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Saltford Environment Group

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14 June 2019

Statement to the West of England Joint Spatial Plan Public Examination

Saltford Environment Group (SEG) response to:

Matter 7.1 – North Keynsham Strategic Development Location (SDL)

Summary & Key Points

The proposed North Keynsham SDL does not represent sustainable development.

If however this SDL is to proceed the following mitigating factors are recommended:-

- An incremental approach be taken to ensure (i) transport and other infrastructure is coping satisfactorily with new developments added in increments **before** additional and relatively significant volumes of new houses are built (i.e. an “infrastructure first” approach allied to intermediate tests to ensure unintended negative consequences have not arisen and that any problems are resolved before making matters worse), and (ii) the genuine need for continued new developments is tested and proven during the plan period.
- 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.
- New housing developments within the SDL and the relocated Avon Valley Wildlife and Adventure Park should be designed so as to contribute to a “significant environmental gain” (rather than a paltry net environmental gain) to help local ecology and wildlife recover from the significant losses of recent decades. Such an approach provides an opportunity to be an example of excellence in meeting environmental needs first to underpin social and economic needs.
- All development associated with this proposed SDL should meet the B&NES Council March 2019 cross-party decision to declare a climate emergency and that “B&NES is well-placed to champion both rural and urban decarbonisation through renewable energy, energy efficiency, smart energy development, zero carbon homes, local & sustainable food, sustainable travel, carbon sequestration”.
- The SDL should be Local Plan led (i.e. by the planning authority taking account of local democratically made decisions and agreements) and not developer led.

Sustainable development and future-proofing our future

As the purpose of the West of England JSP approach to housing development is primarily to serve the housing needs of Bristol, on sustainable development grounds it is not possible to justify development on Green Belt land surrounding Bristol including Bath and North East Somerset.

Such development contributes to increasing commuter travel, pollution and congestion when new homes should be built on brownfield sites closer to sources of employment, retail and leisure facilities. Such inappropriate development leads to the loss of the ecological support to farmland that the Green Belt can or does provide at a time when national and international concerns over wildlife species loss are at their highest (e.g. UN Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) report of May 2019 at www.ipbes.net).

The following inset provides the fundamental reason why the Green Belt in particular is important to both Bath and North East Somerset and the wider West of England area over and above the quality of life reason for protecting green spaces around and within our cities, towns and villages:-

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 ecosystem 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.

CPRE's annual *State of Brownfield* report 2019 shows that "*there is enough suitable brownfield land available in England for more than 1 million homes across over 18,000 sites and over 26,000 hectares*". The 215 Bristol brownfield sites on 120 hectares identified by CPRE's 2019 report provide a total minimum housing capacity of 9330 (the South Gloucs equivalent figures are 80 sites on 317 hectares with minimum housing capacity of 5231). It is not known if that takes account of the need to build medium rise housing in cities thus increasing the housing capacity of cities still further to reduce the need to build on irreplaceable Green Belt and green field sites.

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.

To remove any of this land from the Green Belt for development *exceptional circumstances* need to be identified and proven. SEG shares CPRE Avonside's concern (CPRE Avonside statement on Matter 2: Strategic Development Locations and Green Belt Exceptional Circumstances – Overarching issues and the Relationship between the JSP and Local Plans) that no "exceptional circumstances" have been given and that there has been no adequate and wholesale review of the Avon Green Belt, and there is no robust approach requiring and ensuring the use of brownfield land first.

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. Furthermore the health and well-being of city dwellers in Bristol and Bath benefit from the open green spaces surrounding and between those two major conurbations.

Over-development of the town puts all that at risk and would eventually merge Keynsham with Bristol and Saltford into one large 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 them from merging and to preserve their individual rural setting and character.

An incremental approach

The HM Treasury's monthly report (April 2019) on independent forecasts for the UK economy show a slowing of GDP growth moving forward whilst the constantly changing national and international factors affecting the UK's economic outlook towards the 2030s underline why it is unwise to give too much credence to economic growth forecasts when determining housing need (not demand) and that therefore a phased, i.e. incremental, approach to housing delivery should be undertaken.

Furthermore, an incremental approach to housing delivery is particularly relevant to the proposed North Keynsham SDL where the transport infrastructure in place in the Keynsham area now (2019) cannot cope with existing peak travel times as a result of recent new housing developments. That has a knock-on effect for Saltford where main and side roads become heavily congested at peak times and/or when small hold-ups occur on Keynsham's over used road system during commuter and school run periods with high levels of air pollution.

On 11.12.2018 SEG provided B&NES Council with a detailed consultation response to the B&NES Local Plan (2016-2036) Options Document. In summary, and notwithstanding our comments in this statement, if the North Keynsham SDL is to proceed SEG recommends 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.

SEG also recommended and requested in its response to B&NES Council that the land containing all of the relocated Avon Valley Wildlife and Adventure Park should remain as designated Green Belt land to protect against future inappropriate development and to help maintain Keynsham's Green Belt buffer. Furthermore SEG asked that Saltford Parish Council be consulted on the design layout for the relocated Avon Valley Wildlife and Adventure Park so that the opportunity can be taken to design the park and other related aspects of the SDL in a way that enhances our local ecosystems and wildlife habitat.

Enquiries

Enquiries concerning this statement should be addressed to:
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Saltford Environment Group, 14th June 2019