

Saltford Environment Group response to Local Plan Partial Update Options Consultation (Jan-Feb 2021) – Submitted online 4.2.2021

Development Management Policies

DM36 Amendments to Policy GB2 Development in Green Belt Villages.

Saltford Environment Group is concerned that loss of defined housing development boundaries (HDBs), i.e. the infill boundaries, from the policies map could lead to gradual loss of Green Belt from numerous minor ad-hoc development incursions into the Green Belt. Option 1 (retention) is thus preferred but if Option 2 is chosen, GB2 should be re-worded as follows to prevent inappropriate infilling and by including the Core Strategy policy on infilling as shown so that the definition of infilling in this context is clear and indisputable:-

“Development within villages in the Green Belt will not be permitted unless it is limited to infilling and in the case of residential development where it is limited to infill (or the redevelopment of previously developed land or replacement of dwellings). Infilling in this context is the filling of small gaps within existing development, e.g., the building of one or two houses on a small vacant plot in an otherwise extensively built-up frontage, the plot generally being surrounded on at least three sides by developed sites or roads.”

Addressing Housing Supply and proposed site allocations

Potential site allocations: Land at north and east Keynsham (including Policy KE3b)

Saltford Environment Group agrees with Saltford Parish Council’s response that Keynsham north and east is at risk of over-development taking account of the demands on transport and other services and the loss of green spaces around and within Keynsham as a whole arising from the recent developments authorised by the Core Strategy/Local Plan.

Further development here will spread the sprawl of Keynsham and Bristol closer towards Saltford and Bath, increase traffic congestion and reduce the availability and access to key services. This affects Keynsham itself and other communities adjacent to Keynsham. It is critical to ensure that transport and other infrastructure/services can cope satisfactorily before additional and relatively significant volumes of new houses are built.

Transport infrastructure improvements should precede any removal of safeguarded status to allow development for the two former Green Belt sites at Keynsham east as part of the North Keynsham SDL (Options 1 or 2) as traffic congestion at peak periods is already an issue of rising concern at east Keynsham and adversely affects neighbouring villages like Saltford and Corston.

SEG reminds B&NES Council that if those two sites are to be developed, such development should be in response to genuine need, not demand, for new housing that cannot be satisfied from use of vacant buildings (e.g., the repurposing of retail and offices) and underused previously developed land outside the Green Belt, i.e. in accordance with recent planning policy announcements as shown below in SEG’s response concerning Saltford HELAA sites, the continued protection of which are relevant to existing and proposed development of land north and east of Keynsham.

The Green Belt “buffer” around Keynsham (including between Keynsham and Saltford) should be protected to meet the Green Belt purposes described in the NPPF (2018). B&NES Council should therefore resist any new proposals arising from the Local Plan Partial Update

to remove and develop further parcels of Keynsham's Green Belt for the North Keynsham Garden Community Strategic Development Location (SDL).

Significant loss of Green Belt land has already incurred at east Keynsham from recent development in the Local Plan. To meet sustainable development objectives, further Green Belt land to provide transport infrastructure for development of the two safeguarded sites, if such development is sanctioned, should be avoided via an integrated approach to the layout design of this development so that it incorporates new transport infrastructure.

SEG agrees with Salford Parish Council's request that SPC should be consulted on the layout plans for the relocated Avon Valley Adventure and Wildlife Park in the proposed North Keynsham SDL with reference to its proposed incursion into Salford's Green Belt.

SEG shares SPC's objectives arising from the proposed relocation of the park:- protecting and enhancing local ecology through native tree species planting; protection of the existing wide and ancient hedgerow on far east end of the site; building structures to be on the west side of the park to maintain the openness of the countryside and safeguard it from encroachment; compensatory public footpaths for instances where existing footpaths are lost; and, importantly, that the park site be retained as Green Belt to (a) protect it from future re-development, and (b) maintain Green Belt open space between Keynsham and Salford.

HOUSING & ECONOMIC LAND AVAILABILITY ASSESSMENT (HELAA) 2021 UPDATE - SALTFFORD

The HELAA update including a review of Salford is relevant to the plans for land at north and east Keynsham (including Policy KE3b).

The Green Belt between Keynsham and Salford and the Green Belt around Salford continues to serve the Green Belt purposes as identified by the NPPF (2018), and even more so following recent development on the (former) Green Belt at east Keynsham. SEG remains strongly opposed to the development of Salford's Green Belt and therefore welcomes and supports B&NES Council's proposals not to release parcels of Salford's Green Belt in the Local Plan Partial Update.

The reasons for not developing the 9 Salford sites assessed in 2018 for the 2019 HELAA remain valid. Note: The 9 Salford sites are SAL1, SAL1a, SAL2, SAL3, SAL4, SAL5, SAL27B, SAL27C and SAL28 together with the Salford parcel of Green Belt land within the eastern side of Keynsham site K29Z (for relocating the Avon Valley Adventure and Wildlife Park). Other planning reasons against development additional to NPPF, specific to different sites as acknowledged by B&NES Council in the 2019 HEELA, include the high-pressure gas pipeline, Bath's World Heritage site status setting, and Manor Road Community Woodland (identified by B&NES as a Local Nature Reserve).

Further key policy announcements made in 2020 rule against development of the Green Belt around Salford :-

- (i) The **B&NES Council declaration of an ecological emergency** in July 2020 included the commitment to "resist the destruction of habitats through planning policy and development management" and to "encourage greater biodiversity", for example "through the promotion of grassland habitat diversity".
- (ii) **WECA's aim** (Spatial Development Strategy consultation November 2020) to be "carbon neutral by 2030 and ensure that nature and wildlife can also benefit" -

made in the context of a growing local, national and international awareness that nature is under severe threat.

- (iii) The **Ministry of Housing Communities & Local Government (MHCLG)** announced in December 2020 that cities will be encouraged to make the most of vacant buildings and underused land to protect green spaces whilst the Covid-19 pandemic had created a generational opportunity for the repurposing of offices and retail as housing and for urban renewal.

B&NES Council has an obligation and responsibility to protect the Green Belt for the potential eco-system support for nature and biodiversity it can provide helping to underpin food production and food security, whilst open green space has recreational and quality of life value for local communities, a value heightened by the COVID-19 pandemic. Taking those factors into account, the combined environmental, societal and economic value of the Green Belt far outweighs any short-term economic gain from its development, development that would be contrary to sustainable development principles and NPPF.

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