

NORTH SOMERSET COUNCIL LOCAL PLAN 2036 ISSUES AND OPTIONS CONSULTATION

Response from Churchill and Langford Residents Action Group (CALRAG)

07 December 2018

OPENING COMMENTS

The Local Plan consultation (which includes this Issues and Options consultation) is premature. NSC cannot conduct a proper consultation when very significant issues have yet to be addressed through the JSP process and formal examination. It is wrong to predict or presuppose the outcome of the JSP examination in this manner. Carrying out these consultations would require multiple participants to presume the JSP Inspectors' findings which are at least 12 months away from being concluded and published.

North Somerset Council are well aware of the widespread and vehement objections to the Garden Village at Churchill and Langford submitted through the JSP consultations to date. The summary of issues provided at section 4.2 of the Issues and Options consultation is a wholly inadequate representation of the welter of detailed comments submitted to the JSP and therefore misleading. The impression is conveyed of the Garden Village being the only alternative. No alternatives are presented. The JSP Inspectors have identified a failure by North Somerset Council to consult at all on the choice of Strategic Development Locations. If this Consultation purports to be such a consultation on the SDLs, it fails to identify itself as such and is wholly inadequate as such.

We summarise our fundamental objections to the Garden Village at Churchill and Langford.

- Location distant from main employment locations
- Increase in car movements
- Infrastructure costs
- Environmental and ecological damage
- Flooding and drainage issues
- Proximity to AONB
- Landscape
- Available alternatives
- Sustainability
- Deliverability

North Somerset Council officers have yet to clarify the interrelation of this consultation with the JSP. The recent publication of other consultative documents in relation to Sustainability and Transport merit separate and detailed response outside of this response.

It should be noted that NSC have consistently misrepresented the distances between Churchill/Mendip Spring Garden Village and Weston-S-Mare. Churchill and Langford Parish is 9 miles east of Weston-S-Mare not 3-4 miles as stated. This is not merely a typographical matter, it makes a very real difference to the sustainability and accessibility of the location.

COMMENTS ON SPECIFIC QUESTIONS

Section	Q'n No:	Question	Response
Weston-super-Mare	1	Do you agree with these or are there any other challenges or issues which we have not included and how might the Local Plan address these?	

Clevedon	2	ditto	
Nailsea & Backwell	3	ditto	
Portishead	4	ditto	
Green Belt	5	ditto	<ol style="list-style-type: none"> 1. The Green Belt's original intention was to prevent urban sprawl. Illogically, to persist with NSC's application of Green Belt policy results in proposals such as the Mendip Spring Garden Village, a substantial 2,800 house town to be constructed in pristine countryside 15 miles from Bristol the key source of employment. This is tantamount to 'leapfrog' urban sprawl but in a wholly rural location alongside an AONB with significant supporting infrastructure costs and substantially greater environmental, ecological and landscape damage. 2. The Green Belt policy requires updating or interpreting in favour of development in locations close to jobs and well serviced by public transport. There is no evidence of any Green Belt re-assessment being considered by North Somerset Council. 3. The other three adjacent Local Authorities in the JSP have decided to release Green Belt for development. 4. The Green Belt is not sacrosanct, even in North Somerset: <ul style="list-style-type: none"> • The new South Bristol Link road cuts across NSC Green Belt • Bristol Airport is on Green Belt • Bristol Airport has just been granted planning permission (October 2018) by North Somerset Council to extend the Silver Zone car park on the Green Belt. 6. The Green Belt immediately south of Bristol: <ul style="list-style-type: none"> • Is not good agricultural land • Is not used for recreation by residents • Has a refuse dump • Has a large, under-used golf course. 7. 40% of land in North Somerset is Green Belt. An alternative proposed development in Ashton Vale of 4,500 houses close to Bristol amounts to 2% of the Green Belt. 8. Green Belt could be reallocated so there would not be an overall loss.
Central parishes	6	ditto	
Mendip Hills	7	ditto	<p>The Mendip Spring Garden Village proposal is unsound in principle due to its proximity, and the substantial harm it would cause, to the Mendip Hills Area of Outstanding Natural Beauty (AONB) for the following reasons:</p> <ol style="list-style-type: none"> 1. The proposal contravenes local and national planning policy in failing to conserve, respect, contribute to and enhance landscape, natural scenic beauty and special qualities (including, in particular, tranquility) of the local character of the area and of the Mendip Hills AONB (para 109 NPPF (2012), policies DM10 and DM 11

			<p>Sites and Policies Plan 2016; policies CS5 and CS32 Core Strategy 2017,s.85 Countryside Rights of Way Act 2000 (CRoW), Mendip Hills AONB Management Plan 2014-19)</p> <p>2. Specific statutory considerations apply to AONBs in respect of sites adjoining, affecting or within view of the AONB (s.85 CRoW, Mendip Hills AONB Management Plan paras 1.2.8 and 3.7.3 and policy DM11 Sites and Policies Plan (“development which would have an adverse impact on the landscape, setting and scenic beauty of the Mendip Hills AONB including views into and out of the AONB will not be permitted unless in exceptional circumstances”))</p> <p>3. “Great weight” should be given to conserving the landscape and scenic beauty in AONBs which have the highest status of protection in relation to landscape and scenic beauty” (para 115 NPPF(2012); para 2.5.0 Mendip Hills AONB Management Plan)</p>
Settlement hierarchy	8	What are your views on the options for a revised settlement hierarchy?	The current hierarchy should be maintained
Settlement boundaries	9	What are your views on the options for revised settlement boundaries?	Recent amendments to local policy (CS32) have significantly eroded the efficacy and purpose of settlement boundaries of Service Villages. If rural communities are to be maintained as part of the make-up of North Somerset then a rigorous settlement boundary policy should be re-instituted and adhered to.
Banwell Garden Village	10	Do you have any comments on the proposed vision for Banwell?	<p>We have the same fundamental objections to Banwell Garden Village as we have to Mendip Spring Garden Village (see Opening Comments).</p> <p>A Banwell bypass is firmly linked to the construction of 1,900 houses and a further 1,300 after 2036 (Banwell Garden Village). Any benefit of a bypass to Banwell will be negated by the increase in local car journeys which will exacerbating the already congested local roads. This bypass would have a devastating effect on the pinch point on the Dinghurst Road in Churchill, as well as those in Burrington, Blagdon and all the villages further along the A368 to Bath. Also on the A371 at the approach to Winscombe where there is a pinch point to single lane traffic under the Francis Fox railway bridge close to the centre of village.</p>
	11	<p>Do you agree with the principles set out for Banwell Garden Village and would you suggest any changes to these?</p> <p>We consider that establishing the principles is a fundamental step towards developing the details for development in these areas.</p>	
	12	We would be interested in your thoughts on additional employment at the Banwell development including the type and possible location.	
	13	Do you have any comments on the concept	

		diagrams and alternative scenarios set out.	
	14	Are there any other options you would add for accommodating strategic growth within the garden village near Banwell?	
Mendip Spring Garden Village	15	Do you have any comments on the proposed vision for Mendip Spring Garden Village?	<p>In planning terms the proposed vision is misconceived by reason of the following:</p> <ul style="list-style-type: none"> (a) It is undeliverable because: (i) there are a great number of landowners, many of whom do not wish the development to go ahead; and (ii) is dependent on the construction of roads from the M5 motorway requiring government funding which is unlikely in the absence of there being any sound economic case for it. The conclusion of the Business Case in the JSP evidence is flawed and misleading. (b) It is not viable because the cost of the necessary infrastructure to support such a large development in the middle of the countryside would be disproportionate and prohibitively high and would make the building of affordable housing in Churchill unviable. (c) It is considered that 7.6 of the JSP could be found to be unsound because (i) There is and will not be sufficient local employment to support the new development (ii) There will be no adequate public transport infrastructure to support the development in consequence of which many more journeys will be made by car in to Bristol (2011 Census Churchill and Langford - 87% of those who travel to work commute to Bristol. *) (iii) The cost of necessary flood and drainage infrastructure will add substantially to the cost of development – something which is not taken into account adequately in the BNP Study. (iv) it is adjacent to the Mendip Hills A.O.N.B.. (d) It is unsustainable because the location is too far from employment locations resulting in increased car movement, the lack of an adequate transport infrastructure, the unmitigatable damage to ecology and landscape, and substantial increase in pollution from traffic commuting into and out of Bristol (a City which aspires to be carbon neutral) <p>In summary, we firmly believe that the Mendip Spring Garden Village proposal (7.6 of the JSP) will be found to be unsound at the public examination due to take place in May 2019. The vision for this development is therefore fundamentally flawed.</p>
	16	Do you agree with the principles set out for Mendip Spring Garden Village and would you suggest any changes to these? We consider that establishing the principles is a fundamental step towards developing the detailed for development in these areas.	The comments made in 15 above are re-iterated

Mendip Spring concept diagram	17	Do you have any comments on the concept diagrams and alternative scenarios set out.	The comments made in 15 above are re-iterated
	18	Are there any other options you would add for accommodating strategic growth at Mendip Spring Garden Village?	The comments made in 15 above are re-iterated
Backwell	19	Do you have any comments on the proposed vision for Backwell.	
	20	Do you agree with the principles set out for Backwell and would you suggest any changes to these? We consider that establishing the principles is a fundamental step towards developing the detail for development in these areas.	
	21	Do you have any comments on the concept diagrams and alternative scenarios set out?	
	22	Are there any other options you would add for accommodating strategic growth within Backwell.	
Nailsea	23	Do you have any comments on the proposed vision for Nailsea?	
	24	Do you agree with the principles set out for Nailsea and would you suggest any changes to these? We consider that establishing the principles is a fundamental step towards developing the detail for development in these areas.	
	25	Do you have any comments on the concept diagrams and alternative scenarios set out?	

	26	Are there any other options you would add for accommodating strategic growth Nailsea	
Urban living	27	What are your views on the proposed options for increasing urban living	
	28	Are the principles and priorities set out in the SPD still the right ones for the town centre?	
	29	Do you have any views on the opportunities and challenges of achieving good quality urban intensification within this area?	
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	31-52	[Not relevant]	

Jan Murray

For and on behalf of Churchill And Langford Residents Action Group