

Objection to Planning Application P26/01208/O

Application Ref:	P26/01208/O
Site:	Land at Frog Lane, Coalpit Heath
Proposal:	Outline application for up to 860 residential dwellings, primary school, local centre and community facilities, public open space, habitat enhancement and associated infrastructure, including demolition of existing structures
Applicant:	Edward Ware Homes (Agent: Pegasus Group)
LPA:	South Gloucestershire Council
Date:	19 July 2026
Consultation Deadline:	25 July 2026

1. Summary of Objection

This submission objects to the above application in the strongest terms. The proposal represents a speculative, plan-avoiding attempt to secure a strategic-scale Green Belt release outside the emerging South Gloucestershire Local Plan process, which is currently under Examination by the Planning Inspectorate. For the detailed reasons set out below, the application should be **refused**.

The key grounds of objection are:

1. **Prematurity and conflict with the plan-led system** — the application seeks to pre-empt the Local Plan Examination;
2. **Green Belt harm** — the site is not Grey Belt and the applicant has failed to demonstrate very special circumstances;
3. **Unrealistic transport assumptions** — the modal shift forecasts are unsupported by local evidence, as confirmed by both National Highways and Yate Town Council;
4. **Inadequate infrastructure capacity** — rail, highway, healthcare, and education services lack the capacity to absorb this development;
5. **Cumulative impact** — the proposal cannot be considered in isolation from YA3, Ladden Garden Village, Charfield, and other commitments;
6. **Environmental concerns** — the Environment Agency has identified contamination, drainage, and ecology risks requiring extensive conditions, underscoring the unsuitability of the site.

2. Prematurity and the Plan-Led System

The South Gloucestershire Local Plan is currently under Examination by the Planning Inspectorate. The Examination is considering, among other matters, housing need, Green Belt release, strategic site allocations, transport infrastructure requirements, and the distribution of future growth across the

district. The application site is not allocated for development within the emerging Local Plan and is instead proposed to be retained as Green Belt.

As Yate Town Council observes in its consultee response (29 June 2026):

"The Council considers that decisions regarding the location and scale of strategic growth should be taken through the Local Plan process where alternative sites can be assessed consistently and where infrastructure, transport and environmental impacts can be considered comprehensively."

National Highways similarly notes in its response (10 July 2026) that the site "is not allocated for development within the adopted Local Plan or proposed for allocation as part of the new Local Plan submitted for examination in October 2025" and that "the traffic impacts of the proposal have not previously been considered within the transport evidence base that underpins the emerging Local Plan."

Paragraph 48 of DfT Circular 01/2022 requires that "development proposals which sit outside of the plan-led process demonstrate they will not prejudice the delivery of allocated sites." The applicant has failed to discharge this burden. Determining a major speculative Green Belt application before the Local Plan Examination concludes risks prejudicing consideration of the wider development strategy and undermines the integrity of the plan-led system.

Sources: Yate Town Council consultee response, 29 June 2026 (para. 1); National Highways Planning Response NH/26/16647, 10 July 2026 (Annex A); DfT Circular 01/2022, para. 48; NPPF (2024) paras. 15–26 (plan-led system).

3. Green Belt

3.1 The Site Is Not Grey Belt

The applicant contends that the site constitutes "Grey Belt" on the basis that it makes a "weak or no contribution" to Green Belt purposes (a), (b), and (d) (Planning Statement, May 2026, §§8.42–8.46). This characterisation relies on a narrow, technical reading that treats Coalpit Heath as a village and therefore asserts that Green Belt purposes relating to "large built-up areas," "towns," and "historic towns" cannot apply.

This argument fundamentally mischaracterises the Green Belt's function. The Bristol and Bath Green Belt serves to check the unrestricted sprawl of Greater Bristol and to prevent the merging of Bristol with surrounding settlements including Yate. The application site sits between Coalpit Heath and Yate — a town of approximately 35,000 people — and lies within the Green Belt that prevents Bristol's north-eastern expansion. The applicant's attempt to disaggregate the Green Belt into village-scale fragments ignores the strategic, cross-boundary purpose for which the Green Belt was designated.

Moreover, the WECA Stage 1 Strategic Green Belt Assessment, which the applicant itself cites, found that the operative parcel makes a "Significant Contribution" to the prevention of neighbouring towns merging (purpose b). The applicant dismisses this finding by asserting that the parcel "straddles the whole gap between Yate and Coalpit Heath" and therefore does not reflect a "granular site-specific assessment." However, the very fact that the parcel occupies the gap between settlements is precisely what makes its contribution significant. Development of part of that gap reduces the separation that the Green Belt is intended to maintain.

Sources: Planning Statement, May 2026 (Pegasus Group, ref: P16-1119), §§8.37–8.52; WECA Stage 1 Strategic Green Belt Assessment; NPPF (2024) paras. 142–156; PPG Reference ID: 64-005-20250225.

3.2 The "Golden Rules" Are Not Satisfied

Even if the site were accepted as Grey Belt — which is disputed — paragraph 156 of the NPPF requires that development on Grey Belt must satisfy the "Golden Rules," including the provision of 50% affordable housing, necessary infrastructure, and green spaces. Yate Town Council's detailed analysis demonstrates that the necessary transport, healthcare, and education infrastructure does not exist and has not been secured. The affordable housing provision set out in the application (as a proportion of 860 units) falls well short of the quantum needed to address the acute housing need in South Gloucestershire.

Sources: NPPF (2024) para. 156 (Golden Rules); Yate Town Council consultee response, 29 June 2026, paras. 4–7; Affordable Housing Statement, May 2026.

3.3 Very Special Circumstances Are Not Demonstrated

If the development were found to be inappropriate in the Green Belt — the default position for any major development on greenfield Green Belt land — it could only be permitted if "very special circumstances" clearly outweigh the harm to the Green Belt and any other harm. No such circumstances have been demonstrated. The claimed housing need does not outweigh the strategic harm caused by the loss of Green Belt, particularly given that housing need is being addressed through the Local Plan process with allocated sites assessed through a proper strategic framework.

Sources: NPPF (2024) para. 153.

4. Transport

4.1 Unrealistic Modal Shift Assumptions

The application's transport case relies upon a "vision-led" approach that assumes a 20% shift to non-car modes, producing vehicular trip rates of 0.24 per dwelling in the AM peak and 0.36 in the PM peak. These rates are approximately 50% and 32% below the TRICS-derived rates of 0.49 and 0.53 respectively.

National Highways, in its formal response dated 10 July 2026, expresses clear reservations:

"With assumed levels of internalisation and mode shift, vehicular trip rates under the vision-led scenario are materially lower than the supporting TRICS values, with a 50% reduction in the AM peak hour and a 32% reduction in the PM peak hour. Uncertainty around actual reductions in traffic generation could further impact traffic demand through M32 J1."

Yate Town Council reinforces this concern with reference to observed local evidence:

"South Gloucestershire Council has undertaken monitoring of travel behaviour associated with Ladden Garden Village and other major developments. Whilst sustainable travel measures have been implemented, the anticipated level of modal shift away from private car use has not been fully realised."

The applicant's transport forecasts are therefore speculative and unsupported by local empirical evidence. The true traffic impact of the development is likely to be substantially higher than presented.

Sources: Transport Assessment, Pegasus Group, May 2026; National Highways Planning Response NH/26/16647, 10 July 2026; Yate Town Council consultee response, 29 June 2026, paras. 3, 6.

4.2 M32 Junction 1

National Highways identifies that M32 Junction 1 "currently operates under constraint during the traditional morning and evening peak periods" and that the applicant's trip distribution methodology may have "underestimated commuting trips via M32 J1." Specifically, National Highways notes that while the neighbouring application (P25/023534/O) assumed 40% of work-related trips via M32 J1, Pegasus assumes zero work-related trips through M32 J1 for this application — "a notable difference in assessment inputs."

Furthermore, National Highways notes that "assessment work for the draft Local Plan indicated significant queuing on all approaches to M32 J1" and that "a package of sustainable transport measures should be implemented to reduce car-borne demand through the junction." The application adds further pressure to an already constrained junction without demonstrating where the necessary mitigation will come from.

Sources: National Highways Planning Response NH/26/16647, 10 July 2026 (Annex A); South Gloucestershire Local Plan Examination evidence base.

4.3 A432 Corridor and Wider Network

Yate Town Council has participated extensively in the Local Plan Examination and has presented evidence regarding "existing congestion, network resilience, cumulative growth and the limitations of

proposed mitigation measures" on the A432 corridor. The Council notes that the applicant's own Environmental Statement "acknowledges that routes including the A432 and Church Road junctions already carry high traffic volumes and are sensitive to additional demand," and that the "conclusions reached regarding cumulative transport impacts are inconsistent with the baseline conditions identified within the application itself."

Recent disruption to the A432 has demonstrated "the limited availability of alternative routes when key links are affected." The application provides no adequate assessment of network resilience.

Sources: Yate Town Council consultee response, 29 June 2026, paras. 3–6; Environmental Statement Chapter 7, Pegasus Group, May 2026.

5. Rail Capacity

The application's sustainability case places heavy reliance on Yate Railway Station. Yate Town Council's analysis of rail capacity is devastating to this aspect of the application:

"The current service pattern is generally limited to half-hourly services... There is currently no committed scheme that would significantly increase service frequency through Yate. The Council understands that capacity on the rail corridor is constrained by the interaction between stopping services and higher-speed services operating on the same route."

The Council further notes that Charfield Station, once operational, will add approximately 86,000 rail journeys annually rising to 128,000 by 2030, on the same constrained corridor. Neither this application nor the Local Plan evidence base demonstrates where additional train paths, longer trains, or increased service frequencies will come from.

Additionally, the applicant's preferred transport scenario forecasts approximately four times as many bus trips as rail trips during the morning peak. Bus services themselves depend on the same congested highway network and on financial support arrangements that cannot be guaranteed over the development's lifetime.

Sources: Yate Town Council consultee response, 29 June 2026, paras. 5–6; Transport Assessment, Pegasus Group, May 2026; Charfield Station planning documentation.

6. Infrastructure and Public Services

Yate Town Council identifies critical capacity concerns across multiple public service areas:

Service	Concern
GP services	No evidence of workforce, appointment availability, or operational capacity to accommodate 860 additional dwellings.

NHS dental	Effectively no local practices routinely accepting new NHS adult patients. Zero evidence of provision alongside the development.
Secondary education	Insufficient capacity — the nearest secondary school (Winterbourne Academy) is 3.5km away.
Leisure and community	Facilities already serving a rapidly growing population; further growth puts unacceptable pressure on existing provision.
Yate Town Centre	Public car parks "frequently close to or at practical capacity during peak trading periods."

The applicant asserts spare healthcare capacity but provides no evidence to substantiate this claim. The Planning Statement offers no assessment of NHS dental capacity, secondary school place availability, or the cumulative impact on Yate Town Centre. These omissions are material and undermine the sustainability case for the development.

Sources: Yate Town Council consultee response, 29 June 2026, para. 6; Planning Statement, May 2026; ES Chapter 6 (Socioeconomics).

7. Cumulative Impact

This application cannot lawfully be considered in isolation. The wider area is subject to multiple existing, committed, and proposed developments:

Development	Status
Ladden Garden Village	Substantially built and generating real travel demand
North Yate (YA3)	Proposed allocation in emerging Local Plan
Charfield	Approved, including Charfield Station generating ~128,000 rail journeys/year by 2030
Land east of Coalpit Heath (P25/023534/O)	Awaiting determination — 450 dwellings on adjacent Green Belt land
Other Local Plan allocations	Under Examination

As Yate Town Council states:

"Each individual proposal may seek to demonstrate that its impacts are acceptable in isolation. However, communities experience the combined effect of all development."

The cumulative impact on the A432 corridor, M32 Junction 1, Yate Station, healthcare provision, and community infrastructure has not been adequately assessed. The applicant has not demonstrated

"where spare transport, rail, healthcare and community infrastructure capacity exists beyond that already relied upon within the emerging Local Plan evidence base."

Sources: Yate Town Council consultee response, 29 June 2026, paras. 3, 6–7; National Highways Planning Response NH/26/16647, 10 July 2026; South Gloucestershire Local Plan Examination documents.

8. Environment and Ecology

8.1 Contaminated Land and Water Pollution

The Environment Agency, in its consultee response dated 14 July 2026, states that it **would object** to the development without specific conditions addressing contaminated land, water pollution, piling, and surface water drainage. The Agency requires:

- A comprehensive remediation strategy for each development phase;
- A verification report before occupation;
- Protocols for previously unidentified contamination;
- Restrictions on penetrative piling methods to protect groundwater;
- A prohibition on infiltration drainage without a prior risk assessment to controlled waters;
- A Construction Environmental Management Plan (CEMP) with detailed pollution prevention measures.

The Agency cites paragraph 187 of the NPPF, which requires that development should contribute to and enhance the natural and local environment by "remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land." The need for these extensive conditions — on a greenfield site — underscores the site's unsuitability for residential development at this scale. The coal mining legacy and associated contamination risks represent a material constraint that the applicant has not adequately addressed in its assessment.

Sources: Environment Agency consultee response, 14 July 2026 (ref: P26/01208/O); NPPF (2024) para. 187; Coal Mining Risk Assessment, May 2026.

8.2 Ecology and Biodiversity

The Environment Agency has identified several ecological deficiencies in the submitted proposals, including:

- The ditch on site is "artificially straightened" and would benefit from re-meandering to improve biodiversity value and channel morphology;
- The watercourse is culverted — the Agency recommends daylighting;
- A build-up of algae and duckweed requiring dredging suggests the ditch would benefit from re-meandering to allow the channel to self-cleanse;
- Marginal wetland planting is more appropriate than the currently proposed species;

- The illustrative Landscape Mitigation and Enhancement Plan "does not show the section of ditch by the football pitches."

These are not marginal observations; they go to the fundamental adequacy of the ecology strategy for a development of this scale. The applicant's ecology proposals require substantial revision before they could be considered acceptable.

Sources: Environment Agency consultee response, 14 July 2026 (ref: P26/01208/O); Design and Access Statement, Origin3, May 2026; Draft Habitat Management and Monitoring Plan, GE Consulting, 19 May 2026.

9. Heritage

Yate Town Council draws attention to the "historic mining character of the area, including the setting of the Ram Hill Colliery and Dramway heritage assets which contribute significantly to local distinctiveness." The proposal would "substantially urbanise a large area of currently open land that forms part of the historic mining landscape and assists in understanding the relationship between former mining activities, transport routes and settlement patterns."

The applicant's Heritage Statement does not adequately address these non-designated heritage assets or the contribution that the landscape makes to understanding the area's industrial archaeology. This represents a gap in the heritage assessment that is material to the determination of the application.

Sources: Yate Town Council consultee response, 29 June 2026, para. 2; Heritage Statement, May 2026; Archaeology Assessment Parts 1–2, May 2026.

10. Conclusion

For the reasons set out above, this application should be **refused**.

The proposal represents a speculative attempt to secure a strategic-scale Green Belt release outside the Local Plan process while that process remains under Examination. The applicant has failed to demonstrate that the site is Grey Belt; has failed to demonstrate very special circumstances that would justify inappropriate development in the Green Belt; has relied upon transport assumptions that are unsupported by local evidence and which have been questioned by both National Highways and Yate Town Council; has failed to demonstrate sufficient capacity in rail services, healthcare provision, education, and community infrastructure; has failed to adequately assess cumulative impacts alongside existing and planned growth; and has failed to satisfy the Environment Agency's concerns regarding contamination, drainage, and ecology.

The consultation responses from statutory consultees — Yate Town Council (objection), National Highways (no objection with significant reservations), and the Environment Agency (conditional

objection) — collectively demonstrate that the application is fundamentally unsustainable and should not be permitted.

Planning permission should be refused.

Objector

Save Coalpit Heath Campaign

Date: 19 July 2026