APPEAL: LAND EAST OF MARSHFIELD

PLANNING APPLICATION: P25/02678/O

STATEMENT OF EVIDENCE OF CHRISTINE EDEN

Chair, Marshfield Community Land Trust

1. Introduction

1.1 MCLT's Role and Interest in the Appeal

1.1.1 Marshfield Community Land Trust (MCLT) is a not-for-profit Community Benefit Society able to hold assets on behalf of its community. Its current projects focus on affordable housing and sustainable energy. MCLT has a direct and legitimate interest in this appeal because its purpose is to secure genuinely affordable housing and promote environmental sustainability within the parish.

1.1.2 MCLT has a practical record of delivering these objectives and is actively engaged in addressing local housing needs, community benefit and environmental stewardship. It is not opposed to housing growth in principle. Rather, our concern is that development should occur in appropriate and sustainable locations and deliver long-term community benefit.

1.1.3 Working in partnership with Brighter Places Housing Association and South Gloucestershire Council, MCLT recently delivered the Wheatfield Barns Rural Exception Site, providing 15 affordable homes at social rent to Passivhaus standards for people with local connections and securing those homes for community benefit in perpetuity. Wheatfield Barns demonstrates that housing can be delivered in Marshfield in a way that responds directly to local need while securing lasting community benefit. MCLT believes that this approach sits more comfortably with the village's long-term sustainability objectives than the scale and nature of development proposed in this appeal.

1.1.4 In addition to delivering affordable housing, MCLT supports initiatives designed to reduce carbon emissions and improve environmental sustainability within the village. Through its Energy Group, MCLT promotes lower-carbon lifestyles, reduced dependence on fossil-fuel-based transport and energy, and the exploration of community-owned renewable energy generation. Against this background, MCLT opposes this Appeal. Its submission focuses primarily on Reason for Refusal 3 concerning the sustainability of the site's location.

2. Summary of MCLT's Case

2.1 Marshfield Community Land Trust does not oppose housing growth in principle. Through Wheatfield Barns it has already helped deliver affordable homes for local people whilst securing long-term community benefit.

2.2 MCLT's principal concern in this statement is whether the appeal site represents a sustainable location for development on the scale proposed. We do not believe it does.

2.3 MCLT's objection rests on two distinct but mutually reinforcing propositions. First, the appeal site performs poorly in sustainability terms. Future residents would remain heavily dependent on private car travel for employment, education, healthcare, shopping and other day-to-day needs. This would give rise to environmental, climate-change and transport-related harms. The proposal would also result in Green Belt harm, the loss of Best and Most Versatile agricultural land and additional highway safety concerns.

2.4 Second, whilst MCLT's conclusions do not depend on the emerging Local Plan, the Council's latest strategic assessment of Marshfield points in the same direction and supports a different pattern of growth based on community-led housing delivery.

2.5 This statement therefore focuses on:

- the sustainability of the site's location;
- the extent of future car dependency and its climate implications;
- the Council's most recent strategic assessment of growth in Marshfield;
- the relevance of Wheatfield Barns and community-led housing as an alternative model for meeting local housing needs.

2.6 For the reasons set out in the following sections, MCLT considers that the proposal would not represent sustainable development and respectfully invites the Inspector to dismiss the appeal.

3. Principal Planning Harms

3.1 NPPF paragraphs 8 and 15 identify the economic, social and environmental objectives of sustainable development and require the planning system to pursue those objectives in an integrated manner. Similar objectives are reflected in Core Strategy Policy CS5 (Location of Development) and Core Strategy Policy CS15 (Distribution of Housing), which seek to ensure that growth occurs in appropriate and sustainable locations.

3.2 South Gloucestershire Council concluded that the proposal fails the test of sustainable development, as reflected in Reasons for Refusal 1, 2, 3 and 4, concerning

Green Belt harm, the loss of Grade 3a Best and Most Versatile agricultural land, highway safety impacts and the sustainability of the site's location. While MCLT's evidence focuses primarily on Reason for Refusal 3, it also regards the remaining reasons as important, as together they raise wider concerns about the suitability of the site for development on the scale proposed.

3.3 A high number of objections to the planning application for this site were received regarding the effect of the proposed access arrangements on child pedestrian safety, which MCLT shares. The access runs in front of Marshfield Primary School and affects routes used daily by primary school children. Whilst additional traffic will affect all road users, young children are less able to judge speed and react to changing traffic conditions. As a result, increased vehicle movements in this location give rise to concerns that extend beyond ordinary highway capacity considerations.

4. Sustainability, Transport Choice and Climate Change

4.1 The Key Test

4.1.1 The Appellant places considerable emphasis on the range of services and facilities available within Marshfield. MCLT does not dispute that residents can walk to some day-to-day services within the village.

4.1.2 However, accessibility is not the same as sustainability. Sustainable development requires consideration of how people access employment, education, healthcare, shopping and other essential services. The relevant question is whether future residents could meet most of their day-to-day needs without substantial reliance on private car travel.

4.1.3 The existence of a limited range of village facilities is only one part of that assessment.

4.2 Evidence of Car Dependency

4.2.1 MCLT's evidence demonstrates that future residents of the appeal site would remain heavily dependent on private cars for many of these activities.

4.2.2 Marshfield is physically separated from major employment centres, rail connections and higher-order services. Our evidence shows that Marshfield residents routinely travel beyond the village for employment, education, healthcare, major shopping and many other day-to-day needs.

4.2.3 The evidence demonstrates overwhelming reliance on private vehicles and very limited use of public transport:

- **Census** travel-to-work data records 336 journeys by car or van compared with only 6 journeys by bus or coach.
- **Local bus services** provide no evening services, no Sunday services and limited connectivity to major employment centres. They provide no practical commuting option to Bath and only very limited opportunities for commuting to Bristol. They do not offer a realistic alternative to private car travel for most commuting and everyday journeys.
- **A recent residents' survey** undertaken by MCLT shows similarly limited use of public transport, with 91.6% of respondents stating that they never use public transport and only 4.2% using it regularly. Respondents consistently reported that public transport does not meet their day-to-day travel needs.

4.2.4 The issue, therefore, is not whether a bus service exists, but whether it provides a realistic alternative to car use. The evidence demonstrates that it does not. The dependence on private car travel identified above sits uneasily with development plan policies that seek to promote sustainable patterns of movement, reduce the need to travel and maximise the use of sustainable transport modes.

4.2.5 The level of car dependency identified above sits uneasily with Core Strategy Policy CS5 and PSP11 (Transport Impact Management), both of which seek to promote sustainable patterns of development and travel and reduce reliance on private vehicles where possible.

4.3 Climate Change Implications

4.3.1 The climate implications of the proposal flow directly from this pattern of car dependency.

4.3.2 NPPF paragraph 187 requires the planning system to support the transition to a low-carbon future and to help shape places in ways that reduce greenhouse gas emissions. These objectives are reflected in Core Strategy Policy CS9 (Managing the Environment and Heritage), which seeks to protect environmental quality and support sustainable forms of development. Development in locations that reinforce dependence on private car travel sits uneasily with those objectives.

4.3.3 A development of 50 dwellings would inevitably add to existing travel demand whilst perpetuating an already car-dependent pattern of living.

4.4.1 For these reasons, MCLT does not regard the proposal as sustainable development.

5. Emerging Local Plan and Strategic Assessment

5.1 MCLT's conclusions regarding sustainability do not depend upon the emerging Local Plan. However, it is significant that the Council's most recent strategic assessment of Marshfield reaches substantially the same conclusion.

5.2 Through the Regulation 19 Local Plan process, the Council's latest strategic assessment reconsidered future growth options for Marshfield and chose not to allocate the appeal site for substantial market-led housing development. That assessment is consistent with the emerging development strategy reflected in Policy DS1 (Development Strategy).

5.3 The Regulation 19 SGC Local Plan states:

"MCLT have progressed the delivery of housing through their Community Land Trust which is considered an appropriate level of growth over the plan period and the council support prioritisation of local homes being delivered through the CLT."

5.4 The HEELA assessment undertaken for the emerging Local Plan identified approximately 50 dwellings as an appropriate level of growth for Marshfield. Since that assessment, Wheatfield Barns and other recent developments have already delivered approximately 34 dwellings within the village, 18 of which are through the MCLT development. This supports the SGC view that future housing needs can be met through carefully targeted community-led housing delivery rather than through further speculative market-led expansion.

5.5 MCLT has already demonstrated through Wheatfield Barns that community-led housing can successfully meet local needs. The emerging Local Plan's endorsement of community-led housing therefore aligns closely with MCLT's experience of delivering affordable homes for local people whilst supporting wider sustainability objectives.

5.6 The emerging South Gloucestershire Local Plan is at an advanced stage of preparation and, in accordance with NPPF paragraph 49, can attract weight. The policies relevant to this appeal have progressed through consultation and examination and are consistent with national policy. The weight to be attached to Policy DS1 and the wider emerging Local Plan is ultimately a matter for the Inspector. Nevertheless, the Regulation 19 strategy provides further support for the conclusion that the appeal site is not the most appropriate location for development on the scale proposed.

6. Wheatfield Barns and Community-Led Housing

6.1 Wheatfield Barns

6.1.1 Wheatfield Barns demonstrates that additional homes can be delivered successfully in Marshfield whilst meeting identified local needs.

6.1.2 Delivered through a partnership between MCLT, Brighter Places and South Gloucestershire Council, Wheatfield Barns provides 18 homes. Fifteen of these are affordable homes built to Passivhaus standards for local people at social rent, and those homes are secured for community benefit in perpetuity.

6.1.3 The development demonstrates that housing can be delivered in a different way, one that responds directly to identified local need and reflects the approach now supported through the emerging Local Plan.

6.2 Why This Matters

6.2.1 The appeal should be considered in the context of housing delivery already achieved within Marshfield through community-led development.

6.2.2 The successful delivery of Wheatfield Barns provides important context when assessing the housing benefits claimed for the appeal proposal.

6.2.3 MCLT is concerned that approval of a substantial market-led housing scheme on the appeal site would increase the development value of land around Marshfield, making the delivery of future Rural Exception Sites significantly more difficult and reducing opportunities for future community-led housing provision within the village.

6.3 Response to the Appellant's Reliance on Wheatfield Barns

6.3.1 The Appellant relies on Wheatfield Barns as evidence that the appeal site occupies a sustainable location. MCLT considers that comparison to be misplaced.

6.3.2 Wheatfield Barns was approved under Rural Exception Site policy and was considered under a different policy framework from that applicable to the current appeal proposal.

6.3.3 It was approved because it met an identified local housing need, not because it established a planning precedent for unrestricted market housing development.

6.3.4 Its existence therefore provides no justification for a predominantly market-led housing scheme of the type proposed in this appeal.

7. Planning Balance

7.1 MCLT acknowledges that the proposal would deliver market and affordable housing and that these benefits attract weight in favour of the development.

7.2 The proposal would result in Green Belt harm, the loss of Grade 3a Best and Most Versatile agricultural land, highway and child-safety concerns, increased car dependency and associated climate impacts. These harms conflict with the objectives of Core Strategy Policies CS5, CS9 and CS15, together with PSP11, and attract significant weight in the planning balance.

7.3 These harms arise principally from the characteristics of the site itself and its location.

7.4 They are further reinforced by the Council's most recent strategic assessment of Marshfield.

7.5 Taken together, these harms outweigh the benefits that the proposal would deliver.

8. Conclusion

8.1 MCLT's objection is not to housing growth itself. Through Wheatfield Barns it has demonstrated that additional housing can be delivered in Marshfield in a way that directly addresses local needs and secures long-term community benefit.

8.2 The evidence presented in this statement demonstrates that the appeal proposal would represent substantial housing growth in a location that performs poorly in sustainability terms.

8.3 The Council's refusal reasons, the transport evidence, the climate implications and the Council's most recent strategic assessment of Marshfield all point in the same direction.

8.4 MCLT therefore considers that the appeal proposal would not represent sustainable development and respectfully invites the Inspector to dismiss the appeal