



CHURCHILL PARISH COUNCIL

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Response to Planning Application No. 21/P/2049/OUT

Erection of up to 62no. Dwellings (30% affordable housing) with accesses off Church Lane and Front Street, landscaping and other associated works; access for approval with matters of appearance, landscaping, layout and scale reserved for subsequent approval - land to the east of Church Lane and north of Front Street Churchill.

Churchill Parish Council (CPC) objects to this planning application in the strongest possible terms for the following reasons:

1. This application is not Plan Led: The site sits outside the settlement boundary and does not respect the scale and character of the village and the site's location.
 - 1.1. It does not fall within any overarching national or local plan or planning policy
 - 1.2. It does not form part of the North Somerset Local Plan 2026
 - 1.3. It is not on the North Somerset Council (NSC) Site Allocations Plan (SAP).
 - 1.4. Approx 2/3 of the site is within the Churchill Conservation Area and is surrounded by many historic listed buildings (see #9 below).
2. This site sits outside the settlement boundary. It does not respect the scale and character of the village and the site's location.
3. The site lies close to the Mendip Hills Area of Outstanding Natural Beauty (AONB) and is clearly visible from its western boundary particularly from the Iron Age Hill Fort known as Dolebury Warren. It will severely impact upon the enjoyment of views from the AONB in contravention of the CROW 2000 Act.
4. The site sits at the foot of Windmill Hill, which offers great views over the surrounding area including the Conservation Area which forms part of the site. Windmill Hill is used extensively by walkers who value the peace and tranquillity it offers. There is also archaeological evidence to support Windmill Hill being used in Iron Age and Roman times as a hillfort and look-out point respectively. It is known locally as 'Barrow Field' – an Anglo Saxon name for a rural burial ground.
5. This application contravenes paragraph 185 of the NPPF 2019 regarding the appropriateness of new development stating "... it should a) mitigate and reduce to a minimum potential adverse impacts

resulting from noise from new developments – and avoid noise giving rise to significant adverse impacts on health and the quality of life

b) **identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and**

c) **limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation’.**

6. **The DEFRA 25 Year Environment Plan 2018** sets out under paragraph 2.2.1 that ‘Some of England’s most beautiful landscapes and geodiversity are protected via a range of designations including National Parks and Areas of Outstanding Natural Beauty... **Over the next 25 years we want to make sure they are not only conserved but enhanced.**’

7. **North Somerset’s Landscape Character Assessment- FINAL 041018 p198 ‘Landscape Guidelines’ :**
Strategy for Area J2 (Churchill and surrounding villages)

This application contravenes the provisions of this assessment.

8. **North Somerset Core Strategy Policy CS5** seeks to protect and enhance the enjoyment of Graded Listed Buildings within the community: “The council will conserve the historic environment of North Somerset, having regard to the significance of heritage assets such as conservation areas, listed buildings, buildings of local significance, scheduled monuments, other archaeological sites, registered and other historic parks and gardens”.

9. **Adjacent to the site lie the following listed buildings:**

Grade I Church of St. John the Baptist, Church Lane (LSB1101)

Grade II Gate piers and walls, Churchill Court, Church Lane (LSB1102)

Grade II Churchill Court, Church Lane (LSB154)

Unregistered Park or Garden of Churchill Court

Grade II The Cottage, Church Lane

Within the Conservation area are:

Grade II Sidney Hill Cottage Homes (LSB520)

Grade II April Cottage, Front Street (LSB159)

Grade II Ash Green, Front Street (LSB160)

Grade II Churchill Clock Tower and Railings

10. In addition to the above, the hedgerow to the west of the site bordering Church Lane is an historic hedgerow.

11. The recent **Landscape Sensitivity Assessment by MHP chartered Landscape Architects** (August 2021) referring to this site and its surroundings concludes:

“The land unit is rated as high sensitivity due to it containing nationally protected landscapes and heritage assets, it contains community valued recreational facilities and distinctive natural landform with numerous footpath networks. It is also instrumental in providing separation and separate identities between the settlement areas of Churchill, Churchill Gate, Old Churchill and Langford.”

12. **North Somerset Council REP-001 Landscape Sensitivity Assessment FINAL 130318** refers to **Area 3 Churchill, centred around Front Street and Dinghurst Road**

“Land to the north of Area 3 slopes up from the settlement edge to Windmill Hill. Although dense vegetation on field boundaries encloses the fields in this area, the rising topography increases the visual prominence of this land and there is intervisibility with the AONB. In addition, development on this land would affect the settlement form. Owing to the above, this land is of high sensitivity”.

13. Development on this site is in contravention of NSC's Policy DM11: "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 and where it can be demonstrated that it is in the public interest." This development is definitely not in the public interest.
14. The applicant's 'Landscape and Visual Impact Assessment' omits to mention the ancient hedgerow bordering Church Lane to the west of the site. This hedgerow is an historic hedge – see #10 above). The applicant states, "Proposed Development would require short sections of hedgerow to be removed to accommodate the proposed vehicle and pedestrian access points. Internally, a relatively short section of Category C scrubby hedgerow and a small group of Category U Elm trees which currently form the northern boundary of the smallest field area are also proposed to be removed. This is considered to be a Minor adverse degree of change." [sic] This is but one of many historic hedges. Of particular note is the historic hedge bordering Church Lane. These are important features of the historic landscape. These are not a 'Minor adverse degrees of change'.
15. The above survey further refers to "Scattered farmsteads and small clusters of properties are common to the west of the Site". In reality these are the Unregistered Park or Garden of Churchill Court, the listed: Gates and walls of Churchill Court, Churchill Court, 'The Cottage', and Parish Church. These buildings cannot be described as, '*scattered farmsteads and small clusters of properties*'.
16. NS Core Strategy CS9 – **Living within Environmental Limits** states, "The existing network of green infrastructure will be safeguarded, improved and enhanced by further provision, linking in to existing provision where appropriate, ensuring it is a multi-functional, accessible network which promotes healthy lifestyles, maintains and improves biodiversity and landscape character and contributes to climate change objectives.
Priority will be given to:
*** the promotion of the north slopes of the Mendip Hills AONB as sub-regional corridors for biodiversity, recreation and landscape retention.**
17. NS Core Strategy CS32: Service Villages. It should be noted that Churchill and Langford is designated as a 'Service Village'. It is in fact two villages – Churchill and Langford, with two separate identities. This policy defines Service Villages, "Service Villages are places where a small amount of development (particularly economic, or which extends the range of services available) may be appropriate. New residential development will generally be acceptable in principle **within settlement boundaries, provided it respects the scale and character of the village and the site's location.** Churchill has already accepted or is accepting over 300 new houses on a village of some 857 previously.
18. CS32 further sets out the criteria for service villages regarding land adjacent to settlement boundaries particularly regarding otherwise unmet need. There is no demonstrable need in these two small villages which have no local employment, minimal public transport, full schools and narrow lanes. New developments are being advertised in Manchester and London.
19. **CS32 further states:** Affordable housing will only be permitted either within settlement boundaries or in the form of rural exception sites, and then only adjacent to settlement boundaries." With the recent new developments Churchill has gained a proportionate level of affordable housing.
20. "Sites outside the settlement boundaries in excess of about 25 dwellings must be brought forward as allocations through Local Plans or Neighbourhood Plans." This application for 62 houses is not on the SAP or in the LP 2026 and is not be included the Churchill Neighbourhood plan currently in draft.
21. **Policy CS32:** outlines permitted new development within the service villages, including Churchill. These will be supported where:
 - 21.1. it does **not** result in significant adverse cumulative impacts (such as highways impacts) likely to arise from existing and proposed development within the wider area;

21.2. the location of development maximises opportunities to reduce the need to travel and encourages active travel modes and public transport; and

21.3. it demonstrates safe and attractive pedestrian routes to facilities within the settlement.

This proposal is inconsistent with all of the above.

22. NSC Core Strategy CS1: Addressing climate change and carbon reduction:

22.1. “Developments of 10 or more dwellings should demonstrate a commitment to maximising the use of sustainable transport solutions, particularly at Weston-super Mare. Opportunities for walking, cycling and use of public transport should be maximised through new development and in existing areas emphasising the aim to provide opportunities that encourage and facilitate modal shift towards more sustainable transport modes”.

22.2. The increased volume of traffic generated by this application will reduce the capability of existing residents to walk and cycle on narrow lanes bordered by grass verges which are an important feature of the village scene and are unsuitable for sustained use as footways.

22.3. The applicant has made many incorrect statements regarding distances from the site to employment centres and local amenities. The following are just a few examples:

22.3.1. The applicant claims that the site is:

11km to the east of Weston-S-Mare via the A368 and A371. **Fact Check: 14.5km**

16km south of Bristol via the A38. **Fact check: 25.74km**

22.4. Walking distances from the site to local amenities has also been significantly under-estimated. For examples see #30 below.

23. **NS Core Strategy CS3 Environmental Impacts and Flood Risk Assessment:**

23.1. Bishops Well is an intermittent spring emerging from Windmill Hill on the east side of Church Lane. It discharges into a drain below the road surface which has insufficient capacity to cope with the maximum flow from the spring. The road becomes deeply flooded rendering it impassable to normal cars.

23.2. Flood Risk assessment describes the hedge rows around the site to the North, South and East describing in details the trees and hedges. It fails to mention the hedge to the west of the site that borders Church Lane, where an entrance is planned. This hedgerow is in fact an historic hedge (see #14 above).

23.3. CPC draws attention to the report from Integrale Ltd who undertook, “an intrusive site investigation which included 11 soakaway tests, with results ranging between 2.8×10^{-6} m/s and 1.8×10^{-5} m/s, indicating that the ground permeability would allow some infiltration. However, it is noted that the ground water tables in this part of Churchill rise close to the surface during prolonged wet winter & early spring months, and it has therefore been decided that infiltration should not be relied upon as a primary means of surface water disposal. Ground water was not encountered in any of the excavations which were undertaken in November 2020 and some up to 3m deep.”

23.4. The conclusion states: “Shallow surface water flooding is indicated to occur across the site in the Medium Risk scenario (1 in 100 year), which is slightly more wide spread for the Low Risk event (1 in 1000 year). The site drains to a road ditch on the west boundary but no onwards watercourse has been identified; greenfield run-off from the site appears to flow across adjacent fields in a north westerly direction.” **This road ditch connects to a road drain outside Court Orchard in Church Lane. When this is blocked, Court Orchard, the property opposite the site and lying considerably lower than the road, floods.**

24. **NSC Core Strategy CS4 Nature Conservation.** This application fails to meet the criteria set out in CS4.
25. **North Somerset Climate Change and Nature Emergency Commitment:**
- 25.1. All of the proposed houses will need a car to access infrastructure and leisure activities. The proposal contains measures to remove significant stretches of ancient hedgerows.
26. **Ecology:**
- 26.1. **Bats:** This proposal will destroy important bat foraging routes (incl. internationally protected Greater Horseshoes); The proposed mitigation corridors within the site are entirely inadequate. Excessive illumination is inevitable. Light pollution will further affect the Mendip Hills AONB and the tranquillity of this part of Churchill.
- 26.2. **Great Crested Newts** (DNA and observational evidence) was found in a pond that is slightly less than 50m from the site boundary during the assessment undertaken by Clarkson Woods Ecological Impact Assessment, dated January 2020. It was contained in planning application No 20/P/0056/FUL. Consequently, a licence application must be made to Natural England.
- 26.3. **Substantial reptile population** has somehow also been missed from survey.
- 26.4. **Substantial mammal activity** present from several species; many invertebrate species present.
27. **CS 25 Ensuring safe and healthy communities.** Any [CIL] contributions will be influenced by the North Somerset School Organisational Plan (2007–2012). This strategic document includes an assessment of future demand for school places and how these may be accommodated. The main conclusions arising from the document which are relevant to the Core Strategy are: ● **To ensure that there is a surplus of around 5 – 7% of places in all schools to enable parental preferences to be realised as much as possible.**
- 27.1. This policy cannot be met as both Churchill Primary and Academy are full. Children are already leaving the village to travel to other remote schools in Backwell and Bristol. Families who recently moved to the new developments on the assurance of availability of local school places through the above policy, have been unable to access Churchill Academy or Primary and have been offered places as remote as Worle meaning further traffic on our crowded roads.
28. **CS26: Supporting healthy living and the provision of health care facilities.**
- 28.1. The applicant maintains that there are two medical surgeries. This is inaccurate. “The nearest doctor’s surgery is Mendip Vale Medical Practice some 2.1km (Fact Check 2.4km) to the east of the site with Wrington Vale Medical Practice a further 270m to the east.” Incorrect. Wrington Vale Medical practice became Mendip Vale Medical Practice some 4 years or more ago. Appendix 2 shows two buildings. Incorrect. It is all one surgery in one building situated in Pudding Pie Lane.
- 28.2. This application will put further pressure on our existing GP Surgery, Mendip Vale Medical Practice. It is extremely difficult to get a GP appointment now. The facilities are already overwhelmed. This is counterproductive to wellbeing and health.
29. **NS Core Strategy CS27: Sport, recreation and community facilities.**
- 29.1. The applicant asserts that Churchill Sports Centre is a current amenity. Churchill Sports Centre has been closed since March 2020 and is set to remain so for some considerable time.
- 29.2. The Play area for young children is over 1.6 km away a 25-minute walk with young children.
30. **Public Transport and Travel:**
- 30.1. Churchill is 4.5 miles from the nearest railway station at Yatton and does not have a bus link to it. The applicant maintains that due to the rural nature of the site, it is acceptable that the nearest bus stop is 350m where the acceptable distance is 300m. What it doesn’t reveal is that the service from that bus stop only serves local transport, so not appropriate for employment in Bristol or Weston-S-

- Mare. The bus service is too infrequent and subject to delays and cancellations, to be viable for access to employment.
- 30.2. The applicant further maintains: “The site also sits within walking distance of several bus stops, the closest being an approximate 6-minute walk. That bus stop provides regular services to Bridgwater, Weston-Super-Mare, Banwell, Rooksbridge, Langford and Bristol Airport.” This is incorrect.
- 30.2.1. The Bristol Airport bus is 20-minute walk away on the main A38 and only runs every hour. This bus is run by the Stagecoach company and is subject to regular delays due to frequent stoppages along the M5 due to its origin in Plymouth. It is subject to unexpected delays due to stoppages along the M5. Hold-ups are frequent on the M5 part of its route especially during the holiday season. This bus service also suffers from cancellations when the driver exceeds his legal, scheduled, daily driving time limit - due to these motorway stoppages - and has to be relieved of his shift during the journey to and from Plymouth.
- 30.2.2. There is an hourly bus service from Langford to Bristol operated by Bristol University. However, to get to the bus stop in Langford is 2.5 km (1.5 miles). The last bus on the return journey leaves Bristol at 6pm.
- 30.2.3. There is a very limited bus service to Weston-S-Mare which takes a long time, and runs infrequently and is subject to frequent delays.
- 30.2.4. The applicant further claims that, “The site is therefore considered to be accessible to shops, services and facilities by sustainable modes of transport.” This is not accurate. The small, 24-hour supermarket is 2.4km (1.5 miles) away in Langford. The applicant infers that there is a Post Office, local store and tea room. This is a single shop with a combination of functions in Front Street. It provides a basic range of supplies. The applicant refers to a Fish and Chip shop. This is at least 20mins walk from the proposed site. Fish & Chips will be cold!
- 30.3. CPC fully supports the **Highways Officer’s concerns**, “The A38 Bristol Road/A368 Dinghurst Road signalised is an area of concern in terms of congestion for North Somerset Council. The Highways Officer has requested an assessment to understand the interaction of the site with the signalised junction and to ensure there is no impact on highway safety. CPC would further request that the modelling for the effect of the forthcoming Banwell Bypass is included in this assessment and must also include the impact of the 3000+ houses that are conditional to the Banwell Bypass being constructed. Furthermore, the numerical assessment that is claimed to have been done will be out of date as the above modelling has not yet been made public.
- 30.4. CPC notes that the manual count and assessments of turning movements were terminated by the Government’s official lockdown due to the COVID19 pandemic. However traffic in the village had already substantially decreased in the days preceding this assessment.
- 30.5. The southern access to the site onto Front Street is remarkably close to the Hilliers Lane junction which is subject to complex traffic movements resulting from the substantial number of school buses.
- 30.6. The applicant claims, “The location of the site is accessible to pedestrians, cyclists and public transport users. Access to services, education and employment areas are within walking and cycling distance of the site. This is in line with local and national policies including Policy CS32 of the North Somerset Core Strategy and Policy DM25 of the Development Management Policy.” Churchill Parish Council challenges this statement. The site is not accessible to public transport users, the train station is 4.5 miles from the site, the additional cars in Church Lane will be totally unacceptable and cause existing walkers and cyclists to resort to car use for their own safety – something which is already happening. The schools are full . It is absurd to claim that there are employment areas within walking and cycling distance (see 33 below for details of employment).

30.7. NS Active Travel Strategy:

- 30.7.1. "To support this Strategy, the intention is to address 'rat running' and inappropriate (especially HGV) use of our Rural Lanes network whilst continuing to allow essential motor vehicle access (e.g. to frontages and businesses)".
 - 30.7.2. Brinsea Batch links with King Road and Church Lane (all one road linking the B3133 connecting Congresbury to Churchill) becomes excessively narrow on the approach to the Holloway that frames the approach to Churchill. There is also a narrow, blind, 'S' bend. This road carries a width restriction. It is already used as a rat-run to avoid queues on the A38 and Stock Lane. Walking is dangerous and as mentioned previously a cyclist was airlifted to hospital following an accident in August 2021.
 - 30.7.3. HGV vehicles would need to access the proposed site via Front Street or Hilliers Lane. This would impact on local traffic accessing Churchill Academy. It would also carry a severe impact on the Conservation Area of Front Street.
 - 30.7.4. CPC notes that this proposal is contrary to NS's Active Travel Strategy.
- 30.8. The applicant further concludes "Suitable vehicular access points are provided with Church Lane and Front Street." Both these access points are totally unsuitable. The access on Church Lane will require >6m of historic hedgerow to be removed. Furthermore, it is opposite listed gates and walls and several Grade 2 listed buildings and an unregistered Historic Park or Garden. See #9 above for details.
 - 30.9. The access onto Front Street right opposite the junction with Hilliers Lane is totally unsuitable due to the traffic to and from Churchill Academy. The school buses use both lanes in Hilliers Lane to negotiate the right-angled turn. This is a highly congested junction at school opening and closing times. Emergency vehicles could not get through at these times. Photographic evidence of this congestion is available.
 - 30.10. The applicant claims: 'Pelican crossings with dropped kerbs, tactile paving and pedestrian refuge areas with barriers are provided at the A368 Dinghurst Road.' This refers to the junction where Dinghurst Road (A368) meets the A38 at Churchill traffic lights. This is 1.6 km or at least a 10-minute walk from the site. There are no other pelican crossings.
 - 30.11. There are only grass verges in Church Lane which set the Village Scene. These combined with the school parking along this narrow lane are unsuitable for heavy pedestrian traffic.
31. CPC further **draws** attention to **Avon Fire & Rescue Service report**. "Central Government does not provide any funding to Avon Fire & Rescue Service for the capital cost of growth-related infrastructure"
 - 31.1. "Therefore, Avon Fire & Rescue Service may need to become reliant on **local support funding** through either developer contributions, Section 106 of the Town and Country Planning Act 1990, through the Community Infrastructure Levy (CIL)"
 - 31.2. "These developments will contribute to a significant increase in demand for Avon Fire & Rescue Service. As the population increases, so does the demand. This has an added impact upon the current resources therefore stretching our assets to meet this demand."
 - 31.3. **"It is accepted that Avon Fire & Rescue Service will not be increasing the number of resources or assets to manage with this growth."**
 32. CPC draws attention to the Arboricultural survey report that makes no mention of the ancient hedgerow on the west of the site bordering Church Lane (see#11 above) However, it does highlight, "Significant constraints imposed on the site by the presence of the two veteran trees T15 and T16 ".

- 32.1. The National Planning Policy Framework 2019 (NPPF) states that planning applications for ‘...development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused unless there are wholly exceptional reasons, and a suitable compensation strategy exists’.
- 32.2. 5.3. Detrimental impacts from development on veteran sycamore T15 and oak T16 might include, but are not limited to, damage to roots and understorey, damage to or compaction of soil around the tree roots, and changes to the water table or drainage within the tree’s soil.
- 32.3. 5.4. The Forestry Commission and Natural England standing advice ‘Ancient woodland, ancient trees and veteran trees: protecting them from development’ (‘standing advice’) is a material planning consideration which is taken into account when making decisions on planning applications. In reaching a planning decision, the LPA should assess the potential impacts, and avoid, mitigate or compensate for identified impacts. A key method of mitigation is the use of a ‘buffer zone’. So, in accordance with the standing advice, an additional ancient/ veteran tree buffer zone with a radius of 15 times the diameter of the trees has been shown on the Tree Survey and Constraints Plan in section 2.
There is no such buffer zone on the layout of the site. CPC would welcome a Tree Preservation Order to be put on these historic trees.
33. **Employment.** The applicant states that there are “A number of rural employment opportunities are provided in the local area including at the Langford Vets, home to the University of Bristol Veterinary School some 2.7km northeast of the site in Langford and Thatchers Cider some 2.5km southwest of the site in Sandford.” Again, this statement is inaccurate.
- 33.1. **Fact check:**
Thatchers are currently looking to fill 13 vacancies. Their new site is highly automated.
Langford Vets is 3.21km from the site. There are 4 vacancies: 3 requiring high-level qualification plus 1 part-time receptionist.
The existing new builds will fill these vacancies.
- 33.2. There are no other suitable local employment opportunities. This will lead to more local car use in contravention of NS Council’s Climate Change and Nature Emergency commitment.
34. **Safety Record.** Appendix 4 relates to accidents in the vicinity of the site. This is now out of date. There has been a recent accident on the Dinghurst Road where the pavement is very narrow and two children on separate occasions have been hit by car wing mirrors.
35. CPC highlights the **PEP Transport Assessment** claim regarding parking, particularly in Church Lane. ‘A maximum of 62 vehicles were legally parked on the roads between 09:00 and 09:15 in the morning survey period, including 34 vehicles on Church Lane and 70 between 15:15 and 15:30 in the evening survey period, including 15 vehicles on Church Lane.’
- 35.1. This parking reduces Church Lane into a single lane. There isn’t room for any vehicles to either enter or exit the site on either Church Lane or the very difficult junction of Front Street. At peak school hours it is currently impossible for an emergency vehicle to get through. A journey from the junction of the Dinghurst Road and Hilliers Lane, to the Churchill Green junction (< 500mtrs) can take 20 minutes due to the school buses leaving or approaching Churchill Academy and school related traffic. Photographic evidence of such queues is available.
- 35.2. Further, CPC draws attention to the PEP Transport Assessment July 2021 2.11.2 “Observations made during the school opening period between 07:30-09:30 are as below:
- 35.2.1. Parents turn around in the school gates on Church Street after dropping off;
Some 20-30 buses dropping students off;
Buses and cars queue to get into school;

Buses drop off students at the on-site bus stop;
Cars park on Churchill Green, Churchill Lane, Front Street and Hillier's Lane preventing two-way flow;
No free flow conditions at the Church Lane and Hillier's Lane junctions with vehicles stopping to let each other out;
Parents drop children off by going in to school but a few drop on the roadside; and
6th Form students parked on-street mainly."

Additional observations made during the school closing period between 14:30-16:00 are as below:

Parents parked along Church Green before school finishes with some double parked in layby;
School buses park on Hiller's Lane and students walk out to meet the buses; and Cars travelling on Hiller's Lane towards the school have to queue as the parked buses only allow for one way vehicle movements.

36. **The NPPF 2019 (paras 102 and 103)**, states that planning should, "actively manage patterns of growth in support of the opportunities to promote walking, cycling and public transport use. In assessing applications for development paragraph 108 notes assessments should ensure:
- 36.1. appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
 - 36.2. safe and suitable access to the site can be achieved for all users; and
 - 36.3. any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."
 - 36.4. This site cannot ensure any of the above. It is already too dangerous to walk or cycle in Church Lane and King Road during term time. Residents including school children have to walk in the middle of the road.
 - 36.5. The NPPF states specifically at paragraph 109 that
 - 36.5.1. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts of development are severe."
 - 36.5.2. It will have an unacceptable and severe impact on highway safety and the residual cumulative impacts of this development will be severe.
 - 36.5.3. This development will further deter current residents from walking and cycling due to the increase in traffic.

SUMMARY:

Outlined above are just a few of the many reasons why this proposal is totally inappropriate, not plan led and constitutes a speculative application that is not based on local need. It contravenes many of policies contained within North Somerset's Core Strategy and the NPPF 2019.

This is a Green Field site in an historic area of Churchill.

The Schools are full. Local children are unable to get places at Churchill Academy and are being offered places in Worle and further afield. Primary children are being taken to Backwell and children from families who have moved from Bristol are unable to move their children to Churchill so remain commuting to Bristol.

There is no local housing need. CPC has evidence that the new developments are being advertised in both London and Manchester.

Traffic on our local roads and single track lanes is reaching crisis point where emergency vehicles cannot get

through in school opening and closing times.

CPC notes the opening paragraph of North Somerset's refusal letter to Coln Residential regarding Land At Dinghurst Road, Churchill (19/P/2713/FUL) quoted below. CPC feels that the same issues apply to this application. Where necessary road and place names have been added in [xx]

"The proposed development, by reason of its location in close proximity to the Mendip Hills Area of Outstanding Natural Beauty (AONB), would impact on views towards the AONB from Windmill Hill, have an urbanizing effect on Skinners Lane [the Churchill Conservation Area] which would be visible in views out of the AONB from The Batch [the Iron-Age fort of Dolberrow] into Skinners Lane [Church Lane and Front Street] and have an urbanising effect on Dinghurst Lane [Church Lane and Front Street] and impact on the approach to the historic part of Churchill]. Light pollution created by the proposal would impact on the dark skies of the AONB. This would cause unacceptable harm to the setting of the AONB. The proposed development is therefore contrary to Policies CS5 and CS9 of the Core Strategy, the Mendip Hills AONB Management Plan 2019-2024, the North Somerset Landscape Character Assessment SPD, and paragraphs 170 and 172 of the National Planning Policy Framework".

For all of the above reasons given in this response, Churchill Parish Council urges North Somerset Council to refuse this application.

Mrs Sally Diaz

Clerk to the Council