

North Somerset Local Plan (2023-2038) pre-commencement document

Comments from Churchill & Langford Residents Action Group (CALRAG)

1. North Somerset Local Plan and West of England Joint Spatial Plan (JSP):

This new local plan is an exciting opportunity to embrace future growth in North Somerset whilst at the same time rejecting the failings of the previous Joint Spatial Plan (JSP).

This local plan must not and cannot be a repeat of the JSP which the Inspectors found to be so seriously flawed. The Inspectors' main concerns were focussed on the spatial strategy and allocation of Strategic Development Locations (SDLs). However, the evidence-base acquired during preparation of the JSP remains crucial to all future plans*. Local plan preparation must now take a different course.

2. Evidence for Issues and Options consultation:

The JSP contained extensive investigations which remain pertinent to the preparation of future local plans. The Issues and Options documentation **must be open and transparent and ensure that the evidence including some that was collected for the JSP, as well as that relating to transport modelling is detailed and clearly presented**. Furthermore, the evidence about land use assumptions that were used for the analysis and proposals of the Joint Local Transport Plan should also be made clear.

3. Climate Change:

The Climate Change Emergency declared by North Somerset Council (26th February 2019) to go Carbon Neutral by 2030 must now be taken into account in the new Local Plan.

4. Green Belt Review:

In order to achieve a rational assignment of residential development, a Green Belt Review must be carried out so that houses are built close to employment and public transport. The Green Belt review is essential particularly for the Belt surrounding Bristol. Introduced some sixty years ago but in present circumstances, it is producing an impossible constraint, especially in an already seriously spatially constrained North Somerset.

Question: Is it realistic to progress to Issues and Options consultation in May/June prior to carrying out a comprehensive Green Belt Review?

5. Employment and Housing:

A notable feature of North Somerset is that employment opportunities are concentrated in Bristol. New housing should be concentrated in locations close to the jobs in Bristol. The current plethora of totally unsuitable, opportunistic planning applications is leading to bad planning and unnecessarily overstretched planning departments and unprecedented local anger. This needs to be addressed as a priority.

6. Remote Strategic Development Locations (SDLs):

Such SDLs as Churchill/Mendip Spring as proposed in the JSP, would be unsustainable and inappropriate since they amplify the energy expenditure required for commuting transport and should not be included in any future Local Plan. This fact will remain, as Bristol grows, even if some fraction of commuting is removed by remote working. The proposed SDL at Churchill (SDL7.6) is an extreme example of these highly problematic locations.

7. Infrastructure – Transport:

National circumstances have altered profoundly since the JSP was submitted and rejected. Such changes must ensure equally profound changes in the planning process for all local authorities. We have now both a nationally recognised climate emergency and also an unprecedented crisis provoked by COVID-19. Furthermore, the recent rejection by North Somerset Council of the Bristol Airport Expansion proposals must profoundly change future infrastructure requirements. The primary aim must be to greatly reduce energy expenditure, much of which is devoted to transport. A major reassessment of local transport priorities is also required. Ever-expanding roads schemes offer no evident answer.

8. Public Transport: More energy-efficient transport modes including a greatly expanded rail service, should be sought.

9. Environmental and historic conservation and enhancement:

CALRAG fully supports the Pre Commencement document #10 "*Protection and enhancement of landscapes, wildlife and historic assets, strategic green infrastructure, Mendip Hills AONB*"

10. Public Consultation: CALRAG is extremely concerned that public involvement in this Pre Commencement consultation and the forthcoming Issues and Options (May/June) due the current circumstances, is not practicable with no facilities to inclusively and appropriately consult all residents due to Covid-19. Even Parish Councils are unable meet. Will North Somerset Council review the timetable for the consultations.

* It is particularly unfortunate that (on 7/4/2020) removal from public access took place of all the collected JSP documentation. This removal of information (of which the WoE authorities are custodians, not owners, and which was publicly financed) is totally unacceptable and must be reversed in the public interest.

On behalf of Churchill and Langford Residents Action Group

Robin Jeacocke

Jan Lyons

Jan Murray