



Dear Dave Perry, Strategic Planning Policy and Specialist Advice team, Carl McClure and Patrick Conroy

Consultation: Local Plan Phase 3 – Representation

Siston Parish Council held a public consultation on Monday 8th January 2024, followed by an extraordinary meeting and wish to make the following representations on behalf of the residents.

Consultation process

Residents noted that the timing of this consultation was poor. Held between December to February, during the winter months, it was felt that sections of the population would not have accessible information to make appropriate comments.

Siston Parish Council noted in our extraordinary meeting on the 8th of January 2024, whether South Gloucestershire Council should have considered a letter to every home, considering the potential impact on the parish and in anticipation of the level of concern.

Siston Parish Council publicised through a number of means its own public and extraordinary meetings, which were well attended, as already notified, and appreciated the support for materials from Carl McClure – Principle Planning Officer.

Number of homes and location

It has been noted that the number of homes calculated in the consultation contains an error on the number of homes required, due to the existing planned homes being incorrectly stated (Local Plan document page 30 – 10837, reads 10387) and the residents challenge the validity of the calculation to justify the number of homes calculated using the government method, given that there is decline in birth rate and wish to challenge whether the calculation used is out of date.

Siston Parish Council and its residents feel the number of homes planned for the parish is wholly disproportionate to the total number of houses required across the whole of South Gloucestershire.

Residents request that the rural identity of the area should be protected.

Siston Parish mostly comprises of two villages; Siston and Warmley, traditionally centered around churches, of which St Anne's Church and St Barnabas are two, and has no high street of shops and facilities, which appears to have been overlooked, which makes it different from a town (a large built-up area, with defined boundaries) and we can draw the comparison between Siston Parish and the local Kingswood Town Council area, which is entirely different.

Siston, its village and Warmley have a significant number of protected characteristics including buildings and landmarks listed on Historic England or locally listed, which means they are afforded special protection, and this seems to have been overlooked in any mapping, examples include properties on Goose Green (Bonny Mount Farm, Brook Farmhouse and Mounds Court Farm inclusive), which will be central to proposed site EPS-EV14 if the preferred strategy proceeded. This

reference also contains a home built in the 1850's "The Ashlands" which is located to The Griffin Public House, which is locally listed. It is of paramount importance that all listed buildings are protected in perpetuity.

It should also be brought to the attention of South Gloucestershire Council that the remains of a Roman road travels through Warmley village and passes through Winfield Road on site – EPS-PW1.

The Council appreciated that Cllr Wilmore agreed to instigate a review of the Siston Conservation area and village with South Gloucestershire Council's Conservation Team and latterly the Conservation Officer within a few days of the meeting held by Ward Councillors which she attended on the 9th January 2024 and we assume there are plans to extend this level of investigation and protection across the entire parish, as this will give a fresh perspective on being able to simply build on large sections of green space. The proposed local plan seems to have entirely overlooked this aspect when choosing Siston Parish for an extensive proportion of new homes.

Infrastructure

Parishioners rejected the preferred strategy due to infrastructure.

The road infrastructure is considered inadequate by residents – in our public consultation, which is upheld by the parish council. Concerns are that roads in the parish are already congested and used by traffic trying to bypass the A4174 ring road and the M4 and M5, where the volume increases significantly if there is a major incident on the road network. These routes also contain weight limits. Siston Parish Council highlight significant concerns regarding building in the areas advised when the infrastructure cannot withstand current volumes. Access to and egress from any development would further exasperate the current congestion.

Written submissions made to the parish council which highlight and evidence the impact to Siston Village and adjoining roads on the closure of the A432 (Badminton Road) due to bridge repairs, this is with current traffic volumes, and this has already been advised in a meeting with Cllr Wilmore.

In the consultation residents also noted that the traffic controls at the new site on the former Chief Trading Post site (in Bitton Parish) as being inadequate and that there will already be an increased traffic within Siston Parish from the new housing on the former Grange School site.

Park and Ride

Pertinent to note here due to the comments on infrastructure – comments were made by the parishioners regarding the notes that new Park and Ride sites were to be recommended on preferred sites EPS-EV14 and EPS-EV19.

Residents were concerned about the impact on the existing poor infrastructure and confused why so many park and ride schemes needed to exist and where the people would go. It is contradicting of the opinion that people should be employed locally as stated in the consultation for employment on the east fringe.

A positive comment was made that the existing ones were offering a good service.

Siston Parish Council is now informed that the Park and Ride has been removed from the Warmley proposal, this further demonstrates the level of confusion that exists for residents. It is still showing on the interactive map.

Air Quality

Linking with the potential significant increase in traffic volumes and noted removal of trees and green space, residents highlighted the potential for a further decrease in air quality in the area and want South Gloucestershire Council to understand that the existing extra traffic from the M4 and M5 overspill negatively impact the air quality.

Siston Parish Council agrees with the comment made by residents that air quality and pollution should already be monitored in the parish, due to its location next to the ring road. Part of the A420 in Siston Parish is already covered by a poor air quality zone and has been for many years, but no action to rectify this has been undertaken. The proposed additional loading on the road network would make matters worse and so make it even more difficult for South Gloucestershire Council to rectify the problem.

Residents are therefore against the preferred strategy in this aspect also.

EPS-BV14 and EPS-PW1

The ancient Commons define our area and have been highly protected and managed by Siston Parish Council. The proposal for 970 dwellings behind the A420 (a minimal number which could easily increase substantially) is a degradation to them of the highest order, changing the character of this sensitive area for ever. A pollution and blot on the landscape. This mistake by South Gloucestershire Council Planning should be remedied swiftly - No build - This proposed build seriously impacts and would be detrimental to our historic Conservation /Commons Areas which could never be undone for future generations.

Green Space – across the parish

Residents reject any plans to build on green space, which is supported by the Parish Council. Many hours of volunteer work and financial investment have been done to protect and maintain our green spaces and ancient comments, which are integral to one another. However, one comment was left regarding the fact that the economy should be considered. Please also note the previous commentary about the expected protection of the Siston conservation area.

The residents wish for the South Gloucestershire Council to justify why they feel that building on green space carries with it the “exceptional circumstances” required to satisfy the Secretary of State. They feel that there was no meaningful data in any of the documents which would justify this action.

They wish for it also be explained why Michael Gove has advised that unitary councils should not feel they have to use green space, South Gloucestershire Council are planning that, and with such a concentrated impact on Siston Parish, when smaller, more integrated settlements may have less impact across the whole of authority.

The parish council also received further comments:

- Building on green space is not a sustainable way forward.
- No comments have been made on how the remaining green space will be protected.
- There appears to be no realisation that we are destroying our own land.
- The conservation area is a stone throw away from the planned building.
- Natural space needs to be available for the public, wildlife, plants, and trees.
- The adjoining ancient commons need protecting. In the FWAG report produced by South Gloucestershire Council, it is stated that the surrounding fields are essential to ongoing existence.
- This is green belt and as such is unbelievably valuable for the very reasons it was set up - i.e. to stop urban expansion without green space for people to enjoy, to stop rural communities being subsumed in the urban expansion etc. It is also crossed by many well used footpaths and uniquely dotted with adjacent commons which give the area a special character and value for walkers and wildlife.
- The value of this green belt has been increased in the last 10 years by the planting of Overscourt Woods next to the proposed housing and it is irreplaceable as a green corridor for wildlife.

A question was posed about why Webbs Heath was never formally designated as a green space, as it

met all the qualifying criteria.

Biodiversity

The planned activity in the preferred strategy seems to completely contradict South Gloucestershire Councils own commitment to biodiversity and its climate emergency statement made and it is not clear how the net gain will be sustained or improved through this plan.

Residents commented that the rich biodiversity would be gone and would like answers provided by South Gloucestershire Council on the following:

- The FWAG report commissioned by South Gloucestershire Council states maintenance of the surrounding fields was vital to maintenance of the commons?
- Why is there no protection afforded to the fields at Springfields, which are the lungs of the commons?

Wildlife

Loss of green space will impact on the local wildlife. Residents are rightly concerned about the new strategy impacts and the protection of the many species of animals, flora, and fauna. Comments include:

- The area already has badgers, deer, and foxes, how will this be protected.
- Local nature will not know where to go.
- Loss of wildlife habitat
- Is it really just about human race?
- We have many important species of plants and animals whose habitat would be destroyed by a housing estate: grass snakes, toads, hares, tawny and barn owls, pipistrelle bats tree creepers, kingfishers, grey wagtails, little egrets, goldcrests, kestrels, peregrine falcons, long tailed tits, and resident numerous Roe who fawn on the land. As well as the common butterfly species, there are numerous marbled whites and small coppers in the Summer. There are numerous hay meadow flowers which grow naturally rather than planted: pignuts, cuckoo flowers, knapweed, and heath spotted orchids to mention a few.

Siston Parish Council would like to make South Gloucestershire Council aware of the Bristol Regional Environmental Records Centre, where at least one our residents diligently ensures local references are made. This will impact on where building work can be undertaken where rare species are indicated.

Of note is site reference EPS-EV14 where there is a long-established deer population.

Flooding

Siston Parish Council wish the Council to make note of comments made in respect of anticipated flooding, which is of considerable concern, given the climate emergency.

- No fields to absorb the excess water
- Siston brook is already flooding

Other Services

Residents also feel the preferred strategy has not addressed and will exacerbate existing issue as follow:

- The populations need for GPs / NHS services already overflowing.
- Recycling facilities
- No A&E facilities, after the closure of Frenchay
- Not enough secondary school provision
- The promised Lyde Green Secondary School still has not been built.
- Light pollution from existing sources at Pucklechurch causes an issue with the Siston Conservation Area, which will only increase when there are more properties on its boundary.
- Noise pollution – will be increased in the natural environment.

- A note was submitted regarding the current footfall in Overscourt Wood, causing a loss to the natural environment, which will be impacted by more people using less space.
- Siston Hill Estate has no facilities, and the parish council were advised that already the costs of repairs due to vandalism have depleted the money set aside for the area's upkeep in 2023.24.
- DAP's were produced a few years ago these were supposed to record the services and facilities within a defined area. These are now almost completely wrong and no longer support the strategy as written.

Employment

Of most important significance for Siston Parish is the fact that the employment protection afforded, does not identify a substantial proportion of the employers in Siston Parish or the local parishes of Bitton and Oldland, where some of our parishioners work locally. The concern is therefore that those sites may be used for development, and this could cause a loss of local employment. With the preferred strategy accommodating so many new residents, this would not be sustainable and cause areas of real poverty in the parish.

Residents have also noted that The Old Sawmills site for development has not been protected and therefore local people will lose their jobs.

Resident's comments reflect these views as noted below:

- Not all the employers in the area currently are listed as protected employers
- Employment opportunities do not match the increased number of residents
- Loss of local jobs will be incurred due to the loss of the timber yard (at The Sawmills)
- The employment is woefully inadequate – there are no plans to build suitable buildings
- Lack of employment could lead to deprived areas and more crime – with more housing and no jobs

Siston Parish Councillors would like to offer the comments and objections of our community to the preferred strategy proposed and wish to remain engaged with the process going forward.

With kindest regards

Councillor Andrew Stacey
Chairman
On behalf of Siston Parish Council