

For the attention of the Strategic Planning and Economic Development Scrutiny
Panel July 18th 2018

Notes from Churchill and Langford Residents Action Group (CALRAG)

Ref: Agenda item 7- Housing Infrastructure Fund:

1. There is a serious conflict of timetabling in this HIF presentation. It presumes that the Strategic Development Locations (Banwell and Churchill) in the JSP will have been confirmed by the time that the HIF budget decisions are made. The HIF budget decisions are expected at the end of 2018. The conflict arises because:
 - a. The Public Examination Process will not now start before early 2019 AND
 - b. The decision by the JSP Inspectors is not anticipated before early 2020.
Therefore, this HIF application pre-judges the JSP Public Examination process. Please clarify.
2. The JSP inspectors (letters to LAs June 1st and June 28th 2018) are evidently concerned about the **sustainability** of the SDLs. They have also asked if the Councils wish to reconsider whether there are any reasonable alternative Strategic Development Locations. How is this being investigated further?
3. The information requested by the Inspectors regarding **sustainability** of the SDLs is not expected to be in the public domain until September 2018 yet this presentation before you (HIF - *Banwell Emerging Master Plan*) states that the Banwell SDL cannot be delivered without the proposed bypass around Banwell which forms part of the proposals in the Joint Spatial Plan. This again pre-judges the Public Examination.
4. This HIF presentation makes some interesting assumptions:
 - a. Rates of delivery (1st page) - Deliverable first steps by 2023 – would render it impressively speedy since the JSP will not now be finalised before 2020.
 - b. Housing numbers. To what does the “10,523” refer? We suppose the following:
The number quoted for Weston Villages (2) is 6,823. The HIF dependent number is given as 10,523. However, 10,523 minus the Weston Villages component of 6,823 leaves 3,700.
 - c. The Banwell (SDL 7.5) proposal is for 1,900 houses. The sum of SDL 7.5 and 7.6 (Banwell plus a Churchill component of 2,800 houses) is 4,700. The difference between this figure and 3,700 is 1,000. What does this represent?
 - d. We ask if it is justifiable to include part or all of the Churchill (SDL 7.6) component in this bid?
Again, this pre-judges the JSP Public Examination.
 - e. What does the 11,600 that is quoted overall represent? This is 1,077 homes larger still.
 - f. Could all these figures be clarified?

Ref: Agenda item 8 - Local Plan Issues and Options consultation report:

1. The Inspectors have requested (Letter June 28th 2018) a further Sustainability Appraisal (SA) and Habitat Regulations Assessment (HRA) for each individual SDL, to be ready for consultation by 17th September 2018. When is this actually envisaged to take place?
2. With the high cost of the proposed ‘Issues and Options’ consultation (involving Youtube videos etc.) is it appropriate to hold this consultation before the Sustainability Appraisal and HRA for the SDLs are separately consulted upon?
3. **Report** pages 1 and 2 # **2.1 Policy**: refers to identifying locations for housing at “Sustainable locations”. The location of the SDL of Churchill in particular has been classified as unsustainable by Highways England, CPRE, BNP Paribas etc etc. Therefore, the Sustainability Appraisal for which the Inspectors are calling, is particularly relevant to take place *before* the more detailed ‘Issues and Options’ consultation on the Local Plan 2036 can be valid.
4. We also draw Councillors attention to two recent Inspectors’ reports for Essex and near Rugby where SDLs have been requested to be withdrawn by the inspectors on the grounds of unsustainability

amongst others. There are strong similarities here in each of these with the North Somerset SDLs of Banwell and Churchill.

5. Paragraph 34 of NPPF 2012 expects "*plans to ensure that developments which generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximized*". It is evident that SDL of 7.6 will not meet this criterion. The Inspectors have questioned whether more sustainable alternatives should now be examined. How is this going to be done?
6. The Inspectors are calling for public consultation on the SDLs yet North Somerset is conducting its own 'Issues and Options' consultation simultaneously without having a prior Public Consultation on the SDLs as required by the JSP Inspectors. Perhaps the Issues and Options consultation is North Somerset Council's Strategic Development Location (SDL) consultation under another name? Please clarify this.
7. It would appear that NSC is prejudging what should be an independent Sustainability Appraisal by holding an 'Issues and Options' consultation in the Autumn, on the Churchill SDL in particular? Is this financially wise?

Jan Murray and Robin Jeacocke
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