**NSC Local Plan 2038 : Challenges for the future.**

**Churchill And Langford Residents Action Group CALRAG:**

**Response to North Somerset Council Local Plan 2038 ‘Challenges & Choices’ consultation.**

**Question 1**: **What are your hopes and fears about having new development near where you live?**

**Hopes**

1. The new local plan will stop the constant barrage of speculative, inappropriate planning applications that have led to overbuilding in our villages. This causes so much anxiety to local people, destroys the natural environment, accentuates flooding from the Mendip Hills and concretes over good quality agricultural land.
2. NSC planners will recognise and respect that there is a clear difference between town and village life and that village life is a separate ‘culture’. Churchill and Langford villages have proved, in their response to COVID 19, that small village communities can be resilient and self-sufficient in times of crisis. We know our neighbours; we provided for vulnerable residents, asked for donations and volunteers from our residents and achieved them quickly (and, please note, at no cost whatsoever to North Somerset Council).
3. New development throughout North Somerset must be sustainable and must have climate change at the core.
4. The hope is that NSC will support both John Penrose MP and Councillor Patrick Keating’s view that the villages adjacent to the Mendip Hills AONB should be placed in the newly proposed ‘protected’ zone.

**Fears**

1. The Local Plan will simply repeat the proposals of the Joint Spatial Plan (JSP) that the Inspectors found to be so seriously flawed.
2. The basis for this fear is that the NSC advanced proposals for the new remote Strategic Development Location (SDL) in the Churchill/Langford area in the JSP - the so called Churchill/ Mendip Spring Garden Village - is still being considered. HM Planning Inspectorate expressed their concerns regarding the SDLs and asked the LAs (during the preparation of the JSP for Public Examination) for their reconsideration of issues with an “Open mind”. This was ignored by the LAs. Will it be ignored again? Such an SDL as Churchill Mendip Spring is wholly unsustainable, unviable and is completely contrary to the North Somerset Climate Change Emergency; yet there exist viable alternatives that are ready to go. We might note that the JSP was so emphatically criticised by HM Planning Inspectorate at Public examination in 2019 that it was withdrawn. Presently there appears to be disturbingly little evidence that NSC will change its approach in the formulation of its new Local Plan.
3. Large, new developments will be unsustainable, if they are built on open countryside, far from a railway station, lacking viable public transport, and with no short cycle-route to work.
4. New developments will not be planned close to employment in Bristol, but rather with a 15-mile car commute to reach such employment simply because the most appropriate land is in Green Belt.
5. **A comprehensive Green Belt review is critically needed** but that it will not happen.
6. The fear is that planners will not recognise or respect our village culture.
7. John Penrose, Patrick Keating and their supporters who want our villages adjacent to the Mendip Hills AONB to be placed in the new ‘protected’ zone, will be ignored.
8. It needs to be remembered that despite the JSP Public Examination inspectors’ concerns regarding the sustainability of remote Strategic Development Locations such as Banwell and Churchill, permission to build at least 1,900 houses at Banwell appears to be taken for granted as a condition for the building of the Banwell Bypass. The fear is that the same could happen at Churchill.
9. There is a major concern that in spite of huge opposition to Bristol airport expansion, it will succeed and even more passengers will be encouraged to arrive by car as this increases the airport parking revenue. This is also contrary to North Somerset’s Climate Change Emergency. The hope is that in this event the airport owners will be compelled to pay for rail connections to Bristol and Weston-s-Mare.

**Question 2:** **what changes over the next 15 years do you think will affect how we need to plan for residents, businesses and communities?**

1. Considering the technological advances of the last 20 years, the high level of road traffic afflicting Churchill & Langford has not reduced. On the contrary, it has increased significantly. It is likely that petrol and diesel cars and lorries will still be polluting our environment in 15 years’ time. We cannot assume that all vehicles will be electric as there are substantial challenges and costs yet to be overcome.
2. Large housing developments in the wrong place, miles from employment and activities, will simply add to road congestion and reduce productivity. The focus must continue to be on achieving developments close to existing centres of employment in order to reduce the need for commuting and the consequent need for more roads and transport infrastructure.
3. The long lasting and economically damaging consequences of COVID 19 will need to be taken into account in any development of a local plan.
4. Increased working from home as a result of COVID 19 cannot be solely relied upon to reduce commuting. Furthermore, mental health issues as a result of working from home are already causing concern.

**Question 3:** **Are you concerned that climate change may impact you or your family, business or local community in the future? And if so in what way?**

1. Yes. Climate change should be at the centre of all decisions that we, or our council, make.
2. It is imperative that any new development does not increase the number of cars commuting to jobs in the city.
3. It is of serious concern that many new roads could be built to support new housing developments on valuable farmland. Major new roads and the resultant vehicle traffic will make it impossible for North Somerset Council to be carbon neutral by 2030.
4. Productive agricultural land is a valuable resource for North Somerset and the demand to buy local produce is increasing. Once the countryside is covered in tarmac and concrete it will be lost forever.
5. The risk of flooding in areas that are not officially classified as flood plains but suffer from pluvial flooding – water flowing off the Mendip Hills, needs to be taken far more seriously, it adversely affects both the new houses and existing residents.
6. All houses should be built to far more stringent standards for insulation and solar energy generation to reduce energy consumption and bills particularly in affordable housing.

**Question 4**: **How should we plan for how you and your family will work in the future, or the future needs of your business?**

The majority of jobs will be sourced in the big cities/towns even though there may be a greater incidence of some home working due to the development of technology. Consequently any plan for development should ensure that new houses have ready access to existing transport infrastructures.

**Question 5:** **What sort of types and sizes of houses do you think will be needed in your community in the future?**

The housing needs of the Langford/Churchill community have already been met by recent substantial developments.

**Question 6**: **What do you think makes a good community?**

* In a small village we know our neighbours, and help vulnerable residents; it is a particular culture that people choose and enjoy.
* The community working together towards a common goal.
* The ability to readily make decisions for the benefit of the community.
* Centres where people can meet – village hall, sports facilities etc.
* Freedom of expression.
* Effective communication.

**Question 7:** **Do you agree with these? Are there any others which are important to you?**

1. A Green Belt review is vital. The Green Belt that is strangling Bristol was introduced 65 years ago when the population was far smaller. It was not intended to stop people being able to live near their place of work nor was it intended to make people commute 15 miles or more. The unintended consequence of stubbornly resisting any change to the Green Belt is that urban sprawl is compelled to leap-frog over the Green Belt and is already destroying villages beyond. Green spaces surrounding villages which also supports village cohesion must be protected.
2. At the JSP Public Examination, it was demonstrated that the necessary ‘exceptional circumstances’ that are needed to change Green Belt, exist for North Somerset’s Green Belt near Bristol.
3. Some of the Green Belt in North Somerset (and close to Bristol) is poor quality agricultural land and could be allocated to new development
4. The green space around North Somerset’s villages cannot be sacrificed in order to protect all Green Belt land. Tax payers should not be asked to spend yet more money on costly road transport infrastructure when we have already paid for the South Bristol Link Road with the dedicated Metrobus lane on the outskirts of Bristol.
5. Development that takes place away from urban centres will result in less affordable housing not least because of developers and taxpayers having to cover the substantial additional cost of infrastructure.
6. Urban centre offices may become available if businesses reduce the amount of office space,; this can be converted into housing.

**Question 8**: **We have come to value our local footpaths and green space more since COVID 19. How can we ensure that future residents benefit from access to green spaces?**

1. Ensure that no further development is allowed on green spaces and that the public rights of way network is cherished and maintained.

**Question 9** **Should we be thinking about adjusting the Greenbelt boundary if necessary?**

1. There should be a thorough, wholesale, open minded and committed review of the Green Belt boundary.
2. It is an irony that some of North Somerset’s most attractive landscapes and villages that lie adjacent to the Mendip Hills AONB are the locations for current large amounts of housing development simply because they are neither in Green Belt nor on the designated flood plain This landscape must be saved for future generations. We have seen during COVID 19 just how much everyone values the Mendip Hills and the nearby walks. Once it is covered in tarmac and concrete it is lost forever.
3. Green Belt can be replaced. North Somerset Council should designate the land and villages, including Churchill and Langford, Sandford, Congresbury and Blagdon, beside the Mendip Hills, as Green Belt, and as, in the new proposed Government planning designation, ‘Protected’.
4. At the JSP examination the Planning Inspectors expressed considerable surprise at the continuing failure of NSC to undertake any reassessment of the Green Belt boundary despite neighbouring authorities having done so. It is particularly important because the Green Belt in the North Somerset area is significantly restraining sustainable development in the Ashton Vale area immediately to the south of Bristol where infrastructure to support new development on a substantial scale is already in place and opportunities abound to create businesses and jobs - to the ultimate benefit of all of North Somerset.

**Question 10**: **The previous section set out the six challenges that we feel the local plan should address (shown below) are there any other challenges you feel we need to address to the local plan?**

The local plan should also prevent any further expansion of Bristol Airport and so prevent further damage to the environment.

**Question 11: In the light of the world we now live in is this vision still appropriate for the future?**

The vision as described is too diffuse to make it meaningful. Your vision should be as follows: All new homes to be well designed and constructed to a high quality so as to be environmentally sustainable and always seeking to improve the aesthetic look of the community. There should be more variety and innovation in design and some areas of development land should be allocated for ‘self-build’.

**Question 12: Do these reflect your aims, those of your family, community or business?**

1. All of these aims are laudable in themselves but the real issue is developing robust criteria for their implementation. For example a criterion could be to undertake a meaningful Green Belt review. One of the real concerns of HM Planning Inspectorate in their criticism of the JSP was the failure of NSC to undertake an adequate Green Belt review. In the absence of ~~a~~ robust criteria the aims could become badly skewed and lead to policies which would be damaging to the environment.

**Question 13: Have we identified the right priorities and are there any missing which you think are the most important and why?**

1. The priorities, 1,2,3,6 & 9 are correctly identified, but the others are not.
2. Priorities 4, 5, 7, 8 & 10. The idea contained therein of delivering a new *strategic* transport infrastructure to support regeneration and job creation and thereby significantly to reduce out commuting, particularly from Weston-super-Mare to Bristol, is wholly misconceived. Weston-super-Mare has always been (a) a small seaside resort and (b) a dormitory town for Bristol. The M5 between junction J21 north to J20 should be improved with a link road from J20 through to Bristol. Much employment in Weston-super-Mare supports its seasonal tourist trade. Thus, for example, Brighton is a seaside town with strong transport infrastructure but it has remained a dormitory town for London; this is not a problem nor does Brighton fight to reduce out-commuting to London. The reality of seaside towns is that their one-dimensional hinterland will always be somewhat unattractive to employers especially where there is a major employment hub (such as Bristol) nearby.
3. With particular regard to the climate emergency: every effort should be made to develop housing on brownfield sites and immediately within or adjacent to existing centres of employment. If new communities are to be developed, then they should be in locations which keep additional transport infrastructure to an absolute minimum and where existing public transport services can readily be provided at a proportionate cost. These were all concerns expressed by HM Planning Inspectorate upon their examination of the JSP.
4. Green spaces around rural villages must be preserved.