

# Churchill And Langford Residents Action Group (CALRAG)

## Response to Banwell Bypass and Highways Improvements consultation August 2021

Churchill And Langford Residents Action Group (CALRAG) fully endorses Churchill and Langford Parish Council's submission of 12<sup>th</sup> August 2021 to North Somerset Council's Banwell bypass and Highways Improvements consultation in which the Parish Council demonstrates why it feels that the project has not met the 8 stated objectives.

1. In line with Churchill Parish Council, CALRAG recognises that there is a need to resolve the traffic issues of Banwell.
2. CALRAG notes that the proposal is based on facilitating 1,900 houses (West of England Joint Spatial Plan (JSP)) figures with further ongoing development of up to 1,300 beyond the plan period. It is not intended to specifically relieve Banwell's current traffic flow problem.
3. CALRAG objects to the proposals for the following reasons:
  - 3.1. All of the routes outlined in the consultation document will increase traffic flows in neighbouring villages through the release the current bottleneck deterrent of Banwell and will be further exacerbated by the very large number of new houses which the bypass is planned to facilitate.
  - 3.2. The bypass will lead to a deterioration in road safety for pedestrians and cyclists, cause greater congestion and negatively impact the quality of life of many residents. It is highly unlikely that the proposed bypass will fit in with the developing North Somerset Health and Wellbeing strategy.
  - 3.3. The Banwell Bypass and Highways Improvement proposals are based on an application by NSC for 1,900 plus a further 1,300 (#2 above). Such houses at the time of the initial application did not fully fit the criteria for funding since they did not appear on any consulted and *approved* plan. CALRAG recognises that it was anticipated that the JSP would be passed on Public Examination however it was turned down citing significant concerns that sites, particularly remote Strategic Development Locations (SDLs) were not determined on a robust consistent and objective basis and failed to adequately consider reasonable sustainable alternatives.
  - 3.4. **NSC will cover all overspend:** In accepting the HIF funding for the bypass, NSC has agreed to cover 'ALL overspend'. This is a particular concern as council services are currently being reduced. The HIF fund is now closed.

**3.5. NSC's decision to accept the HIF funding lacked appropriate scrutiny :**  
NS Councillors approved the decision to accept the funding offered by the Housing Infrastructure Fund as a 'procurement decision'.

3.6. No modelling was available to councillors of the impact of approx. 3000 houses and the knock-on effect of the release of a current deterrent (the bottleneck of Banwell) on the obvious increase in traffic flow in the surrounding villages. It appears from the consultation that such modelling has still not taken place and will be limited in scope. It cannot therefore have been appropriately scrutinised by NS Councillors.

**3.7. Environmental concerns:**

CALRAG believes that the proposals will have serious, damaging environmental aspects, loss of biodiversity despite the consultation's claim to the contrary.

**3.7.1. The Southern Link Road:**

This link road is particularly problematic for a number of reasons including its proximity to sensitive environments on the margins of the AONB, a Groundwater Protection Zone and habitats of protected species. Have mitigation measures been appropriately considered and costed?

**3.7.2. The conservation area of Churchill:**

There are many listed buildings and structures, such as the Clock Tower, walls and railings – Grade 2 listed and the Queen Victoria Diamond Jubilee Oak and its enclosure that abut the A368 in Churchill. These are already being damaged by the heavy traffic adjacent to them. The increase in traffic, especially HGVs, has caused the mortar of the Clock Tower area to crumble and necessitate repairs which will cause serious delays.

**4. National Planning Policy Framework (NPPF)**

4.1. The NPPF covers the general principles of assessment of development of such a scheme as this.

*In considering any proposed development, and in particular, when weighing its adverse impacts against its benefits, the Examining Authority and the Secretary of State should take into account:*

- Its potential benefits, including the facilitation of economic development, including job creation, housing and environmental improvement and any long-term or wider benefits;
- Its potential adverse impacts, including any longer-term and cumulative adverse impacts, as well as any measures to avoid, reduce or compensate for any adverse impacts.

- 4.2. The consultation states many advantages to Banwell, (although fails to adequately stress the impact of 3000+ new houses in the remote SDL). It fails to note any potential benefits to the villages of Sandford and Churchill.
- 4.3. Assessments on Health Impact Screening and Equality Impact Screening (June 2021) do not extend as far as Churchill and Langford. As the bypass is expected to impact directly on Churchill and Langford residents in terms of Health and Equality, why are these not being considered? In contrast, the Habitat assessments extend much further. This suggests perhaps that NSC planners are more concerned with Conservation of Habitats and Species Regulation than with the Health and Equality of the residents in surrounding villages.
5. North Somerset Council declared a climate emergency in 2019 with two key actions in a commitment to tackle climate change:
- an overarching goal to become carbon neutral by 2030
  - encouraging greener choices in local infrastructure, building and planning.

Such a commitment appears “out of step” with the proposal to build a new road to bypass Banwell and enable substantial housing developments that are remote from major centres of employment and commerce and where the infrastructure is already in existence. Indeed, these might be poor choices for the welfare of the planet and of our succeeding generations

**6. Mitigation measures:**

To mitigate the impacts of the Banwell bypass CALRAG proposes the following actions:

- Speed restriction will be achieved *before* the completion of the bypass through an effective combination of traffic management, self-enforcing measures including signage and village gateways, and supported by average speed cameras on the A368.
- A speed limit of 20 mph should be imposed on the A368 from the western parish boundary to the A38 traffic lights. All roads (except the A38) within the parish of Churchill and Langford should become subject to an “area wide default 20 mph speed limit” as soon as possible.
- Pavement facilities and crossing points on the A368 should be upgraded to allow residents and families to walk and cycle between local destinations, including schools, without anxiety over road safety and traffic conditions on village roads.
- The numbers of HGVs transiting through the parish will be reduced through effective governance and restrictions.

**7. CONCLUSION**

**7.1. CALRAG’s Concerns:**

Whereas CALRAG Recognises the need for relief from the traffic flow problem at Banwell, it should not be at the greater expense of the larger number of residents in the surrounding villages. Our concerns are the following:

- Building a road to facilitate 3000 houses in a remote SDL cannot fit in with NSC's excellent Climate Change and Nature Emergency commitment.
- The Public Examination Inspectors rejected the JSP citing their significant concerns that sites, particularly remote SDLs (such as Banwell and Churchill/Mendip Spring) were not determined on a robust consistent and objective basis. Furthermore, the councils failed adequately to consider reasonable sustainable alternatives. Is this history repeating itself?
- The negative impacts the Banwell bypass will have on residents in the surrounding villages due to the increased traffic flow which will make the roads more dangerous, and will establish rat-runs in unsuitable rural lanes of Churchill and Langford.
- The lack of appropriate assessment of impact on the lives of those in our villages is woeful and negligent, and needs to be addressed urgently.
- The impact on listed buildings including the iconic Grade 2 Churchill Clocktower.
- That Councillors' acceptance of the HIF funding did not include information/appropriate modelling on the adverse impact of the project on the surrounding villages.
- The deleterious Environmental impact of the project.
- The Southern Link Road – the effect on the AONB, the Environmental impact and the impact on the Ground Water Protection Zone.
- Building a road to facilitate 3000 houses in a remote SDL cannot fit in with NSC's excellent Climate Change and Nature Emergency commitment

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