

Salford Environment Group response to B&NES Council's Housing and Economic Land Availability Assessment (HELAA) Review 2017

1. SUSTAINABLE DEVELOPMENT

None of the sites identified for housing development by the HELAA Review meet the requirements of Sustainable Development for the following reasons:

- (a) The A4 in Salford is already subject to heavy congestion (see TRANSPORT PROVISION below) as its capacity is reached or exceeded at peak periods of the day. As a result of this congestion B&NES Council made a stretch of the A4 (along the Bath Road from its junction with Beech Road until 150 metres south of the Glen) an Air Quality Management Area, with effect from July 2013. Additional congestion arising from further housing would increase health hazards (air quality and noise) for local residents.
- (b) Salford's side roads are mainly narrow (therefore subject to a 20 mph speed limit) and lack the capacity to take additional vehicles resulting from new housing.
- (c) Any new housing developments should be located close to the sources of employment to reduce the need to travel for commuting; there are no major employers in Salford except for the primary/junior school.
- (d) Salford school has insufficient space for further expansion. If (undemocratic) pressure from central Government makes new housing unavoidable, then larger sites where education provision can be incorporated would be much more appropriate.

The presence of springs on higher elevation fields on the south side of Salford together with fast rainwater run-off creates pooling of water at times of heavy rainfall. New housing developments in this area should not be considered until the resulting additional risk of flash and land flooding has been fully studied by experts.

2. NATIONAL PLANNING POLICY FRAMEWORK & THE GREEN BELT

All of the identified sites are in Salford's Green Belt and serve most of the core purposes of the Green Belt stated in the NPPF.

In March 2014, despite *"the substantial shortage of deliverable housing land in B&NES"* the Secretary of State for Communities and Local Government refused planning permission for 99 new dwellings south of Manor Road (shown as SAL1 in HELAA) for the following reasons which remain valid:-

"the proposed development would result in an unacceptable reduction of the Green Belt in that area."

"the site lies within a substantial sub-area of Green Belt identified as strongly serving the purpose of safeguarding the countryside from encroachment, and attributes considerable weight to this issue in the planning balance."

"harm to the Green Belt's openness and harm to the Green Belt's purpose of preventing encroachment into the countryside."



3. TRANSPORT PROVISION

SEG agrees with Saltford Parish Council's response (7.11.2017) that "to relieve the current situation consideration should be given to utilise existing transport routes thereby reducing the need to destroy Green Belt land and other habitat. For example in addition to re-opening the GWR mainline railway station at Saltford, the LMS rail route that is now the Bath - Bristol cycle route could be enlarged to have a light rail route alongside the Sustrans cycle and running track. The river Avon and Kennet and Avon Canal has the potential to provide additional transport opportunities." Such improvements would help overcome existing problems of commuting congestion, not provide additional transport capacity for new housing in Saltford.

4. PUBLIC COMMITMENT BY B&NES COUINCIL

At the public meeting held at Saltford Golf Club on 1 December 2016 the Leader of B&NES Council, Tim Warren, said that the "*current B&NES administration had no intention to allow housing development on Saltford's Green Belt in the Joint Spatial Plan*".

5. LAND USE PLANNING AND FOOD SECURITY

Climate change impacts together with unsustainable and unmanaged population growth means that agricultural land, and equally importantly the surrounding undeveloped land that provides the supporting eco system (biodiversity) to enable arable farming to succeed, should not be lost to housing development (at a national and international level).

Increasing concerns for the nation's food security and thus the need to reduce dependency on imported food, means that any new development should have compensatory habitat. No such areas have been identified for the Saltford HELAA sites.

6. ARCHAEOLOGY & LANDSCAPE HERITAGE

The geophysics surveys in 2015 and 2016 by Bath and Camerton Archaeological Society (BACAS) and SEG of the Roman Coffin Field (in SAL2) together with recently obtained LIDAR (Light Detection and Ranging) images from the Environment Agency of those fields have identified significant Roman and Iron Age archaeological interest in this area. This important aspect of Saltford's landscape heritage from the Roman and Iron Age periods should not be destroyed by housing development that does not even meet sustainable development criteria.

Important Footnote: The small paddock on the west side of SAL1 (identified as SAL1a on some maps) is privately owned. The landowner has informed SEG that she has no intention of releasing ownership of that land for development.

Saltford Environment Group
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www.saltfordenvironmentgroup.org.uk