

From: Bleadon BOB Community Website <bleadon@live.co.uk>
Sent: 23 November 2017 15:27
To: Bleadon Parish Clerk
Cc: Cllr Chinn; Cllr Dobson; Cllr Hartree; Cllr Strong
Subject: Reply to BPC on Cllr Dobson's NDP paper

Dear Maria,

Please can you ensure that all other councillors also receive copy of this email and attachment before BPC make any resolutions/decisions on additional Bleadon resources and associated reserve/precept funding for a Neighbourhood Development Plan (NDP). Ideally before the next relevant committee meeting.

As you maybe aware, BPC took on the closed churchyard in early 1980's (rather than let District Authority take responsibility) and now residents face huge ongoing maintenance costs for the church walls. A NDP could also present significant short term and future costs for Bleadon that without a NDP would solely be a NSC responsibility as the planning authority (in our understanding without further explanation by BPC).

As it seems BPC is currently unilaterally committing all Bleadon residents to a Neighbourhood Development Plan (NDP) we would hope that BPC has considered the financial ramifications but, due to a lack of publicly accessible BPC information on this matter, we are writing to express our/residents concerns and queries.

We have been circulated a copy of the attached NDP paper produced by Cllr Dobson via the Bleadon Action Group, this response is not from them. We are unclear why it was sent to the group, whether BPC feels it constitutes an official consultation with a community group, or who else has received this document? It is also not clear who it was produced for, but it seems to show no disadvantages, cost implications, risks or future liabilities for Bleadon in creating a Neighbourhood Development Plan. BOB personally feels this needs urgent clarification before a NDP with associated costs proceeds any further, as BPC seems intent.

Also, you will recall that we/residents have previously asked for but not received information on the role and membership of the Management Working Group (MWG) and access to their agenda, minutes and reports that, as reported in BPC minutes, has seemed to steer BPC. A similar situation exists for the proposed NP Steering Group.

Currently, this mysterious MWG and Cllr Dobson apparently see no disadvantages, no resident/landowner conflict in deciding development sites, no future legal responsibilities for defending it, no development and support costs and no increase in precept either.....Really? If we/residents had this information, we may all understand their and BPC rationale and possibly gain reassurance for this project?

As indicated in our attachment, we currently feel that most of the stated advantages listed in Cllr. Dobson paper are not dependent on Bleadon having a NDP, they are relevant to anyone wishing to comment on planning applications and most already exist via the NSC Local Plan and associated policy processes. Therefore please read our comments to Cllr Dobson paper as attached and then for clarity, please confirm those items which are solely and uniquely beneficial to Bleadon having a NDP?

The following is additional comment to further highlight and reinforce our concerns with a NDP.

As previously discussed, people need to do their own research to form their own opinion before deciding whether BPC actually needs a NDP. (As you may be aware some links are available on BOB via the Current Development & Action Group pages). Misinformation and critically lack of comprehension/understanding of all facts is the biggest risk to failure of any project plan. Disunity within our community and BPC's historical approach to the adopted Parish Plan has not helped change public opinion or engagement with BPC on these new strategic matters.

For example:

- Residents appear not to have been given a choice as to whether to have a Neighbourhood Development Plan or to use other planning routes E.g. Sections one and two in the Government's guidance on Neighbourhood Planning <https://www.gov.uk/guidance/neighbourhood-planning--2> Did BPC consult with all residents before making this decision, if so please can you tell us when and how?
- In September 2017 BPC submitted the whole of Bleadon Parish as a Designated Neighbourhood Area, please can you tell us when and how all residents were consulted on this decision and subsequent application?
- NSC are the Planning Authority NOT Bleadon.
- NSC already has developed a Local Plan at zero extra cost to Bleadon precept.
- NSC assess potential development sites through it's SAP and so absorb any neighbourhood conflict.
- NSC already provide planning direction for Bleadon through the Core Strategy/Local Plan and Development Management policies and support officers. Why do we need to duplicate these policies and create a plan that may legally offer more development than NSC, all at resident cost? Bleadon is currently an Infill Village protected by NSC CS33 policy, we feel it should not become a Service Village like all the other NDP areas, but what is NSC and BPC's view?
- To our knowledge BPC doesn't own any land to build on, or additionally protect, so what does BPC feel residents currently want to build, and where, that necessitates a NDP? Again, BPC may have addressed these issues but not published their view to all residents.
- Hutton (T Porter) & Locking (E Ap Rees) currently have no NDP, why? Although they do seem to have/want a Parish Plan. They also have 'Strategic Gaps' surrounding their parish boundary. So why not just update our Parish Plan, submit it as a Supplementary Planning Document, use it as a BPC resource Action Plan and lobby NSC for Strategic Gaps? BPC may have considered and rejected this, and other options, but to our knowledge, have not discussed and communicated them to all residents.
- Backwell and Sandford NDPs have been challenged by developers on Appeal and they have lost, to residents financial cost, what would be BPC's approach in their situation? E.g. Backwell "*Parish Council has spent thousands of pounds in legal fees*" https://www.bleadon.org.uk/media/images/user-images/24400/Backwell_NDPHousing.jpg

It may also help us/residents understand if BPC could work through a number a scenarios and associated queries to understand why a NDP will help the future of Bleadon, and the potential associated costs. For example:

Community Infrastructure Levy (CIL) /New Homes Bonus (NHB)

Cllr Dobson's paper mentions CIL and the 15% & 25% 'windfall' payments. The multi-million pound development at Riverside Holiday Village (Purn Caravan Park) has been recently approved (£7-12 million). The developer may have been asked to fund local improvements by NSC (highways, schools, leisure, etc.) but not contribute to other services that affect residents such as Government controlled infrastructure (doctors, dentists, opticians, etc.) or upgrading of private sector utilities (gas, electric, water, etc.).

- How much finance will NSC receive from the Holiday Park expansion development? (e.g. New Homes Bonus, Section 106, etc.)
- How much finance will residents/BPC receive? (e.g. CIL 15%?, etc.)

- If Bleadon had a NDP how much extra finance would it have received? (e.g. CIL 25%?, etc.)
- What infrastructure improvements will Bleadon directly see through this recently granted multi-million pound development?
- As the Holiday Village is an all year round commercial operation we presume NSC will receive ongoing annual business rates income but Bleadon would receive no additional annual precept to cover additional use of our park, bins, poo bins, toilet facilities, litter picking, associated ranger duties, etc.?
- If this were a residential development (like that proposed on the Sanders Field) NSC would receive annual Council Tax. (Under the New Homes Bonus scheme, NSC will receive double Council Tax for the first 4 years and an additional bonus if the houses were affordable i.e. under £250K?). BPC would receive an annual precept but what additional services would residents receive over and above those paid for through taxes to NSC and Government? NB it is highly unlikely that any health facilities would be provided by Government in the foreseeable future.

Legal Defence of a NDP

Assume Bleadon had a NDP and that the land associated with the Purn Caravan Park was not designated to build on, and residents through the plan had stated that they wanted no more expansion on this land for tourism, leisure, etc. purposes (like the current adopted Parish Plan).

- Would BPC defend the site and take the application to appeal? What maximum cost to the residents/precept would BPC be prepared to commit? (See Backwell example of thousands of pounds in legal fees)
- Would BPC support NSC's decision to build on the land but with reduced units i.e. 40 units? (as BPC did with a 'no comment' submission)
- Would BPC support the developer's application to build on the land with 90 units? (as BPC did with a 'no comment' submission)
- Would BPC be prepared to defend all applications that didn't comply with Bleadon's NDP, regardless of NSC's decision to take to appeal or not, continually raising the precept to pay for legal costs?

Legal defence against existing permitted licences - Utilities

We raised the following issue with BPC last December 2016 with no response. In September 2016 the Government issued a Petroleum Exploration & Development Licence (PEDL) e.g. potential fracking. In December 2016 the CEO of South Western Energy Ltd spoke on BBC Bristol indicating the "desire to drill 'just south of Weston-super-Mare' and to build a 'small modular power station' to convert any shale gas into electricity" with expected "planning permission submissions within the year, and drilling with two years". (<https://www.bleadon.org.uk/fracking>).

In September 2017 BPC declared the whole parish of Bleadon as Designated Area for a NDP.

- How does BPC envisage handling this existing PEDL licence within the NDP?
- If a development application was submitted it would also affect other neighbourhoods outside of Bleadon. Who would foot the bill should residents want to object to the application? If NSC potentially permitted the development, potentially as directed by Government (E.g. Hinkley Point), would residents have to bear the costs alone or has BPC discussed this with neighbouring parish councils but not published the information?

How will conflict over land and its use be addressed?

For example: Bridge Rd/Bleadon Rd fields – Landowners/farmers want to build on them, the majority of residents do not, BPC want to declare it a Strategic Open Space, NSC declare it in private sector ownership with agriculture designation. How would BPC resolve this designation of these fields and subsequent development in the NDP?

We can not speak for all others but please be assured that these are not just our personal viewswe/residents just want access to open, honest, clear, transparent, informed public information made available for all Bleadon residents as part of our democratic right. Not personal discussions and agreements made in closed undocumented meetings, with people who may also be ill-informed, that may ultimately produce an expensive cost in both the future financial and social well being for Bleadon residents.

To reiterate, BOB is not necessarily against a Bleadon NDP. However, given the Parish Plan history, especially this year, we feel the public should be convinced why BPC believe a NDP is better than its existing reliance on the NSC Local Plan with a supplementary adopted Parish Plan. Also, that the full cost, legalities and resource implications of a NDP should be clearly explained to all residents. We feel that this should be done before getting to the final referendum stage, when of course residents could then vote 'NO', thus wasting all the time, effort and cost in creating it

Finally, at the September public meeting regarding proposed development at Bridge Rd/Bleadon Rd, you may recall I stated my/residents concern about Bleadon's proposed NDP, yet BPC has yet to allay those concerns or have any public consultation on the matter. When will BPC start openly, honestly and transparently answering fundamental key questions relating to the NDP? Consequently, it seems BOB will currently have no option other than to campaign 'NO' at the required legal referendum to adopt any NDP.

Kind regards,

Chris Butler

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