

TOP SHEET

B&NES Local Plan Options Consultation 12 February to 8 April 2024

Response from Saltford Parish Council (resolved by SPC on 5.3.2024)

The attached responses to B&NES Council from Saltford Parish Council are for the following Sections of the Local Plan Options Consultation :-

Chapter & Section	Response from SPC
Chapter 5 "Bath (Area 1)" Section: South of Burnett, next to A39 (potential site)	Comment
Chapter 6 "Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)" Section: Keynsham and Saltford: Area overview	Partially Object
Chapter 6 "Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)" Section: Keynsham and Saltford: Transport opportunities	Partially Object
Chapter 6 "Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)" Section: Keynsham and Saltford: Site options - Site Option: North Keynsham	Partially Object
Chapter 6 "Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)" Section: Keynsham and Saltford: Site options - Site Option: West Saltford	Strongly Object
Chapter 6 "Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)" Section: Keynsham and Saltford: Site options - Site Option: South Saltford	Strongly Object
Chapter 6 "Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)" Section: Keynsham and Saltford: Site options - Site Option: SE Keynsham	Strongly Object
Chapter 9: "Development management policy options" Section: Green Belt	(Option B)

Saltford Parish Council
www.saltfordparishcouncil.gov.uk
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Chapter 5 “Bath (Area 1)”

Section: South of Burnett, next to A39 (potential site)

Response from Saltford Parish Council (resolved by SPC on 5.3.2024)

Question 1 Do you think we should explore the potential for longer-term development in this location? Please explain your reasons.

Saltford Parish Council acknowledges that new settlements are recommended by NPPF (December 2023) at para. 74, and have the potential to provide a much more acceptable Local Plan if B&NES Council chose one or two big new site(s) where new infrastructure can follow "garden city" principles as recommended in NPPF (December 2023) at para. 74c.

However, before providing an opinion on its suitability for a large development in the longer-term for this particular Green Belt location on Saltford's southern border, SPC would need to see more detailed proposals so that we can see potential impacts of proposals for local issues including:

- transport connectivity that includes taking account of the lack of capacity in Saltford and Keynsham;
- likely impact on Saltford's roads, lanes and footpaths including those used for recreation (walking and cycling);
- ecology of woodlands on the south side of Saltford (e.g. wildlife connectivity between Longwood, Folly Wood and Stantonbury Hill); and
- proposals for biodiversity net gain.

SPC therefore requests that it be kept informed and consulted on work by B&NES Council when the Council further explores this potential location for longer-term development.

If B&NES explores this option further, it should be designed and built on sustainable development principles with easy access to employment, leisure, health services and retail facilities as well as good public and road transport links to the larger cities, whilst limiting the need to travel as part of the overall design. Local recreational space (e.g. public park) for the new inhabitants and a biodiversity net gain should be factored in.

Can you suggest other ideas we should consider?

See our answer to Section: Keynsham and Saltford: Area overview in Chapter 6 “Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)” where we list several brownfield sites in the Bath area and elsewhere, i.e. where the new job opportunities are likely to be situated and thus new housing developments should be located if people are to walk and/or cycle to work. The former WWII RAF base at Charmy Down is a 90ha brownfield site, for example, that could be the perfect site for a Market Village along the lines of Poundbury.

Do you have any evidence or documentation that you would like to upload, to support your answer?

No.

Name: Saltford Parish Council **Email:** clerk@saltfordparishcouncil.gov.uk

Chapter 6 “Keynsham, Salford, Hicks Gate and Whitchurch Village (Area 2)”

Section: Keynsham and Salford: Area overview

Response from Salford Parish Council (resolved by SPC on 5.3.2024)

Do you support this approach?

~~Strongly support~~

~~Partially support~~

~~Neither support or object~~

Partially object <<

~~Strongly object~~

Please say why, and add any extra comments about this policy that you would like to make.

Salford Parish Council requests that our Local Planning Authority accepts and implements its landscape designation request for Salford’s Green Belt submitted in January 2023, reaffirmed in January 2024 when the Parish Council expressed its willingness to accept a “NE2a Landscape Setting of Settlements” designation, rather than AGLV, and further explained this request by letter to the B&NES Cabinet in February 2024. To accept this request would reflect the strongly held wishes of Salford’s local community and provide a more permanent protection of Salford’s Green Belt for the health and wellbeing of residents and visitors and to protect and enhance nature.

A detailed evidence and landscape character assessment paper for all of Salford’s Green Belt “The Salford Area of Great Landscape Value - Planning Policy and Character Appraisal by Salford Parish Council (March 2024)” is attached. It underlines the importance of the landscape designation request so that Salford Parish Council can make representations to the Local Plan process and/or to the Secretary of State on this important matter for our community. The Parish Council shall seek direct discussion with B&NES Council Planners on this specific matter.

The Parish Council reminds B&NES Council that the December 2023 update of the NPPF was specifically intended to avoid removal of land from the Green Belt to meet housing need. The Secretary of State said in his official statement launching the NPPF, “the Government is ensuring it is clear there is generally no requirement on local authorities to review or alter Green Belt boundaries if this would be the only way to meet housing need.”

Furthermore, the Environment Act 2021 and its Environmental Principles Policy Statement (EPPS) from 1st November 2023 puts an even greater emphasis on protecting the natural environment in the NPPF. Yet this is not reflected in the options proposed. B&NES Council is apparently willing to surrender Green Belt land to development to meet housing need and not comply with the spirit and intent of the Government’s national planning and environmental policies under the NPPF (December 2023) and the Environment Act 2021.

The fundamental aim of Green Belt policy in the NPPF is “to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” To remove land from the Green Belt for development in the Local Plan would represent a failure of trust by B&NES Council to the local communities adversely affected.

The NPPF (December 2023, Chapter 11) recognises that the availability of agricultural land for food production is a consideration in planning; likewise the function of undeveloped land for food production is also recognised. 81% of Bath and NE Somerset is farmland (University of Sheffield data). Farmland requires the ecosystem support (e.g., habitat for pollinating insects) of surrounding undeveloped Green Belt and natural/semi-natural land to function. B&NES Council should acknowledge and promote the fact that Bath and NE Somerset does and can have an increasingly important role in the nation’s food production capacity and future food security, hence its Green Belt should be protected from development.

The economy cannot function without a healthy natural environment. It would be irresponsible to locate new developments on B&NES' natural/semi-natural land that underpins the economy of B&NES and the wider West of England area. It is patently not sustainable development to compromise our future food security by placing new developments in open countryside, green fields and Green Belt land. Food security and local food production by implication need to be key aspects of land use planning.

Can you suggest alternatives that you think we should consider?

NEW SETTLEMENT

As recommended by NPPF (December 2023) at para. 74, these new settlements would provide a much more acceptable Local Plan if B&NES Council chose one or two big new site(s) where new infrastructure can follow "garden city" principles as recommended in NPPF (December 2023) at para. 74c. This would be designed and built on sustainable development principles with easy access to employment, leisure, health services and retail facilities as well as good public and road transport links to the larger cities, whilst limiting the need to travel as part of the overall design.

This would be much less harmful overall than the current approach by B&NES Council of the over-developing and ruining of existing settled communities by adding additional housing developments to meet housing targets that put such a strain on local services, congest local roads and remove the last remaining parcels of green space that are so important for residents' health and wellbeing and local wildlife habitat.

BATH & ELSEWHERE

The identified need for new housing going forward is in Bath not Saltford. If people are to walk and/or cycle to work new housebuilding should be where the jobs are.

The construction of so many student properties in Bath that are so far from their respective University campuses is not helping the situation. The student let market is in direct competition for development space and B&NES Council's declared commitment to build affordable housing within the city.

The predicted growth in jobs and need for new housing in Bath, is likely to be mainly in the academic, care, retail and hospitality sectors (as these are the main employers in Bath). The workers in these new roles are likely to be looking for affordable housing, which in turn will aid staff retention.

Due to the need for affordable housing provision in Bath, B&NES Council is strongly advised to follow the European model of encouraging and/or providing incentives for developers to convert existing buildings, including large terraced residential properties, and unused retail and commercial buildings to apartments for sale or rental. This might include the sympathetic conversion of some of Bath's Georgian buildings.

Potential brownfield sites in Bath and elsewhere (SPC recognises that B&NES Council has already identified some of these as potential sites for development) :-

- The former WWII RAF base at Charmy Down: this 90ha brownfield site could be the perfect site of a Market Village along the lines of Poundbury;
- The former Print Press on the Lower Bristol Road, this site could easily incorporate retail with residential uses above;
- The remaining garage businesses along the Lower Bristol Road, whose sites sit within the original consented BWR OPA, there is no need for inner-city car sales outlets as the model for car ownership evolves;
- The Westmark site on the junction of the Windsor Bridge Road and the upper Bristol Road;
- The former (Hartwells) garage and car dealership across from Charmouth Road, on the Upper Bristol Road, which has been derelict for years;

- Derelict land at the end of Church Road in Bathford;
- The council depot off Entry Hill, Bath, which has been under-used for years;
- Derelict land adjacent to the B&NES Recycling depot in Radstock;
- Swathes of disused former NCB buildings/land in Midsomer Norton (Station Road); and
- Swathes of disused former NCB buildings/land in Radstock (land at the end of Tynning Hill)

The report from CPRE "*State of Brownfield 2022*" on the state of brownfield in England found that local councils' registers of brownfield land show over 1.2 million homes (up from 1.05 million in 2018) could be built on 23,000 sites covering more than 27,000 hectares of previously developed land (compared to 21,500 sites on 26,250 ha in 2021). Just 45% of available housing units have been granted planning permission and 550,000 homes with planning permission are still awaiting development.

Most brownfield land still does not have a current planning permission. The minimum housing capacity on brownfield for the South West region is 71,452 homes with just 56% having received planning permission.

Notwithstanding this, many developers have consented schemes on brownfield sites, or options on brownfield sites, but are reluctant to progress these challenging/costly sites (other than creating the site access so that they are deemed to have commenced construction) whilst they can obtain consent on greenfield schemes.

Do you have any evidence or documentation that you would like to upload, to support your answer?

YES :- "The Salford Area of Great Landscape Value - Planning Policy and Character Appraisal by Salford Parish Council (March 2024)" NOTE: This document is also relevant to other Sections that SPC is responding to.

Name: Salford Parish Council **Email:** clerk@salfordparishcouncil.gov.uk

Chapter 6 “Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)”

Section: Keynsham and Saltford: Transport opportunities

Response from Saltford Parish Council (resolved by SPC on 5.3.2024)

Do you support this approach?

Strongly support

Partially support

Neither support or object

Partially object <<

Strongly object

Please say why, and add any extra comments about this policy that you would like to make.

The WECA initial options recently consulted on (upgrades to the A4 Bath to Bristol corridor, range of proposed “improvements” for active travel modes and bus services including a bus lane on the Keynsham bypass) have proved unrealistic, likely to make congestion worse and, Saltford Parish Council understands, have been withdrawn.

Can you suggest alternatives that you think we should consider?

Re-opening Saltford Station would be a sustainable transport solution and alternative to car travel. It would contribute to relieving some of the congestion at peak times on the Bath Road A4 that is a result of existing over development. Saltford Parish Council welcomes the West of England Mayor’s commitment in December 2023 to a new WECA study that will consider the feasibility and business case for Saltford station.

Do you have any evidence or documentation that you would like to upload, to support your answer?

No.

Name: Saltford Parish Council **Email:** clerk@saltfordparishcouncil.gov.uk

Chapter 6 “Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)”

Section: Keynsham and Saltford: Site options

Site Option: North Keynsham

Response from Saltford Parish Council (resolved by SPC on 5.3.2024)

Do you support this approach?

Strongly support

Partially support

~~Neither support or object~~

Partially object <<

Strongly object

Please say why, and add any extra comments about this policy that you would like to make.

Saltford Parish Council is concerned that adding such a large mixed development that includes a further 1,500 dwellings to Keynsham at this location on an area where the flood plain is likely to expand due to increasing heavy rainfall events arising from climate change, will put yet further unsustainable pressure on local roads in Keynsham. This will affect neighbouring communities including Saltford as traffic backs up during peak time congestion on roads leading onto the Bath Road A4 as well as this heavily used main transport route itself.

Keynsham lacks sufficient public parks to cater for such a large increase in residents; this will put additional and potentially harmful pressure on neighbouring green spaces and wildlife habitats.

Closing the gap between the north side of Saltford and Keynsham North will harm the openness and setting of this area of Green Belt land.

B&NES Council should consider what the overall limit of development is that Keynsham can take to enable local services to meet residents' needs, prevent Keynsham's merger with Bristol and Saltford, and not cause further harm to the health and wellbeing of residents through the loss of green open space whilst leaving sufficient space for nature in the ecological emergency.

Can you suggest alternatives that you think we should consider?

Yes. See SPC's response to the Section "Keynsham and Saltford: Area overview."

Do you have any evidence or documentation that you would like to upload, to support your answer?

No.

Name: Saltford Parish Council **Email:** clerk@saltfordparishcouncil.gov.uk

Chapter 6 “Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)”

Section: Keynsham and Saltford: Site options

Site Option: West Saltford

Response from Saltford Parish Council (resolved by SPC on 5.3.2024)

Do you support this approach?

Strongly support

Partially support

~~Neither support or object~~

~~Partially object~~

Strongly object <<

Please say why, and add any extra comments about this policy that you would like to make.

Saltford's Green Belt, part of the Bristol and Bath Green Belt, helps restrict urban sprawl that would otherwise merge Bristol with Bath. The unwelcome precedent from the creation of new housing developments on Saltford's Green Belt land would undermine that important planning constraint that helps Bristol and Bath maintain their unique identities and provides surrounding green open spaces that are essential for protecting the quality of life for city dwellers.

Saltford is classified as a Rural Area RA1 village in the B&NES Placemaking Plan 2017, i.e. development will be acceptable within and adjoining the housing development boundary on land outside the Green Belt. Further new housing developments on Saltford's Green Belt land would contravene policy RA1.

The Secretary of State's assessment and precedent for refusing development of Saltford's Green Belt was set on 4th March 2014 when the Secretary of State for Local Government and Communities, Eric Pickles, dismissed the appeal and REFUSED planning permission for the Crest Nicholson planning application to build up to 99 dwellings on Saltford's Green Belt fields south of Manor Road that he described as "proposals for significant development in the Green Belt".

In reaching his decision, the Secretary of State said, "the proposed development would result in an unacceptable reduction of the Green Belt in that area." He was also "mindful that 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."

In dismissing the appeal and refusing planning permission and taking into account "the substantial shortage of deliverable housing land in B&NES" (in 2014) the Secretary of State "identified harm to the Green Belt's openness and harm to the Green Belt's purpose of preventing encroachment into the countryside". He attached "considerable weight" about the "extent of that encroachment" and that this "represents considerable harm, to which he attributes substantial weight." There are no exceptional circumstances to change that assessment whether for West Saltford or for South Saltford.

Access for residents to Saltford's riverside areas during sunny warm weekends and holiday periods is already reduced by high visitor numbers. Losing local green space and footpaths to development will cause considerable harm to the health and wellbeing of residents whilst increasing demand for a limited resource. The overall increased demand for the remaining open green space will place further harmful pressure on local wildlife habitat.

The Bath Road A4, cannot take more housing. Recent new housing developments have resulted in prolonged periods of heavy traffic congestion during peak times and when roadworks, an accident or vehicle breakdowns occur. This harms the economy and makes local travel increasingly difficult and unreliable for important journeys including to the GP, school collections, employment, etc.

The narrow lanes between Keynsham and Saltford used for rat-running to avoid congestion on the Bath Road A4 will become less safe or usable for walkers and cyclists (including school children). These narrow lanes are regularly used by walkers for recreational use, horse riders, cyclists and by school children walking or cycling to and from school. They lack footpaths and there is a shortage of passing places so pose a danger to those users whilst being single lane in many places they quickly become congested when used for avoiding congestion problems on the Bath Road A4.

Saltford's Green Belt rich mix of habitat for nature is important for a wide-ranging richness of wildlife. In the ecological emergency it should be protected and enhanced, not built on.

Observing wildlife in the open countryside is important for the health and wellbeing of residents and visitors. Such a loss of access and habitat for wildlife to development as proposed by the West or South Saltford options will cause considerable harm.

Losing agricultural land to development would show a lack of foresight and be irresponsible during the ecological emergency and when the UK obtains 40% of its annual net food requirements from overseas that in itself is unsustainable against a background of climate change increasingly causing crop failures, conflict and population growth.

Saltford, now a large rural village, has already undergone significant development since the 1950s and 1960s. Since 1961 Saltford has grown by 36% from a population of 3,044 in 1961 to 4,133 in 2021. Saltford grew by a significant 58% between 1951 (at 1,928) and 1961 (at 3,044) and by a massive 114% from 1951 to 2021 (source: census data).

Saltford has reached the peak of its growth potential if it is to retain its rural countryside setting without drastically reducing the quality of life for existing and potential new residents moving into new housing developments whilst having a negative impact on neighbouring settlements (including Keynsham, Corston, and Newton St Loe) as well as further reducing the open green spaces outside the city boundaries desired by Bristol and Bath residents alike.

Can you suggest alternatives that you think we should consider?

Yes. See SPC's response to the Section "Keynsham and Saltford: Area overview."

Do you have any evidence or documentation that you would like to upload, to support your answer?

YES :- "The Saltford Area of Great Landscape Value - Planning Policy and Character Appraisal by Saltford Parish Council (March 2024)" NOTE: This document is also relevant to other Sections that SPC is responding to.

Name: Saltford Parish Council **Email:** clerk@saltfordparishcouncil.gov.uk

Chapter 6 “Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)”

Section: Keynsham and Saltford: Site options

Site Option: South Saltford

Response from Saltford Parish Council (resolved by SPC on 5.3.2024)

Do you support this approach?

~~Strongly support~~

~~Partially support~~

~~Neither support or object~~

~~Partially object~~

Strongly object <<

Please say why, and add any extra comments about this policy that you would like to make.

Saltford's Green Belt, part of the Bristol and Bath Green Belt, helps restrict urban sprawl that would otherwise merge Bristol with Bath. The unwelcome precedent from the creation of new housing developments on Saltford's Green Belt land would undermine that important planning constraint that helps Bristol and Bath maintain their unique identities and provides surrounding green open spaces that are essential for protecting the quality of life for city dwellers.

Saltford is classified as a Rural Area RA1 village in the B&NES Placemaking Plan 2017, i.e. development will be acceptable within and adjoining the housing development boundary on land outside the Green Belt. Further new housing developments on Saltford's Green Belt land would contravene policy RA1.

The Secretary of State's assessment and precedent for refusing development of Saltford's Green Belt was set on 4th March 2014 when the Secretary of State for Local Government and Communities, Eric Pickles, dismissed the appeal and REFUSED planning permission for the Crest Nicholson planning application to build up to 99 dwellings on Saltford's Green Belt fields south of Manor Road that he described as "proposals for significant development in the Green Belt".

In reaching his decision, the Secretary of State said, "the proposed development would result in an unacceptable reduction of the Green Belt in that area." He was also "mindful that 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."

In dismissing the appeal and refusing planning permission and taking into account "the substantial shortage of deliverable housing land in B&NES" (in 2014) the Secretary of State "identified harm to the Green Belt's openness and harm to the Green Belt's purpose of preventing encroachment into the countryside". He attached "considerable weight" about the "extent of that encroachment" and that this "represents considerable harm, to which he attributes substantial weight." There are no exceptional circumstances to change that assessment whether for West Saltford or for South Saltford.

The traffic generated by this proposed development option would need to pass through existing residential roads.

To build houses either side of Longwood and put a road through this long-standing woodland would ruin this important local wildlife habitat and be contrary to B&NES Council's planning policies due to Longwood's protective NE2a landscape setting designation.

To remove Saltford Golf Club's land that is used as a practise and coaching area for golfers of all ages and abilities for a new housing development would represent a serious loss of recreational facilities whilst diminishing the club's parkland setting. Saltford Golf Club was established in 1905 and remains a popular golf facility due to its attractive parkland and open landscape setting that this development option would

seriously harm. It would drastically reduce the club's ability to encourage and train young people to participate in this sporting activity.

Access for residents to Saltford's riverside areas during sunny warm weekends and holiday periods is already reduced by high visitor numbers. Losing local green space and footpaths to development will cause considerable harm to the health and wellbeing of residents whilst increasing demand for a limited resource. The overall increased demand for the remaining open green space will place further harmful pressure on local wildlife habitat.

The Bath Road A4, cannot take more housing. Recent new housing developments have resulted in prolonged periods of heavy traffic congestion during peak times and when roadworks, an accident or vehicle breakdowns occur. This harms the economy and makes local travel increasingly difficult and unreliable for important journeys including to the GP, school collections, employment, etc.

The narrow lanes between Keynsham and Saltford used for rat-running to avoid congestion on the Bath Road A4 will become less safe or usable for walkers and cyclists (including school children). These narrow lanes are regularly used by walkers for recreational use, horse riders, cyclists and by school children walking or cycling to and from school. They lack footpaths and there is a shortage of passing places so pose a danger to those users whilst being single lane in many places they quickly become congested when used for avoiding congestion problems on the Bath Road A4.

Saltford's Green Belt rich mix of habitat for nature is important for a wide-ranging richness of wildlife. In the ecological emergency it should be protected and enhanced, not built on.

Observing wildlife in the open countryside is important for the health and wellbeing of residents and visitors. Such a loss of access and habitat for wildlife to development as proposed by the West or South Saltford options will cause considerable harm.

Losing agricultural land to development would show a lack of foresight and be irresponsible during the ecological emergency and when the UK obtains 40% of its annual net food requirements from overseas that in itself is unsustainable against a background of climate change increasingly causing crop failures, conflict and population growth.

Saltford, now a large rural village, has already undergone significant development since the 1950s and 1960s. Since 1961 Saltford has grown by 36% from a population of 3,044 in 1961 to 4,133 in 2021. Saltford grew by a significant 58% between 1951 (at 1,928) and 1961 (at 3,044) and by a massive 114% from 1951 to 2021 (source: census data).

Saltford has reached the peak of its growth potential if it is to retain its rural countryside setting without drastically reducing the quality of life for existing and potential new residents moving into new housing developments whilst having a negative impact on neighbouring settlements (including Keynsham, Corston, and Newton St Loe) as well as further reducing the open green spaces outside the city boundaries desired by Bristol and Bath residents alike.

Note: SPC does not know the dimensions and extent of the reputed plague pit on the south side of Saltford and on the border of the proposed option (South Saltford) and whether the pit extends into the proposed development area covered by this option. If B&NES Council wishes to discuss this issue with SPC please email clerk@saltfordparishcouncil.gov.uk.

Can you suggest alternatives that you think we should consider?

Yes. See SPC's response to the Section "Keynsham and Saltford: Area overview."

Do you have any evidence or documentation that you would like to upload, to support your answer?

YES :- “The Salford Area of Great Landscape Value - Planning Policy and Character Appraisal by Salford Parish Council (March 2024)” NOTE: This document is also relevant to other Sections that SPC is responding to.

Name: Salford Parish Council **Email:** clerk@salfordparishcouncil.gov.uk

Chapter 6 “Keynsham, Saltford, Hicks Gate and Whitchurch Village (Area 2)”

Section: Keynsham and Saltford: Site options

Site Option: South East Keynsham

Response from Saltford Parish Council (resolved by SPC on 5.3.2024)

Do you support this approach?

Strongly support

Partially support

Neither support or object

Partially object

Strongly object <<

Please say why, and add any extra comments about this policy that you would like to make.

Saltford Parish Council is concerned that adding a further 350 dwellings to South East Keynsham will put yet further unsustainable pressure on local roads in Keynsham. This will affect neighbouring communities including Saltford as traffic backs up during peak time congestion on roads leading onto the Bath Road A4 as well as this heavily used main transport route itself.

Keynsham lacks sufficient public parks to cater for such a large increase in residents; this will put additional and potentially harmful pressure on neighbouring green spaces and wildlife habitats.

Closing the gap between the south side of Saltford and South East Keynsham will harm the openness and setting of this area of Green Belt land.

B&NES Council should consider what the overall limit of development is that Keynsham can take to enable local services to meet residents' needs, prevent Keynsham's merger with Bristol and Saltford, and not cause further harm to the health and wellbeing of residents through the loss of green open space whilst leaving sufficient space for nature in the ecological emergency.

Can you suggest alternatives that you think we should consider?

Yes. See SPC's response to the Section "Keynsham and Saltford: Area overview."

Do you have any evidence or documentation that you would like to upload, to support your answer?

No.

Name: Saltford Parish Council **Email:** clerk@saltfordparishcouncil.gov.uk

Chapter 9: “Development management policy options”

Section: Green Belt

Response from Saltford Parish Council (resolved by SPC on 5.3.2024)

[Option A = Retain policy as existing. Option B = Amend policy to require that applications for infill development to demonstrate that they're delivering housing that meets the specific needs of the local area.]

Do you prefer Option A or Option B?

Answer: Option B

Please explain the reasons for your opinion on these options

Option B would be compliant with the latest version of the NPPF (version December 2023) published by the Government in 2023.

Saltford Parish Council notes that the “WECA Strategic Green Belt Assessment” by Land Use Consultants Ltd produced in September 2022, referred to by B&NES Council as supporting evidence for the new Local Plan, pre-dates the latest NPPF; it refers to the 2021 NPPF whereas the NPPF has been updated twice since September 2022.

WECA's assessment by LUC Ltd does, however, recognise that “Despite being too small to be defined as a town, the settlement of Saltford was also considered relevant to the assessment of Purpose 2 by virtue of its location being vulnerable to merging with neighbouring Keynsham and Bath (as referenced in the original justification for the Bristol and Bath Green Belt)”. However, the “WECA study is focussed on the aspects of historic Bristol's setting” rather than the specific interests and needs of Bath and NE Somerset.

In announcing the latest update to the NPPF in December 2023 the Secretary of State included the following important clarification in his public statement :-

“This Government is committed to protecting the Green Belt. Planning policy already includes strong protections to safeguard Green Belt for future generations. The Green Belt is vital for preventing urban sprawl and encroachment on valued countryside. England's cities are already less dense than those of most of our European neighbours. That is environmentally wasteful and economically inefficient. We seek to support the gentle densification of urban areas in preference to the erosion of Green Belt land. That is why the Government is ensuring it is clear there is generally no requirement on local authorities to review or alter Green Belt boundaries if this would be the only way to meet housing need.”

For the avoidance of doubt, the Government is therefore emphasising that the new NPPF is making it even more abundantly clear than before, that Local Authorities (including B&NES Council) should not review or alter Green Belt boundaries to meet housing need.

Furthermore, the Environmental Principles Policy Statement (November 2023) under the Environment Act 2021 is intended to guide Central Government's policy decisions and policy making, and specifically “national policy statements, strategies and frameworks”; in other words, policy frameworks like the NPPF are also covered by the EPPS (it is not an exempted policy). The objective of the EPPS therefore is, in the light of the ecological emergency, to strengthen environmental protection.

For the purpose of the new EPPS (and as defined in the Environment Act 2021 section 45), "environmental protection" means:- (a) protection of the natural environment from the effects of human activity; (b) protection of people from the effects of human activity on the natural environment; (c) maintenance, restoration or enhancement of the natural environment; and (d) monitoring, assessing, considering or reporting on anything in paragraphs (a) to (c).

According to the “State of Nature” report (September 2023), produced by a collaboration between conservation and research organisations, the UK is one of the most nature depleted countries worldwide

with the abundance of 753 terrestrial and freshwater species having on average fallen by 19% across the UK since 1970. The report states that in protected areas on land, there is some evidence that target species or species of conservation concern have more positive trends than outside them.

The ecological and climate emergencies highlight the importance of protecting the countryside and Green Belt landscapes from development and to enhance, not diminish, the variety of wildlife habitats they contain.

On behalf of the strongly expressed wishes of the local community we represent, Saltford Parish Council implores B&NES Council to comply with the spirit and intent of national planning and environmental policies (i.e. NPPF and EPPS) by protecting the Green Belt in Bath and NE Somerset, and in particular around Saltford that is gradually becoming the last remaining green open space on the Bath Road A4 corridor between Bristol and Bath. SPC has provided evidence and described the ecological value of Saltford's Green Belt in other Local Plan submissions concerning Saltford's Green Belt landscape.

Failure to protect Saltford's Green Belt and allow West Saltford or South Saltford to be put in the draft Local Plan as development options would result in an "unacceptable reduction of the Green Belt", cause "harm to the Green Belt's openness and harm to the Green Belt's purpose of preventing "encroachment into the countryside" that would represent "considerable harm", as identified by the Secretary of State in 2014 when he dismissed the appeal by Crest Nicholson to build 99 houses on Saltford's Green Belt south of Manor Road.

The fundamental aim of Green Belt policy in the NPPF is "to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence." To remove land from the Green Belt for development in the Local Plan would represent a failure of trust by B&NES Council to the local communities adversely affected.

Can you suggest alternatives that you think we should consider?

SPC refers to its previous answer and asks B&NES Council to comply with Government policy on the Green Belt as required by NPPF (version December 2023) and the EPPS (November 2023) under the Environment Act 2021.

Do you have any evidence or documentation that you would like to upload, to support your answer?

Yes :- "The Saltford Area of Great Landscape Value - Planning Policy and Character Appraisal by Saltford Parish Council (March 2024)"

Name: Saltford Parish Council **Email:** clerk@saltfordparishcouncil.gov.uk

[END]