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| **BACKWELL RESIDENTS ASSOCIATION****36 LONGTHORN, BACKWELL BS48 3GY****Hon. Sec. Mike Veal****Tel.: 01275 461187****E mail: smveal@talktalk.net** |  |
| North Somerset Council Planning Policy Team, Post Point 15, First Floor, Town Hall, Walliscote Grove Road, Weston super Mare BS23 1UJ |  |

2 September 2020

Dear Sirs,

**north somerset local plan – challenges consultation**

Backwell Residents Association wishes to submit the following representations to the Challenges Consultation on the Local Plan 2038.

Established in the 1960s, Backwell Residents Association (BRA) works to safeguard and promote the collective interests of local residents of Backwell. The Association has over 400 paid up households reaching up to 700 members and has represented the community in respect of a number of development proposals affecting the village.

BRA works collaboratively with Backwell Parish Council and Backwell Resistance to represent the interests of the local community and has very recently undertaken a joint survey of the whole parish community to understand its collective views on the future of Backwell and the community’s aspirations for future growth and development.

This representation outlines the views of BRA and its members to the future development of Backwell with the context of the various “challenges” identified through the consultation document.

**The Benefits of New Homes and Employment**

BRA recognises the potential benefits which new homes and jobs can bring to a community. However, these benefits rely upon an appropriate scale of development which is commensurate with the existing community, the capacity of and potential for enhancement of existing infrastructure and the impact of new development on the character of the area.

Proposals which are disproportionate in scale to the existing settlement and/or would result in the significant loss of open countryside for relatively low-density development due to the character of the area result in harm which can outweigh the benefits of new housing outlined in the consultation document.

**The Challenges**

**Challenge 1: Climate Emergency – How will addressing this influence development?**

The current pandemic has resulted in significant changes to our way of life. Whilst temporary in many respects, these could deliver long-term changes which will need to be factored into future development plans. In this regard, there is a strong likelihood that some employees will work from home more often, although it must be recognized that a significant number of employees will continue to travel to work due to the nature of their work.

Following North Somerset Council’s recent declaration of a climate change emergency, the Local Plan must place climate change at the heart of its proposals, to ensure future associated changes to our climate are planned for and the land use proposals serve to shape and influence our behaviour to encourage more sustainable living.

**As a result, a priority for this Local Plan must be to plan for large-scale housing development at the main urban areas, closely-related to existing and proposed employment areas and a wide range of other facilities, including retail, leisure and community uses.** The opportunities to reduce travel distances, enable commuting by foot and cycling and to utilise existing public transport infrastructure should be fully exploited. Accordingly, large-scale housing at Bristol and Weston-Super-Mare must be considered ahead of other development locations and the climate change declaration should represent very special circumstances to justify the removal of land from the Green Belt to achieve these aims.

Importantly, the current trend of home working due to the pandemic should not be put forward as justification for locating new homes where residents would continue to rely upon private car for the majority of trips on the assumption that commuting levels will have reduced.

**Challenge 2: Supporting our Economy**

BRA agrees with NSC in respect of the likely economic changes which we can expect to see as a result of the pandemic. Renewal of existing town centres and tourism is supported, with opportunities for a more varied mix of uses rather than a dominance of retail within market town centres. The increased day time population within existing residential areas could lead to increased demand for retail, leisure facilities and more childcare provision etc., which could provide an economic boost for local centres and town centres which have struggled in recent years.

**Local hubs for home-workers to access and enhanced high speed broadband infrastructure for residents and businesses will become ever more crucial to enable the economy to function effectively.**

In respect of the future plans for the port and airport, BRA does not support the future expansion of the airport, particularly within the context of North Somerset Council’s Climate Emergency Declaration. Whilst it is recognised that the airport is a significant contributor to the local economy, further expansion of the airport to accommodate more passengers is simply incompatible with the Council’s climate change declaration.

**Challenge 3: Providing homes and creating communities**

BRA recognises that there is an ongoing need to provide a range of new housing to meet a variety of needs within the local population. However, it is also noted that by 2026 the natural change in population is expected to decline, with deaths exceeding births at an increasing rate through to 2038. Even taking into account an influx of residents into North Somerset from elsewhere in the UK, there would appear to be a general decline in overall population post 2026 which should be reflected in the housing requirement. Moreover, if declining average household size generates demand for additional housing, it should follow that an increasing proportion of the planned housing should be smaller housing units which should be deliverable at higher densities. Accordingly, an increase in housing need should not necessarily translate into a need for a greater quantity of developable land.

BRA’s vision for Backwell as a community by 2038 is for Backwell to maintain its individual village identity, with physical separation from neighbouring settlements of Nailsea, Flax Bourton and Brockley. Steps will have been taken to achieve a step change in travel, with a reduced reliance on private cars and an increased use of electric cars, public transport, walking and cycling, reducing both congestion and pollution along the A370 corridor. The existing retail, employment, leisure and community facilities will be sustained and enhanced with a more diverse mix of facilities to serve the local population. Opportunities to consolidate the existing school and leisure campuses will have been fully considered and planned to deliver a sustainable solution capable of meeting the long-term needs of the community for adequate school places. BRA envisages that the current recycling centre in Backwell is moved to a more suitable location as the existing site is far too close to residential areas, schools etc. causing congestion and safety concerns. **The housing stock will have been enhanced through small-scale development sites on the edge of the village and within the built-up area, providing a range of housing to meet local needs, including opportunities for custom/self-build.**

**Challenge 4: Creating a Sustainable Future**

BRA broadly supports the definitions of sustainable development provided within the Challenges documents, subject to the following observations:

1. Where new public transport is proposed as part of large-scale new development to achieve a sustainable development, this should only be regarded as sustainable where the public transport is demonstrably deliverable and viable. Furthermore, the impact of additional car usage upon already congested roads must be duly considered in determining appropriate locations for growth. Whilst enhancements to public transport are to be encouraged, it must be acknowledged that this will not achieve a marked reduction in car usage, particularly where public transport is unable to offer significant cost or time advantages over car usage for commuters.

**The village currently suffers from significant traffic congestion at peak times on the A370 road and Station Road, and this situation requires to be addressed as a priority**

1. Where accessibility to employment relies upon public transport, the extent to which new residents are likely to use public transport modes must be fully considered. The availability of public transport connections is not sufficient to achieve sustainable development, if a significant proportion of residents are likely to continue to use the private car; if such journeys are unsustainably long; or existing congestion would dissuade commuters and public transport operators from using these routes.
2. **The recognition that public transport hubs should only be considered as the focus of new housing development where high-density development would be suitable, is fully supported.** Careful consideration must be given to the areas around transport hubs to support new development. **It should not automatically follow that a transport hub is capable of accommodating significant new housing development.**
3. The safeguarding of nationally protected habitats and species is fully endorsed and should be informed by an understanding of the network of habitats and foraging areas which these species rely upon to survive. The degradation of the wider environment around these safeguarded sites places these protected populations of species at significant risk.

**Challenge 5: Protecting important green and blue spaces**

BRA fully endorses the issues raised in respect of the protection of existing green spaces and the provision of new spaces to support communities. The importance and value of green spaces, including open countryside and public rights of way must be taken into account in determining suitable locations for new development.

**Challenge 6: The Future Role of the Green Belt**

BRA welcomes the explanation of Green Belt, its role around Bristol and the distinction between Green Belt and other open countryside. Green Belt is not a landscape policy, it is a policy constraint imposed to prevent the coalescence of Bristol with nearby villages and towns. Whilst it is acknowledged that other important landscapes are covered by landscape designations which offer protection from inappropriate development, large areas of attractive, tranquil countryside are unprotected and threatened by development, due to the sacrosanct nature of the Green Belt designation. The Bristol/Bath Green Belt has consistently stifled opportunities for highly sustainable urban extensions to the south of Bristol which could deliver significant new housing for North Somerset.

As explained within the consultation document, the Green Belt is an out-dated policy tool which is no longer fit for purpose or compatible with the climate change emergency and sustainable development objectives. Within the context of national policy for Green Belt, the Council must ensure that the Green Belt boundaries are capable of enduring for the long-term, beyond the horizon of this Local Plan whilst delivering sufficient development in a sustainable manner. For the reasons discussed at the Joint Spatial Plan Examination the retention of the Green Belt without modification, would lead to unsustainable patterns of development, long-distance commuting and significant harm to communities and open countryside beyond the Green Belt. The flaws of the JSP spatial strategy must not be repeated through this Local Plan.

**The Vision for 2038**

BRA broadly supports the vision, aims and objectives as outlined on pages 30-33 of the consultation document. Most importantly, the vision for North Somerset and its aims and objectives must take on board the aspirations, needs and views of local communities.

The Pre-Commencement Document for this Local Plan committed to working with local communities from the start of the process, with particular emphasis on Neighbourhood Plan communities. The Local Plan is intended to identify housing requirements on a parish basis, thereby inferring that local communities will be able to influence where new housing takes place within their parish. The Council must ensure it engages quickly and effectively with local communities, parish councils and interest groups and adopts a grass roots approach to identifying suitable locations for development, which are supported by the community wherever possible.

Lessons should be learnt from the JSP process, that communities are willing to support appropriate levels of growth and have a unique knowledge of their area which makes them well-placed to work with the Council to identify suitable development locations and opportunities for new infrastructure.

In this regard, Backwell Parish Council (BPC), through its Development Working Party - which includes village wide representation, including BRA and Backwell Resistance - in July/August commissioned a survey of all Backwell parish residents to gauge the community’s views towards development and the issues raised through this consultation. The questions asked comprised some from North Somerset Council’s own consultation exercise as well as Backwell specific ones.

The survey was well received and produced a gratifying level of response (both digital and hard copy).

BRA proposes that an analysis of the survey results, provided by BPC representatives, is shown and discussed with relevant NSC officers in the weeks ahead, thereby providing more details of the thoughts and aspirations of Backwell residents.

Yours faithfully

Michael Rose

On behalf of BRA