

Statement in support of Priston Parish Council's response to B&NES Options Document

While Priston Parish Council is sympathetic to the need for more (especially affordable and social) housing, our area will be overburdened by excessive building programmes following the increased housing targets imposed by the NPPF, particularly in the Somer Valley and Keynsham/Hicks Gate, but also over the area as a whole, this will put an unsustainable strain on travel and transport as well as the provision of other services for our residents.

Discussions with B&NES Council, as well as the letter written to the Minister for Housing, underline that for this area the housing target implies significant damage to our heritage assets, and furthermore look unachievable with the resources available.

Rather than address the target at this stage the approach from BANES is to follow the process with an expectation that at the end the Inspector will be persuaded of the unsustainability of the numbers. The Parish Council believes this approach to be relying too much on hope.

Priston Parish Council suggests that it would be sensible to keep other options on the table on housing targets in expectation that revisions to the NPPF as applied to this area will result in more reasonable targets.

The effect of the macro target of 27,000 houses is to alter significantly the liveability and nature of communities across the whole of North East Somerset. The plan assumes that most new dwellings are outside the cities, driving up traffic and demand on local services.

One of the options which should be in the frame is the reinstatement of the proposals re housing targets in the previous (2025) Options document. Questionable as these projection based calculations of housing need were, at least they attempted to give some idea of how many people are likely to be living in B&NES by the end of the Plan period. The new Standard Method based simply on targeting build levels as a proportion of the existing housing stock, together with an affordability adjustment, takes no account of demographic realities, economic circumstances, the ability of any area to absorb more housing, the ability of the industry to supply on this scale, or any other locally relevant factors. Without strategic planning for the shape, size and nature of these new communities, a housing target based purely on numbers is simply pushing people into areas which cannot support them.

The latest population statistics indicate that the number of households in B&NES will increase by a number significantly less than about 8300 27,000 by 2043. Why, then are we BANES being asked to build 27,000. more houses plus whatever is thrown at us for Bristol's unmet need?

One of the many consequences of the increased targets is that B&NES no longer has a 5 year supply nor is expected to regain one for some time. Speculative development proposals are likely to crop up over the area which will be very difficult to resist. Changes in the NPPF also mean that an unmet need for housing is an 'exceptional circumstance' thereby easing the way to more development on the Green Belt (subject to the Golden Rules). In addition, there will be large removals of land from the Green Belt purposely to allow more development.

As a village currently washed over by the Green Belt, Priston is very concerned by the introduction of the concept of Grey Belt. As Priston, in common with large parts of NE Somerset, does not play a role in limiting urban sprawl or preventing towns from merging, and it lies outside the boundary of the World Heritage site, it clearly qualifies as Grey Belt. Development is considered appropriate in the Grey Belt (without regard for the openness of the Green Belt) and, subject to sustainability objections, more proposals are to be expected.

While there is support in Priston for some low-cost housing in the local area, the Parish Council hopes that B&NES Council will strengthen its policies on sustainability (to include greater consideration of preservation of biodiversity as well as sustainable transport) and viability because there is little enthusiasm for no capacity for more cars in the lanes and parking in the narrow village streets, as well as concern for a sewage system built some 70 years ago for a village with half the number of houses as now.

Priston Parish Council – Response to the BANES Local Plan Options Consultation (2025)

1. General Comments and Overview

Priston Parish Council welcomes the opportunity to comment on the Local Plan Options Consultation. The Council and residents recognise the importance of addressing local housing needs across Bath and North East Somerset, and support the principle of sustainable, well-planned development that meets genuine local demand.

However, residents have expressed strong concern that proposed development options, if pursued without corresponding investment in local services, transport, and infrastructure, could have significant adverse impacts on the character, sustainability, and quality of life in Priston and surrounding villages.

The Parish Council therefore urges BANES to ensure that any housing growth in nearby settlements such as Timsbury and Farmborough is preceded — not followed — by robust, funded infrastructure improvements.

2. Spatial Strategy and Distribution of Development

Priston residents cautiously support a balanced approach to accommodating housing need within the wider rural area. However, there is deep concern that new allocations in rural villages could result in unsustainable commuting patterns, traffic congestion, and loss of rural identity.

The Parish Council supports modest, well-integrated development concentrated in larger, better-served villages such as Timsbury and Farmborough, provided these are accompanied by infrastructure commitments secured at the outset of development.

Conversely, it would strongly oppose any development expansion that:

- precedes improvements to transport, healthcare, and schools; or
- leads to urban sprawl or the coalescence of rural settlements; or
- undermines the rural setting and landscape character of Priston Parish.

3. Infrastructure and Services

Infrastructure provision is the single greatest concern expressed by residents. The Parish Council highlights the following deficiencies, which must be addressed before any significant housing uplift proceeds in nearby settlements:

- Health services: persistent difficulty accessing doctors, nurses, and particularly dentists;
- Education: existing schools at or near capacity, with no clear plan for expansion;
- Transport: rural road network already heavily used by through traffic attempting to reach Bath;
- Road safety: speeding and inadequate parking within the village are growing issues;
- Non-car alternatives: a lack of viable and safe walking, cycling, or public transport options.

The Parish Council urges BANES to adopt an infrastructure-first approach: no major new allocations should be confirmed until there is clear evidence of deliverable investment in the above sectors.

4. Traffic, Transport, and Connectivity

Priston and neighbouring villages are experiencing steadily increasing through-traffic as drivers seek alternative routes into Bath. This has created congestion, noise, safety risks, and damage to narrow rural roads.

The Parish Council calls for:

- a comprehensive transport assessment for the rural west of BANES before finalising development sites;
- investment in sustainable transport options such as cycleways, greenways, and car-share schemes;
- exploration of rural bus service enhancements and better integration with Bath's transport network.

Development should be explicitly tied to these improvements, not assumed to follow afterwards.

5. Environment, Landscape, and Rural Character

Priston Parish places a very high value on the rural character, tranquillity, biodiversity, and dark skies of its surroundings. Any Local Plan proposals that diminish these qualities would be regarded as contrary to the objectives of sustainable development.

The Council therefore recommends:

- maintaining strong green belt and landscape protection policies;
- requiring biodiversity net gain and green infrastructure in all rural allocations;
- avoiding light pollution and suburbanisation of the countryside;
- prioritising design codes that reflect the character and materials of local settlements.

6. Economy and Employment

Residents have raised serious concerns regarding employment patterns associated with rural housing growth. Few employment opportunities exist within Priston or neighbouring small villages; therefore, most new residents will likely need to commute to Bath or other urban centres.

Without local job creation or improved public transport links, additional housing would only increase road traffic and carbon emissions, undermining sustainability objectives. The Parish Council recommends that:

- any rural housing growth be accompanied by workspace or small business provision, and
- BANES promotes home-based enterprise, digital connectivity, and remote working hubs as part of the rural strategy.

7. Community Involvement and Local Planning

Residents expressed frustration at the limited opportunity for genuine community-led planning. The Parish Council believes the Local Plan should embed a clearer commitment to parish-level engagement and Neighbourhood Planning principles, ensuring that local character, needs, and aspirations inform site selection and policy design from the outset.

8. Conclusion

Priston Parish Council supports a Local Plan that delivers genuinely sustainable growth — where homes, jobs, and services are balanced, and where rural communities retain their distinctive character.

The Council cannot support any development strategy that proceeds without infrastructure guarantees, or that risks overburdening already stretched local services.

The Parish Council stands ready to work constructively with BANES to help refine the Local Plan and ensure that the voices of smaller rural communities are fully reflected in its final version.

CLIMATE Change and resilience adaptation

Policy Wording

New development proposals, including proposals for infrastructure, will need to demonstrate that its vulnerability to climate change has been taken into consideration and how it has been designed to be resilient to the effects of climate change over the full lifetime of the development.

Priston PC response :

All new housing in this plan must not only be designed to be resilient to climate effects, but should also be designed to minimise embedded carbon. The build process similarly should minimise impact. Any policy affecting communities into the 2040s must have climate impacts at the top of its priority list and criteria for assessing suitability of proposals.

FARMBOROUGH & TIMSBURY SITE OPTIONS

Priston PC response :

Priston residents have expressed a variety of views in response to Local Plan options for potential development in the area. This summarises their views:

- cautiously welcome the move to address local housing need but with strong concern over where new developments would be situated, the kind of buildings, and above all an overriding concern over impacts on local community (services, infrastructure, environment, character) simply from an uplift in housing numbers.
- Villagers wanted to see much more emphasis on community planning and development in all proposals
- Specific concerns:
 - Access to doctors/nurse/surgeries
 - The continued absence of adequate dentist provision
 - Schools
 - Traffic volumes and flows – the villages have become rat runs for cars competing to get into Bath
 - The consequential impact of traffic on local road infrastructure
 - Speeding in the village
 - The absence of adequate parking spaces for the growing number of cars
 - The absence of viable non-car transport alternatives such as greenways, effective car share schemes, cycleways etc

The concerns about infrastructure make the housing options a double edged proposition.

If the options for expanding Timsbury and Farmborough are accompanied (and crucially **preceded**) by a robust plan to upgrade the infrastructure, transport and services provision (especially health, school) then the extension to those villages would be broadly welcomed.

But, if the options were simply focused on numbers with no heed or limited heed paid to infrastructure concerns until after development was under way or completed, then the extensions to those villages would merely drive negative impacts on residents and make living in Priston less sustainable.

Priston residents place a high value on rural character. Absence of noise, healthy natural landscapes, dark skies all matter greatly to parishioners. Should development options come at a cost to biodiversity and rural character, the village would become significantly altered in character to the detriment of all who live here.

Parishioners expressed a deep concern about employment options. Where will the influx of new residents into rural areas work? How will they get to work? Clearly there are few employment opportunities within the villages – so it is understood that all the new inhabitants will need to travel to work, putting yet more strain on roads.

GREEN BELT

There are 2 options here:

1. Amend policy so that it references and includes the 'golden rules' that should be met in progressing development in the Green Belt (either via very special circumstances or through the release of land via the local plan). In referencing the need to provide new or improve existing green spaces a requirement that its role for nature recovery is assessed and maximised, also facilitating achieving 20% BNG related to development proposals.
2. Retain existing policy and rely on NPPF for articulating 'golden rules'

Priston PC response :

PPC fully supports option 1.

NATURE and ECOSYSTEMS

The policy suggests retaining current policy for BNG

Priston PC response :

It is very noticeable that there are hard metrics for issues such as housing unit numbers and equality, but for the crucial area of nature wealth we are at the very beginning in being able to provide similarly simple metrics.

The areas around Bath outside of the conurbations are homes to a rich diversity of plants and animals. Nature is suffering a catastrophic collapse. Building over natural areas is an irreversible move.

Our suggestion is that the first preference for further development should always be greater density within existing urban areas. Creating new conurbations on green land is only going to accelerate nature depletion at a time when the UK is already one of the most nature depleted countries in the world. The Natural England report of Sept 2023 details this depletion: <https://naturalengland.blog.gov.uk/2023/09/29/state-of-nature/>

In the absence of simple numbers to represent the threat to nature from development it seems that the superficially easy option is to consider sites that disrupt relatively few people i.e. sites that are in areas that are currently unbuilt. Taking a long term view – especially from the perspective of the youngest generations – any move that further depletes nature stocks in and around the area seems short sighted at best.

It is hard to see how a BNG target of 20% could possibly be achieved by choosing sites on presently “green” sites. We strongly urge BANES to prioritise development options within existing conurbations.

Issues Challenges

1. Housing Affordability and the Economy

There is no evidence that increasing the supply of housing in B&NES will necessarily cause house prices to fall. There are many other factors at play. If there happened to be a substantial fall in house prices this would not benefit existing home owners and may give rise to problems of negative equity

2. Climate emergency

Reducing emissions from existing buildings and transport etc is laudable but there is no consideration of the effect on emissions and net zero by 2030 of hugely increasing housing numbers together with the associated needs of the increased population for transport and travel etc. This should be part of the Sustainability Appraisal instead of limiting this to the assessment of the relative emission effects of development in different locations.

3. Transport and Connectivity

This document fails to address the consequences of the huge increase in the number of journeys (including by car) that implementation of the housing targets will give rise to. As funding for public transport remains in the control of others, there cannot be said to be a Plan for this important aspect. Walking and cycling provisions are to be welcomed but hardly provide the basis for a functioning economy.

4. Spatial Priorities

a. We approve the idea of trying to draw together all these various aspects of a Local Plan into a coherent framework. This valiant attempt ends up being confusing and meaningless in a jumble of corporate strategies, core policies, principles and priorities. The use of Doughnut Economics is a good idea but the anti-growth regenerative policies it recommends do not sit easily with the Council's ambitions.

Key Requirements

1. The need for housing as required by Government does not address existing and projected population changes. The 'need' dictated by Government is way in excess of that indicated by all population forecasts.

2. The climate emergency is not being taken account of, as the excessive provision of housing and the associated requirements of the inhabitants who must be drawn away from other areas will be a retrograde step as regards net zero.

3. The emphasis on walking and cycling fails to address the many thousands of cars which will be driven by these new inhabitants. It is unrealistic to expect car journeys to fall with such a large rise in population. Public transport, which is in the hands of others and is subject to unreliable provision, seems unlikely to mitigate the reliance on the car.

5. Is the jobs target consistent with the housing target? B&NES has a working age population of 125000 and 1100000 jobs ie .88 jobs per person. An additional 27000 houses would probably yield 54000 working age population which would require 47000 jobs. In addition, this shows up the disadvantage of working with a small unitary authority. The economic and housing market areas are much wider and B&NES is in no way self-contained. Plan making should be made on the basis of these wider areas.

6. The overall housing 'need' as per the new standard method is way in excess of the expected number of households over the Plan period. Who is going to live in these houses (assuming they ever get built)? They will have to come from outside the area. Where will they come from and why? What will be their age structure and skill set? How is all this related to the birth rate catastrophe unfolding? This Options Document does not even ask the questions, let alone provide answers. The old Standard Method was very flaky but this one bears no relation to economic or social factors or to local circumstances and is in complete opposition to local democracy.

7. Because of relaxation in the protections offered by the Green Belt and the introduction of Grey Belt, it is likely that the number of windfall sites coming forward will be much greater than in previous times and this should inform the targets in strategic areas.

8. To discourage undesirable development, the size of small developments not requiring an affordable element should be reduced from 10 to less than 5 as permitted by para 65 of the NPPF.

9. Large developments should have strict viability rules applied so that development in the Green or Grey Belt will at least have a large element of affordable homes.

10. The attempt by Bristol to offload their unmet need on to B&NES should be resisted. Through the application of the arbitrary standard method algorithm, the increase in housing targets bears much more heavily on B&NES than the other West of England Authorities, and this without any evidence that B&NES has a greater unmet need than these others.

12. We support the plan to turn Park and Rides into transport interchanges. The other transport plans seem very inadequate to deal with the issues created by massive development.

Rural Areas Approach

1. In our view, a major problem facing rural communities in B&NES is the lack of adequate (or sometimes any) public transport as recognized within this Options Document. Countryside living by definition requires the ability to travel at various times of day, in all directions, and with a continuity of provision. Funding needs to be adequate, consistent and long term, which is not at present and, which the Options Document confirms, is unlikely to be in the future. This is vital to reduce the reliance on the car and to provide for the needs of rural dwellers who cannot access a car or for health or other reasons unable to drive. The widely dispersed nature of many rural communities together with the narrow lanes which mainly connect them means that the opportunities to promote walking and cycling are limited and do not address the needs of large parts of the population.

2. Another major problem, which will be made much worse by proposals in this Options Document is the huge expansion planned for the surrounding towns and cities which will make the travel essential for rural dwellers for work and other vital purposes much more difficult.

3. Rural communities are also concerned that combined with B&NES unmet housing need, the reduction in protections offered by the Green Belt and the new Grey Belt designation (which will apply to much of the countryside outside the immediate areas of Bath and Bristol), will give rise to extensive small and larger scale speculative development. We ask firstly that consideration is given to tightening the definition of 'sustainability' as this seems to be the main pathway to controlling unconstrained development in the countryside. We also suggest that the authority granted under the NPPF to restrict the size of developments escaping the 'Golden Rules' be taken full advantage of so that many more projects will include the affordable housing so sorely needed in our rural communities.

4. We are not encouraged by the results from the UK Shared Prosperity Fund so far, which produced only 5 very modest village improvements. Investment is required on a much larger scale.

5. We are broadly in favour of the concept of 5% proportionate growth in the rural villages with some social facilities, (other than villages washed over by the Green Belt). However, such piecemeal development in the past has led to a under-provision of essential services and affordable housing. However, the selection of certain well provided -for villages to deliver a larger quantum of housing opens the door to disproportionate growth of villages which will be overwhelmed and fundamentally changed in character. The favouring of Pathway 1 (community-led) development, where local people have a real opportunity to engage with the Council and express and implement their views,

will improve the success of this policy (though it is suggested in the Options Document that this route is only applicable to larger scale development).

Spatial Principles

1.Spatial Strategy

- a. **Climate change.** Any new house adds scope 1,2 and 3 emissions and the effect of 27000 new homes on the 'transition towards carbon neutrality and climate resilience' is nowhere addressed in this document.
- b. **Sustainable transport.** The aim of minimising transport by car is undermined by the 60,000 cars accompanying the extra 27000 new homes. Not everyone can walk or cycle and the provision of public transport in the rural areas is uncertain.
- c. **Biodiversity.** We support the measures relating to biodiversity and nature recovery.
- d. **Landscape character.** Overdevelopment on greenfield sites eg West of Bath degrades landscape character.
- e. **Historic environment.** The proposals threaten to overwhelm towns and villages which have a historic core such as Keynsham, Saltford, Bishop Sutton and Newton St Loe.
- f. **Green Belt.**
 - Meeting the prescribed housing targets will require much land to be removed from the Green Belt. The Green Belt, established many years ago, remains largely intact and the proposed incursions would be a severe threat to an institution which has served us so well.
 - It has been established that even land remaining in the Green Belt will no longer be protected from development by the 'exceptional circumstances' rule because changes to the NPPF now allow that exceptional circumstances include an unmet need for housing (which B&NES currently has and will have for some years because of the increased housing targets impact on the 5 year supply). This threat to the quality of the Green Belt is moderated by the application of the 'Golden Rules' which specify that any large development will have to be 50% affordable. This may restrict the extent of development on the Green Belt but we are concerned that the viability arguments may be successfully deployed to lower the require proportion of affordable homes. We also note that the Golden Rules only apply to larger developments and suggest to B&NES Council that the NPPF does allow that affordable homes may be required on developments of 5 or less and that local policy should be frames so as to prevent a proliferation of small developments over the Green Belt.

- We take issue with the statement that ' the strategic release of lower quality Green Belt for development is to be considered. In identifying areas of lower quality Green Belt the government introduced the new concept of Grey Belt'. As the following sentence makes clear, whether the Green Belt land is of lower quality or not is completely irrelevant to whether it can be classified as Grey Belt. As it stands, most of the existing Green Belt in B&NES other than the areas adjoining Bath and Bristol (and the areas contributing to the setting of the WHS) could be classified as Grey Belt. Even if land is not officially designated in the Local Plan as Grey Belt, its status as Grey Belt could be challenged by developers. We strongly object to most of our valued rural landscapes being open to development which is no longer classified as 'not inappropriate' (subject to sustainability) in this part of the Green Belt. Once again, the Golden Rules apply to development in the Grey Belt and we repeat our caution that viability arguments may be deployed to reduce affordable housing and we urge B&NES Council to limit as far as possible the size of developments not requiring a contribution to affordable housing. We also request that in the absence of the relevant NPPF changes being rescinded, B&NES Council should reinforce its definition and requirements of sustainability.

g. **Infrastructure.** We remain skeptical that the provision of social infrastructure will match the extent of development leading to a lower quality of life for existing residents.

Sub Areas

- a. **The totality of development.** The real problem with this section is the extent of development being proposed. In itself, the concentration of development in Bath(to the extent of the limited space available), the Bath-Bristol corridor and the Somer Valley is preferable to having widespread housing all over the countryside. It is the quantum of development to which we object. It is also probable that the number of windfall sites emerging will exceed expectations due to the relaxation of protection rules for the Green Belt.
- b. The scale of possible development in the strategic areas is alarming. Work and other journeys to Bath and Bristol already involve delay and congestion which will be made unsupportable by the proposed development without expensive and substantial interventions (mass transit) which are not in the equation.
- c. We believe a new settlement in B&NES is both unnecessary and very damaging to the character and the quality of life.
- d. **Site Options- a general comment.** Various parties will be scrutinizing the proposals to glean support or otherwise for their particular interests. But the main problem with these strategic sites is the sheer volume of development proposed and the deleterious effect this will have on current residents as well as the degradation of the landscape.

RETROFIT FIRST:

Policy Wording

“Development should adopt a retrofit first approach, where options for retrofitting and retention of existing buildings are considered before demolition.

Where development proposals include substantial or total demolition of existing building(s), applicants must provide evidence to justify the demolition. Applicants must also demonstrate how they will reuse and recycle the materials created through demolition.”

Priston PC response :

Priston PC fully supports the retention of existing buildings as taking priority over demolition and new build.

Sulis Club Options

We support no change to Policy SB19 and object strongly to development on this valuable green belt site within the World Heritage Site setting. All the major disadvantages of the proposal are listed in Option 2. In addition, the removal of this land from the Green Belt would significantly compromise the Green Belt as a whole. The intended provision of purpose-built student accommodation does not include affordable housing and therefore does not comply with the Golden Rules

Land West of Bath

The land was considered and rejected at the Core Strategy deliberations and the very good reasons for that rejection remain valid. It represents a serious threat to the World Heritage status of Bath and other than providing a ready option for boosting the supply of housing has absolutely nothing to commend it.