

CALRAG response to the Choices consultation **Deadline 14th December**

CALRAG has studied all the documentation over the past 5 years and attended and participated in the Public Examination of the West of England Joint Spatial Plan. We have a team of experts in all relevant matters on whom we call.

NS Councillors and Officers have listened to comments you made in the previous Local Plan Challenges consultation. CALRAG ‘Strongly’ supports **Urban Focus** and gives reasonings.

NS Council needs EVERYONE to take part again. YOUR opinion matters. We believe that NS Councillors and Officers are listening. Your support in the past has made a HUGE difference. Please encourage everyone to respond.

CALRAG’s selected options are highlighted in red. Council wording is in italics. Some of the questions can appear to be a little confusing at first, but we hope that our comments below our selections help you to form your own responses.

Question 1: Development in our Towns

We could prioritise the use of previously developed land (brownfield sites) in the towns. We estimate this will only contribute about 1000-2000 houses over the plan period and it is likely to mean denser development within our towns with more, taller, buildings. Do you support an approach which maximises the use of brownfield land in the towns?

You must provide an answer to this question.

- **Strongly support**
- Support
- Neither support nor object/Don't know
- Object
- Strongly object

Question 1a

If you have said you support or strongly support using as much brownfield land as possible which of the following statements best describes the reasons for your view?

Select up to 3 options.

- We should plan positively for higher density developments and taller buildings.
- **Sites will be closer to public transport and probably within walking and cycling distance of facilities and jobs, so there will be less need to use the car.**
- New planning rules allow extra storeys to be built which could provide new homes.
- Concentrating development in towns will help to protect the rural areas and Green Belt.
- **Good to encourage more life into our town centres.**
- **Higher density developments make new services and facilities more viable because there will be more people to support them.**

Please provide any other comment you wish to make in the box below

1. CALRAG agrees that the use of Brownfield sites for development in towns, close to jobs, good public transport, services and facilities should be a priority to support NSC's commitment to the Climate Change Emergency.
2. Some Green Belt that is strangling Bristol needs to be reallocated to protected rural areas
3. The concentration of development in towns will protect access to Green and Blue Spaces for everyone in North Somerset.

2. Approach to Flood Zones

Flooding is a major concern in North Somerset with about one third of the district currently regarded as being at risk. This is likely to increase further with climate change. Following feedback from the Challenges consultation, and in light of the climate emergency facing the district, our suggested approach is to develop a spatial strategy that avoids allocating land for new development in flood zones 3 (the areas at highest risk of flooding). We would like to find out more about what you think about that approach and why.

Question 2

We suggest that new housing development should avoid locations which are at risk from flooding (flood zone 3) even where it could be demonstrated that measures can be put in place to address any harm. Do you support this approach?

You must provide an answer to this question.

- Strongly support
- Support
- Neither support nor object/Don't know
- **Object**
- Strongly object

Question 2b

If you have said you object or strongly object to avoiding flood zone 3 which of the following options best describes your reason for this?

Select up to 3 options.

- There are plenty of good examples of new developments being built in flood risk areas.
- **The government allows residential development in flood risk areas subject to certain safeguards.**
- **Flood risk areas in sustainable locations such as close to towns should not be discounted.**
- Innovative building designs can provide a solution – it happens in other countries.
- We should consider using flood risk areas before Green Belt.
- **The flood risk might be outweighed by other considerations such as supporting regeneration.**

Please provide any other comments you wish to make in the box below

1. It is important to ensure that future development does not take place on pasture that forms a natural soak away for water draining down from the Mendip Hill AONB as is currently the case in Churchill, which has put existing houses at risk of flooding as well as flooding the A38 and other roads. This has already created a bigger, and potentially extremely expensive-to-resolve problem in Churchill.

Question 3: Retain Green Belt

Which of the following options best describes how you feel about the “Retain Green Belt” approach?

You must provide an answer to this question.

- Strongly support
- Support
- Neither support nor object/Don't know
- **Object**
- Strongly object

Question 3b

If you have said you object or strongly object to the Retain Green Belt approach which of the following statements best describes the reasons for your view?

Select up to 3 options.

- Green Belt is outdated and needs to be rethought
- **Green Belt restrictions push too much development to the central and southern parts of the district which will risk changing and spoiling its character.**
- There should be an opportunity to build in the Green Belt if new Green Belt can be added elsewhere.
- **Green Belt policy results in more car use, particularly longer commuting times to jobs in Bristol.**
- Villages and towns in or surrounded by Green Belt do not have the opportunity for growth which might be needed to support services or provide local housing.
- **There is an opportunity to provide new communities with easy access to Bristol's facilities and jobs.**

Please provide any other comments/reasons you wish to make in the box below

1. CALRAG agrees with all the above reasons to object.
2. It must be noted that ‘Exceptional Circumstances’ **do exist** to reallocate or remove some Green Belt land. Evidence of this was presented to the Inspectors at the Public Examination of the West of England Joint Spatial Plan (JSP) by many representatives including BANES and South Gloucestershire Local Authorities.
3. There is scope for very limited, appropriate expansion in some villages that are surrounded by Green Belt. Current Green Belt restrictions are pushing all development onto the small number of

villages such as Churchill and Langford which are outside of the Green Belt. Churchill and Langford have already accepted a 35% increase in number of houses in the past two years. This is the maximum that can be ‘absorbed’ without destroying the culture of village life, for the duration of the plan.

4. Inspectors at the Public Examination of the JSP repeatedly expressed concerns about the remote Strategic Development Locations (such as Churchill). They asked the LAs to review them with an “Open mind”. It is encouraging to see that NS officers and councillors have heeded this and have presented the possibility of removal of some Green Belt land along with the removal of Churchill/Mendip Spring as a remote SDL, as credible options in this part of the Local Plan consultation.
5. Green Belt was created around Bristol in 1955 to prevent ‘urban sprawl’. It covers over 40% of North Somerset. Its purpose was to prevent urban sprawl. Now, it is not only strangling Bristol, but it is also forcing North Somerset to miss a great opportunity both in terms of houses close to existing infrastructure and in new employment opportunities. Importantly it is forcing urbanization of green space and destroying the culture of village life.
6. Green Belt land is causing Urban Sprawl to destroy remote, valuable green spaces and create soulless commuter towns which is contrary to North Somerset’s own and vital Climate Change Emergency commitment.
7. Need not Greed should guide where houses are placed in rural areas. There is a need for a small amount of affordable homes for local young people and/or older/disabled residents. Currently affordable homes are prioritised to those outside of the villages who have no access to public transport or to the range of cheaper supermarkets and leisure facilities that towns offer. Thus those who have built up a lifetime of friends and supporters in villages have to move away. This needs to stop.
8. Such an amendment to Green Belt land presents a real opportunity for North Somerset to embrace its proximity to our city with its existing employment and infrastructure already in place whilst preserving and protecting the very best of North Somerset’s natural beauty in the villages and countryside (Green and Blue spaces).
9. If such an amendment were made, it would assist planners in implementing the Countryside and Rights of Way Act 2000 (CROW) which protects views FROM the Mendip Hills AONB which is used by so many from Bristol and North Somerset towns whilst protecting valuable ecosystems. It would also prevent losing valuable natural soak-aways for water draining down from the Mendip Hills which causes the flooding recently seen on the A38 in Churchill.
10. People have chosen to live in villages for the culture of village life which is very different from living in a town. Villages can quickly mobilise support for their more vulnerable neighbours/residents at minimal cost to the LA, as has been proved in the current pandemic.
11. Current overdevelopment of villages to the south of the region, particularly Churchill, Sandford, Congresbury and Wrington is disproportionate to their size. This is a direct result of inappropriately large band of Green Belt in North Somerset which is not only strangling Bristol but denying North Somerset the opportunity of developing a thriving area alongside Bristol.
12. Much of the Green Belt agricultural land surrounding Bristol is of poor quality compared to the land surrounding the Mendip Hills AONB. CALRAG believes that releasing a small amount of GB land is sensible to create sustainable communities close to our vibrant city of Bristol. The GB land should be reallocated to include the villages of Churchill, Langford, Congresbury Blagdon and Wrington which surround the Mendip Hills Area of Outstanding Natural Beauty (AONB).
13. UK food security should also be considered when planning to build on good quality agricultural land.

Question 4: Urban Focus

Which of the following options best describes how you feel about the “Urban Focus” approach?

You must provide an answer to this question.

- **Strongly support**
- Support
- Neither support nor object/Don't know
- Object
- Strongly object

Question 4a

If you have said that you **support or strongly support** this approach which of the following statements best describes the reasons for your view?

Select up to 3 options.

- It could support better public transport.
- **Concentrating development in a limited number of larger areas makes it easier to deliver essential infrastructure such as renewable energy and schools.**
- May need less land overall because development at the towns is likely to be at a higher density.
- **Houses would be closer to a range and choice of existing services, facilities and jobs.**
- **It protects the countryside and villages from development.**
- It supports the regeneration of the towns.

Please provide any other comments/reasons you wish to make in the box below

1. CALRAG welcomes Urban Focus as a credible, sustainable, viable and achievable solution.
2. Urban Focus is the most sustainable choice for development and enables the Council to work to its Climate Emergency commitment.
3. 5000+ homes and jobs, close to Bristol, its employment opportunities, its existing good quality public transport infrastructure, services and facilities, where people can cycle and walk to work is the logical, environmentally acceptable solution.
4. This option reduces commuting.
5. The houses would be built close to facilities and services such as schools and hospitals cutting down valuable emergency ambulance times and saving lives.
6. It cannot be assumed that the Airport will provide the anticipated employment hub as the expected expansion of air travel must now been in doubt. Automation needs to factored in when considering the airport as an employment hub.
7. In July, it was reported in the Bristol Live that the airport was reducing its workforce by 23 per cent and it expected passenger numbers in 2021 to be down to 6.5-7 million (2015-2016 levels).

Question 5: Transport Corridors

Which of the following options best describes how you feel about the “Transport Corridors” approach?

You must provide an answer to this question.

- Strongly support
- Support
- Neither support nor object/Don't know
- **Object**
- Strongly object

Question 5b

*If you have said that you **object or strongly object** to the Transport Corridors approach which of the following statements best describes the reasons for your view?*

- **Could cause ribbon development along the road corridors resulting in sprawl and merger of settlements.**
- Could fundamentally change and reduce the Green Belt with multiple releases of Green Belt land at various locations.
- **Danger that housing could be built before the supporting transport infrastructure is delivered.**
- Better to plan for electric vehicles than public transport.
- **Not clear what the new transport infrastructure is and when or if it will be delivered.**
- Post-Covid, there will be less use of public transport.

Please provide any other comments/reasons you wish to make in the box below

1. This is not a viable option. It will cause more problems than it solves.
2. The UK faces a serious recession so it is highly unlikely that any new transport or general infrastructure could be delivered before houses are built. Schools, shopping and healthcare facilities need to be in place first as has been demonstrated to work well in Cambridgeshire.
3. CALRAG has not clicked ‘Strongly objects’ because it supports small development close to railway stations and new railway stations whether in Green Belt or not.
4. New corridors of roads are not the answer. Though CALRAG does support better public transport from Bristol to the airport and would appreciate the reinstatement of the bus service between Churchill and Weston-S-Mare which has been withdrawn.
5. CALRAG strongly supports a link between M5 Junction 20 and Bristol.

Question 6: Greater Dispersal

Which of the following options best describes how you feel about the “Greater Dispersal” approach?

You must provide an answer to this question.

- Strongly support

- Support
- Neither support nor object/Don't know
- Object
- **Strongly object**

Question 6b

If you have said that you object or strongly object to the Greater Dispersal approach which of the following statements best describes the reasons for your view?

Select up to 3 options.

- Will lead to more cars, commuting and congestion.
- Increased population may mean existing local services are stretched.
- **Could result in harm to the appearance of the rural areas and countryside.**
- Less easy to deliver new infrastructure such as health facilities and new secondary schools as there might not be enough development to support it.
- **Further to travel to services, facilities and jobs so walking and cycling would be less attractive.**
- **Difficult to deliver improvements to public transport when new development is much more spread out.**

Please provide any other comments/reasons you wish to make in the box below

1. CALRAG agrees with all the above objections.

Question 7: Do you have any other suggestions for alternative approaches?

No.

Questions 8 and 9 need to be filled in by individuals.

11.11.2020