of spatial objectives for the District?

*Yes. Laudable objectives but not enough detail*

**DW3**: Are there any others? [please specify]

*You have not addressed in real terms the problems of existing traffic let alone future traffic problems*

District-Wide locational Strategy Options 1 & 2

1.New development focussed in & around city with limited role for towns & rural area

2.New development less focussed on city with greater role for towns & rural area

**DW4**: What are your views on the 2 District-Wide special strategy options?

*Prefer Option 2, which gives more flexibility.*

**DW5**: Are there any other reasonable options we should be considering in the light of the national and regional policy context and our spatial vision?

*In respect of housing need, how much more could be released if further student accommodation could be built?*

(b) Core Policies [CP]

(i) Climate Change

**DW6:** Do you agree with the targets suggested by the research or should we aim for higher targets?

*The whole subject requires much more rigorous analysis to lead to worthwhile proposals. Government incentives means that “alternative energy” looks set to develop into a highly lucrative industry which will put huge pressures on the planning process.*

*Although it is much more important to site wind turbines where there is good wind [e.g .on hills], English Heritage guidance in ‘Wind Farms & the Historic Environment’ states that “the effect of wind farm development on the setting and visual amenity of historic buildings, monuments or areas should be fully evaluated in determining planning applications”. Experience has shown that applications for wind farms are often documented in a less than clear manner, with the impact on the historic environment in general played down.*

*Domestic scale turbine should not be installed: they use more energy in their manufacture than they produce in use.*

**DW7:** Can you comment on any other planning framework to ensure a smooth and effective way to support renewable energy production?

*Reduction of current energy consumption by individuals: carry out a vigorous campaign about energy efficiency in the home as more energy is used in buildings than anywhere else.*

*Most of our housing stock will continue to be older homes, including listed buildings, which will contribute the majority of domestic energy use. Research is needed to develop guidance for our particular housing stock – it is really no longer acceptable to prohibit double-glazing in listed buildings with rows of cars parked outside! BANES should positively encourage use of solar energy in all proposed new buildings.*

**DW8:** Do you think a local policy should be developed to support retro-fitting  
*Assuming this refers to improved house insulation: yes*

**DW9:** Do you agree with the targets suggested by the Research?

*Reduced energy use is more important than reduced local emissions. Reduced “emissions from energy used” encourages use of electricity generated remotely.*

(iii) Sustainable Construction and Energy Efficiency

**DW11:** Do you agree that major development should meet higher targets than national standards?

*Yes*

**DW13:** Should the checklist be required as part of planning application?

*The planning process should be used to encourage both developers and individuals to use available technology for renewable energy production while at the same time being sensitive in relation to impact on the physical environment. Emphasis should be on new build.*

(c) Development Growth & Infrastructure

**DW16:** Does the proposed CP for Infrastructure Provision include all the necessary elements?

*Disappointing that an Infrastructure Delivery Plan not available now to inform our responses*

Green Infrastructure

**DW17:** Does the proposed CP for Green Infrastructure include all the necessary elements?

*It is most important not to compromise biodiversity when creating green infrastructure –balance is essential*

Safe guarding Minerals

**DW18:** Does the proposed CP for safeguarding minerals include all the necessary elements?

*Yes*

Housing: Meeting Housing Need

*We agree with bullet points 1,2,3,4 but don't think "essential" in point 2 is the right word.*

Affordable Housing

**DW19:** Do the proposed policy parameters for meeting housing need include all the necessary elements?

*Geographic Options: not sure;*

*Proportion Options: prefer Option 3;*

*Site threshold: prefer Option 1;*

*Tenure Split: prefer Option 3;*

*Mix of A H: don't know;*

*Rural A H Options: prefer Option 1;*

*Parameters for AH policy: not sure*

Gypsies, Travellers etc

**DW20:** does the proposed CP for Gypsies etc include all the necessary elements?

*Reasonable, and when the document is produced we can respond*

d) High Quality Environments

Highest Urban Design

**DW21:** Does the proposed CP for High Quality Urban Design include all the necessary elements?

*Hopefully. Under minimum space standards Option 3[ Lifetime Homes ] will produce a better result for the future.*

Nature Conservation

**DW22:** Does the proposed CP for Nature Conservation include all the necessary elements?

*Decision making strategies around competing land-use priorities are likely to become more complex. Needs to be a deeper understanding of the 'economic value' of nature in the wider ecosystem. Need for formal recognition for ecosystem services which can*

*help to mitigate climate change. It is essential for natural resource management to promote biodiversity.*

#### Landscape

**DW23:** Does the proposed CP for landscape include all the necessary elements?

*Preparing landscape character assessments should be a highly skilled job for professionals. Need to fast track a 'landscape strategy plan' so that it can be reviewed by local communities.*

#### (d) Historic Environment

**DW24:** Does the proposed CP for Historic Environment include all the necessary elements?

*Yes*

**DW25:** Do you agree with the Council's preferred option for protecting the setting of the World Heritage Site?

*Yes, but the rural nature of Bath skyline & upper slopes of hills must be preserved*

#### (e) Prosperous Economy

**DW26:** Does the policy framework for a prosperous economy above include all the necessary elements?

*There is a very strong need to be responsive to the needs of commerce and business. In particular for flexibility at the 'start-up' scale and small business scale where help with rents and rates can be crucial. Bath in particular has rents that are very high and BANES has the power to make a positive contribution with regard to premises already existing as well as undertake provision for new building. Already too many of the shops are chains which can afford to pay the high rentals and this will become even more evident as Southgate fills up.*

**DW27:** Is the hierarchy of centres identified appropriate and if not what changes should be made?

*Yes*

**DW28:** Does the proposed CP for Community Services and Facilities include all the necessary elements?

*Yes*

#### (f) Accessibility & Transport

**DW29:** Does the proposed CP for Accessibility & Transport include all the necessary elements?

*No. There is no real policy annotated. The most important aspects are not specified. Does BANES have a real policy on cycle paths etc apart from those for leisure for example. What about for sensible commuting...*

#### Spatial Options for Bath & a New Neighbourhood to South/ South West Bath

##### (i) Key Characteristics & Challenges

**B1:** Do you consider this to be a fair portrait of the city?

*See below.*

**B2:** Are there any elements missing or wrongly presented?

*Recent research suggests that by 2020 40% of all retail purchases will be over the internet so it is inconceivable that Bath itself requires more large retail outlets. There is a definite need to provide and maintain good public lavatories (the sort that our Councillors and Council Officers will happily use) in sensible places*

**B3:** Do you consider this list to be a reasonable summary of the key issues identified in the portrait?

*Bath's public space needs to have the maintenance of it's infrastructure greatly improved - road and pavement quality and elegant street furniture in particular. Not only in central Bath, but throughout the entire city. Bath's parks and gardens need their maintenance to be well funded and creative – it is not enough to keep them just ticking over.*

(ii) The Spatial Vision for Bath

**B4:** Does the vision capture the themes and ideas that should guide the future  
*Fine, but delivery?*

**B5:** Do the objectives successfully break down the vision into a series of specific goals against which to evaluate a strategy for Bath?

*Do not agree with part of 5. Expand...Bath's central shopping area, no. Enhance the area by developing a strategy for supporting small individual shops rather than chains, yes. Support and improve local shopping centres for food and necessities within Bath [and throughout BANES], yes.*

(ii.b) Strategic Options for Central Bath

**B11:** What are your views on options 1a and 1b and options 2a and 2b?

**B12:** To what extent should the CS seek to accommodate office space and comparison retail within the central area?

*In general, significant business developments should be created only where existing transport links are satisfactory; near supply of employees; where it will not adversely affect existing similar development; with stringent building regulations for carbon neutral buildings; on brown-field sites or within new large housing developments so as to reduce travel requirements.*

(iii) New Neighbourhood in an Urban Extension in Bath

Proposed Spatial Vision for a new neighbourhood

**B15:** Do you agree with this vision?

*Yes. But both extension options will have a major effect on rural surroundings that will be hard to mitigate, so doing so must have high priority.*

**B16:** Do you agree with these objectives?

*Yes*

**B17:** What is your view of the preferred location option west of Twerton?

*Yes. The chosen option must be placed where existing transport links are satisfactory.*

**B18:** What is your view on the Odd Down/South Stoke location?

*No. Existing transport links are not strong enough.*

Spatial Options for Rural Areas

**RA1:** Do you agree with the vision and objectives for the rural areas?

*Yes*

**RA2:** What is your view of the two options for identifying policy 'C' villages?

*No strong view but some of the villages on the list seem to be too close together.*

**RA3:** Do you think the villages currently covered by the green belt should be included in the list of villages identified under policy 'C'?

*No, although it is a matter for the 3 villages concerned.*

**RA4:** Do you think there is a need for a rural exceptions policy?

*Yes*

**RA5:** Should any exceptions policy apply only to villages with a housing development boundary?

*Not sure*

**RA6:** Which of the elements listed should be pulled forward into a policy on rural diversification?

*All, excepting point 5, [outline situations in which employment sites will be appropriate on Greenfield land].*

**RA7:** Are there any additional elements that need to be included?

*Support for homeworking must include increasing both access itself and the quality of access to the broadband infrastructure: BANES should have a policy on this issue and use the influence of West of England Partnership to pressurise for improved broadband infrastructure across rural areas.*

*Decision making strategies around competing land-use priorities are likely to become more complex. The relationship between land, land managers and their communities of interest and place will become increasingly important yet this area of policy has been neglected.*