

Salford Environment Group's response to the planning application 26/01700/OUT Parcel 8966, Manor Road, Salford, from Crest Nicholson Operations Ltd & the landowner(s)

Salford Environment Group (SEG) strongly OBJECTS to this outline planning application and asks BaNES Council to refuse consent.

BaNES Council properly refused planning permission to Crest Nicholson for this site in 2013. That decision by BaNES earned the gratitude of the local community including SEG. It was greatly appreciated that BaNES had recognised the inappropriateness of a new housing development on this green field, Green Belt site, a site that was also then, as now, not included in the Local Plan. After the application went to appeal in August 2013, the Secretary of State on examining the evidence given at the Appeal Inquiry in August 2013 and the Inspector's report itself, agreed with BaNES Council and the local community and concluded that the proposed development was harmful to the Green Belt's openness and harmful to the Green Belt's purpose of preventing encroachment into the countryside that, represented considerable harm, to which he attributed substantial weight. The relief then in the local community was palpable, yet Crest Nicholson has chosen to ignore those important factors.

Since the Secretary of State's decision in 2014, there are no new exceptional circumstances to devalue the importance of the paddocks to the setting, character and openness of Salford's Green Belt at this location.

It would be extremely harmful to local communities if the Government's raised national housing target is used as a blunt instrument by developers or landowners to try and build what they want where they want regardless of the negative consequences for local communities and their local green spaces. It is premature and even more unjustified when it ignores a new (draft) Local Plan that is currently being actively progressed by BaNES Council and is intended to deliver housing alongside the appropriate infrastructure in a planned way, rather than an *ad hoc* approach from speculative planning applications. The local primary school, for example is already full, and demand for local essential services (e.g. GP) already exceeds current capacity.

To build the new homes the nation needs, the Government has stated it is committed to a brownfield-first approach, to protect sensible use of the Green Belt, and that only genuine brownfield sites such as disused petrol stations and abandoned car parks will be developed. This particular Green Belt site, chosen by the developer despite a previous failed attempt, ignores the need to build affordable housing near employment.

There is no government data or evidence from other respected sources including Homes for Everyone and CPRE that show that to meet the nation's housing needs for affordable homes, or the Government's housing target, there is an actual need to take undeveloped land out of the Green Belt for new housing developments. SEG agrees with Salford Parish Council's assessment in January 2025 that this land is not Grey Belt; it is undeveloped land in the Green Belt.

It would therefore be unjustified and harmful to local communities like Salford's for BaNES Council to grant planning permission to a developer on a sensitive Green Belt site such as this, at that developer's suggestion that a parcel of land should be changed to Grey Belt just to allow a development to proceed, especially when the Local Planning Authority and the Secretary of State has previously ruled against such a development.

SEG supports the Parish Council's evidence-based application for a protective landscape designation for this area of our rural setting and welcomes its acceptance by BaNES Planning Officers for why this parcel of land is NOT included in the draft Local Plan options for development list. As a result, the site is highlighted as having NE2a status in the emerging Local Plan due to its visual prominence (on the rising slope above Manor Road), unique landscape setting, views, landform, character and the sense of place that it provides to residents, the proposed development will harm the landscape and will cause significant visual

impact by breaking the skyline, urbanising an open hillside and blighting the views from the Cotswolds National Landscape (AONB). For those reasons alone, reasons that the Secretary of State recognised in 2014 and to which he attributed substantial weight, this application should be refused.

The plans in the application propose locating the site entrance/exit on the outside bend of a busy road with restricted sightline (due to the bend in the road) and has been positioned directly in front of habited rooms, which are situated at a lower level than the road, such that vehicle headlights leaving the site will cause significant glare for residents. The proposal is therefore contrary to the principles of the National Planning Policy Framework which require developments to provide safe and suitable access for all users and to ensure that a development does not result in unacceptable impacts on highway safety or residential amenity.

A more sensible design would have located the entrance/exit to the east so that it faces the school playing field. However, and notwithstanding that issue, wherever the entrance is located on Manor Road it would be directly onto where young children arrive for school *via* various means (on foot, scooter, bicycle or *via* a private car) and is thus a safety concern. Manor Road itself will become less safe for older children cycling to Wellsway School *via* the popular Manor Road lane shared cycle/walkway.

Streams of rainwater running down Saltford's residential roads northwards and towards the river, when the public drains cannot cope with the sheer volume of surface water run-off due to the increase in occurrences of intense rainfall events, has become more common in recent years. Increasing surface water run-off resulting from new housing developments will just make matters worse. The ongoing and long-term management of the proposed flood risk attenuation pond to maintain safety including through minimising drowning risk for young children, the control of odours, mosquito and midge control, clearance of accumulated litter, and vegetation management to prevent blockages will be a matter of great concern to residents in the immediate vicinity.

The proposed development also conflicts with Policy D6 of the B&NES Placemaking Plan, which seeks to safeguard the amenity of existing occupiers and resist development resulting in significant adverse impacts from noise, disturbance and general activity for the surrounding area. The harm is exacerbated by the scale of the proposed development, which could generate substantial daily vehicle movements through a poorly positioned site entrance/exit. Although some level of activity is expected within residential areas, the intensity and direct relationship of the proposed access to existing homes would result in material and unacceptable harm to living conditions.

This stretch of Manor Road is part of the B&NES Strategic National Cycling Network and also of the circular route around Bristol, the 85-mile Avon Cycle Way route 410, that leads down to the Bristol and Bath Railway Path on the northeast side of Saltford. Additional traffic arising from a new housing estate leading directly onto that route that is already busy with traffic and where speeding is already a concern, would put the safety of cyclists visiting the area at increased risk.

There are many further important reasons why this planning application should be refused. These include the following:-

Residents already feel trapped in their own village for large parts of the day due to traffic congestion and increasingly frequent grid-locks in Saltford on the A4. Saltford's residential side-roads and back-lanes have become severely blocked at peak times due to the level of new developments by or near the A4 in recent years.

The incremental growth of housing due to recent new housing developments in the area mean our residential roads have become "Park and Ride" car parks for users of the main bus services to Bristol and Bath.

Access to the Bath Road A4 and bus services will be past the adjacent primary school's rear entrance, along the walk/ride-to-school route, and via residential roads already badly affected by peak time congestion and parking. This area cannot take any more vehicular traffic.

New homes here will not be affordable but will create yet more commuter travel on roads that are already beyond their carrying capacity at peak times. Saltford is rural and not a centre of employment. New affordable homes should be built in Bristol and Bath close to future employment.

Saltford has increased in size by 114% since 1950 and has thus reached the reasonable limit of its development growth, particularly as Saltford is not a centre of employment. This means new housing developments would lead to loss of undeveloped Green Belt land whilst creating and worsening the transport congestion that so badly affects the area. To constantly add new housing developments to areas that have reached their limit for development growth, has the disastrous effect of drastically reducing the quality of life for existing communities. It is not sustainable development for attempts by developers to override Local Plans to be allowed to proceed in this manner.

This parcel of land is immediately east of Longwood, one of only two mature woodlands in Saltford. The proposal, if consented, would result in the removal of approximately 200m of mature hedgerows (including over 25 mature trees) along the fringe of Manor Road and the hedgerow running north to south through the site; that would be a substantial loss of mature vegetation and would result in irreversible harm to habitat connectivity, wildlife corridors and the ecological function of the site.

Wildlife species that roost in Longwood, Tawny Owls, Little Owls and bats, and are regularly observed feeding in and across the paddocks, depend on established landscape features like this that form part of a wider habitat network supporting biodiversity and protected species.

Wildlife corridors adjacent to important habitat like Longwood should be protected from development to help our local ecosystems to thrive at a time when we all face an ecological emergency with potentially devastating consequences. Biodiversity net gain (BNG) actions as suggested in the application's Ecological Impact Assessment have notable limitations, including significant time lags for habitats to mature and limited enforcement capacity at the local authority level as well as the negative impact on existing established habitats in the immediate vicinity from habitat fragmentation. Loss of the specific habitats and ecological support those paddocks provide would be extremely detrimental for the aforementioned wildlife in Longwood, and for a long period before any BNG had become effective.

Loss of this green open landscape area will be harmful to residents' health and well-being, an important factor that should not be under-estimated. Furthermore, therapy animals for people with mental and physical health needs are kept and used in the paddocks for health support work commissioned by social services. The therapy provided is a very valuable service to the wider community and should be protected.

In summary, SEG asks BaNES Council to deliver on its responsibilities for protecting its rural communities, green spaces, future food security, wildlife habitats, nature and the crucial contribution to health and well-being that the Green Belt between Bristol and Bath provides, by rejecting this planning application. Saltford's Green Belt provides a useful buffer zone that helps keep Bristol, Keynsham and Bath from merging into one large urban sprawl. Incremental developments in the Green Belt, including speculative planning applications from developers if permitted, undermine all our futures and slowly eradicates the "countryside next door" for both rural and city dwellers.

www.saltfordenvironmentgroup.org.uk

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