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**Saltford Environment Group**

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[www.saltfordenvironmentgroup.org.uk](http://www.saltfordenvironmentgroup.org.uk)

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

<https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3230009>

**THE CASE AGAINST ALLOWING THE APPEAL**

For this Appeal Inquiry to allow a developer to interrupt and disrupt the local strategic planning process by permitting this development to proceed outside the policies set in the 2014 Core Strategy and its updated replacement, the emerging B&NES Local Plan, would represent a rejection of a key principle of national planning policy that “the planning system should be genuinely plan-led” (NPPF 2018, paragraph 15).

Local residents, schools and businesses in Saltford and Keynsham are already heavily inconvenienced and incur financial costs due to local traffic congestion during peak periods that include frequent grid-locking of local roads resulting from the existing over-development of Keynsham and its surrounding area that lacks the necessary infrastructure to cope. Hence the planning application attracted some 330 objections.

**Any serious consideration for development of this site for new housing should only be considered if a genuine need not demand for further new housing remains after the other Core Strategy and Local Plan developments have been completed.**

The appellant has demonstrated no exceptional circumstances to allow this development to proceed before the review of the 2014 Core Strategy has been completed by the drafting and adoption of the new B&NES Local Plan that is currently undergoing drafting and agreement with local communities and their elected representatives. The financial gain or convenience for a developer is not an exceptional circumstance.

Further to our objection made in April 2018 Saltford Environment Group is in full agreement with the statement dated 6 August 2019 submitted to the Inquiry by Saltford Parish Council (SPC) that makes a strong case for this proposed premature development to be rejected by the Appeal Inquiry.

B&NES Council has already made a commitment (in document WED 004A of November 2018 for the West of England Joint Spatial Plan) that no housing will be completed at the North Keynsham SDL (that contains this site) ahead of the multi modal Avon Mill Lane to A4 link, Keynsham rail station improvements and completion of the Metrobus route from Bristol to Keynsham on the A4 corridor, etc.

That is an important commitment by B&NES Council for a “**transport infrastructure first**” approach to further developments like this in Keynsham to avoid the mistakes of the past from which the local and wider community continues to experience the negative consequences.

These consequences include peak time congestion accompanied by air pollution (Saltford has an Air Quality Management Area due to the effects of congestion backing up through the village from Keynsham resulting in periodic levels of dangerously high NOx levels being reached), and increasingly long delays in obtaining appointments at the local Doctors’ surgeries. The problem of growing congestion is borne out by the Senior Highways Development Control Engineer at B&NES Council whilst objecting to this planning

application; he made it clear that the existing road network in the vicinity of the site has insufficient capacity to accommodate the increase in traffic likely to be generated by the proposed development.

The selective use of transport modelling by the appellant cannot alter the fact that the roads in and out of Keynsham are regularly heavily congested at lengthening peak periods due in part to recent new developments from the 2014 Core Strategy that are still incomplete and have yet to make a full impact.

The developer has made no real attempt to justify the development as genuine sustainable development, i.e. on environmental, economic, and social grounds and make provision of a **net environmental gain** to meet Government planning policies in NPPF 2018 which specifically makes several references to the need to provide net environmental gain for development (at paragraphs 51, 72a, 102d, and 118).

“*Net environmental gain*” requires an improvement over and above the existing provision of natural environment, i.e. more than simply “no net loss”, with a higher amount of habitat value for wildlife including insects than prior to the development. No evidence has been provided by the developer that a net environmental gain can be provided by bringing forward this development ahead of the new Local Plan timetable. This is a specifically important issue for B&NES over and above the consequences for the quality of life that green open spaces and attractive countryside provide for residents and visitors from neighbouring villages, towns and cities. This is because the Green Belt in B&NES has a role in providing ecosystem support, i.e. natural capital, to farmland and/or the wider natural environment in B&NES (see explanation in box below).

81% of B&NES is farmland compared to the national average of 57% yet only 5% of B&NES is natural or semi-natural land (heathland, natural grassland etc.) compared to a national average of 35% (data source: Dr Alasdair Rae, University of Sheffield, using Co-ordination of Information on the Environment (Corine) land use codes, 2017). Farmland requires the eco-system support (e.g. habitat for pollinating insects) of surrounding Green Belt and natural/semi-natural land to function. It would be irresponsible not to protect B&NES' natural/semi-natural land that underpins the economy of the B&NES and wider West of England area and our future food security in a changing climate made more critical by unmanaged population growth.

## CONCLUSION

It is not for developers to determine where and when new housing developments should be built, that role rests with the local planning authority following local consultation to gain local knowledge and acceptance of its Local Plan, with such plans and consultations unhindered by the financial ambitions of developers.

On behalf of our 550 members, SEG therefore asks the Appeal Inspector to show that a plan-led approach to planning where local views shape the development of local communities will not be over-turned by a developer seeking to benefit from higher property prices achievable by disregarding sustainable development principles. Those principles are to build affordable housing where it is actually needed, i.e. close to the main centres of employment, and without loss of valuable Green Belt or other green field land that does or can provide eco-system support for farmland whilst providing the health and quality of life benefits from access to open countryside for local residents and city dwellers alike.

**Saltford Environment Group**  
**09 August 2019**

**Please contact** SEG's Chairman via [www.saltfordenvironmentgroup.org.uk](http://www.saltfordenvironmentgroup.org.uk) for any enquiries concerning this submission.