

Saltford Green Belt Inquiry into the appeal by Crest Nicholson (South West Ltd) following the non-determination of their application for planning permission for a residential development of up to a maximum of 99 units, access and associated works at Manor Road, Saltford BS31 3AB. August 2013.

Sustainability Appraisal (by Phil Harding)

By way of introduction of myself and my knowledge of sustainable development matters, page 9 of my Sustainability Appraisal includes a brief description of my background and work in sustainable development and related topics.

In addition to working on a diverse range of Government programmes for the Department of Energy, I have well over 20 years' experience working on sustainable development issues in Whitehall and from the Government's South West regional office when I transferred from London to Bristol in 1991.

During most of the 1990s I was the Government's Regional Energy Efficiency Officer for the South West of England. From 2005 to 2011 I co-chaired with the Regional Director of the Environment Agency "Climate South West" - the cross-sectoral partnership tasked with helping the South West region to adapt sustainably to the impacts of extreme weather and climate change.

My team at the Government Office for the South West also established the South West Round Table for Sustainable Development that was, in its early years, chaired by Jonathon Porritt who went on to chair the Government's Sustainable Development Commission. The South West Round Table developed the Regional Sustainable Development Framework that informed and underpinned the production of Regional Planning Guidance and other regional and local policies including the economic policy of the Regional Development Agency.

Until closure of the Government Office for the South West by the Coalition Government in 2011, I was Senior Policy Adviser for climate change adaptation, resource efficiency and sustainable development. In 2006 I was awarded the MBE in the Queen's 80th birthday honours list for my contribution to sustainable development in the South West.

I helped set up Saltford Environment Group in 2011 and became Chairman in June 2013.

It is fair to say I have an understanding of what sustainable development looks like.

My Sustainability Appraisal report finds that the development proposed by this planning application on undeveloped Green Belt agricultural land (class 1, 2 and 3a) does not contribute to sustainable development.

It would erode Saltford's Green Belt and create additional urban sprawl into the local countryside with a negative effect on the landscape at this location. With no significant employment opportunities in the village, a housing development of this size would generate additional commuter traffic to and from the cities of Bristol and Bath, and to a lesser extent the town of Keynsham. It would contribute to higher levels of carbon emissions thus raising Saltford's carbon footprint. It would make Saltford a less sustainable settlement.

When deciding whether undeveloped land should be developed there are three questions that all affect the decision making process:-

1. Is the development to be on Green Belt or agricultural land?
2. Is the development sustainable development?
3. Is the development going to meet the needs and aspirations of the local community?

Planning policy, as set out in the NPPF, tells us that development can only be permitted on the Green Belt in exceptional or very special circumstances.

I wish to stress this next point because “Green Belt” is supposed to be at the top of the hierarchy in planning policy terms:-

If a proposed new housing development on Green Belt land does not meet sustainable development objectives it is unsustainable. It is difficult to see which exceptional or very special circumstances would justify such a development.

In other words as “Green Belt” is at the top of the planning hierarchy, if permission is ever given for a parcel of Green Belt land to be surrendered to development, that development must be sustainable development. Because otherwise we are making a mockery of how we manage and use this nation’s finite land resource.

Sustainable development is about taking a long-term view so that we do not compromise “*the ability of future generations to meet their own needs*”. Decisions concerning major new housing developments, particularly those on the Green Belt and on agricultural land, therefore need to take a longer term view and not be taken in haste.

Any new housing development of this size has a permanent impact on the local community so it should be in response to an agreed and identified need through community consultation and a strategic approach, not because a developer wants to build there.

Development decisions with a lasting impact that are made outside of a strategic approach, i.e. a Core Strategy, lack credibility and do not sit well with a sustainable development approach. This is especially the case here where:

- the draft Core Strategy does not include this development; and thereby
- this development has not gone through a robust sustainability appraisal and full consultation with the local community (e.g. through a Place-making Plan process).

My Sustainability Appraisal report shows (at Appendix 2) that the Sustainability Statement from Pegasus and (at Appendix 3) the 7 issues raised by Crest Nicholson as “very special circumstances” in their “Grounds for Appeal” are not very special circumstances and do not achieve sustainable development objectives for this proposed housing development.

Furthermore, the letter from the Planning Minister at Appendix 5 makes the point that “*if development on farmland is essential, planners should seek to use areas of poorer quality land in preference to that of a higher quality*”. The fields in question are agricultural land (class 1, 2 and 3a), i.e. “best and most versatile land” and therefore not of poorer quality.

There is no evidence that this development is essential or that an exceptional reason exists to allow it.

Phil Harding, 14 August 2013