Farrington Gurney - Parish Council feedback to BaNES local plan

The following statement represents the Parish Council's feedback on B&NES local plan update. The Parish Council has consulted and listened to its residents through meetings and surveys and presents those views within this statement.

Housing

The Local Plan consultation proposes strategic growth in the form of 2 options of approximately 500 homes sited North and South of the main village. Approximately 275 currently run next to the A37 and East along the A362. B&NES classifies Farrington Gurney as being part of the Somer Valley. The proposals for strategic growth in Farrington Gurney raise a significant number of concerns, especially when taking into account the context of the Somer Valley and the wider District. The village strongly agrees that either proposed option is extremely disproportionate; it would increase the village population by 135% and destroy its very nature as a rural location.

Based on the data and options in the consultation material, the proposals identified by B&NES at Farrington Gurney, and the wider Somer Valley, amount to greater potential housing capacity in the Somer Valley than any of the other areas in B&NES – see table 1 below. This is because there are both some very large strategic options presented as well as non-strategic options in the Somer Valley, which is not the case elsewhere. On top of this, the level of existing commitments is high, especially when taking into account the housing proposals in Somerset which adjoin the Somer Valley towns and effectively entail an expansion of the Somer Valley urban areas. The latter are not included in B&NES' housing figures in the consultation material

Table 1 – overall housing context

Location	Existing sites not yet built	Strategic Options	non-strategic Options	Total
Bath	4,349	0	0	4,349
Keynsham & Saltford	671	3,200	0	3,871
Hicks Gate	0	1,000	0	1,000
Whitchurch	0	1,300	0	1,300
Somer Valley	830	3,200	c.500?	5,080

However, the evidence shows that the scope to accommodate new housing growth in the Somer Valley is very different from other parts of the district. Key points are;

Transport

• The Sustainability Appraisal that B&NES has done for the options concludes that Somer Valley is a much less sustainable location than other most parts of the district as (see para 9.36). The SA also states that compared with the other urban areas in B&NES, the Somer Valley has the highest car dependency with most out-commuting

(see SA report p.49). This is most likely due to the specific circumstances of the Somer Valley as illustrated by the 2021 census figures, eg;

- Percentage of workers who travel to work by driving a car or van;
 - o Farrington Gurney Area 60%
 - o Bath is 18 & 45%
 - o Keynsham & Saltford are 40 to 50%
- Percentage of workers in who work mainly at home:
 - o Farrington Gurney area is 28%
 - o Bath is 40 & 50%
 - o Keynsham & Saltford are 30 to 40%
- Percent of workers who travel more than 10km to work:
 - o Farrington Gurney area is 32%
 - o Bath is 10 & 15%
 - o Keynsham & Saltford are 14 to 18%
- The data shows that Farrington Gurney residents are less likely to work at home and so there is a much greater need for workers from the village to travel to work and to travel further. Most residents accept the need to travel as they choose a rural home life. Alternatives to the private car are poor compared to Keynsham and Bath, therefore residents of Farrington Gurney are much more reliant on private transport to commute. At the same time, WECA & B&NES are investing comparatively far less in the Somer Valley in providing alternatives to the private car. It would therefore be contrary to the Plan's objectives to steer large-scale strategic growth to the most unsustainable part of the district.
- Furthermore, the Somer Valley is receiving the least investment towards improving sustainable transport options compared with Bath and Keynsham. Para 6.32 of the Sustainability Appraisal (p.49.) states that "the settlements located along the roads that benefit from the WECA Somer Valley Links projects (A367, A362 & A37) will perform positively from a transportation perspective. This is because these projects will improve sustainable access to services and facilities, and employment across the district."

However the SA goes on to acknowledge that "investment through the WECA Somer Valley Links project is unlikely to be as significant". It is understood that the Somer Valley Links project seeks to address existing transport problems (and it's not clear at this stage how successful it will be in that regard) and it is not designed to respond to the impact of new growth. Therefore, the Somer Valley Links project is a relatively very modest package that will do little to address the existing unsustainable travel patterns, let alone address the impact of strategic new growth. NB Clarification is sought whether the reference to improved bus services in the

penultimate para on p. 223 of the SA suggests more regular and additional services or just improvements to bus stops etc.

- On behalf of residents the Parish Council has been campaigning for a cycle/safe walking route to Midsomer Norton for over a decade; it has also campaigned more recently for a commitment to a bus link to Bath as the main commercial centre of the Council. To date, neither of these has materialized and it is unclear that they ever will. This increases necessary road traffic.
- B&NES has not assessed the traffic impacts of the housing growth options on Farrington Gurney and the Somer Valley, so the full impacts are unclear. B&NES' proposed approach in responding to the transport needs arising from new development is not to provide for new traffic capacity arising from the new growth but instead that the transport network will be "rebalanced in favour of sustainable modes, with a lot less emphasis on accommodating private car usage than has been the case historically, which has led to car reliant communities and our places becoming dominated by cars" (Vision and Objectives' document p.5). Whilst the reasons for this new approach is understood, it will mean that whilst any new urban extensions themselves will be built with 'on-site' sustainable principles (eg density, layout, priority for active travel), the wider impacts of substantial new housing on the existing communities and road networks, particularly in terms of traffic, will not be addressed. B&NES acknowledges the higher car dependency in the Somer Valley makes modal shift much more difficult than elsewhere in the district. The plan therefore simultaneously proposes more people who would have to drive to work with no viable means of sustainable transport to get them there. It is not plausible that residents working in Bristol or Bath would cycle or walk there.
- A key issue for Farrington Gurney is its inclusion by B&NES in the wider Somer Valley.
 The village is physically separate from Midsomer Norton, Westfield, and Radstock and
 does not properly function as part of this urban area. Farrington Gurney is a small village
 of less than 975 residents which has much more in common with other small settlements
 and it should be treated as a rural village and not as an adjunct to the larger more urban
 towns nearby.

Air Quality Management

- Due to the geographical local of the village at the foot of a hill and junction of 2 main A-roads Nitrogen Oxide levels are high and will continue to be high as vehicles (particularly HGVs) have to accelerate hard from a standing start at the traffic lights to progress south along the A37.
- The very nature of traffic lights at the junction of 2 main A roads means there are always long queues of stationary traffic.
- Current dwellings next to the A37 and A362 have been in the past targeted by B&NES to warn again unsafe Nitrogen Oxide levels.

- Residents asked for and received trees planted alongside the A362 specifically to counter the effects of these unsafe levels.
- With additional housing proposed in Somerset and B&NES there is very little hope that Nitrogen Oxide levels will decrease unless extra steps are taken. The addition of the SVEZ and traffic to and from the site will only exacerbate what is already a problem.
- It has been suggested that part of the site proposed as Option B adjacent to A37 (Rush Hill) would be better suited to the creation of protected woodland to off-set the air quality issues and extend the Forest of Avon

Other infrastructure

- When assessing the growth options (SA p. 219) not only are there existing pressures on infrastructure, especially health facilities, but there will be further pressure from committed growth in the Somer Valley, even without any of the new strategic options coming forward. The SA report (p220) recognizes that "significant growth in the Somer Valley could place considerable pressure on existing health facilities and there may even be a need for a new GP surgery" but this is something B&NES or developers have almost no control over.
- Page 221 of the SA Report states that "all options provide a significant opportunity to
 deliver improvements to support health and wellbeing objectives, providing an opportunity
 to support active travel uptake, deliver new and improved areas of multi-functional green
 infrastructure alongside development; and promote access to the
 countryside". However, this is entirely dependent on how the development is delivered and
 how successful B&NES is in securing these outcomes.
- 7.74 mentions downgrading vehicle speed within the village which we would encourage to improve noise and air pollution. Also mentioned is a mobility hub, the need or demand for which remains obscure.

Agricultural land classification

- The land proposed in both options comprises of some of the top 1 percent of agricultural land in the United Kingdom, thanks to its exceptional soil quality and fertility. To build on this land would be contrary to policy as referred to in 7.72. This land can't be replaced and will be lost forever.
- The Village is extremely lucky to have 2 successful working farms producing high quality agricultural produce. The loss of land to Home Farm would have a significant detrimental impact on the viability of this business employing over 70 people. It would also contribute to food insecurity.

Landscape

- Both options will have a detrimental effect of the village landscape. South of the village is
 the Rush Hill ancient woodland, and Option B would have a significant detrimental visual
 impact on this rural village. This area of land forms the gateway approach to the Mendip
 Hills AONB. Any change to this landscape that takes it from green fields to a built
 environment would negatively impact the gateway to the AONB.
- Option A would negatively impact the cherished view of the Grade II listed St John's church which remain one of the few standalone churches set in a rural field setting in the whole of the UK.
- The local plan should look to offer protected status to the Church and surrounding fields to ensure that views from the community village memorial hall to the church are fully protected forever. We would expect the Council to agree to this proposal in the local plan.
- Due to the historic nature and setting of the village which dates back to historical events in the English Civil war and which was a significant route build by the Romans, it seems likely that the proposed options would uncover significant archaelogical artifacts.

Summary of village concerns

- Disproportionate size of development for the village
- Poor alternative transport options available to Bath
- The local primary CofE school is over-subscribed
- Local secondary schools (Norton Hill/Somervale) require more coach travel at further cost to the council
- Loss of green space, visual aspect of historical church
- Detrimental effect on local farms and farm jobs
- No viable walking or dedicated cycle routes to local towns
- Further development would further exceed already dangerously high pollution levels
- Large scale development would destroy a sense of rural community and 'village way of life'.

Solar Farm proposal - West of Enterprise Zone

The Parish Council of Farrington Gurney wish to strongly object to this proposal for the following reasons

- Loss of Grade 1 organic farm land producing high quality produce for the local economy.
 This type of land makes up less than 1% of the best quality producing soil in the United Kingdom
- Detrimental effect of Home Farm as a via business, employing 70+ persons from the local area
- Possible effect on a proposed safe cycle/walking route linking Farrington Gurney to Midsomer Norton