

Marksbury Parish Council feedback on the Local Plan 'South of Burnett next to A39 (potential development)' chapter 5 of the Local Plan.

Marksbury Parish Council are hereby registering feedback on the Bath and NE Somerset Local Plan 2024.

1. Food Security

This is food producing farmland, and the UK is not food secure or self-reliant (UK Govt. Food Security Report 2021, updated 2023 ([United Kingdom Food Security Report 2021: Introduction - GOV.UK](#)) and here is an excerpt from Theme 1 of that report:

'The UK has relied on imported foodstuffs to supplement domestic production for over two centuries and currently almost half of food consumed in the UK is imported.'

The Government announced new measures reaffirming how our environmental land management schemes work alongside food production by limiting the amount of land farmers can take out of productive actions under the Sustainable Farming Incentive (SFI) have been announced today (Monday 25 March). Full details may be found online at [Government ensures food production remains primary purpose of farming - GOV.UK \(www.gov.uk\)](#)

On 25th March 2024 Farming Minister Mark Spencer said:

"Food production is the primary purpose of farming and today we are taking action to clarify this principle."

At a time when Global Markets are under threat from Geopolitical shifts and our population is growing at a rate of a city the size of Bristol every year (source ONS.gov.uk), the UK needs to preserve all of its current food producing capabilities, this development will take around 320 of acres of farmland permanently out of food production. Developing this farmland is in direct contravention of Government Policy.

2. Environmental Issues - destruction of Bio Diversity natural habitat

Corston Fields and South Burnett provide a relatively quiet and undisturbed habitat for several wild life species. If this went ahead the development would impact above average numbers of critically endangered species including sky larks, field fare, song thrush, yellow hammer, cuckoos, newts, hares, little grey owls, partridge and bats to name but a few. This development would completely erase for ever the unique bio diversity in this area.

Corston Fields Farm, which comprises a significant proportion of the proposed development, was one of the first zero carbon farms in the UK and is an award winner in the Duchy of Cornwall's Habitat Award Scheme for its commitment to government guidelines to diversify and adopt sustainable farming methods.

Participation in the Countryside Stewardship Scheme supports and meets the aim of having a Local Nature Recovery Strategy in place for the West of England by summer 2024.

3. Unsuitable Location - Unacceptable damage to the Green Belt

This location is unsuitable because it has no infrastructure to support a large urban development. There are no transport links to Bath or Bristol, the water, sewage, and electricity supply is sized to the current very low level of population, and there is no gas supply - we rely on oil or Calor gas for our heating needs.

There is however, a major Gas pipeline that bisects the location. This Gas pipeline has safety restrictions placed around it regarding developments. It would need to be lifted and shifted at significant environmental impact.

All of this very significant major infrastructure would need to be installed from scratch with disruption lasting for years and damage to the Green Belt that would never be fully restored.

Then of course there is the issue of population support - at least 2 new primary schools will be required and an additional secondary school in order to provide education services to the envisaged population that will reside in this new settlement.

Additionally, a new GP Surgery will be needed and a Dentist. As you know GPs and Dentists are not direct employees of the NHS, rather they are Limited Liability Partnerships owned by the partners of these business. The NHS and BANES cannot compel a GP surgery or a Dentist to set up business so it would be with a 'hope and a prayer' that these services would eventually be provided.

The West of Bath potential site has less environmental impact and drawbacks than the South of Burnett Next to the A39 proposal. However, this potential development seems to have been already ruled out because of what is stated in the Local Plan excerpt below:

5.98 'Exceptional circumstances' would need to be demonstrated in order to justify removing the land from the Green Belt. Whilst such 'exceptional circumstances' are site specific this broadly means demonstrating that reasonable alternatives outside the Green Belt have been considered and rejected and that harm to the Green Belt is outweighed by the benefits of development.

Given the statement above, why is the South of Burnett site even being considered as it is at least as 'Green Belt' (if not more so) than the West of Bath site?

What are the 'exceptional circumstances' to justify taking the land South of Burnett out of the greenbelt?

4. Site of Historic Value - Stantonbury Iron Age Hill Fort

The plan indicates that the potential development would butt up against Stantonbury Hill on the south side of the A39. Stantonbury Hill is the site of an Iron Age hill fort that is a 'Scheduled Ancient Monument'.

As far as we are aware the site has never been properly archaeologically explored. Building up to the base of the hill would prevent any exploration of the North side of the hill.

The site is on the English Heritage at Risk Register as being a danger of deterioration due to animal burrowing. With a sizeable settlement on its door step the footfall of leisure walkers and people walking their dogs would increase exponentially from the current level of visitors making the deterioration risk even worse.

Alternatives

However, there are alternatives. The Local Plan identifies multiple locations for future housing development. One of those is the already established location at Farrington Gurney. At this location water supply, sewage and electricity infrastructure already exists that could be expanded. There is room to expand here without damage to the green belt or taking out valuable farming land.

What is not clear is just how much effort has been put into producing the local plan that examines the viability of development brown field sites. The old Gas Works in Bath was probably the last sizeable Brown Field site that could be exploited, but there are multiple small Brown Field in-fill sites that could be utilised - have these all been identified and assessed?

The West of Bath location appears to have more potential and less drawbacks in terms of infrastructure impact from our reading of the Local Plan.

What about lo-rise buildings within Bath (such has already been achieved alongside the A4 with blocks of student accommodation) in order to make maximum use of the available land – has this been considered? There is no grand edict that the World Heritage status of Bath cannot be challenged, as Liverpool City Council did regarding the redevelopment of their derelict docklands.

Summary

For the reasons stated above, Marksbury Parish Council consider that the land South of Burnett does not warrant exploration as a potential long-term strategic development.

It is clear however, that there are more sustainable and less damaging options that would meet the expected development needs arising over the period of the Local Plan.

Sally Collins, Chair

Marksbury Parish Council

8th April 2024