

Westerleigh & Coalpit Heath Parish Council - DRAFT response (approved 13th July 2026)

P26/01208/O Outline application with details of access from Badminton Road and all other matters reserved 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. Land At Frog Lane Coalpit Heath

Westerleigh & Coalpit Heath Parish Council OBJECTS IN THE STRONGEST POSSIBLE terms to this speculative application, which will compound the negative impacts of the application for the adjacent site east of Roundways (P25/02534/O for 460 homes and other infrastructure).

Coalpit Heath cannot accommodate either of the large-scale speculative developments proposed on the exceptionally narrow strip of Green Belt that separates Downend/Emersons Green on the north-eastern fringe of Bristol, from the town of Yate.

This response has been prepared with regard to Yate Town Council's objection response (YTC objection, 1st July 2026), which this Council fully endorses. The following response repeats some points from that response that are of greatest concern to this Council

The two principal grounds for objection are the same as those set out in this Council's objection to application P25/02534/O, site east of Roundways. They are explained again below.

Additional grounds for objection are set out after the principal objections.

The two principal objections are:

- **The site is not identified in the draft Local Plan for South Gloucestershire, which has been subject to extensive and rigorous consultation and is supported by this Council.**
- **The application represents inappropriate development in the Green Belt.**

1. The site is not identified in the draft Local Plan for South Gloucestershire

If approved, this application would introduce a strategic scale development outside of the current plan-led growth strategy for housing being examined by the Planning Inspectorate. Ad hoc development proposals such as this one, particularly on such a large scale, are not an appropriate way to address South Gloucestershire's housing need.

This application is seeking to secure a major Green Belt release via the development management process, rather than the Local Plan process. The Local Plan is the only appropriate mechanism for assessing where strategic level growth should occur, what infrastructure is required and how cumulative impacts should be managed.

It is noted that this site, and the neighbouring P25/02534/O site east of Roundways, were both considered and rejected for sound planning reasons, at earlier stages of the Local Plan consultation process.

This Parish Council endorses Yate Town Council's conclusion that 'the applicant has not demonstrated where additional transport, rail, healthcare, education and community

infrastructure capacity exists beyond that already relied upon to support growth proposed through the draft Local Plan.’ (YTC objection, 1st July 2026)

2. Inappropriate development in the Green Belt

The applicant’s claim that the site can be reclassified from Green Belt to Grey Belt is rejected. This site (and the adjacent site east of Roundways) make a significant contribution to a ‘qualifying purpose’ of the Green Belt, as identified in the National Planning Policy Framework.

First and foremost, this exceptionally narrow stretch of Green Belt prevents the towns of Bristol and Yate from merging into each other (purpose b - prevent neighbouring towns merging into one another).

The proposed development site occupies a critical piece of open countryside, that maintains separation between Downend/ Emersons Green on the north-eastern fringe of Bristol, and the growing town of Yate.

Furthermore, the combined communities of Coalpit Heath, Frampton Cotterell and Winterbourne have a population and size equivalent to that of other towns. The three communities function as a single large dormitory settlement. Therefore, the Green Belt east of the Coalpit Heath boundary also prevents these communities, which can be considered a town in their own right, from merging with the town of Yate (qualifying purpose b).

If this site is developed, given its size of 47 hectares and the number of houses involved, there would be a substantial reduction in the Green Belt if one draws a straight line between Yate and Bristol. The only remaining gap between Yate and this new community would be the land between the adjacent solar farm and Westerleigh Road. The remaining Green Belt in a direct line would be less than one mile wide.

This large-scale urban extension would result in the complete loss of Coalpit Heath’s semi-rural identity.

The WECA Green Belt Assessment notes that the parcel of Green Belt between Coalpit Heath and Yate (parcel 28), which includes this site, is narrow.

‘The physically narrowest part of the gap between Coalpit Heath and Yate ...is the triangle of land between the A432 and the railway line and these connecting transport routes also reduce perceived settlement separation. Any land east of Frampton End can be considered to play a significant role in terms of preserving the settlement gap.’

The proposed site is east of Frampton End, i.e. on land that contributes significantly to Green Belt purpose b (prevent neighbouring towns merging into one another).

This Council concludes that this application represents inappropriate development in the Green Belt.

Further grounds for objection

3. Transport – unacceptable negative impact on traffic and highways

The transport and highways implications of this development are significant. Evidence has been presented to the Local Plan Examination in public to demonstrate that the A432 corridor is already experiencing significant pressures.

This application fails to identify where additional highway capacity exists or would be developed to address demand over and above what has been set out in the South Gloucestershire Local Plan.

This site was first put forward in the abandoned Joint Spatial Plan (JSP). The JSP strategy relied upon additional infrastructure changes which would have helped mitigate the transport impact of development in this location i.e.

- A Winterbourne / Frampton Cotterell Bypass
- Metrobus lanes along the A432 Badminton Road

Neither of these improvements are currently proposed. Thus, the site is less suitable than when it was previously rejected in the JSP enquiry.

A related concern, and a significant weakness of the application, is the assumption made in the Transport Assessment that sustainable travel methods will result in a significant modal shift in vehicle usage. A reduction in single occupancy vehicle use of 20% for peak-period car trips, is assumed by the applicants. There is no evidence such assumptions are realistic based on observed behaviour at other completed developments in the area, such as Ladden Garden Village. A reduction of 15% is assumed in the application for the P25/02534/O east of Roundways development directly adjacent. It follows that the application is understating future demand on the A432 and surrounding network.

This Council endorses Yate Town Council's assessment 'that many of the higher-order employment destinations upon which future residents are likely to depend are located within North Bristol, Filton, UWE and the wider North Fringe. Whilst the application places considerable reliance upon active travel and modal shift, the Council is not aware of any continuous, direct, high-quality and deliverable active travel corridor meeting modern design standards that connects this part of the district with those major employment destinations. As a consequence, many journeys are likely to continue to be undertaken by car or by public transport operating on an already constrained highway network.' (YTC objection, 1st July 2026)

This assessment is also supported by the Strategic Planning Policy Team response to the P25/02534/O site east of Roundways (14th Jan 2026). It refers to assessment of the sites on the east of Coalpit Heath carried out under the regulation 18 Local Plan consultation... 'the lack of local access to employment facilities was considered to have the negative effect of encouraging a larger number of longer distance trips, and the majority of these trips to be car based.'

While the application promotes walking, cycling and public transport, the reality is that a significant proportion of journeys generated by this development will continue to be made by private car.

Finally, the additional traffic created by this development will further undermine network resilience. There are limited alternative routes to the A432. Some local alternatives are vulnerable to seasonal surface water flooding i.e. Henfield Road and Roundways.

4. Transport - insufficient rail and bus network capacity

As is noted in Yate Town Council's objection response 'The application places considerable reliance upon sustainable transport, including access to Yate Railway Station and the wider public transport network.' (YTC objection, 1st July 2026)

With respect to rail, although Yate Railway Station is accessible from the development site, accessibility does not equate to capacity.

Yate Town Council reaches two conclusions regarding rail capacity and the impact of the proposed development that this Council endorses and repeats.

Firstly regarding Yate Railway Station, 'Yate Station already serves a wide catchment extending beyond Yate itself and experiences significant demand from existing communities. The station car park is heavily used, and existing cycle parking facilities are already well utilised. The Council is unaware of any significant spare secure cycle parking provision at the station. The application provides no evidence that additional station infrastructure, cycle parking or passenger facilities will be delivered to accommodate the substantial increase in demand arising from this proposal.'

Secondly regarding the capacity of the rail network, 'More fundamentally, the application fails to demonstrate that sufficient rail capacity exists to accommodate the additional passengers generated by this development.'

A full analysis is set out in Yate Town Council's objection response (YTC objection, 1st July - section 5).

With respect to bus services, this Council endorses and repeats Yate Town Council's concerns:

'The applicant's preferred transport scenario forecasts approximately four times as many bus trips as rail trips during the morning peak period. Consequently, the sustainability case for the development is heavily dependent upon the availability, reliability and long-term viability of local bus services. However, bus services remain dependent upon the wider highway network and are, themselves, vulnerable to the congestion and delay identified elsewhere in this response. The application assumes that public transport will provide a realistic alternative to private car travel. However, many local services are dependent upon financial support and subsidy arrangements. Future service levels, frequencies and long-term funding cannot be assumed. In addition, bus services are, themselves, affected by congestion on the wider highway network and, therefore, cannot be considered independently of the highway constraints identified elsewhere in this response.'

Also noted is the fact that no strategic investment to upgrade bus services along the A432 corridor i.e. to Metrobus standard, is planned.

5. Unacceptable pressure on public services and community infrastructure

This Council is unsatisfied that the community and public service infrastructure requirements of this proposal have been addressed by the applicants.

Whilst the proposal for a new primary school is welcome, there is little detail to explain how the related significant increase for demand in secondary school places would be addressed.

There is existing pressure on GP services and NHS dental services. Anecdotal evidence suggests there is no local capacity. There is a particular issue with accessing NHS dental services locally, with no local practices routinely accepting new NHS adult patients.

The Council shares Yate Town Council's concern that 'the applicant's sustainability case relies heavily upon the availability of retail, leisure, transport and community facilities within Yate. However, little evidence has been provided demonstrating that these facilities possess capacity beyond that already required to support existing communities, Ladden Garden Village and growth proposed through the Local Plan.' (YTC objection, 1st July

6. Coalmining history - inadequate risk assessment

Recent work commissioned by this Council in respect of the adjacent proposed development (P25/02534/O east of Roundways), emphasised there are old shallow mine workings across that site which are not fully mapped, as well as extensive underground drainage channels. It was concluded that the applicant should not rely on desk-based research and the limited assessment carried out to date.

An independent researcher has reviewed the applicant's coalmining risk assessment for this latest site and reached similar conclusions. Specifically:

- i. The presence of old shallower workings. The boreholes referred to in the CMRA located the seams concerned, but discounted them as not having been worked. The researcher believes they would have been worked.
- ii. As the BCMA report suggests, there are likely to be unmapped drainage levels or tunnels at shallow depth. These had access shafts that are hard to differentiate from mine shafts.
- iii. Although the mine workings in the eastern section of the area associated with Frog Lane Colliery are at such a depth to avoid risk, there may also be a lengthy drainage level from Frog Lane through to Ram Hill. The manhole/entry noted at the southern end of the site may be associated with this. Interference with it adds to the already substantial risk of water-logged ground (the whole area is very poorly drained).

These findings, once again, lead the Council to conclude that further detailed analysis of available records and consultation with local researchers is urgently required, plus follow-up on site analysis of the identified mine workings if indicated. An in depth analysis of all historical mine workings on the site and their implications for any proposed development is lacking. These analyses must be made available to South Gloucestershire Council to properly inform consideration of the application.

7. Access to the site – interaction with active travel measures

A single vehicle access point is proposed via Frog Lane with a new mini roundabout on Badminton Road. There are serious concerns about this proposal given the introduction of active travel cycle and footways along this stretch of the A432 Badminton Road. The interaction between the active travel infrastructure and the new access is unclear. The impact the new access and increased vehicle movements will have on cyclists and other users of the active travel corridor is also unclear.

8. Heritage concerns

The proposals will result in harm to the Grade II listed Mays Hill Farm.