

**Bath & North East
Somerset Council**

Improving People's Lives

Ref:

**(For
official
use only)**

Local Plan

Publication Stage Representation Form

**Name of the Local Plan to which this
representation relates:**

Bath and North East Somerset Council
Pre-submission Draft Local Plan
(Regulation 19)

**Please return to the council BY Friday 30 October 2026 to
planning_policy@bathnes.gov.uk**

Part B – Please use a separate sheet for each representation

Name or Organisation: **Saltford Parish Council**

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

**3.8
South
Saltford**

Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant

Yes

No

NO

4.(2) Sound

Yes

No

NO

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan please also use this box to set out your comments.

LEGAL COMPLIANCE TEST as it applies to West and South Saltford development proposals.

Saltford's Green Belt contributes to all 5 purposes of the Green Belt as set in the NPPF for the Bristol and Bath Green Belt. No exceptional circumstances have been demonstrated to justify the loss of such a large proportion of Saltford's Green Belt to development on the west and south side of Saltford to meet the high housing target set by national Government for B&NES Council. That target is not evidence-based and has not been set to meet a local, identified need.

Such a large-scale and disproportionate development of Green Belt land at Saltford conflicts with NPPF requirements. Those requirements are exceptional circumstances, reasonable alternatives, sustainable patterns of development, proportionality, landscape, infrastructure, and Green Belt purposes.

The proposed release of Green Belt land at Saltford also needs to be considered in the context of B&NES Council's wider strategy for the Bristol to Bath Corridor, which proposes substantial housing growth along a transport corridor whose principal road is through Saltford, the A4. The A4 is already subject to considerable weekday peak-time congestion which the Council itself identifies as requiring particular transport mitigation. The effects on transport of the proposed allocations for the Bristol to Bath Corridor including Saltford therefore also need to be assessed cumulatively rather than as individual development sites.

SOUNDNESS TEST as it applies to West and South Saltford development proposals.

The proposed development proposals for Saltford are both in the Green Belt and do not meet the necessary objective of building the right homes in the right places, i.e. affordable houses near employment alongside the necessary infrastructure and services for existing and new inhabitants of the resulting expanded community whilst protecting the Green Belt.

Bath and NE Somerset Council has not demonstrated that allocating this scale of development at West and South Saltford, a huge and significant 75% increase relative to the existing housing provision for Saltford, is the most appropriate, sustainable and deliverable spatial strategy when reasonable alternatives and the effects of development are properly considered. It

- does not seek to meet identified development needs for our rural village;
- do so in a way consistent with sustainable development; and
- does not properly balance the scale and distribution of housing growth against employment provision, transport capacity, sustainable travel opportunities and other infrastructure constraints, particularly the cumulative impact on the A4 through Saltford.

B&NES Council has not demonstrated, through evidence, that the proposed allocations are appropriate or proportionate having regard to: Saltford's settlement role and character, employment provision, transport capacity, schools, healthcare, drainage and utilities, landscape and environmental constraints; Green Belt purposes (*see Part 1. Legal Compliance Test*); the cumulative effect of new developments already completed or underway; and reasonable alternatives available elsewhere in the wider Bath and NE Somerset area.

To further develop the Bristol-to-Bath corridor by changing it into a growth area despite significant transport constraints and thereby pushing a significant level of new development into the Green Belt at Saltford and Keynsham will undermine all five NPPF purposes of the Green Belt as follows:- (a) Check the unrestricted sprawl of large built-up areas (Bristol, Keynsham and Bath); (b) Prevent neighbouring towns merging into one another (Bristol, Keynsham and Bath); (c) Assist in safeguarding the countryside from encroachment; (d) Preserve the setting and special character of historic towns (Bristol, Keynsham and Bath); and (e) Assist in urban regeneration, by

encouraging the recycling of derelict and other urban land (i.e. Bristol and Bath where employment is mostly centred).

A draft Local Plan that seeks to develop Green Belt land rather than more appropriate locations for new affordable housing developments, i.e. near employment, cannot be considered sound. There is no evidence that the adverse impacts from such extensive development of Saltford's Green Belt on the community would not significantly and demonstrably outweigh the benefits.

See Saltford Parish Council's continuation sheet for Policies 3.7 & 3.8 attached to this representation.

Part 1 of that paper addresses the legal compliance test for West and South Saltford. Part 2 addresses the soundness test (positively prepared, justified, effective, and consistent with national policy). It supports in detail why SPC considers policies 3.7 (West Saltford) and 3.8 (South Saltford) to be legally non-compliant and unsound and describes the extremely negative impacts they will have on Saltford.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Both West Saltford (policy 3.7) and South Saltford (policy 3.8) should be removed from the proposals for development.

Saltford Parish Council cannot be expected to propose alternative sites, however Bath and its immediate perimeter are the most suitable locations for new and affordable housing as Bath is the key location for employment in Bath and NE Somerset. Significant further development of the Bristol to Bath corridor including at Saltford would be highly damaging to existing communities due to the existing severe levels of transport congestion for which no realistic solutions are proposed to alleviate the existing problems or further problems arising from these proposals.

The plan should implement a strictly phased release mechanism with a brownfield first sequence alongside the statutory 5-yearly review cycle, ensuring that undeveloped Green Belt fields are protected unless brownfield capacity is entirely exhausted and a localised need is explicitly proven.

Note: Protection and permanence of the proposed country park

Without prejudice to Saltford Parish Council's primary position that Policy 3.8 (and 3.7) should be removed from the Plan, if Policy 3.8 is retained the Parish Council considers that the proposed **country park** and associated strategic green infrastructure must be clearly defined, secured and protected through the Local Plan. The NPPF also requires plans to provide for accessible green space as part of sustainable development and states that Local Green Space should be capable of enduring beyond the end of the plan period.

Given the disproportionate and large scale of development proposed for Saltford and resulting significant loss of access to the countryside for local residents, the Parish Council therefore considers that the proposed country park should be treated as an integral component of the South Saltford allocation, rather than as a later or

discretionary benefit or aspiration. Its extent, boundaries, connections to existing public rights of way and the wider green infrastructure network, public accessibility, management arrangements and timing of delivery should be established through the Plan.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

☐

No, I do not wish to participate in hearing session(s)

☐

YES

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

With its local knowledge, Saltford Parish Council is better placed than B&NES Council, landowners or developers to defend and represent the interests of Saltford as a community against the worst effects of the damaging proposals for West and South Saltford in the Draft Local Plan.

Therefore, if the planning inspector is minded to amend the draft plan as it affects the proposals for Saltford during the examination hearing, Saltford Parish Council should have the opportunity to participate in any such consideration.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

BaNES Draft Local Plan (Reg 19): Continuation Sheet from Saltford Parish Council

West Saltford (policy 3.7) and South Saltford (policy 3.8)

1. LEGAL COMPLIANCE AND 2. SOUNDNESS TESTS (from page 5)

PART 1: LEGAL COMPLIANCE TEST

4.1. Do you consider the Local Plan is legally compliant? NO.

SUMMARY (reason as provided in Reg 19 response form): Saltford's Green Belt contributes to all five purposes of the Green Belt as set in the NPPF for the Bristol and Bath Green Belt. No exceptional circumstances have been demonstrated to justify the loss of such a large proportion of Saltford's Green Belt to development on the west and south side of Saltford to meet the high housing target set by national Government for Bath and NE Somerset Council. That target is not evidence-based and has not been set to meet a local, identified need.

Such a large-scale and disproportionate level of development of Green Belt land at Saltford conflicts with NPPF requirements. Those requirements are exceptional circumstances, reasonable alternatives, sustainable patterns of development, proportionality, landscape, infrastructure, and Green Belt purposes.

The proposed release of Green Belt land at Saltford also needs to be considered in the context of B&NES Council's wider strategy for the Bristol to Bath Corridor, which proposes substantial housing growth along a transport corridor whose principal road is through Saltford, the A4. The A4 is already subject to considerable weekday peak-time congestion which the Council itself identifies as requiring particular transport mitigation. The effects on transport of the proposed allocations for the Bristol to Bath Corridor including Saltford therefore also need to be assessed cumulatively rather than as individual development sites.

THE CASE: Green Belt or Grey Belt issue for Saltford (West and South Saltford)

Any proposed allocations within the Local Plan must be strictly proportionate to the scale, character, and infrastructure capacity of the existing settlement.

The principles of natural justice and the need to ensure planning equity to avoid inconsistent policy application require that residents of large historic villages like Saltford should have an equal right to the protection of their local Green Belt as those in historic towns and cities. B&NES Council's interpretation and application of the National Planning Policy Framework (NPPF) to classify these specific Green Belt parcels in Saltford as "Grey Belt" is fundamentally flawed. It fails to meet the test of soundness, as it overlooks the unique character of the historic village of Saltford and will result in severe, irreversible harm to the local community as described elsewhere in this response.

The approach taken relies on a selective interpretation of the NPPF, creating a critical misalignment with national policy objectives. Any proposed allocations within the Local Plan must be strictly proportionate to the scale, character, and infrastructure capacity of the existing settlement. By enabling unsustainable development under the guise of applying a Grey Belt designation, the plan fails to promote sustainable development and will cause

demonstrable harm to the area's spatial strategy. It will cause considerable harm to Saltford that is already subjected to the ill-effects of new or recent development in areas adjacent to Saltford in the Bristol to Bath corridor.

The cumulative effect of development in the Bristol to Bath Corridor is particularly important because Saltford is not an isolated development location. Chapter 3 expressly establishes a corridor-wide growth strategy for Keynsham, Saltford, Hicks Gate and Whitchurch Village, with land use, transport and infrastructure intended to operate together. B&NES Council describes the corridor as a location for significant housing and employment growth and identifies the A4 as a strategic transport corridor requiring particular mitigation. The effects of the proposed allocations therefore need to be assessed cumulatively rather than as individual development sites.

This is especially important for Saltford because the A4 is the principal road serving the village and B&NES Council itself records that it is typically congested during weekday highway peak hours. The proposed additional housing at West and South Saltford would therefore add substantial residential population to a settlement already served by a severely constrained principal road. The cumulative effect of the wider corridor strategy, rather than merely the traffic generated by individual site accesses, must be taken into account when assessing whether the proposed Green Belt release represents sustainable development. Saltford Parish Council agrees with the Prime Minister's stated policy (September 2024) for the Grey Belt that the Government's introduction of a Grey Belt definition was not intended for green field sites in the Green Belt. The Prime Minister made it clear that the Government's planning policy intention is to allow development of disused petrol stations, abandoned car parks and low value scrubland.

Grey Belt is defined in the NPPF as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of three specific Green Belt purposes.

Taking each of those in turn, the parcels of land in question in Saltford's Green Belt are not Grey Belt for the following NPPF planning reasons:-

(a) to check the unrestricted sprawl of large built-up areas.

Saltford's Green Belt helps restrict urban sprawl that would otherwise merge Saltford with Keynsham and hence 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.

To develop Saltford's Green Belt parcel by parcel undermines that policy.

The strategic significance of this function is reinforced by B&NES Council's own description of the Bristol to Bath Corridor as a growth corridor between Bristol and Bath. The cumulative effect of releasing land for development along the corridor is therefore not simply a series of individual site decisions. It creates additional residential and transport pressure between the two cities and makes the preservation of the remaining physical and visual separation between settlements increasingly important.

(b) to prevent neighbouring towns merging into one another.

Saltford's position between Bristol and Bath gives the Green Belt in this area an important strategic separation function. Development of Saltford's Green Belt would set an unwelcome

precedent leading to an urban sprawl merging the cities of Bristol with Bath engulfing Keynsham, then Saltford, Corston and Newton St Loe in the same all-encompassing sprawl. Keynsham has undergone substantial development in recent years and the cumulative effect of development along the Bristol to Bath Corridor has increased pressure on the A4 and the wider highway network. This is not simply a matter of local inconvenience. The A4 is the principal road serving Saltford and B&NES Council's own Chapter 3 evidence records that, during traditional weekday highway peak hours, there is typically congestion along the A4. B&NES Council also expressly acknowledges that significant growth across the Bristol to Bath Corridor requires major transport investment and that the North Keynsham Strategic Access Link Road is intended to address cumulative impacts on an "already heavily constrained network". Chapter 3 identifies the A4 as a particular focus for transport mitigation. This evidence is important because the Plan proposes further substantial housing growth at Saltford and elsewhere along the same corridor. The cumulative increase in population will inevitably increase travel demand.

Where new employment opportunities and essential services do not grow at a commensurate scale and where sustainable transport does not provide a realistic alternative for the full range of journeys, significant additional demand will fall on the A4. This risks further congestion and reinforces the importance of retaining the physical separation and distinct identity of the settlements along the corridor.

To develop parcels of Saltford's Green Belt parcel by parcel undermines the NPPF policy of preventing neighbouring towns merging into one another.

(d) to preserve the setting and special character of historic towns.

"Preventing encroachment into the countryside" was the main reason why the Secretary of State REFUSED planning permission for 99 new houses on Saltford's Green Belt in 2014. In dismissing the appeal from Crest Nicholson and refusing planning permission whilst 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."

Saltford's Green Belt also meets the other two NPPF purposes: (c) Assist in safeguarding the countryside from encroachment - "preventing encroachment into the countryside" was the main reason why the Secretary of State REFUSED planning permission for 99 new houses on Saltford's Green Belt in 2014, and (e) assist urban regeneration by encouraging the recycling of derelict and other urban land, for example through the redevelopment and intensification of under-utilised previously developed sites that are close to employment.

Saltford's Green Belt, described in detail and resolved as an Area of Great Landscape Value (AGLV) by Saltford Parish Council in March 2024, gives the village its rural countryside setting valued by residents, local businesses, and visitors alike. It is important to retain and enhance attractive landscapes near where people live.

Saltford is classified as a Rural Area RA1 village in the B&NES Placemaking Plan 2017 (policy RA1 is not deleted by the draft Local Plan), 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 therefore contravene policy RA1.

Further loss of Green Belt land in the Saltford and Keynsham area would contribute to the incremental destruction of the essential characteristics of the Green Belt (NPPF), i.e.

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“openness and permanence” of the countryside as well as the rural setting and individual character of Saltford, a village steeped in history (an Anglo-Saxon settlement that was specifically recorded in the Domesday book), as with other communities nearby including the town of Keynsham. It is important to retain and sustain a sense of community for rural villages like Saltford.

Saltford, a large rural village with a Conservation Area and historic landscape with a population of over 4,000, is larger than several of England’s towns whose histories are not necessarily more significant than Saltford’s (e.g. Watlington and Charlbury in Oxfordshire; Mitcheldean and Painswick in Gloucestershire; Settle and Bedale in North Yorkshire; Sedbergh and Appleby-in-Westmorland in Cumbria; Bruton, Watchet and Williton in Somerset, etc.). Although the NPPF definition of Grey Belt refers to the special character of historic towns, there is no statutory definition of towns or villages.

Furthermore, interpreting the intent of heritage protection legislation, beyond the context of the NPPF, arguments focus on the fact that the Planning (Listed Buildings and Conservation Areas) Act 1990, for example, requires special regard to preserving the setting of all designated heritage assets - including conservation areas within villages - regardless of the size of the settlement. Historic villages often possess similar, or higher, sensitivity regarding their "setting" and "special character" compared to larger towns. Failing to protect the village setting through Green Belt policies may be interpreted to contradict the broader statutory duty to preserve the historic environment.

If a large settlement like Saltford is historically called a "village" but may act similarly to a small town, any reasonable interpretation of the Government’s intended policy for the use of the grey belt definition should apply to Saltford’s surrounding land and therefore must be assessed under purposes (a), (b), or (d). This is especially the case when Saltford’s Green Belt meets all five NPPF purposes of the Green Belt, as discussed in the paragraphs above. Saltford’s Green Belt is a critical component of the Bristol and Bath Green Belt and serves a key purpose of keeping those historic cities apart and separate as two distinct settlements within a rural setting. In Saltford Parish Council’s opinion there are no exceptional circumstances* to re-classify it as grey belt and thereby undermine the purposes of the Bristol and Bath Green Belt as well as the five NPPF purposes of the Green Belt.

****Note re. the absence of exceptional circumstances to justify loss of Green Belt land at Saltford: As previously discussed, the housing target set for B&NES Council is a national target, it is not evidence-based and has not been set to meet a local, identified need.***

The **Golden Rules** (NPPF 2026 policy GB8, or NPPF 2024 para.156) for releasing Green Belt land for development (*affordable housing; necessary improvements to local or national infrastructure; and provision of new green space, or improvements to existing green space, which is accessible to the public*) have not been met in full for the development proposals for Saltford.

This failure to meet the Golden Rules is with particular regard to infrastructure and green space. Infrastructure capacity must include the cumulative transport consequences of the corridor-wide housing strategy and how that will be addressed. In particular, B&NES Council needs to demonstrate that the proposed housing growth can be accommodated without unacceptable additional pressure on the A4 through Saltford and that the necessary transport infrastructure and sustainable travel measures will be delivered in a timely manner rather than relying on mitigation being provided retrospectively through individual planning applications.

These are already severely compromised by the cumulative ill-effect of new or recent developments in the wider area for the reasons and “lived experience” of the community as described elsewhere in this consultation response. To worsen the current bad situation still further would bring national planning policy into disrepute and would be deeply harmful for the existing community as well as for new residents housed in the proposed new developments.

Bath and NE Somerset Council should not assume that Saltford's Green Belt should, or can safely, absorb a significant proportion of the district's housing requirement where that requirement is primarily driven by Bath's housing needs and Bath considers itself unable to accommodate the level of development required by a nationally set housing target within its own boundaries.

That inability to accept new housing is due to its World Heritage City status, a status that clearly works to the distinct disadvantage of a rural, food producing area like Bath and NE Somerset that has a significant food production capacity and further potential to assist the nation's food security, an issue that is of increasing concern to Defra, reinforced by the 2026 summer of heatwaves and drought.

PART 2: SOUNDNESS TEST

4.2. Do you consider the Local Plan is sound? NO.

SUMMARY (reason as provided in Reg 19 response form): The proposed development proposals for Saltford are both in the Green Belt (*see Part 1. Legal Compliance Test*) and do not meet the necessary objective of building the right homes in the right places, i.e. affordable houses near employment alongside the necessary infrastructure and services for existing and new inhabitants of the resulting expanded community whilst protecting the Green Belt.

Bath and NE Somerset Council has not demonstrated that allocating this scale of development at West and South Saltford, a huge and significant 75% increase relative to the existing housing provision for Saltford, is the most appropriate, sustainable and deliverable spatial strategy when reasonable alternatives and the effects of development are properly considered. It

- does not seek to meet identified development needs for our rural village;
- do so in a way consistent with sustainable development; and
- does not properly balance the scale and distribution of housing growth against employment provision, transport capacity, sustainable travel opportunities and other infrastructure constraints, particularly the cumulative impact on the A4 through Saltford.

B&NES Council has not demonstrated, through evidence, that the proposed allocations are appropriate or proportionate having regard to: Saltford's settlement role and character, employment provision, transport capacity, schools, healthcare, drainage and utilities, landscape and environmental constraints; Green Belt purposes (*see Part 1. Legal Compliance Test*); the cumulative effect of new developments already completed or underway; and reasonable alternatives available elsewhere in the wider Bath and NE Somerset area.

The 8,900 new houses proposed for the Bath to Bristol Corridor, including the 1,290 for Saltford, will have a significant impact on existing traffic congestion levels for the Bath Road A4 through Saltford. There will be a significant cumulative impact on travel demand and traffic levels. This is not simply a site-access issue: it is a strategic consequence of concentrating substantial housing growth along an already constrained transport corridor. This is a fundamental issue of spatial strategy. The Plan should not treat housing, employment and transport as separate matters when their cumulative relationship is central to whether the proposed growth is sustainable and deliverable and how it will impact on existing communities.

To further develop the Bristol to Bath corridor by changing it into a growth area and thereby pushing new development into the Green Belt at Saltford and Keynsham will undermine all five NPPF purposes of the Green Belt as follows:-

(a) Check the unrestricted sprawl of large built-up areas (Bristol, Keynsham and Bath); (b) Prevent neighbouring towns merging into one another (Bristol, Keynsham and Bath); (c) Assist in safeguarding the countryside from encroachment; (d) Preserve the setting and special character of historic towns (Bristol, Keynsham and Bath); and (e) Assist in urban regeneration, by encouraging the recycling of derelict and other urban land (i.e. Bristol and Bath where employment is mostly centred).

A draft Local Plan that seeks to develop Green Belt land rather than more appropriate locations for new affordable housing developments, i.e. near employment, cannot be considered sound. There is no evidence that the adverse impacts from such extensive development of Saltford's Green Belt on the community would not significantly and demonstrably outweigh the benefits.

THE FOUR SOUNDNESS TESTS

This section makes Saltford Parish Council's case why the Draft Local Plan:

- (i) has not been positively prepared**
- (ii) is not justified**
- (iii) is not effective**
- (iv) is inconsistent with national policy**

(i) The draft Local Plan has not been positively prepared

Saltford Parish Council is deeply concerned by the national Government's insistence that B&NES Council should produce a Local Plan based on an unrealistically high and unjustified housing target allocated without sufficient regard by the Government to local democracy or local need. Such a one-size-fits-all approach is not appropriate or positive for a rural area like Bath and NE Somerset.

The Government's housing target for Bath and NE Somerset is not evidence-based. It does not provide a sound basis or justification for the loss of Green Belt land to development and the resulting harmful economic, social and environmental consequences described in this response for adding such a huge increase in housing along the Bristol to Bath corridor and thereby putting unsustainable pressure disproportionately on the communities of Saltford and Keynsham.

Neither does it respond to the lessons from the severe heatwaves and drought of the summer of 2026. The disastrous impact of 2026 on food production and wildlife has proven beyond doubt that the nation urgently needs a stewardship approach to land-use planning.

That approach is vital for our economy, future food production capacity (food security is recognised by Defra's Secretary of State as a national security issue), nature, and for our health and well-being, but is not reflected in the Government's planning policies and approach to housing targets that are set without taking fully into account local issues.

The city of Bath is a major factor for the high housing target set by Government, yet despite also being the main centre of employment B&NES Council has allocated only 27% of the planned increase in housing (5,900) by the plan for Bath whilst the remaining 73% of the requirement is proposed for NE Somerset and thus overwhelmingly on Green Belt land. The draft Local Plan is therefore highly unbalanced and not positively prepared.

To increase Saltford's housing stock by such a large proportion (75%) does not represent a sustainable spatial strategy. The existing peak time levels of severe traffic congestion that simultaneously disrupts public transport (the bus service) is already expected to worsen as a cumulative result of recent and forthcoming new developments between Keynsham and Saltford at Keynsham East.

The issue is therefore not simply whether individual development sites can be provided with acceptable access. B&NES Council needs to demonstrate that the cumulative housing growth along the Bristol to Bath Corridor, together with the employment and service provision proposed, will produce a sustainable pattern of travel and will not place unacceptable additional pressure on the A4 through Saltford.

For such a large and disproportionate expansion of Saltford, evidence has not been provided on whether the additional population can be accommodated without unacceptable consequences for the existing local population of Saltford including the negative impacts on infrastructure capacity.

These consequences include:-

- **Local roads in Saltford constantly become over-congested during am and pm peak travel times, trapping residents in their own village.** The village is not a major employment centre, therefore building a further 1,290 houses in Saltford will exacerbate an existing constrained transport situation. The new affordable homes that are actually needed for Bath and NE Somerset should be provided close to centres of employment to reduce the need for commuter travel.
- **Healthcare services are already over-stretched** with, for example, long waiting times for GP appointments.
- **The movement of primary school children between Saltford and Keynsham** following Keynsham's expansion in recent years adds to the pressure on local roads and back lanes during peak travel times.
- **Proximity to green space and nature is essential for public health and well-being.** The public green recreational space and wildlife habitat along the River Avon in Saltford, a Site of Nature Conservation Interest (SNCI), is already severely compromised by heavy visitor pressure during sunny weekends and school holidays. The absence of substantial new public green space associated with some recent development is relevant to the assessment of cumulative recreational pressure. Further large

housing developments in this area including on Saltford's Green Belt would further worsen existing negative impacts on the health and well-being of the community from over development and the significant reduction in access to green space.

- **Transport infrastructure across the wider area is similarly under pressure.**
B&NES Council itself recognises that the cumulative level of growth across the Bristol to Bath Corridor requires major transport investment and that the existing highway network is already heavily constrained. The Plan must therefore demonstrate not merely that individual sites can make financial contributions to transport schemes, but that the necessary strategic infrastructure will be delivered at the scale and timing required to accommodate the cumulative growth.

The draft Local Plan gives recognition to the value of Saltford's landscape setting in terms of *"LP Policy NE2A landscape setting of settlement to ensure that development within the setting area conserves and enhances the landscape setting of Saltford and its landscape character, views and features"*. It highlights the risk of *"development that would result in adverse impact to the landscape setting"* of Saltford.

It then completely ignores that policy with a very harmful decision to propose a huge 330 house development at South Saltford in Area 2 of Saltford's NE2a, blocking this landscape from the existing footpaths and the road due north (Manor Road) including the pedestrian quiet lane, despite much evidence and discussion with Saltford Parish Council at senior planning officer and Cabinet level concerning the importance of the character of this landscape to Saltford's setting as a rural village and the open green space it provides for residents' health and well-being.

The Parish Council also wishes to record the circumstances surrounding discussions with B&NES Officers and a B&NES Cabinet member on 2 February 2026.

Following B&NES Council's review of evidence submitted by the Parish Council concerning the landscape setting of Saltford and the recognition of the relevant NE2A area, the Parish Council understood from those discussions that South Saltford was unlikely to be proposed for development. The subsequent inclusion of South Saltford in the Draft Local Plan was therefore unexpected by the Parish Council that therefore feels justifiably let down by, and strongly objects to, the subsequent proposal for development at South Saltford.

The Parish Council considers that the South Saltford allocation requires a particularly clear explanation of how Policy NE2A is being applied consistently with the allocation decision.

(ii) The draft Local Plan is not justified

As the proposed growth requires a very significant and disproportionate Green Belt release at Saltford, B&NES Council has not demonstrated fully justified evidence that exceptional circumstances make this necessary and that all other reasonable options for meeting identified development needs have been fully examined, including brownfield and under-utilised land, optimisation of densities and alternative locations.

The scale of growth cannot be supported by adequate evidence of settlement capacity, infrastructure, landscape sensitivity and comparison with reasonable alternative locations. To remove so much green space from a community and forcing it to take a massive 75% increase in housing will create unbearable additional pressure on roads that are already heavily congested during peak times. Furthermore, B&NES Council has not demonstrated

that the cumulative transport implications of concentrating substantial additional housing along the Bristol to Bath Corridor have been adequately assessed against the existing and planned capacity of the A4.

The proposals will seriously compromise the quality of life for existing residents. They rely on access to the countryside on their doorstep for their health and well-being; removing that green space in such an authoritarian and undemocratic manner when new affordable homes can and should be built close to centres of employment to reduce, not increase, commuter travel is unjustified and irresponsible.

A draft Local Plan that seeks to develop undeveloped Green Belt land whilst thereby creating considerable and disproportionate harm to the local community rather than choosing more appropriate locations for new affordable housing developments closer to employment cannot be considered justified or sustainable development.

The plan is not the most appropriate strategy when considered against reasonable alternatives. It fails to firmly embed a 'brownfield first' sequencing strategy using previously developed and under-utilised land, and density optimisation. By failing to exhaustively allocate and prioritize previously developed land before releasing undeveloped Green Belt sites, the plan unnecessarily sacrifices vital green infrastructure and contradicts sustainable development principles.

(iii) The draft Local Plan is not effective

The housing allocation for Saltford is unrealistic and disproportionate due to existing constraints on highway, public transport, schools, drainage, healthcare and other infrastructure.

The adverse impacts of the development of Saltford's Green Belt on the health and well-being of the community would be severe and would significantly and demonstrably outweigh the benefits.

The current allocation strategy exacerbates the spatial mismatch between housing and employment. Delivering large-scale housing allocations in areas like Saltford that are removed from major employment hubs - without adequate public transport infrastructure - will result in unsustainable commuter patterns. The plan fails to demonstrate how it will deliver truly affordable housing near employment hubs to meet genuine local needs rather than inflating market-led supply.

To identify the Bristol-to-Bath corridor including Saltford as a growth area with "strong transport links" takes no account of the peak-time congestion that already inflicts severe costs and disruption to residents and businesses. In Saltford, frequent gridlocks routinely trap residents in the village, exposing the cumulative effect of over-development and poor spatial planning in the recent past. Keynsham is subjected to similar congestion problems.

The plan should implement a **strictly phased release mechanism with a brownfield first sequence** alongside the statutory 5-yearly review cycle, ensuring that undeveloped Green Belt fields are protected unless brownfield capacity is entirely exhausted and a localised need is explicitly proven.

The Parish Council considers that **healthcare capacity** is an important component of effective plan-making. Existing residents report pressure on local healthcare services, including difficulties obtaining timely GP appointments.

B&NES Council's evidence should therefore demonstrate how the additional population generated by approximately 1,290 homes will be served by healthcare infrastructure.

Where healthcare requirements remain subject to further work with the relevant health authorities, the Plan should explain:

- what additional capacity is required;
- who will provide it;
- how it will be funded;
- when it will be delivered; and
- how housing delivery will be related to that provision.

Education capacity should likewise be assessed cumulatively. The Parish Council is concerned about the interaction between existing school travel patterns in Saltford and Keynsham and further housing growth. The movement of children between Saltford and Keynsham already contributes to peak-period travel demand.

The Plan should therefore demonstrate that school capacity and school travel arrangements have been properly considered for the cumulative population arising from the proposed allocations and other committed development.

Where new school provision or expansion is required, delivery should be appropriately related to housing occupation.

(iv) The draft Local Plan is inconsistent with national policy

A disproportionately huge (75%) increase in housing for Saltford, and the corresponding harm that would follow for the local community, does not reflect a proportionate approach that the NPPF requires throughout the framework. For example, NPPF (2026) policy PM14 “Examining spatial development strategies – Effective” requires that a “proportionate approach should be taken in assessing assumptions for the longer term, given the uncertainty which is likely to surround them” (or as similarly required in paras. 36 and 37 of NPPF 2024).

Such a large-scale and disproportionate development of Green Belt land at Saltford conflicts with NPPF requirements concerning exceptional circumstances, reasonable alternatives, sustainable patterns of development, proportionality, landscape, infrastructure and Green Belt purposes.

Open green spaces in the countryside, like Saltford’s Green Belt and in particular taking account of Saltford’s location midway between Bristol and Bath, are important for the mental and physical health and well-being of city, town, and rural village dwellers alike.

Further loss of Green Belt land in Saltford (and Keynsham) on the scale proposed would result in a substantial expansion of development into the Green Belt. It would contribute to the destruction of the essential characteristics of the Green Belt (ref. NPPF 2026 Chapter 13 including policies GB1-8). These characteristics, or “essential features”, are their “openness and permanence” and for “safeguarding the countryside from encroachment”, as well as the rural setting and individual character of Saltford, a village steeped in history, as with other communities nearby. It is important to retain and sustain a sense of community for rural villages like Saltford.

B&NES Council has not demonstrated why the proposed spatial distribution is the most appropriate strategy, why there are not adequate or reasonable alternatives, or why Green Belt release is justified and not harmful to the existing community.

To be consistent with the NPPF's core commitment to sustainable development, a longer-term stewardship approach is needed for land use in planning policy but is not provided by the draft Local Plan.

A stewardship approach would protect the countryside and the landscape settings of villages in North East Somerset from development to support health and well-being, nature and food security. This is required to respond to climate change impacts that are already reducing the ability of the UK to feed itself at affordable prices and drastically accelerating the depletion of wildlife.

B&NES Council should therefore reconsider the scale, distribution and phasing of development for the Bristol to Bath Corridor including at Saltford so that it provides a spatial plan that demonstrates, through proportionate and robust evidence, that the cumulative housing, employment and transport strategy for the corridor will not be harmful but will be sustainable, deliverable and effective.

Saltford Parish Council

www.saltfordparishcouncil.gov.uk

6th October 2026