

B&NES Local Plan (2016-2036) Options Document Consultation, Winter 2018 - Response from Saltford Parish Council

Please note

This response from Saltford Parish Council (SPC) seeks consultation discussions between B&NES Council and SPC on:- (a) any consideration of putting forward Saltford Green Belt into the draft Local Plan prior to insertion at the earliest opportunity (*page 2*), and (b) the North Keynsham SDL (*page 3*). SPC also raises the question of “net environmental gain” (*page 4*) and makes specific recommendations concerning the proposals for relocating Avon Valley Adventure and Wildlife Park (*page 3 & 4*).

The content of the responses from SPC to the Local Plan Issues & Options Consultation made on 2.1.2018 and to the draft HELAA consultation made on 3.7.2018 remains valid.

Comments on Chapter 8: Development Management Policies (as these affect Saltford)

8.12 Housing in Green Belt Villages

We agree with the proposed “policy approach options for housing in Green Belt villages” (DM10) to simplify the definition of limited infill in Green Belt villages as ‘The filling of small gaps within existing development in an otherwise extensively built up frontage.’

Saltford Parish Council agrees with B&NES Council that, by implication from their non-inclusion as options for strategic development, the 9 sites in the Green Belt surrounding Saltford considered by Planning Officers in the Housing and Economic Land Availability Assessment (HELAA) from the B&NES call for sites are not appropriate for development. The Parish Council is therefore pleased that B&NES Council is maintaining the commitment in the public statement made by its leader Cllr Tim Warren in December 2016 that the “*current B&NES administration had no intention to allow housing development on Saltford's Green Belt in the Joint Spatial Plan [and by implication in the B&NES Local Plan]*”.

We remind B&NES Council that in March 2014, despite “*the substantial shortage of deliverable housing land in B&NES*” (although we understand the current situation is much improved with 7.35 years of deliverable housing land) the Secretary of State for Communities and Local Government refused planning permission for 99 new dwellings south of Manor Road for the following reasons:-

- “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."

There is no evidence or reason to suggest that situation has changed to make that or other sites or portions of Green Belt sites in Saltford, including any that are adjacent to Keynsham (see comment on Chapter 5, the North Keynsham SDL), acceptable or suitable for development. We therefore ask that B&NES Council adheres to good sustainable development principles and maintain the protection of Saltford's Green Belt. **If B&NES Council starts to consider any development proposals in Saltford for inclusion in the draft Local Plan Saltford Parish Council should be consulted at the earliest opportunity.**

Comments on Chapter 5: Keynsham

North Keynsham Strategic Development Location (SDL)

The proposed development option North Keynsham SDL is immediately adjacent to Saltford's Green Belt and in the draft outline map overlaps onto Saltford's Green Belt. We acknowledge that the North Keynsham SDL site boundary has not been set at this stage, including at the eastern edge of the SDL.

A boundary for this SDL that enters into the parish of Saltford, and thus onto Saltford's Green Belt, should it be adopted may require parish boundary changes for Keynsham and Saltford if the early proposals are adjusted and housing or industrial development overlaps onto Saltford (despite the presence of the high pressure gas main which should prevent such development). The *Local Government and Public Involvement in Health Act 2007* requires a community governance review (including a public consultation covering both communities) for a boundary change and B&NES Council would be required to take into account representations received in connection with the review. Saltford Parish Council would strongly resist a development incursion as we recognise that it would have negative consequences for both communities whilst breaking the commitment from B&NES Council not to allow development on Saltford's Green Belt.

The Green Belt between Keynsham and Saltford serves several important Green Belt purposes as identified by the NPPF (2018) and in particular the first four:-

- (a) to check the unrestricted sprawl of large built-up areas;
- (b) to prevent neighbouring towns merging into one another;
- (c) to assist in safeguarding the countryside from encroachment; and
- (d) to preserve the setting and special character of historic towns.

Protecting that Green Belt from development also supports the objective, and therefore the NPPF 5th purpose for the Green Belt, to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Exceptional circumstances need to be identified and proven to remove any of this land from the Green Belt for development.

Just as Saltford is a rural village that is set within and surrounded by an open landscape with the Green Belt designation to protect that landscape from unsuitable development, the same can be said for our neighbouring town, Keynsham.

Keynsham is a rural town; people like to live and work in Keynsham due to its semi-rural NE Somerset setting. The open fields that surround the town and the views of the Cotswold AONB hills are an essential part of what makes Keynsham a desirable place to live and work whilst helping to attract visitors to its restaurants, pubs, sporting other leisure facilities. Over development of the town puts all that at risk and would eventually merge Keynsham with Bristol and Saltford into one large continuous urban conurbation.

As Saltford's Green Belt, just like Keynsham's, is under constant pressure for development from developers it is imperative that both settlements retain their own Green Belt as a buffer to prevent the settlements merging and to preserve their individual rural setting and character.

There are strong concerns in both communities over the inability of local roads, in particular the A4 Bath Road and the roads leading to and from Keynsham High Street, to cope with traffic volumes at peak periods arising from existing housing developments as well as from traffic visiting or driving through from elsewhere. Time lost whilst commuters, local trades persons and visitors are stuck in grid locked traffic has an economic cost and the resulting air pollution has a health and social cost; hence the Air Quality Management Areas in Keynsham and Saltford.

Although as a general rule we are reluctant to comment on development proposals outside Saltford, if such proposals are highly likely to have a negative impact on Saltford it is incumbent on Saltford Parish Council to respond.

Before the draft Local Plan is produced we consider it necessary and appropriate that as these proposals for North Keynsham SDL directly affect Saltford's Green Belt, Saltford's elected representatives, i.e. Saltford Parish Council, are consulted directly on how North Keynsham SDL will affect Saltford and that B&NES Council discusses the layout plans for North Keynsham SDL and for the Avon Valley Wildlife and Adventure Park eastward relocation with Saltford Parish Council. It is our specific request that a development incursion into Saltford's Green Belt is avoided and that the plans be re-drawn as necessary to allow Keynsham to retain a Green Belt buffer within its border.

If however B&NES Council decides to retain its proposal to relocate Avon Valley Wildlife and Adventure Park eastwards and onto part of Saltford's Green Belt for the Local Plan we request that:-

- (i) The land containing all of the relocated Avon Valley Wildlife and Adventure Park remains as designated Green Belt land to protect against future inappropriate development and to help maintain Keynsham's Green Belt buffer.
- (ii) Saltford Parish Council is consulted on the design layout for the relocated Avon Valley Wildlife and Adventure Park.
- (iii) The Local Plan and subsequent planning permission should stipulate that:-
 - (a) in the interest of protecting and enhancing the local ecology, all new tree planting at Avon Valley Wildlife and Adventure Park shall be native tree species

ecologically appropriate to NE Somerset (Saltford Environment Group provides an online list at www.saltfordenvironmentgroup.org.uk/wildlife.html#trees), and

(b) all building structures associated with Avon Valley Wildlife and Adventure Park should be unobtrusive and to the west within a designated area of the park (to be agreed with Keynsham Town Council and Saltford Parish Council) to maintain the openness of the countryside and safeguard it from encroachment.

Some of Saltford and Keynsham's existing public footpaths are likely to be within the relocated Avon Valley Wildlife and Adventure Park. Compensatory public footpaths close to the relocated park should be created as the existing footpaths are part of a network of public footpaths that provide an important recreational facility enjoyed by residents of Saltford and Keynsham.

To help B&NES Council ensure that the Avon Valley Adventure and Wildlife Park in its proposed relocated site is planted only with native species ecologically appropriate to NE Somerset, Saltford Environment Group (SEG) has advised SPC that through its wildlife adviser (a Wildlife Surveyor and Wildlife Conservation Adviser) SEG is willing to provide some level of professional pro bono advice to support the ecological design of the park. In a local context the existing hedgerow on the far east of the site is, for example, a very important ancient, wide and dense hedge, with good floristic and structural diversity. That hedgerow should be protected against loss during and after any relocation eastwards of the Avon Valley Adventure and Wildlife Park.

We are aware that Keynsham as a community greatly values its Green Belt; in support of that factor and to adhere to sustainable development principles that meet environmental, social and economic objectives, we recommend that B&NES Council adopts a policy for Keynsham in its Local Plan that Keynsham should retain a Green Belt buffer zone surrounding the town within the town/parish boundary for the reasons given above in this response. This would ensure Keynsham continues to thrive as a rural town and remains a distinct and separate community from its neighbours, in particular Brislington, Bristol and Saltford.

If B&NES Council determines that development of Keynsham's Green Belt can be justified on environmental, economic, and social grounds there must be the provision of a **net environmental gain** to meet Government planning policies in the revised NPPF (2018) which specifically makes several references to the need to provide net environmental gain for development (at paragraphs 51, 72a, 102d, and 118).

It is reasonable to interpret "*net environmental gain*" as an improvement over and above the existing natural environment with a higher amount of natural habitat for wildlife including insects than prior to the development. That is more than simply the provision of a compensatory habitat. No evidence has been provided by B&NES that a net environmental gain can be provided alongside any of the developments proposed on Keynsham's Green Belt. This is a specifically important issue for B&NES over and above the consequences for the quality of life that green open spaces and attractive countryside provide for residents and visitors from neighbouring villages, towns and cities. This is because the Green Belt in B&NES has a role in providing ecosystem, i.e. natural capital, support to farmland and/or the wider natural environment in B&NES.

81% of B&NES is farmland compared to the national average of 57% yet only 5% of B&NES is natural or semi-natural land (heathland, natural grassland etc.) compared to a national average of 35% (data source: Dr Alasdair Rae, University of Sheffield, using Co-ordination of Information on the Environment (Corine) land use codes, 2017). Farmland requires the eco-system support (e.g. habitat for pollinating insects) of surrounding Green Belt and natural/semi-natural land to function. It would be irresponsible not to protect B&NES' natural/semi-natural land that underpins the economy of the B&NES and wider West of England area and our future food security in a changing climate made more critical by unmanaged population growth.

5.13 Review of existing policies for Keynsham

East Keynsham- Safeguarded land

We do not agree with the proposed approach of assigning the two safeguarded sites and deleting their safeguarded status at East Keynsham for inclusion within a new site allocation policy for the North Keynsham SDL.

Safeguarded Green Belt land was safeguarded for longer term development needs. That is if genuine need, not demand, for such new housing development remains after the developments in the Core Strategy have been satisfactorily completed.

We therefore strongly recommend and request that no further development be permitted at East Keynsham until and not before the effects caused by existing plans for development of the Green Belt in the B&NES Core Strategy have been experienced, assessed and remedied where found to be negative.

The existing traffic congestion in and around Keynsham affects people travelling to, from and through Salford and local roads leading towards Keynsham Town Centre, Salford's closest town, are increasingly grid locked. We consider that the existing road infrastructure will struggle to cope with new housing already planned for East Keynsham.

Despite the inclusion of the proposed new roads in and around the North Keynsham SDL further development at East Keynsham will result in the local road network having even higher levels of congestion and more instances of grid lock in and around Keynsham and on the A4 towards Bristol and through Salford towards Bath. The narrow back country lanes between Keynsham and Salford near Manor Road will be increasingly used as rat runs to avoid congestion putting at risk the equestrian use of the fields adjacent to the lanes, as well as increasing the level of traffic hazards for horse riders, walkers including those accessing Manor Road Community Woodland, and cyclists (including school children).

In objecting to planning applications 18/01509/OUT and 18/02899/OUT by developers in 2018 for these safeguarded parcels of land the B&NES Senior Highways Development Control Engineer referred to the fact that for both sites "the existing road network in the vicinity of the site has insufficient capacity to accommodate the increase in traffic likely to be generated by the proposed development."

The additional effect on congestion at peak periods from the new housing developments underway at East Keynsham and the Somerdale site is yet to be experienced on completion. The proposed new roads concept for North Keynsham, if approved and implemented prior to the proposed housing developments, may or may not relieve existing congestion. The risk

that congestion will get progressively worse with such further over-development in this area should not be discounted.

SPC welcomes the commitment (in WED 004A) that no housing will be completed at the North Keynsham SDL ahead of the Avon Mill Lane to A4 link, Keynsham rail station improvements and completion of the Metrobus route from Bristol to Keynsham on the A4 corridor. We recommend that after the proposed transport improvements are implemented and are in use, the North Keynsham SDL should be carefully developed using an incremental approach with the two safeguarded East Keynsham sites developed last, if at all, in response to need, not demand, for new housing. That approach can help ensure transport and other infrastructure is coping satisfactorily with new developments added in increments before additional and relatively significant volumes of new houses are built.

Saltford Parish Council

4th December 2018

Note: This consultation response has been produced jointly by Saltford Environment Group and Saltford Parish Council.