



GOVERNMENT OFFICE  
FOR THE SOUTH WEST

## Draft South West RSS – Proposed Changes Comments Form

Office Use Only

Respondent No:

Comment No:

Date Received:

Acknowledged:

If you wish to comment on the Proposed Changes to the Draft South West Regional Spatial Strategy please:

- Complete all relevant details in Section A – this need only be done once irrespective of how many parts of the RSS you wish to comment on
- Complete a separate page 2 of the form for each part of the RSS you wish to comment on. Ensure you insert your organisation name (or surname if responding as an individual) on each page 2 and complete Sections B, C & D. You may make copies of this form.
- Type or print clearly in black ink
- Note that all comment forms will be made available for the public to read – they cannot be treated as confidential
- E-mail or post (~~please do not send duplicates~~) the completed forms to be received by the Government Office for the South West before **5.00pm on Friday 17<sup>th</sup> October 2008**.

**Please send all responses to:**

Regional Spatial Strategy Team  
Government Office for the South West  
2 Rivergate, Temple Quay  
Bristol  
BS1 6EH

**E-Mail:** rssconsult@gosw.gsi.gov.uk

**Telephone:** 0117 900 1705

**Fax:** 0117 900 1914

**Section A**

Comments submitted by:		Agent (if applicable):	
Organisation	Pri ston Pari sh Council	Organisation	
Surname		Surname	
Title/first name	Clerk of The Council	Title/first name	
Address Line 1	The Shippen	Address Line 1	
Address Line 2	Pri ston	Address Line 2	
Address Line 3	Bath	Address Line 3	
Postcode	BA2	Postcode	
E-Mail		E-Mail	
Tel. (day)		Tel. (day)	
Fax		Fax	

**Signature**..... **Date**.....

**Comments from** (organisation, or surname)..... Priston Parish Council

**Section B**

Support / Oppose / Comment (please specify)	Comment
RSS Reference – Policy or Paragraph Number	Various
For comments on the Sustainability Appraisal – Paragraph Number	
For comments on the Habitats Regulation Assessment Report – Paragraph Number	

**Section C**

To help us process your response effectively please summarise why you support or oppose the Proposed Change:

This document sets out to give an overview of the response of the Parish community of Priston to the Regional Spatial Strategy for the South West (RSSSW) proposals to create an urban extension to Bath to fulfill housing and mixed use requirements during the period to 2026.

Currently the most recent directive from the Secretary of State (main proposed changes to RSSSW, July 2008) aims to place 21,300 new homes within the Bath and North East Somerset Council (BANES) area with 2000 of those being placed within an urban extension provision, thus providing a cohesive platform for further development beyond the current period of the Regional Spatial Strategy.

With focus concentrated upon the creation and long term maintenance of new sustainable strategies, the view of the Parish is that the area of search chosen presents considerable challenges in both economic and environmental terms. The loss of Bath Green Belt is of particular concern when the designation of Bath as a World Heritage site is specific to its placement within a wider quality landscape.

**Synopsis/Conclusion of Response**

- Clear detailed provision of funding for all necessary infrastructures must be agreed and in place before any development commences.
- Periodic reviews of economic growth forecasts, which affect the viability of the development process of the RSSSW, should be undertaken. Initially, within the boundaries of BANES this should take account of the findings of its commissioned Strategic Housing Survey, and thereafter to take account of changes to the economic situation.

### Section C (Cont)

- World Heritage status for the city imposes stringent conditions with regard to its landscape setting. This setting must be defined so as to include the city's placement within a wider quality landscape. Equally, it is essential to environ the city with a 'buffer zone' to protect the surrounding area from urban sprawl. The Green belt, therefore, should generally be respected and protected.
- Agricultural land classified as either Grade 2 or Grade 3a should not be released for development. For this reason and for the constraints on sustainable infrastructure development, the area of search should be extended to the west to the A4 at Twerton/Newbridge.
- The need to provide to enhance transport corridor between Bristol and Southampton via the A4/A36 should not include a southern bypass/link road for Bath.
- The Parish Community regards the retention of the R3 designation for the village to be of paramount importance.

## Section D1

If you wish to expand your response please use the space below.

The Parish of Priston is situated 4.5 miles south west of the centre of Bath with land that falls to the south west edge of the BANES area of search for urban extension land.

Planning for the parish is subject to Green Belt policy and the village of Priston is currently designated as an R3 settlement and is therefore 'washed over' within the existing development plan. It has no designated areas for infill or reserved land. This effectively means that of the village communities within the area it is considered to have the least in existing infrastructure (roads, shops, schools, utilities, etc) and therefore under government planning policy guidance cannot be considered as an appropriate place for any necessary expansion.

Priston has escaped the gentrification which has beset many of the outlying villages surrounding Bath. Its scale and location has allowed it to retain a strong sense of community respectful of the high value attached to the continued existence of an active agricultural base which historically defined its existence. The community envisages its future being to remain as an R3 settlement (Parish Survey 2008)

The local vernacular is rubble stone construction of Oolite lime stone. (See Photo's ..)

During the course of the consultation on the Draft R3SSW and BANES core strategy launch document regarding housing need and urban extension requirements, there has been no consultation, or stated objective which would suggest any change to During the course of the consultation on the R3SSW and BANES core strategy have the village being moved to 'in set' status, a move which would allow for limited development or limited expansion. During public meetings held in early February 2008 however, representative members of the Parish Council were told by Cllr Charles Gerrish (BANES) that the parish could not be ruled out of being 'affected' by any urban extension development by BANES.

In light of no documented clarification of meaning for the aforementioned statement there has understandably been concern within the parish and hence a discussion began on how best to approach making a response to any proposal.

BANES' obligations under the recommendations of the R3SSW were initially to provide 15,000 new homes within this time span with 1500 to be situated within an urban extension. The Government appointed Panel set up to examine the R3SSW strategy recommended this be increased to 18,800 new homes with a higher amount of job creation.

ENVI

The subsequent recent proposal by the Secretary of State to increase the scale of housing development in BANES by an even greater amount, to 21,300, with 2000 within the Bath urban extension places further pressure upon the Parish, and the quality of the Landscape Character of the area.

It is the view of the Parish that release of green belt on the south west urban fringe of Bath will result in a significant loss of character within its rural surroundings, and reduce the buffer zone between a rural parish and the urban sprawl of the city.

## Section D1 (Cont)

### Development Policy H

Whilst accepting the inevitability of need for some release of Green Belt to accommodate further expansion the Parish additionally feels strongly that all new development should first be restricted to the use of existing Brownfield within the City. This restriction is requested to ensure that development of existing sites is undertaken before land is taken out of cultivation, therefore avoiding urban sprawl whilst leaving tracts of city land derelict through cherry picking by developers. (There is a concern that any developer proposing to create housing in response to speed of delivery will gain permission for Greenfield use without recourse to use of existing Brownfield because of the dictates of the Strategy for annual new home rates).

There is also concern that the contradictions between PPS3 clauses 36 and 70 will allow the local authority to grant planning permission for Greenfield development over Brownfield usage, the World Heritage Status of the city being a factor which inevitably complicates and slows up the determining of applications within the city centre. The Parish feels that clause 36 should prevail. Despite pressures in meeting development targets.

#### *PPS3*

##### *Identifying suitable locations for housing development*

*36. In support of its objective of creating mixed and sustainable communities, the Government's policy is to ensure that housing is developed in suitable locations which offer a range of community facilities and with good access to jobs, key services and infrastructure. This should be achieved by making effective use of land, existing*

*infrastructure and available public and private investment, and include consideration of the opportunity for housing provision on surplus public sector land (including land owned by Central Government and its bodies or Local Authorities) to create mixed use developments. The priority for development should be previously developed land, in particular vacant and derelict sites and buildings.*

#### *PPS3 Housing*

##### *Determining Planning Applications*

*70 Where Local Planning Authorities have an up-to-date five year supply of deliverable sites and applications come forward for sites that are allocated in the overall land supply, but which are not yet in the up-to-date five year supply, Local Planning Authorities will need to consider whether granting permission would undermine achievement of their policy objectives.*

Unlike many urban fringe landscapes those within the area of search to the south/south west of the city are of a high quality. The green belt landscape within the area is undulating with some very steep slopes which would render development complicated and expensive, and in some places impossible. Such constraints do not sit naturally with the notion of sustainable access and development.

The land to the west of the A367 at Odd Down extending to Culverhay School at Rush Hill is one such example. (See ref 1 photograph from the top of Kilkenny Lane towards the west).

## Section D1 (Cont)

It is considered by members of the Parish that the level of development proposed and the supporting infrastructure required to enable new residential and commercial districts to be economically sustainable would not be achievable without an environmental compromise and substantially increased urban access difficulties for existing rural residents and businesses.

Currently the City boundary falls naturally within the topography of the landscape with the ridge between adjacent valleys forming the division between urban and rural environments. The visual impact of these two contrasting settings is clearly defined with landscape views being evident at the point of change. (See Photographic ref 2&3)

This situation occurs right the way along the city edge within the current area of search. Moving towards Englishcombe there is some undeveloped land on the urban fringe (west of Culverhay school and southeast of Haycombe Cemetery) which would allow for limited development, however beyond that ridge the land levels fall steeply into the valley which houses Englishcombe village.

Whilst there are pockets of more level land south of the village access and transport infrastructure into the city from this area is at its most limited with only a small steep lane linking the village to Rush Hill. The Parish of Priston extends to the Hamlet of Wilmington and it is noted that development at Englishcombe would have a considerable visual impact upon this community (see photographic ref. 4)

The Newton Brook Valley and its surrounds comprise a complex plateau cut by small combs and valley landscapes. (See Photographic ref. 5-14)

Topography has always inhibited construction. The hamlets of Wilmington, and that of Inglesbatch in neighbouring Englishcombe parish sit high on their respective ridges above the valley rendering them highly susceptible to the increased visual, noise and light impact that urban development would generate.

Priston Village lies partly in the folds of surrounding higher ground and therefore though not directly affected through any visual means would potentially suffer increased noise pollution.

These issues are additionally significant in ecological terms as there are numerous communities including the marker species, Yellow Hammer and Bats which move between the two parishes and will not readily adapt to changes from agricultural to urban environment.

Of agricultural land within the area most is generally Grade 3 though there are pockets of Grade 2, notably around the ridge of Wilmington and to the west of Englishcombe. The Parish believes Grade 2 and 3a agricultural land should not be released for development whilst the alternative of Grade 4 land exists within a widened area of search towards the A4 at Twerton/Newbridge.

## Section D1 ( Cont)

*Development policy F:*

*Planning and Delivery of Major Development*

*Major developments, including urban extensions and regeneration, should be planned on a comprehensive and integrated basis to ensure that they contribute to the delivery of sustainable communities and a high quality of life in providing for:*

- *High standards of design and access and the lowest levels of energy and car use*
- *Public transport, cultural, leisure, retail, health care, education and other services and facilities commensurate with the needs of the expected population of the area and delivered in step with growth of that population*
- *Sustainable transport links between urban extensions and city/town centres, with an emphasis on public transport, cycling and walking*
- *Amenity space and green infrastructure that meets community needs and supports improved biodiversity; and*
- *A range of housing types and tenures*

### PLACEMENT OF NEW SETTLEMENT

With respect to government planning policy guidance there are several notable sections/subsection definitions which the parish view as critical.

Transport infrastructure within the area of search for urban extension around the south western fringe of Bath is currently extremely limited and new provision is viewed as being potentially detrimental to the Parish and wider local environment.

There are two main routes into Bath from this area, the A367 and the A39 (into A4), (east and west from the village centre) with A367 via Odd Down providing the most direct access into the City. The levels of traffic entering and leaving the city during peak hours have significantly increased over the last decade and whilst Park and Ride provision is available at Odd Down (A367) and Newbridge (A4).

Dense residential development lines the route from Odd Down into the centre of the city rendering further opportunity for road enhancement impossible. This facility at Odd Down represents the only tenable public transport link from Priston Village into the City Centre, as the village bus service is very limited in nature.

There is no rail or alternative transport links between the City and these outlying villages and towns, and no disused cuttings, channels of open land, or suitable landscape topography to provide new cost effective or sustainable transport.

All information produced to date indicates that the current trunk and local road network is overloaded, and that unless there is a very drastic reduction in road traffic demand this situation will only get worse. It will also be exacerbated by the increased housing requirements as proposed in the draft RSSSW, and further exacerbated by the Secretary of State's Proposed Changes to the draft RSSSW.

As there are no transportation proposals outlined in the Proposed Changes and as there appears to be limited scope to provide alternatives in the form of enhanced rail services or other public transport initiatives which are not road dependent, the likelihood appears to be that the road network in and around Bath will become gridlocked for extensive periods of time.

**Section D1 (Cont)**

Any significant improvements in terms of new roads within BANES would be extremely expensive and extremely intrusive in environmental terms.

We therefore see it as essential that any increase in the requirements for additional housing takes into account the following requirements:

- To place developments where the maximisation of the use of public transport is most feasible and where the effects on the existing/improved system are minimised, in line with PPS1 Delivering Sustainable Development  
*27 (VII) Reduce the need to travel and encourage accessible public transport provisions to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres near to major public transport interchanges*
- To develop appropriate plans for the improvement of the existing main road network in order to minimise problems of traffic overload. These plans should not include a Southern Bypass to Bath [A4 to A36 Link] and should not lead to significant increases in traffic on minor rural roads which are neither designed, constructed or maintained to permit them.
- To develop plans to improve Public Transport and restrain demand for Private Transport.

## TRANSPORT CORRIDOR INFRASTRUCTURE

*RSSSW Secretary of State's Proposed changes*

### *5.1.4*

*...making best use of existing networks, targeting new infrastructure to unlock pinch points these transport outcomes will be achieved through the development of a corridor management approach and through the implementation of policies for freight and the Primary Route Network, ports and airports*

### *5.1.15*

*The corridor between Bristol/Bath and South Hampshire includes the A4/A36 and the Cardiff to Southampton Link. As with other regionally important corridors this route plays an important role in supporting the economic and housing growth of the SSCT's along its route which include Bristol, Bath, Trowbridge, Salisbury and Southampton."*

For the parish of Priston there is already concern about the increased difficulty of access for rural communities to this side of the city, (as aforementioned).

Statements linking the creation of transport corridor networks to the urban extension serve to increase this concern. . The potential for major road infrastructure carving up the landscape between the Parish and Bath to accommodate what could then be deemed economically sustainable development, and to provide an enhanced transport corridor between Bristol and Southampton via the A4/A36, is considered a very real threat to the community.

Due to the topography of the land, characterised by pockets of small steep sided valleys which render development prohibitive, opening out onto rolling hills and good quality arable land, the concern is that the Newton Brook valley would be viewed as one of the only suitable 'cuttings'

## Section D1 (Cont)

to create a bypass/link road for Bath and an access/movement corridor for any urban extension. It is widely considered that this would be very damaging environmentally and serve to increase rather than decrease the access difficulties for outlying communities such as this parish.

### INFRASTRUCTURE AND SUSTAINABILITY

#### Removal of Development Policy D

The removal of the detailed provision of funding for delivering new or improved infrastructure is a most retrograde step in relation to sustainable development. The parish is of the opinion that such provision must be reinstated.

#### Development Policy G

The increase in Housing Numbers contained in the Secretary of State's Proposed Changes to the draft RSSSW will also further exacerbate the perceived problems in relation to provision of infrastructure beyond that of transport.

Again it would appear necessary to ensure that future development takes place in areas where the provision of such infrastructure is most feasible in terms of cost and sustainability, and that sustainable power, water and sewerage provision are given a high priority to reduce the environmental impact within an already sensitive area.

#### RE 1 & RE 5

The renewable electricity targets from a range of on shore renewable technologies which are being insisted upon as documented within the proposed changes, with their very large step up between 2010 - 2020, will require enormous investment.

These proposals for sustainability are wholeheartedly supported although the current economic will make their realisation challenging.

**Section D2**

If you are suggesting changes to the draft RSS please supply revised wording of policies or supporting text as you wish to see them:

**Please ensure that you have written your name at the top of the page. Completed forms should be received in the Government Office for the South West by 5.00 pm on Friday 17<sup>th</sup> October. Late responses will not be accepted.**