

Campaign Against Urban Sprawl (CAUS) - Consultation Response on Core Strategy Launch Document

To: David Halkyard – Planning Policy Manager, Bath & Northeast Somerset Council

CAUS represents local residents who are concerned that any new housing developments must minimise erosion of B&NES's countryside in order to preserve the distinctive character of B&NES's towns and villages. While recognising the urgent need for genuinely affordable housing, we work to broaden the public's understanding of the issues and to keep people well informed about how they can be involved in decision-making processes to ensure the best outcome is achieved for the whole community. We have already demonstrated significant reach in relation to this matter with more than 100 people signing our online petition and almost 500 more having submitted written representations to Councillor Gerrish regarding the proposed housing developments.

In response to your consultation request on "issues", we wish to raise the following points:

- While we recognise there is an urgent need for affordable homes, we consider it crucial that protecting our green spaces is given at least equal weighting to the need for more housing. The countryside is a fast disappearing resource, especially in the relatively densely populated area of North East Somerset. Green Belt land should be protected and enhanced wherever possible. It is important to maintain the bulk and siting of the green belt. Keeping the "integrity" of the green belt by not puncturing it is simply not enough. The need to preserve and protect our countryside is not just for the benefit for those who live in it. The countryside is a precious resource for the entire community for the following reasons:
 - We must maintain as much agricultural land as possible. With rising oil prices and falling oil supplies it has become more important than ever to ensure we maximise local food production. 81,500 farmers and farm workers left the land in the UK, between 1995 and 2004.
 - Countryside is an environmental, economic and social asset for all of us. Beautiful, tranquil, diverse and productive countryside is fundamental to people's quality of life, wherever they live, an asset for recreation and leisure that contributes to better physical and mental well being for everyone.
 - Loss of countryside means a loss of havens for wildlife leading to a reduction in biodiversity. These issues have already identified in Council Studies¹.
 - The countryside is an important asset for tourism – Bath's setting in beautiful and distinctive countryside should not be underestimated.
- In relation to this first point we question the basis on which the housing projections have been worked out. While we are aware that these figures have originated from the South

¹ Landscape Heritage Study south & southwest of Bath, Background Paper on importance of Cotswolds AONB, SSA of locations surrounding Bath, AONB Bath Urban Extension Environmental Capacity Appraisal, Urban Extension Environmental Capacity Appraisal Report – all available from B&NES Council

West Regional Assembly, it is essential that the public is given access to the process by which these figures have been arrived at and that the public agrees with the scale of housing development needed. We believe that it is up to B&NES council to act as an intermediary between their constituents and wider authorities to confirm for the public how these figures have been reached, and to ensure that assessments for more housing genuinely meet the needs of local people. Housing needs must be assessed on a “local” basis and not be decided by a distant centralised authority. It is essential that the Council provides the public with transparent information showing what models have been used to work out these figures and when the calculations were made. Could they already be out-of-date (for example in the face of a global credit-crunch)? Housing figures must meet current economic projections.

- Although not identified in the launch document we believe one of the key issues to be the extent of the Council’s authority in relation to varying the plans for the District set out by Central Government, Government Office for the Southwest, Regional Development Agency and the Southwest Regional Assembly.
- We would encourage the Council, wherever conformity is assessed to carry forward into the Core Strategy process existing Planning Policies developed over years of applying specialist local knowledge to PPG/PPS from government. This should include the excellent work already done on national protections e.g. AONB and international protections e.g. UNESCO World Heritage City status.
- The economic projections underpinning the RSS do not give sufficient detail about what areas of the economy are expected to grow in the planning period. This makes it extremely difficult to make any informed response to questions about the land use for business or where the occupants of any new houses are likely to work. Several local manufacturing industries have moved, or are about to move, their plants abroad e.g. Dyson, Clarks, Cadburys. In a globalised economy this trend is likely to continue.
- Every effort must be made to use brownfield land before any greenfield site is developed. We strongly urge the Council to resist any attempt that Government might make to allow developers to apply for planning permission “over the heads” of the Unitary Authority. Although we acknowledge that bringing some houses back into the general stock for sale or rent may not be as fast as having them built new, we urge the Council to recognise the great, sustainable, benefits this action would offer. The Empty Homes Agency has confirmed to us the existence of almost 1,000 vacant homes across the district. We are also aware that for the most recent year for which records are available, only a handful were brought back into use.
- We entirely acknowledge the value of green space within the city boundary. However, we believe there to be very considerable potential for housing development to be “fitted in” within the existing urban framework. We eagerly await the outcomes of the Urban Capacity Study currently being undertaken by your staff.

- There needs to be joined-up thinking between local and national objectives for tackling climate change and proposed housing development ie joined-up thinking between transport proposals and housing plans. Additionally, we ask that the Council take a leading role in requiring the specification of any houses that are needed to be as energy efficient as possible, putting pressure on the developers, if need be, to ensure this happens. More than any other single change, an increase in the energy efficiency specification for homes would reduce domestic emissions of carbon dioxide – simply by driving down the domestic need for energy.
- We believe that housing developers hold immense sway with the Government and Local Authorities. We saw this clearly demonstrated at the Examination in Public (EiP), where developers were given precedence at every stage over local groups and organisations. However, we urge the Authority to ensure that the needs and wants of developers should not be put ahead of the needs of local people. Overwhelmingly the district needs more genuinely affordable houses. Developers are reluctant to build this, as it presents a lower profit margin than four and five bedroom ‘executive’ homes on small plots. Developments such as Poundbury in Dorset have adversely distorted rental prices in a substantial surrounding area. We believe the council has a key role to allow only responsible development: namely, development that meets the needs of the community; rather than the aspirations of shareholders. Additionally, we look forward to the Council taking all measures it can to restrict the sale of affordable housing to investment buyers.
- Should the Council decide that a significant proportion of the expansion capacity needs to be distributed across the district’s villages (as CPRE are suggesting) we would urge the Authority not to be bullied from this path by the developers (who stand to make greater profits from building on fewer, larger sites), and to make persuasive arguments to Government in relation of the additional investment that would be needed for upgrading infrastructure at the most local level. Similarly, extant infrastructure capacity should be a key determinant in where houses are built in order to prevent unnecessary travel to schools, for example.
- Home working is related, overwhelmingly, to socio-economic groups A and B, who tend to inhabit higher cost homes. Placement of additional housing in many outlying villages would increase pressure further on the already-limited extant infrastructure. However, mixed development is by far and away the most preferable option; but the low likelihood of live/work and the increased pressure on transport and roads would need to be acknowledged.
- Every effort should be made to keep towns and villages distinct from one other. By closing the gaps between settlements, ribbon development means that communities start to lose their sense of identity. People need to retain their sense of place. Living in a long drawn out development means isolation from, and lack of identity with, village centres, etc. Keeping villages distinct is also essential to maintaining the character of the North East Somerset area.

- We understand the decision on the Area of Search was based in part on identifying land with the lowest level of protections; noticeably outwith the AONB. Looking back at the decisions on setting the AONB boundary; what was in/out now seems to have been decided in a most arbitrary manner - and does not including consistently important land around the city. *In reality* the value of the land in the Area of Search is just as high as that included in the AONB. With this in mind we urge the Council in the strongest terms to only undertake any development on green field sites when all other alternatives have already been used, and to recognise the value of the setting of the World Heritage City. We would also wish the Council to develop the World Heritage City Buffer Zone to full policy status before the planning period begins. Should development be needed, in the area around the city, we urge the Authority to phase this carefully so as not to oversupply housing relative to the then current economic growth.
- Promotion of renewable energy resources should only go forward on the basis of the District's natural characteristics (miles from the coast - so little value in wind generation, no meaningful potential for hydro-electric schemes). Biomass would very significantly favoured over wind turbine generation, particularly when paired to integrated combined heat and power generation plants and an energy-from-waste strategy. Either biomass or wind turbine generation should proceed only on the basis of robust cost/benefit analysis with substantial weighting to reflect the very special landscape characteristics of the district.

We are keen to continue our involvement as greater detail becomes available eg from the report of the EiP Panel, the Secretary of State's Consultation and, ultimately her decision. In advance of these key developments we trust you appreciate we are only in a position to make headline comments on the issues for the Unitary Authority in relation to the development proposed by the Regional Spatial Strategy and the Council's response to it. As an example, other parties have proposed an extension to the Area of Search. Until we are clear whether or not this has found favour in the EiP Panel report, it would be premature for us to make more detailed comment.

Notwithstanding the outline character of our comments, above, we look forward to working more closely with you on these issues and their corresponding options as they develop over the coming months.