

Consultation on the B&NES Local Plan (2016-2036) Options Document (November 2018 – January 2019)

Part 1. Contact details

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I can confirm that I would like to be on the **Planning Policy Mailing List** and receive updates about future consultations on Planning Policy documents including the Local Plan. I am aware that I can unsubscribe at any time.

Part 2: Which proposed policy approach/option in the Options document (November 2018) are you commenting on?

NOTE: SEG assisted Saltford Parish Council in the production of its response to this consultation. Both organisations share similar policies concerning development planning and the Green Belt in Saltford and within the wider B&NES area including the need for Keynsham and Saltford to each retain their own Green Belt buffer. Many of the comments in this response will therefore be similar. SEG can additionally provide some level of professional pro bono wildlife advice concerning the design plans for the relocated Avon Valley Adventure and Wildlife Park such as planting with native species ecologically appropriate to NE Somerset.

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

8.12 Housing in Green Belt Villages

SEG agrees with the simplified the definition (DM10) of limited infill in Green Belt villages as 'The filling of small gaps within existing development in an otherwise extensively built up frontage.'

SEG 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. SEG therefore supports B&NES Council in maintaining its commitment made in the public statement by its leader Cllr Tim Warren in December 2016 that the "*current B&NES administration has 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. **We support the request from Saltford Parish Council that 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, and contains a housing development in Saltford should it be adopted may require parish boundary changes for Keynsham and Saltford. However, the presence of the high pressure gas main should prevent such development.

SEG would join Saltford Parish Council in strongly resisting a housing or industrial 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. To remove any of this land from the Green Belt for development exceptional circumstances need to be identified and proven.

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 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 gridlocked 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 SEG is reluctant to comment on development proposals outside Saltford, if such proposals are likely to have a negative impact on Saltford SEG will respond with the objective of preventing or mitigating the negative effects of such proposals.

SEG agrees with Saltford Parish Council that 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.

Due to the importance of protecting Saltford's Green Belt from a development incursion for the planning reasons given above, the plans for the North Keynsham SDL should 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 support the request from Saltford Parish Council 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.* Note: *See our comment below re. developing the wildlife aspect of this park as an environmental gain for native and ecologically appropriate habitat.*

(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. * Note: See our comment below re. developing the wildlife aspect of this park as an environmental gain for native and ecologically appropriate habitat.

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 should be created whilst avoiding a negative impact on wildlife 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.

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 support Saltford Parish Council's recommendation 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).

"Net environmental gain" requires an improvement over and above the existing provision of natural environment, i.e. more than simply "no net loss", with a higher amount of habitat value for wildlife including insects than prior to the development. 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 support, i.e. natural capital, to farmland and/or the wider natural environment in B&NES (see explanation in box below).

However the design of the relocated **Avon Valley Adventure and Wildlife Park** does provide an opportunity to make a limited improvement to the local ecology. In seeking to meet the objective of net environmental gain arising from the North Keynsham SDL, some positive actions are possible. For example SEG encourages the planting of native species in Saltford to help provide wildlife habitat and, **as the Avon Valley Adventure and Wildlife Park in its proposed relocated site will be partly within Saltford, we ask that it is planted only with native species**

ecologically appropriate to NE Somerset. That could contribute to the achievement of net environmental gain through providing habitat more suitable for local wildlife than might come from ecologically inappropriate plantings. This could be incorporated as a positive feature and enhanced visitor attraction of the park in the future. SEG through its wildlife adviser (a Wildlife Surveyor and Wildlife Conservation Adviser) is willing to provide some level of professional pro bono advice to support the ecological design of the park. The extent to which this will be required to meet net gain can be determined only after an assessment of development-induced wildlife losses.

Any buildings associated with the park as they would be within the Green Belt should be located as far west as possible (as requested at (iii) above). The design of these buildings as well as other buildings in the North Keynsham SDL should incorporate design features suitable for providing habitat for endangered native wildlife species such as Otters, Bats, Swifts, House Martins and Swallows etc. 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, reduction or degradation during and after any relocation eastwards of the Avon Valley Adventure and Wildlife Park.

Ensuring that the tree and other plants etc. are native to NE Somerset and that the building design provides suitable wildlife habitat can reduce the risk that this aspect of the North Keynsham SDL will diminish local wildlife value. A condition on the planning permission for the park should identify a restricted area on the west side of the site where buildings may be constructed and not in any other part of the park, and that all initial and future building work and fauna planting should meet strict ecological standards set at the outset of this project.

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 (- see the final paragraph below recommending an incremental approach after transport infrastructure improvements have been made).

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 support Saltford Parish Council's recommendation 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 Saltford and local roads leading towards Keynsham Town Centre, Saltford'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 Saltford towards Bath. The narrow back country lanes between Keynsham and Saltford near and including 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.

SEG 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 agree with Saltford Parish Council's recommendation 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 Environment Group
11th December 2018