

Sustainability Appraisal (SA) Report by Phil Harding for Saltford Environment Group of the Planning Application by Crest Nicholson (South West) Limited

17th June 2013

Site at Parcel 8966, Land to the South of Manor Road, Saltford, BS31 3AB

- Planning Inspectorate Reference APP/F0114/A/13/2195351
- Bath & North East Somerset Ref: 12/0531/OUT

The proposed development involves the erection of up to 99 dwellings with associated parking, 1 no. access from Manor Road and 2 no. parking lay-bys on Manor Road.



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The fields south of Manor Road, Saltford. ©Phil Harding, May 2013

More landscape photographs can be found in Appendix 4 (pages 18-20) of this report.

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1. Summary Findings and Key Considerations

1.1 **This 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.

1.2 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?

1.3 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.

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

1.5 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.

1.6 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 is willing and able to build there.

1.7 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).

1.8 This SA 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. 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.

2. Policy context and appraisal methodology

2.1 In the Sustainability Statement BRS.2656 (November 2012) associated with this planning application, Pegasus draws attention to the widely accepted definition of sustainable development: “**Development that meets the needs of the present without compromising the ability of future generations to meet their own needs**” from the World Commission on Environment and Development 1987 report, “Our Common Future”, chaired by Mrs Gro Harlem Brundtland, often referred to as the Brundtland definition. The NPPF refers to this definition also.

2.2 Sustainable development is central to the NPPF. Nationally, Defra is the Government Department with overall responsibility for sustainable development policy. When the NPPF was launched in 2012, the Secretary of State for Environment, Food and Rural Affairs at the time, Caroline Spellman, said of the NPPF:

“It gives local communities more powers to shape the neighbourhoods they live in and protect the green spaces that are important to them, and will mean we won’t see the kind of unsustainable development which has blighted rural areas in the past.”

2.3 The author has obtained further guidance from the Minister for Planning – this is reproduced at Appendix 5 and shows 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”.

2.4 Saltford Environment Group uses a ‘Brundtland-based’ definition of sustainable development that originates in the South West of England (www.oursouthwest.com, 1999). This provides a definition that would be more readily understood by the general public and makes a distinct reference to the carrying capacity of the environment. It is as follows:

"At its heart sustainable development is the simple idea of ensuring a good quality of life for everyone, now and for generations to come. It is about living within the carrying capacity of the environment so that how we live, work and enjoy leisure activities, does not harm or put undue pressures on the environment. It is about ensuring everyone has the opportunity to have a decent education, a quality environment that they take pride in, good health and a decent job."

2.5 Taking account of a growing awareness in the community of threats to the natural environment and in particular to the Green Belt, SEG’s Executive Committee agreed a policy statement in January 2013 incorporating six core principles for why Saltford’s Green Belt should not be developed. The statement is at Appendix 1.

2.6 For the purpose of this appraisal the proposed housing development has been tested against six key sustainability objectives (see Note 2 below):

1. Uses previously developed land
2. Close to sources of employment to minimise commuter travel
3. Low carbon sustainable construction methods & resilient to climate change
4. Protects or enhances wildlife and habitats, protects biodiversity
5. Meets local needs and enhances local services
6. Complements the setting and style of the existing area

Note 1: The objective “*Benefits the local economy*” is not included for housing developments such as the one proposed. This is not usually a specific medium to long term purpose for house building on sustainable development grounds.

Note 2: These objectives are based on the SW Regional Sustainable Development Framework produced by the SW Round Table for Sustainable Development in 2001 and further developed in 2007 by Sustainability South West as “SustNav”.

2.7 The ratings used for the appraisal are in Table A below:

Table A. Sustainability Appraisal Ratings

YES	Objective met
PART	Objective partially met
NO	Objective not met or no evidence supplied
N/A	Not applicable

3. Sustainability Appraisal

3.1 Table B gives the appraisal ratings for each of the six key sustainable development objectives together with explanatory comments (C). Just one objective is partly met and that is only a very marginal case (as described).

Table B. Sustainability Appraisal (SA) Ratings for this Development

<p>1. Uses previously developed land</p> <p>SA RATING: NO</p> <p>C1.1 This is part of Saltford’s Green Belt agricultural land (class 1, 2 and 3a). It has not been previously developed.</p>
<p>2. Close to sources of employment to minimise commuter travel</p> <p>SA RATING: NO</p> <p>C2.1 Saltford is not a source of new employment opportunities; it is primarily a housing settlement with a few local shops, Post Office, four public houses and a few micro businesses. It is between two major cities and centres of employment (Bristol and Bath). A new housing development of this size would inevitably create more road traffic (principally cars) and resultant CO2 and Nitrogen Dioxide emissions on Saltford’s road network including the A4 which is already at or close to capacity during peak periods.</p> <p>C2.2 An air quality management area was declared by B&NES Cabinet from Beech Road/Manor Road to the southern end of Saltford on the A4 in December 2012 because of the excess mean vehicle emissions of Nitrogen Dioxide; additional congestion at the Manor Road junction with the A4 resulting from this development would add to the pollution.</p>
<p>3. Low carbon sustainable construction methods & resilient to climate change</p> <p>SA RATING: NO</p> <p>C3.1 Although only outline planning permission is sought at this stage, there are no zero or</p>

near-zero carbon renewable energy plans included in the proposals.

C3.2 The developer proposes to meet, not exceed, Building Regulations (i.e. minimum standards) rather than take a more ambitious sustainable development approach through, for example, aiming for a high Code for Sustainable Homes rating or high BREEAM rating.

C3.3 The densely packed development proposed, of up to 99 dwellings, may increase the existing problems of flooding of the local area with faster surface water run-off during or after heavy rainfall - a growing problem and area of concern amongst local residents. The developer has made no mention of how the proposed dwellings would be suitable for a changing climate during their lifetime and before refurbishment would be appropriate (i.e. design for the climate in 20 - 30 years' time, not as it is now, using UK Climate Projections UKCP09).

4. Protects or enhances wildlife and habitats, protects biodiversity

SA RATING: NO/PART* *see C4.5 for explanation of this rating

C4.1 This development destroys an area of undeveloped Green Belt.

C4.2 All of nature is inter-linked which is why a healthy countryside requires a range of different habitats to support wildlife. These fields are not highly cultivated farmland and look somewhat richer in diversity and number of wild flowers than is typical of the neighbouring farmland. These plants provide wildlife with food and habitat benefits that complement the other eco systems within or surrounding Salford that thereby help enable farmland in the near locality to function through, for example, pollinating insects.

C4.3 Badgers, bats and many species of wild birds are regularly seen to feed or pass through this area. A badger sett has been in existence close to the south west corner of the fields for at least 35 years according to the current owner of the adjacent field.

C4.4 The main habitats of wildlife value are the boundary hedgerows, trees and stone wall along the southern boundary. The proposed plans appear to indicate that most of the boundary hedgerows and trees will be retained and where not, replacement planting has been proposed. In addition to this, it is likely that non-intensified agricultural land, i.e. such as these fields that are mostly used for horse grazing, provide a better wildlife habitat than intensified agricultural land or residential developments with small gardens. Landscape views can be found at Appendix 4.

C4.5 An "objective partially met" rating might be achievable if the hedgerows are enhanced and native trees and other native species of flora are planted on the site boundaries and within the gardens of dwellings. This could have the potential to provide slightly more wildlife habitat than the open grazed fields as at present. Specialist advice would be necessary to ensure wildlife habitat provision was enhanced as a result of this development compared to the loss of some established hedgerows and the open fields.

5. Meets local needs and enhances local services

SA RATING: NO

C5.1 The developer's case for building on this site is essentially to help address the shortfall in the supply of housing across the wider B&NES administrative area. So far as it is possible to establish, a housing-needs survey or place-making plan for Salford has not been undertaken by B&NES. It is therefore difficult to assess the extent to which the proposed

mix of houses in this development would contribute to meeting local needs. Responses to the Parish Plan Questionnaire, circulated in September 2009, suggest that there is a need for more affordable housing in the village – cited by 140 households – as well as a lesser demand for housing to rent, small 1-2 bedroom properties, retirement homes, warden assisted homes and bungalows etc.

C5.2 However, it is significant that despite the potential need for affordable housing, 93% (1,002) of respondents to the Parish Plan Questionnaire said that they thought it important to preserve the Green Belt around Saltford. This would strongly suggest that the provision of new affordable housing in a rural village like Saltford should be on brownfield and infill sites within the existing housing development boundary.

C5.3 Open green space within the community forms part of that community's green infrastructure. As described in the Secretary of State's foreword to the June 2011 Natural Environment White Paper "*The Natural Choice: securing the value of nature*", human health and happiness suffer when people lose contact with the natural environment. These Green Belt fields are part of Saltford's green infrastructure for residents living near this location. The NPPF (paragraph 83) states that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan and (paragraph 88) Green Belt development is only permitted in "very special circumstances". Any amendments to Green Belt boundaries therefore should be approved through the Local Plan (or Core Strategy) process and/or an independent Green Belt review, not by planning applications from developers. In this application there is no evidence of "very special circumstances" for permitting the loss of this Green Belt (an appraisal of Crest Nicholson's "very special circumstances" in their grounds for appeal is given at Appendix 3).

C5.4 Several residents have expressed concern that the increased traffic volumes at this location would increase both congestion and the existing traffic hazard for children using the rear access in Manor Road for Saltford Primary School and Tiddlers pre-school. Additional daily vehicle trips of up to 693 (calculated using the daily trip rate of 7 trips per dwelling, as set out in the B&NES Supplementary Planning Document on Planning Obligations, July 2009) would increase existing incidences of localised traffic congestion, especially at peak times on the A4 and for local residents gaining access from residential side roads.

C5.5 Local parents and prospective parents have expressed to SEG and the Saltford Green Belt Campaign, and in the planning objections submitted, their concern that their children may not be able to get a place at Saltford Primary School in the future if these houses are built and of the additional burdens this development would place on the school. Saltford Primary School uses "temporary" mobile classrooms now with little space for enlargement other than building on the school playing field or the adjacent sports field thus losing even more green space in this locality. Such a loss of amenity would be detrimental to the availability of outdoor areas for sports enjoyed by children attending the school as well as for local children who live on this side of Saltford and spend leisure time at this location.

C5.6 Residents have also expressed concerns that Saltford does not need more burdens on local services such as the local Doctors' surgery that already struggles to cope with existing demand.

6. Complements the setting and style of the existing area

SA RATING: NO / N/A

C6.1 The loss of open green space at this location would harm the existing rural setting of this part of Saltford.

C6.2 The attractiveness of the design of houses is subjective and not appropriate for this sustainability appraisal as only outline planning permission is sought at this stage.

3.2 It can be seen from this appraisal that the proposed development fails to meet 5 of the 6 key objectives and that the remaining objective is met only partially and conditionally.

3.3 Using the sustainable development policy context as described in this report, the author has also appraised two key documents provided by Crest Nicholson and their agents Pegasus:

1. Sustainability Statement BRS.2656 (Nov 2012) by Pegasus – the appraisal is at Appendix 2.
2. 7 issues raised by Crest Nicholson as “very special circumstances” in their “Grounds for Appeal” – the appraisal is at Appendix 3.

3.4 The appraisal of the two key documents (at Appendix 2 and 3) shows that they do not make a case for permitting this development on sustainable development grounds.

3.5 The appraisal of the proposed development shows that if permitted it would harm Saltford’s environment, have a negative impact on the quality of life for local residents, destroy the openness of the Green Belt on the south side of the village, increase commuting by car as Saltford is not a source of new employment opportunities, and increase the carbon footprint of Saltford. **The conclusion reached by this appraisal is that the proposed development does not contribute to sustainable development.**

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About the author

After a career in UK Government service in Whitehall (Department of Energy) and the South West, and following the closure of regional Government Offices in 2011, Phil Harding now works freelance communicating ideas, advice & guidance on motivation, change, sustainability & the environment.

Phil transferred from the Department of Energy’s HQ in London to its South West office in 1991 as Deputy SW Regional Energy Efficiency Officer. He was subsequently appointed Regional Energy Efficiency Officer and, with changes to national and regional support programmes, that post evolved so that Phil became Senior Policy Adviser (at the Government Office for the South West) with responsibility for climate change adaptation, resource efficiency and sustainable development. Phil became a member of the Chartered Management Institute in 2005. He was awarded the MBE in 2006 for his “contribution to sustainable development in the South West”. Phil has built up considerable knowledge of sustainability issues and also an extensive network of professional contacts. At the local level, Phil helped set up Saltford Environment Group in 2011 and became Chairman in June 2013.



APPENDIX 1

Green Belt: The Six Core Principles

Saltford Environment Group's Committee agreed the following policy statement incorporating six core principles on 15th January 2013.

We are of the opinion that the Green Belt land around Saltford should not be developed because:

- It is important to retain and sustain a sense of community for villages like Saltford. The creation of additional housing on Green Belt land around Saltford would set an unwelcome precedent leading to an urban sprawl merging Bristol with Bath, the destruction of the setting and special character of the area, and loss of community cohesion. This would seriously diminish the quality of life for the wider community, as well as the residents of Saltford.
- Traffic congestion requires sustainable solutions, not simply creating more roads that increase overall road traffic with higher carbon and other polluting emissions whilst creating traffic problems elsewhere.
- The protection of our 'natural capital', the natural environment and the biodiversity of wildlife that it supports, is essential for the health and well-being of present and future generations. It is important to retain and enhance attractive landscapes near where people live.
- Green Belt and agricultural land should be retained and protected for potential future food production purposes should that become necessary against a background of extreme weather due to climate change creating food shortages in the future.
- The existing services and infrastructure struggle to cope with heavy rainfall; further development would make matters worse.
- Central and Local Government have a duty of care to take a more long term and strategic approach by first identifying the future 'carrying capacity' of the UK and local regions. This must be done against a background of world population growth that is creating an ever growing demand for food whilst the increasing episodes of extreme weather in the UK and worldwide due to climate change will reduce the UK's ability to feed itself or rely on imported food.

For these reasons we cannot accept development on our Green Belt as a matter of principle.

Source: <http://www.saltfordenvironmentgroup.org.uk/greenbelt.html>

APPENDIX 2

Sustainability Appraisal of the Sustainability Statement BRS.2656 (Nov 2012)

An assessment of the claims or statements made by Pegasus in its “Sustainability Statement BRS.2656 (Nov 2012)” is set out below. This covers

1. Construction Standards: Greenhouse Gas Emissions;
2. Transport;
3. Surface Water Run-off; and
4. Pollution Management

1. Construction Standards: Greenhouse Gas Emissions

Pegasus:

1.1 As there are no material considerations within applicable planning policies that require Code for Sustainable Homes or BREEAM standards to be used at the proposed development, energy and carbon dioxide emissions associated with the operation of the new buildings will comply with Part L of the Building Regulations 2010. The only exception to this will be the Affordable Homes, which must achieve Level 3 of the Code for Sustainable Homes.

1.2 It is proposed that any emissions reductions beyond Building Regulations which are required by the Council are achieved in accordance with the Zero Carbon Hierarchy (i.e. prioritising energy efficiency over renewable energy).

Assessment:

1.3 Building Regulations are minimum standards to be met; they are not standards that achieve sustainable development. The code level 3 energy standard is already incorporated in the Building Regulations yet level 4 is already readily achievable (Note: Level 1, or 1 star is the lowest level and level 6, or 6 stars, incorporates zero carbon and is the highest). According to the “Code for Sustainable Homes and SAP ratings Statistical Release” from DCLG dated February 2013, between April 2007 and December 2012, 115,204 dwellings at the design stage received a 3 star rating and 32,242 dwellings received a 4 star rating for England, Wales and Northern Ireland.

1.4 Buildings account for approximately 50% of the UK’s carbon emissions. It is reasonable to expect, therefore, that if new housing developments are to claim to contribute to sustainable development, then they should be as near zero carbon as is technically possible, and higher than minimum standards. The government reaffirmed its committed in the March 2013 Budget to making all new homes zero carbon homes from 2016.

1.5 Only outline planning permission is sought at this stage so a sustainability appraisal of the construction and individual dwelling design is not appropriate. However to seek to only meet and not exceed Building Regulations (level 3) does not appear to demonstrate sustainable development, especially as the Government’s zero carbon emissions target for all new homes is less than 3 years away (i.e. 2016).

1.6 If planning permission were to be granted one would reasonably expect to see a higher standard of sustainable construction in terms of lower carbon emissions for a development of this size. This report agrees that the Zero Carbon Hierarchy approach should be taken, i.e. that energy efficiency should take precedence over renewable energy. However, the construction standards proposed by Pegasus do not contribute to sustainable development.

2. Transport

Pegasus:

2.1 Reference is made of the site's close proximity to the A4 (Bristol/Bath Road) public transport corridor, bus stops located on Bath Road to the north of the site, approx. 500 metres from the centre of the site via Manor Road.

2.2 Reference is also made of a Transportation Assessment (TA) by Hydrock concluding that the proposed development is sustainably located and can be accessed on foot, by cycle and by local bus services. It also concludes that the anticipated trips generated by the development can be accommodated without detriment to the existing operation and safety of the local highway network. The TA states that the site is considered to be in a sustainable location, which is accessible by public transport facilities and close to shops and facilities required on a daily basis. It notes that the site is suitably located to allow residents and employees to travel to and from the site by foot, by cycle or by bus to the surrounding residential and commercial land uses within Saltford village centre and other local and regional destinations.

Assessment:

2.3 NPPF (March 2012) section 4 on promoting sustainable transport, states:

“37. Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.

38. For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site...”

2.4 Furthermore NPPF (paragraph 158) states:

“Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated...”

2.5 Saltford is not a source of new employment opportunities; it is primarily a housing settlement in a rural setting with a handful of local shops, four public houses and a few micro businesses. It is between two major cities so a new housing development of this size would inevitably create more road traffic (principally cars) and resultant CO₂ and Nitrogen Dioxide emissions on the road network that is already at or close to capacity during peak periods.

2.6 An air quality management area was declared by B&NES Cabinet from Beech Road/Manor Road to the southern end of Saltford on the A4 in December 2012 because of the excess mean vehicle emissions of Nitrogen Dioxide; additional congestion at the Manor Road junction with the A4 resulting from this development would simply make the situation worse.

2.7 Existing evidence shown by the travel habits of Saltford commuting residents that live closer to the bus stops on the A4 than the proposed development is that car use is the preferred choice in Saltford for those without access to concessionary fares. The location encourages further car use compared to a more appropriate location close to a centre of employment. Saltford's carbon footprint would be raised not lowered by this development so this development would contribute to higher levels of carbon emissions from transport.

2.8 The A4 is understood to be at or near capacity during the morning and evening peak periods. This is illustrated by the traffic count within the Transport Assessment (TA) by Hydrock Consultants Ltd. That count found that in the 3 hours from 7am to 10am at the Grange Road junction on 19.9.2012 6,404 vehicles (equating to 35.6 per minute or 1 in every 1.7 seconds) were recorded at this section of the A4. Due to the heavy volume of traffic, long tailbacks through the village occur regularly during weekday peak periods; these can stretch for over 1 mile in either direction (east and west) from Saltford.

2.9 Furthermore there is concern in the local community that there would be an increase in traffic hazards for young children attending Saltford School and Tiddler's Pre School via the Manor Road entrance immediately opposite the site. This would also affect secondary school children travelling to and from Wellsway School in Keynsham on foot or on bicycle who will cross Grange Road and/or users, including school children on foot or cycling, of the narrow back lanes of Manor Road, a rat run used by motorists between Saltford and Keynsham that is likely to attract further traffic due to the congestion on Manor Road and Grange Road.

2.10 Any objective view supporting sustainable development would reasonably demand that for new housing developments to contribute to sustainable development, they must be located close to sources of employment to minimise the need for commuter travel – and the NPPF supports this approach. New housing developments should not contribute to existing traffic congestion problems or traffic hazards for local residents and their children.

2.11 Crest Nicholson has made reference to the possible opening of a new railway station in Saltford. The West of England Transport Body does not envisage construction of a station at Saltford until 2018/19 at the earliest after a business case has been made.

2.12 On transport grounds, this proposed development detracts from rather than contributes to sustainable development.

3. Surface Water Run-off

Pegasus:

3.1 New drainage will be a separate system with foul draining to the public foul network and surface water draining at 1 in 1 year Greenfield runoff rate. To achieve this, a Sustainable Urban Drainage System (SUDS) will be implemented on site. Should the site ground

conditions be appropriate, then roofs may be designed to drain to soak-away in gardens which would reduce the overall amount of surface water storage needed.

Assessment:

3.2 The northern end of the fields and Manor Road adjacent to the fields already become water-logged or experience streams of surface water run-off during periods of prolonged wet weather, 2012 being a prime example.

3.3 Local residents in this part of Salford (and therefore in homes below the proposed development) are naturally concerned that a housing development at this location would increase flood risk to their properties raising insurance premiums and considerable stress and concern. Enhanced drainage, supervised by an independent Sustainable Urban Drainage expert, is already required in this location before matters are made worse by any new housing development.

4. Pollution Management

Pegasus:

4.1 Reference is made to various measures that can be taken during construction to minimise pollution and of being “pollution positive” to reduce adverse effects on land, water and air quality, restore land to beneficial use and avoid risk of flooding, the development becomes more sustainable.

Assessment:

4.2 Reducing pollution during construction does not by itself make a development “more sustainable”, it simply makes it less harmful to the local environment. Such measures should be taken by any responsible construction company that takes environmental stewardship seriously and would have an Environmental Management System in place. According to their websites, Crest Nicholson and Pegasus Planning Group are accredited or are working towards accreditation for ISO14001 (Environmental Management System standard).

4.3 However, whilst it is reasonable to expect effective measures to be taken to manage and prevent pollution during construction, given that the development is not sustainable development due to its location, use and thereby destruction of Green Belt and agricultural land (class 1, 2 and 3a); this development itself means that the site cannot be restored thereafter “to beneficial use”, i.e. for agricultural or landscape value purposes.

**Phil Harding
2013**

APPENDIX 3

Sustainability Appraisal of the 7 issues raised by Crest Nicholson as “very special circumstances” in their “Grounds for Appeal”

The 7 issues raised by Crest Nicholson were:

1. Delays of the Council to produce an up-to-date Development Plan
2. Green Belt boundaries need to be amended in order to achieve additional housing to meet local needs
3. Affordable Housing Need
4. The site provides an appropriate and logical site to release from the Green Belt
5. The site has a limited landscape function in landscape terms
6. The site would meet national objectives to achieve sustainable development
7. Other issues

The response to each of the seven issues raised is as follows:

1. Delays of the Council to produce an up-to-date Development Plan

1.1 It is for B&NES to explain the reasons for those delays and if there is any shortfall of dwellings or in the 20% buffer to the 5 year housing land supply. However, in the absence of an assessment of need there is no “very special circumstance” or, as claimed, “exceptional circumstance” to justify why development on Saltford’s Green Belt land should be permitted especially as this is not included in the draft Core Strategy.

2. Green Belt boundaries need to be amended in order to achieve additional housing to meet local needs

2.1 If Green Belt boundaries need to be amended, this should be through an independent Green Belt review and a housing needs assessment. Boundaries should not be amended at the behest of planning applications by developers who have no lasting interest in the local community other than capitalising on a parcel of Green Belt land.

2.2 Crest Nicholson states that consideration should be given to paragraph 85 of the NPPF for defining Green Belt boundaries. However it is reasonable to surmise that the NPPF makes it clear that those considerations are for local planning authorities to use in the context of Green Belt reviews, not for individual planning applications from developers.

2.3 The independent Green Belt Review Stage 1 Report (April 2013) by the consultants Arup for the draft Core Strategy records that Saltford’s Green Belt at this location (i.e. South of Saltford) “*helps to preserve the identity and setting of the village of Saltford.*” It also states that “*Positive uses of the Green Belt in this land parcel include the protection of the Folly Wood Site of Nature Conservation Interest and Saltford golf course*” and “*the Green Belt here does help to preserve the setting of the Saltford Conservation Area.*”

3. Affordable Housing Need

3.1 The forthcoming Core Strategy is the means and democratic process by which B&NES Council will address the provision of new affordable homes in the B&NES area including Saltford and in suitably chosen locations. Crest Nicholson has not shown a “*very special circumstance*” for allowing this development to proceed on the grounds of affordable houses.

4. The site provides an appropriate and logical site to release from the Green Belt

4.1 That is a subjective claim by the developer wishing to build houses at this location and cannot be described as a “*very special circumstance*”. Furthermore if that claim were correct, the Green Belt review by Arup (see 2.3 above) would have identified this site as suitable for the purpose of housing development.

4.2 The developer is incorrect to claim that “*this site does not perform Green Belt functions well*” by ignoring 3 of the 5 purposes of the Green Belt in NPPF paragraph 80. These are (with comment):

- *to check the unrestricted sprawl of large built-up areas* (Saltford will become an unrestricted sprawl and eventually lose its village status if its Green Belt is allowed to be removed in stages, this being the first);
- *to assist in safeguarding the countryside from encroachment* (the residents of Saltford value their local countryside - this is probably the most important of the 5 purposes in this particular case);
- *and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land* (in other words, developers should develop brown field sites in urban settings or immediately adjacent to urban areas, not the Green Belt).

4.3 The other 2 purposes of the Green Belt in the NPPF (to prevent the merger of neighbouring towns and protecting the special character of historic towns) are not applicable as there is no town immediately south of the site and Saltford is a village not a town although Saltford does have buildings of historic interest and value e.g. Saltford Brassmill (18th Century), St Mary’s Church (Saxon), and Saltford Manor (thought to be the oldest continuously occupied private house in England). These collectively are within the Saltford Conservation Area and contribute to the historic and rural feel and setting of Saltford.

5. The site has a limited landscape function in landscape terms

5.1 Another subjective statement from the developer wishing to change the use of a parcel of land to allow it to build houses at the location. It is not one shared by those who live in this part of Saltford. The golf club including its driving range immediately south of the site provides a parkland landscape and the open views from Manor Road (the main viewing point of this landscape) over the fields and the golf club land provides a strong perception of open countryside with housing, partially obscured by trees and other natural vegetation, only visible on one boundary (east). Landscape photographs can be found at Appendix 4.

5.2 The Government's Natural Environment White Paper "*The Natural Choice: securing the value of nature*" (Defra, June 2011, ISBN 978-0-10-180822-4) sets an ambition for Government policy concerning landscapes in Chapter 2 (Protecting and Improving our Natural Environment). That ambition is:

"We want to improve the quality of our natural environment across England, moving to a net gain in the value of nature. We aim to arrest the decline in habitats and species and the degradation of landscapes."

5.3 The following policy statement in Chapter 2 (2.37) of the White Paper describes Government policy concerning the importance to communities of their own local landscapes:

"In England the diversity of our landscapes contributes to our national identity and the distinctive character of our local communities. As our landscapes continue to change to meet the needs of the 21st century they will retain a strong local character across the country. They will reflect the needs and aspirations of local communities, who will have opportunities to shape them through local planning and conservation projects. England's protected landscapes will set the standard for excellence in integrated conservation management."

5.4 To build a housing development at this location would lose the openness of views from this part of Salford and be contrary to Government policy concerning valuing landscapes from a community viewpoint. There is therefore no "*very special circumstance*" for allowing this development on this area of local landscape; quite the reverse.

5.5 Appendix 4 to this report shows landscape views of the fields south of Manor Road.

6. The site would meet national objectives to achieve sustainable development

6.1 The developer claims that Salford is one of the most sustainable villages within the Council's administrative areas, a claim that is not made by Salford Environment Group even if this is a long term aspiration (and the proposed development makes Salford less sustainable not more sustainable). No case is made that can describe a "*very special circumstance*" on sustainable development grounds and as far as the author is aware, no independent sustainability appraisal of this proposed development has been made during the planning application process.

6.2 The Sustainability Appraisal and the "Summary Findings" (pages 5 - 9) of the main report demonstrate why this proposed development does not contribute to national sustainable development objectives.

7. Other issues

7.1 A response will be given as appropriate to other issues raised during the Inquiry process.

Phil Harding
2013

APPENDIX 4

Landscape views: Fields south of Manor Road, Saltford

Note. Higher resolution versions of the photographs featured in this Appendix may be available from Phil Harding on request.

#1. Looking west-south-west approaching from the east on Manor Road.



© Phil Harding, May 2013

#2. Looking west-south-west approaching from the east on Manor Road.



© Phil Harding, May 2013

#3. Looking south from Manor Road.



© Phil Harding, May 2013

#4. Looking south from Manor Road.



© Phil Harding, May 2013

#5. Looking east from the south west corner of the fields



© Phil Harding, May 2013

Appendix 4 continued

#6. Looking east from the south west corner of the fields



© Phil Harding, May 2013

#7. Looking west-south-west from south east corner of the fields (from Hill Farm Cottage).



© Phil Harding, May 2013

APPENDIX 5

Food security and land use planning – Ministerial Correspondence

1.1 On 12th April 2013 the author of this report, Phil Harding, wrote to the MP for North East Somerset, Jacob Rees-Mogg, setting out in detail the issue of how extreme weather events arising from climate change and a rising UK and global demand for food due to population growth brought into sharp focus the importance of land-use planning and its impact on the UK's food production capacity. Phil Harding's letter* outlined why the precautionary principle should be applied for protecting the UK's Green Belt and agricultural land from development that renders such land unusable for food production should the future need arise.

1.2 The letter asked Jacob Rees-Mogg MP to put two related questions to the Departments for Environment, Food and Rural Affairs, and for Communities and Local Government:-

1. What strategic action is the Government taking to ensure that the UK's carrying capacity, in particular food security, will continue to have sufficient headroom for a growing population experiencing climate change and further extreme weather events in the future?
2. On what grounds should local communities be expected to surrender Green Belt and agricultural land for housing or other non-food related development before Defra and CLG can demonstrate with clear evidence that it is safe to do so without risking future food security and the nation's supply and access to food?

*A copy of Phil Harding's letter of 12.4.2013 can be obtained on request (see page 1 for contact details).

2. Response from the Planning Minister

2.1 The response letter dated 20th May 2013 from Nick Boles MP, the Planning Minister at the Department for Communities and Local Government is within this Appendix. The Minister makes the point (in the third paragraph) 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"*.

2.2 This shows that the proposed development does not fit with the Government's planning policies as:

- a) There is no evidence that this development is essential; and
- b) The fields in question are agricultural land (class 1, 2 and 3a), i.e. "best and most versatile land." They are not of poorer quality.

3. Response from the Minister of State for Agriculture and Food

3.1 The response letter dated 26th May 2013 from David Heath CBE MP, the Minister of State for Agriculture and Food, at the Department for Environment, Food and Rural Affairs is also within this Appendix. In the final two paragraphs the Minister also confirms that *"planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality"* and that *"in any particular case, it is up to the local decision-makers, in consultation with the local community, to assess all the facts..."*

3.2 This response supports the case made by this SA that poor rather than best and most versatile agricultural land (class 1, 2 and 3a) should be considered for development and of the need for community engagement and acceptance in the decision making process.



Department for
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Our Ref: ER/NB/014506/13

20 MAY 2013

Thank you for your letter of 29 April to the Rt Hon Eric Pickles MP, Secretary of State for Communities and Local Government, enclosing correspondence from your constituent, Mr Phil Harding, of [REDACTED], about food security and the loss of agricultural land to development.

We want people to have access to safe, affordable, sustainable and healthy food at all times. However, our domestic food industry also needs to be able to compete on the world stage. The Government believes that food security is best achieved through access to fully functioning global markets. Too great an emphasis on growing all our own food could affect our ability to respond effectively to shortfalls in particular foods, whether home-grown or imported, and make the sector less resilient to major impacts from pests, disease and extreme weather. Therefore my colleagues across government are working to help food-producers access international markets and be resilient to major shocks that affect supply.

Following our planning reforms, the National Planning Policy Framework puts local communities at the heart of decision-making about where housing and business development should go, and includes strong safeguards for the environment. Decisions about the allocation of land for development in Local Plans, and on individual planning applications, rest with local planning authorities. However, they must have regard to policies in the Framework whenever relevant.* For instance, the Framework requires planning authorities to encourage re-use of previously developed land if not of high environmental value, and to take into account the economic and other benefits of the best and most versatile agricultural land. If development on farmland is essential, planners should seek to use areas of poorer quality land in preference to that of a higher quality, and Natural England must be consulted where development will mean the loss of twenty or more hectares of the best, most versatile land. The Framework also maintains strong protections for Green Belt and other land with protective designations.

In view of the above, we have no plans to forbid all building on farmland until self-sufficiency is assured, as Mr Harding proposes, but I am grateful to him for setting out his concerns.

NICK BOLES MP



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Our ref: MC309968/MW

May 2013

From David Heath CBE MP
Minister of State for Agriculture and Food

Thank you for your letter of 29 April to the Secretary of State enclosing a copy of one from your constituent, Mr Phil Harding of [redacted] about food security and land use planning. I am replying as the Minister responsible for these policy areas.

We recognise the coming decades will present the farming sector with growing economic, environmental and social challenges and that, in order to help feed nine billion people worldwide by 2050, we will need to increase food production sustainably through improving productivity and competitiveness in the UK, EU and beyond. This Government is taking action to meet its objectives of supporting British farming, encouraging sustainable food production and helping to enhance the competitiveness and resilience of the whole food chain with the aim of ensuring a secure, environmentally sustainable and healthy supply of food with improved standards of animal welfare.

The Government's Chief Scientific Advisor Sir John Beddington produced a Foresight report on the Future of Food and Farming: challenges and choices for global sustainability. The Foresight report examines population growth and climate change along with other pressures on the food system. The report challenges governments worldwide to take action. Defra and the Department for International Development (DfID) have both committed to act on the report and have signed up to a Foresight action plan. You can access Defra's Foresight Action Plan and the Foresight Report at the following website:

<http://www.bis.gov.uk/foresight/our-work/projects/published-projects/global-food-and-farming-futures/reports-and-publications>

We recognise that producing more food needs to be done in a sustainable way in conjunction with land use. In response to the challenge of increasing food production sustainably Defra has taken a number of actions including the launch of the Green Food



INVESTORS
IN PEOPLE

Project. This is a joint initiative between Government, the food and farming industry, environmental groups and consumer organisations, to examine how we can increase food production in England whilst at the same time enhancing the environment.

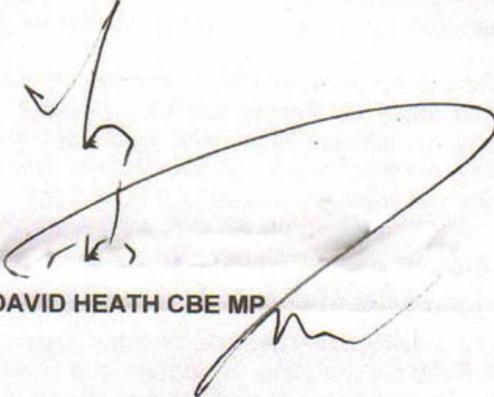
The initial conclusions were published on Defra's website on 10 July 2012 as '*Green Food Project – Conclusions*' together with a news release '*Feeding the nation and enriching the environment*'. These are being used to shape our policy work on food and farming and the way in which we contribute to the global debate on food security. You can view the document here:

<https://www.gov.uk/government/publications/green-food-project-conclusions>

On the specific use of land, throughout the Government's National Planning Policy Framework there is a strong and clear emphasis on sustainability. In the Framework we require planning authorities to take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.

The Framework also sets out that planning should recognise the intrinsic character and beauty of the countryside, protect the Green Belt and encourage re-use of brownfield land, provided it is not of high environmental value. However, in any particular case, it is up to the local decision-makers, in consultation with the local community, to assess all the facts and say how much weight should be given to all the relevant policies, facts and circumstances. You can view the full document at:

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>



DAVID HEATH CBE MP

