

SPC response to Local Plan Partial Update Options Consultation

(resolved 02/02/2021)

Development Management Policies

DM36 Amendments to Policy GB2 Development in Green Belt Villages.

Saltford Parish Council prefers Option 1 to retain the defined housing development boundary (HDB) as the infill boundary. Any change to an existing HDB following an assessment would need to be in exceptional circumstances as the HDB presently serves the purpose of identifying the Green Belt boundary beyond which development is not normally permitted.

Unless carefully re-worded, Option 2 carries the potential risk of numerous attempts to develop the Green Belt in a non-strategic, piecemeal approach following the removing of HDBs from the Policies Map. SPC therefore requests that if, despite SPC's reservations, B&NES Council decides to adopt Option 2 in preference to Option 1, GB2 be re-worded to prevent inappropriate infilling by including the Core Strategy policy on infilling so that the definition of infilling in this context is clear and not subject to dispute. If Option 2 is chosen, Policy GB2 should be reworded to read as follows (PLEASE NOTE the use of the term "within villages" rather than "in villages" is deliberate to help further prevent villages expanding outwards thereby eroding the Green Belt) :-

“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). *For the avoidance of doubt, 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 Parish Council is concerned 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 new developments authorised by the existing Local Plan.

In addition to spreading the sprawl of Keynsham and Bristol closer towards Saltford and Bath, this impacts negatively on Keynsham itself and neighbouring communities like Saltford. These impacts include increased traffic congestion and reduced availability and access to key services. The need to ensure transport and other infrastructure/services can cope satisfactorily BEFORE additional and relatively significant volumes of new houses are built must be a determining factor.

Traffic congestion at peak periods is already an issue of rising concern at east Keynsham. 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) needs to be preceded by appropriate transport infrastructure improvements.

Furthermore, those two sites should only be developed, if at all, 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. That approach would be in accordance with recent Government planning policy announcements – as described in our HELAA LPPU comments (below).

The Green Belt “buffer” around Keynsham (including between Keynsham and Saltford) should be protected in accordance with its purposes in the NPPF (2018). SPC therefore asks B&NES Council to 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).

Taking account of the significant loss of Green Belt land already incurred at east Keynsham from recent development in the Local Plan, further Green Belt land to provide transport infrastructure for development of the two safeguarded sites would not represent sustainable development. An integrated approach to the layout design of this SDL that incorporates new transport infrastructure should be adopted and required to avoid such an outcome.

SPC reminds B&NES Council of its request (4.12.2018) to 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 Saltford’s Green Belt. SPC’s particular interests arising from the proposed relocation of the park are:- 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 that the park site be retained as Green Belt.

Housing and Economic Land Availability Assessment (HELAA) 2021 Update (LPPU)

Saltford Parish Council remains strongly opposed to the development of Saltford’s Green Belt and therefore welcomes and supports B&NES Council’s proposals not to release parcels of Saltford’s Green Belt in the Local Plan Partial Update.

The reasons for not developing the 9 Saltford sites assessed in 2018 remain valid. Those 9 sites are SAL1, SAL1a, SAL2, SAL3, SAL4, SAL5, SAL27B, SAL27C and SAL28 together with the Saltford parcel of Green Belt land within the eastern side of Keynsham site K29Z (for relocating Avon Valley Adventure and Wildlife Park rather than built development whilst, at SPC’s request, retaining its Green Belt status).

The Green Belt between Keynsham and Saltford continues to serve the Green Belt purposes as identified by the NPPF (2018). As appropriate to each specific site, 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), also continue to provide planning reasons not to develop those sites as acknowledged by B&NES Council in the 2019 HEELA.

Since 2019 there have been further key policy announcements that rule against development of the Green Belt around Saltford :-

- (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) 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.

Those planning policy statements together with **WECA's aim** (Spatial Development Strategy consultation November 2020) to be carbon neutral by 2030 and ensure that nature and wildlife can also benefit, were made in the context of a growing local, national and international awareness that nature is under severe threat.

It thus follows that **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.