

**Submission from Saltford Parish Council to the Appeal Inquiry (ref APP/F0114/W/19/3230009) for the Mactaggart & Mickel Homes Ltd application 18/01509/OUT to build 200 homes etc. on the safeguarded Green Belt land between Saltford and Keynsham**

In submitting this statement of case to the Planning Appeal Inquiry, Saltford Parish Council (SPC) makes its strong objection to this proposed development for the following reasons:

- Paragraph 15 of NPPF 2018 states that “the planning system should be genuinely plan-led” and that those local plans should provide a “platform for local people to shape their surroundings.” The attempt by the appellant to gain planning permission on safeguarded Green Belt land against the wishes of local people and their local planning authority goes against the spirit and intention of the Government’s planning policy for a plan-led, not developer-led, planning system.
- There are no exceptional circumstances to bring forward the development of this safeguarded Green Belt land at a time when significant volumes of new housing is already being constructed in the local area as part of the B&NES Core Strategy adopted in July 2014. The full effects of new housing currently under construction have not yet been felt on local transport and other infrastructure yet already Keynsham and roads from Saltford to Keynsham are heavily congested at peak periods to the detriment of residents, local schools and businesses.
- The 2014 Core Strategy is currently being updated with local consultation to form the new B&NES Local Plan 2016-2036; it is therefore premature and disruptive to the plan-led local planning process for a developer to attempt to overrule local plans to suit its own convenience. The 2014 Core Strategy stated that this land is “safeguarded for possible development in the future” and that “development of this land will be permitted only when allocated for development following a review of the plan.” The new Local Plan currently under separate discussion is that review; it is unreasonable to compromise and interrupt that review, the production of the new Local Plan, through this premature planning application.
- The 330 objections submitted to B&NES Council to this planning application prove that the local community has serious concerns about the impact of the proposed development on the local environment, transport infrastructure and other services. These and the forthcoming Local Plan must be a key factor in the decision making process to protect any democratic integrity in a plan-led planning system. It is for local planning authorities via their Local Plans produced in consultation with the communities they directly affect, that should decide when and where new developments should be built, not developers.

SPC agrees with the fundamentally important objection from the Senior Highways Development Control Engineer at B&NES Council who made it clear that 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.

Whilst the appellant may dispute the effect on transport, and different modelling and measurements used selectively might produce an indicative theoretical effect on local transport congestion or movement that fits the case for adding further traffic as a result of new housing developments, that would not necessarily be borne out in practice.

It thus follows that the views of local Town and Parish Councils and other local representative bodies who are in regular contact with residents that experience traffic flows on a daily basis should be given higher value and relevance in the decision making process than the case put forward by a developer lacking local experience but with a financial interest rather than a local community interest in refuting the local knowledge of those who actually live with the consequences of poor planning decisions.

The fact, as evidenced by 330 objections, that the existing road infrastructure will struggle to cope with other new housing already planned for East Keynsham and that the local road network will be even more seriously congested by this proposal should it be allowed to proceed must not be overlooked if there is to be a genuine plan-led approach to planning. Local roads already experience regular congestion at peak periods; the effect of adding more traffic is a matter of serious concern to local residents, schools and businesses already heavily inconvenienced by traffic congestion with fears that levels of air pollution will rise again. Salford has an Air Quality Management Area due to the effects of congestion backing up through the village from Keynsham resulting in periodic levels of dangerously high NOx levels being reached.

SPC therefore supports the Senior Highways Development Control Engineer's statement that the proposal is contrary to Policies KE3b (safeguarded land) and ST7 (traffic management proposals) of the B&NES Placemaking Plan, and contrary to paragraph 32 (transport statement/assessment support for significant developments) of the NPPF.

SPC has made its own representations in the Local Plan consultation process that any development of this safeguarded land should be after infrastructure including transport, education provision and other local services, is already in place and found to be coping with existing and new demands placed on it.

SPC also places great store on the case that any consideration for development of this site for new housing be considered if a **genuine need not demand** for further new housing remains after the other Core Strategy and Local Plan developments have been completed.

**In conclusion**, SPC asks the Inspector to support a plan-led approach to planning where local views shape the development of local communities by rejecting the appeal and refusing to grant planning permission.

**Salford Parish Council**

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6<sup>th</sup> August 2019