



CHURCHILL PARISH COUNCIL

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West Of England Joint Spatial Plan
c/o South Gloucestershire Council
Planning
PO Box 1954
Bristol
BS37 0DD

Dear Sirs,

West Of England : Joint Spatial Plan (JSP) – Consultation question responses Churchill Parish Council

The Churchill Parish Council (CPC) has resolved that the following response should be sent to you.

Introduction

Churchill Parish Council strongly objects to several aspects of the West of England Joint Spatial Plan Publication Document (JSP), particularly those aspects set out in Policy 7.6 which relate to the proposal for a 'Strategic Development Location' (SDL), consisting of 2,800 dwellings, many of them within the Churchill parish boundary.

Most of our arguments against this allocation of housing land revolve around sustainability and the environmental impact of the development. We will demonstrate that the allocation of this many houses adjacent to our rural community is in direct contravention of NPPF (2012) policy and, indeed, of the policy objectives of the draft JSP itself.

The plan seeks to force huge quantities of housing into an area which offers little employment, congested roads and totally inadequate public transport infrastructure. Moreover there are no concrete proposals to address these deficiencies during the life of the plan.

We have structured our comments to address our concerns as follows:

1. That the allocation of a Strategic Development Location (SDL) in Churchill parish is not in accordance with National planning policy or with the strategic objectives of the JSP itself;
2. That the proposed Churchill SDL is unsustainable from a transport and infrastructure perspective and that the road infrastructure proposed is not only unsustainable but unrealisable without significant central government contributions;
3. That the SDL is therefore unsustainable from an employment perspective due to its remoteness from existing employment nodes and likelihood that new business will not be attracted to the location;
4. That the proposed Churchill SDL is unsustainable from an environmental perspective, damaging the Mendip Hills AONB and destroying the biodiversity of high-quality rural land,
5. That, partly as a result of the above factors, the proposed Churchill SDL will be unable to contribute effectively to providing housing and/or affordable housing in the region, in accordance with central government policy.
6. That community involvement has been kept to a bare minimum, with consultation periods targeted during holidays, and we assert that, based on a door-to-door assessment, the community is overwhelmingly opposed to the level of development proposed in the plan.

Finally we suggest that there are far more sustainable and policy-compliant options available for fulfilling the governments housing targets in North Somerset.

1.0 Conformity with the NPPF and Strategic Priorities set out in the Plan

1.1 Lack of Conformity with NPPF Policy:

Clause 151 of the NPPF states:

“Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development.”

We assert that the plan fails comprehensively to meet these criteria.

This Parish would also like to point out that the plan has failed all 4 of the tests set out in clause 182 of the NPPF:

The Churchill SDL is not **‘Positively Prepared’**. Policy states that *“the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development”*.

No evidence has been made available which demonstrates that the specific requirement for housing in Churchill parish has been objectively assessed. In any event the proposed housing is clearly to support the unmet requirements from the neighbouring authority of Bristol. We argue that it is not a reasonable strategy given alternative options available and it is certainly not sustainable, as described throughout this document.

The Churchill SDL is not **‘Justified’**. Policy states that *“the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;”*

As we will argue later, we believe that there are better alternative locations for new housing.

The Churchill SDL is not '**Effective**'. Policy states that "*the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities*". Evidence from Weston-super-Mare regarding the take-up of housing and business development land indicates that the SDL will not be deliverable over the plan period. It is also highly questionable whether the proposed road will ever achieve funding.

The Churchill SDL is not '**Consistent with National Policy**'. Policy states that "*the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.*"

As set out below, we do not believe that the planned Churchill SDL is at all sustainable, nor can it be made so in its proposed location and thus it is in breach of several framework policies.

1.2 Lack of Conformity with the JSP Strategic Priorities:

In addition to the plan not being in conformity with National Planning Policy, the Churchill SDL breaches the JSP's own strategic priorities as follows:

Strategic Priority 3 of the JSP states:

"To deliver a spatial strategy which ensures that new development is properly aligned with infrastructure and maximises opportunities for sustainable and active travel."

As we will highlight in Section 2 of this letter, the development of the Churchill SDL does not at all align with infrastructure and offers little or no opportunity for either sustainable or active travel.

Strategic Priority 4 of the JSP states:

"To protect and enhance the sub-region's diverse and high quality natural, built and historic environment and secure a net gain in biodiversity"

As we will highlight in Section 4 of this letter, the development of the Churchill SDL will destroy hundreds of acres of high grade agricultural land and cause long term damage to the important Mendip Hills AONB through impacting on views, pollution, ecosystems and setting.

1.3 Lack of Conformity with NSC Core Strategy:

Although we understand that the core strategy and local plan will become superseded in part by the approved JSP it should be noted that the proposed Churchill SDL runs contrary to very many core strategies in the current document, approved by North Somerset as recently as January 2017.:

CS32 – Service Villages

An extension to Churchill village is entirely contrary to policy CS32, relating to service villages, particularly as the village has been highlighted as the least sustainable of service villages in North Somerset, with the exception of Wrington.

CS1/CS4/CS5/CS10/CS14/CS12

The proposal is also in direct contravention of policies CS1, CS4, CS5 (environment and sustainability) and CS10 (sustainable transportation). Comments on transportation are set out in section 2.1 of this letter while comments on CS12 and 14 are set out below:

CS14 – Distribution of New Housing

CS14 3.195 highlights that the ‘..scope for significant development is more limited’ outside the towns of North Somerset. The policy states that “small scale development in service villages may be appropriate subject to meeting the objectives of CS32”, which we would argue have been completely ignored by NSC in their support of the current JSP document.

CS12 – Achieving High Quality Design & Place Making

In particular, Core Strategy policy CS12 suggests the importance of good design and place-making. A review of the high-level design of the proposed Churchill SDL demonstrates that the 4km ribbon of development, around 500m-800m wide, sits astride a new dual carriageway, an existing 132 kV power line of the National Grid and a newly installed Bristol water high pressure water main which is part of the BW Southern Resilience Scheme.

Allowing for a 100m power and water corridor and a 100m wide reserve for the new road, for noise abatement, it has been calculated that around 35% of the SDL would be sterilised. When a further 5% is lost to existing built-up areas then it is clear that a vast swathe (over 100 ha) of the proposed site is undevelopable, either reducing housing numbers or increasing densities and resulting in the unnecessary loss of much high grade agricultural land.

Furthermore the need to acquire 100ha of additional land, which will not be utilised for profitable housing development, will put further pressure on the financial viability of the project – as already demonstrated in the BNP Paribas report (see section 5).

2.0 Transport & Infrastructure:

2.1 Sustainable Travel

Department for Transport (DfT) Circular 02/2013, paragraph 12, states:

“The preparation and delivery of Local Plans provides an opportunity to identify and support a pattern of development that minimises trip generation at source and encourages the use of sustainable modes of transport, minimises journey lengths for employment, shopping, leisure, education and other activities, and promotes accessibility for all.”

Sections 3, 27 & 28 of the JSP also refer to the desire to increase sustainable travel choices.

As it must be assumed that the vast majority of residents of the Churchill SDL will not be working in the area¹, it must follow that they will need to travel outside the area to get to work, most likely to Bristol. This will lead to a significant environmental impact as described in section 4 below.

The Churchill SDL has no access to rail transport. Churchill is 4.7 miles from Yatton railway station along an extremely over-burdened road network which runs through the middle of two already-congested villages, Congresbury and Yatton. The area also has very limited bus services. While it is acknowledged that bus services may be improved, it is highly likely that bus will not be the mode of choice for Bristol commuters from the SDL due to the long distance to be travelled and therefore that car use will remain by far the most frequented transport mode.

¹ See 2011 census data

The lack of sustainability of the location was highlighted in a recent local appeal decision (15P02480) relating to land South of Knightcott Road, Banwell. When refusing an appeal to grant consent for 155 dwellings the inspector's letter states:

"...the proposal cannot be described as sustainable development and there are no material considerations which would warrant a consideration other than in accordance with the development plan."

The parish sees that the JSP misses the enormous opportunity of dramatically improving the existing rail services across the region and using railway stations as higher-density housing development nodes, thus increasing access to sustainable travel choices and reducing car use (see later).

Active travel by cycle or on foot will also be impossible for the vast majority of Churchill SDL residents who will be forced to travel long distances by car to get to work.

The parish is struggling to envisage any form of viable public transport solution which can be integrated into a low-density, sprawl of housing situated deep in the countryside.

2.2 Roads

While the JSP indicates the approximate route of a possible new road, connecting the new M5 junction 21a with the A38 and the airport, which will form a spine road to the proposed Churchill SDL, there are some major concerns to be addressed relating to the Churchill community:

1. It is unclear how such a major piece of infrastructure costing in excess of £600m² will be funded and the parish fails to see how the proposed road improvements can meet the JSP objectives:

"Transport and infrastructure provision needs to be in place up front or to keep pace with development to support sustainable growth." Draft JSP.

The allocation of hundreds of acres of land for development without commitment to road funding in advance of the development taking place will either: (i) put unacceptable pressure on the already strained road infrastructure of the area or (ii) blight the undeveloped area, damaging its rural character, until such time as infrastructure investment is secured.

2. One of the indicated new roads appears to run through the middle of parish council recreational land which is widely used by the community for football, cricket, a meeting hall and children's play. No discussions were held with the parish about the possibility of destroying the lion's share of the community's social infrastructure. This road would destroy the last green corridor between the villages of Churchill and Langford.
3. A lozenge of new development along a by-pass is highly unsustainable from a public transport perspective and appears to be a return to ultimately-unsustainable, car-borne development which the NPPF seeks resolutely to avoid.

3.0 Proximity to Employment:

In the forward to the JSP document the statement is made that:

² Estimate set out in WoE JTS Final Report, October 2017, page A68-A70

“Businesses should be able to locate where they can be most efficient and create jobs, enabling people to live, rent and own homes in places which are accessible to where they work.”

The parish fails to see that sufficient demand exists for employment-generating uses in the Churchill SDL. We note that significant employment land remains undeveloped in Weston-super-Mare and around Junction 21 of the M5 in spite of those locations being significantly better for business in terms of access to road, rail and a workforce.

Indeed even Weston has been struggling to create employment to match growth in housing numbers as stated in the now-revoked Regional Spatial Strategy:

“4.1.16 ... Major housing development has not been accompanied by commensurate employment growth and the imbalance between homes and jobs in the town is such that Weston-super-Mare is the least self-contained SSCT in the region.”

It is clear that the City of Bristol is the most powerful magnet to new businesses and that demand for employment will, for the foreseeable future, continue to be close to the city. It is entirely counter-productive to try to force employers into unsustainable locations, away from transport, customers and employees.

With the exception of Charfield, the Banwell and Churchill SDLs are the furthest away from Central Bristol. Charfield, it should be noted, is a much smaller development area (1,200 houses) which will have its own railway station and is in relatively close proximity to the North Bristol employment hub.

Even in the event that full quota of 7.4 ha of employment land is developed out as B1c and B8 uses then the total number of employees within the SDL would not exceed more than 444³ against a new population of in excess of 6,720⁴ people.

According to ‘Business in North Somerset’ the parish is home to only 3 of the top 100 employers in the district: Monaghan Mushrooms, the veterinary department of Bristol University and Churchill School, the combined number of employees within these businesses does not exceed 1,000 and there is limited prospect of them growing significantly over the plan period. Even the Thatchers Cider Company, in neighbouring Sandford, employs less than 100 employees⁵.

4.0 Environmental Impact

4.1 Departure from Policy

The proposal would fail to protect and enhance the character, diversity and quality of the landscape. It would conflict with CS policies CS5 (landscape and historic environment), CS32 (Service Villages), the provisions of DMP policy DM10 (landscape), DM11 (Mendip Hills Area of Outstanding Natural Beauty) and would be contrary to paragraph 109 of the NPPF.

Moreover, significant weight should be given to the Mendip Hills AONB Management Plan 2014-2019 (MP), to the National Character Area (NCA) profile for the Mendip Hills (NCA 141) and the North Somerset Landscape Character Assessment Supplementary Planning Document (SPD).

³ Calculated on 40% site coverage with 1 employee per 77sqm for B8 use and 1 employee per 47sqm for B1c use (Homes & Communities Agency Employment Density Guide 2015).

⁴ Calculated on the basis of 2.4 persons per household (UK average house occupancy according to 2011 census).

⁵ Grocer Directory website.

Recent appeal decisions have concluded that considerable weight can be given to the landscape issues and found it to be a major ground for rejection of an appeal (application 16/P/0798/0, Front Street, Churchill).

4.2 Proximity to the AONB

AONBs are, unlike National Parks, rather small areas and so much of their highly valued scenic quality derives from regions near their boundaries; consequently views outwards and inwards assume great importance for the scenic integrity of the AONB itself.

This is certainly the case at Dolebury Warren. Here the prospect north from the extensive east-west ridge contains, in the middle ground view, the settlement patterns of Churchill and Langford village as a substantial part.

The proposed addition of a substantial block of development in open countryside, outside the various established settlement boundaries, would bring an incongruous urban area to an otherwise rural scene. The discordance would be apparent within the AONB, not only along the Dolebury ridge but on Lyncombe Hill to the west and on Burrington Ham to the east.

However, this is not a case of just visual impact but of the very proximity of a large residential development to a sensitive AONB which contravenes a plethora of policies referred to above and designed to protect such locations. It is without precedent in this country.

4.3 Flood Risk

It should be recognised that, apart from its evident and much appreciated scenic qualities, The Mendip Hills Area of Outstanding Natural Beauty exhibits a geology and a topography which impacts substantially on the area around it.

Rainwater falling on the Mendip uplands (and its outliers like Windmill Hill) is conveyed downwards and outwards by the limestone rock to enter other adjacent strata in the surrounding lowlands. Some such water reappears as the many strong springs characteristic of the Mendip edge. But other water emerges in ill-defined seepages and intermittent springs distributed widely around the Mendip edge. In storm conditions, some of these transient flows emerge to produce substantial local floods, the effects of which are, at present, attenuated by the absorbent sponge effect of open countryside. Urbanisation as proposed immediately north of Mendip will largely obliterate this absorbent sponge by substituting various water-impermeable surfaces. The result will be a substantial increase in sudden flood flows and a need for further civil engineering measures to cope with them.

4.4 CO2 Emissions

Based on the 2011 census, commuter trips in Churchill are made mainly by car (87.7%) with only 3.8% made by public transport.

The development of 2,800 houses in Churchill has been calculated to add an extra 14.9 million driven kilometres per year to the road network, generating over 1,800 extra tonnes per year of CO2 emitted to the atmosphere.⁶

5.0 Market Demand & Ability to Support Affordable Housing

The BNP Paribas report (November 2017), when looking at property prices, highlights the fact that **the Churchill SDL is able to generate the lowest contribution to infrastructure**

⁶ Based on Peter Brett Associates calculations for Taylor Wimpey, 2016

and/or the lowest ratio of affordable housing out of all of the SDLs in the region.

This is due to the assessment that house prices are lower in the Churchill area than in other SDLs in the Bristol Housing Market Area (HMA) and are therefore less able to generate contributions to infrastructure and affordable housing.

Some of the reasons for this are the poor transport links for commuting and lack of employment opportunities in the area (see above).

Meanwhile better located development land close to Junction 21 of the M5 and the railway stations at Weston and Worle has been very slow to be developed. Based on North Somerset statistics there is currently a total housing supply for Weston-super-Mare for 11,500 dwellings. Based on average development take-up levels over the last 10 years in Weston of 346 house deliveries per year, this supply would take over 33 years to be absorbed.

On the basis that there is better, serviced development land, already benefitting from proximity to employment and infrastructure, which is being developed too slowly to meet 'assessed demand' then it would seem unlikely that the ambitious plans to develop 2,800 additional houses in Churchill could possibly be fully realised during the JSP plan period, with or without a new road.

The above calls into serious doubt the deliverability of the Churchill JSP.

6.0 Community Involvement

6.1 NPPF Intentions towards Community Involvement

In the forward to NPPF (2012) Greg Clarke makes the following statement:

"...in recent years, planning has tended to exclude, rather than to include, people and communities. In part, this has been a result of targets being imposed, and decisions taken, by bodies remote from them. Dismantling the unaccountable regional apparatus and introducing neighbourhood planning addresses this."

Policy 52, page 13 NPPF states:

*"The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. **Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development.**"*

Plans for the Churchill SDL have certainly not been developed 'with the support of [its] community' and do not achieve sustainable development.

It has been the impression of the communities of Churchill and Langford that there has been no real and genuine attempt from North Somerset Council to encourage public participation beyond the absolute statutory minimum. No options have been presented to residents of the parish and no reasons have been given for the proposed contents of the plan.

Realising that the JSP proposals are likely to be extremely unpopular, due to their destruction of our rural communities, there seems to have been a campaign to limit engagement, highlighted by the fact that the JSP documents have been released for consultation for a limited period of time over the Christmas and New Year holiday period.

Furthermore, the November 2017 walk-in session at Churchill Primary School confused residents still further by seeking feedback on the Churchill SDL stating that: *"This consultation is about the new North Somerset Local Plan.."* but then requesting comments to

be made to the West of England Joint Spatial Plan.

6.2 The Parish Plan and Community Objection

Between 2005 and 2008, the Parish produced a very comprehensive Parish Plan following an extensive review of various aspects of the village and full consultation with all the householders.

In respect of Housing and Development, overwhelmingly residents who expressed a view (89% of 1109) felt it was either vital or very important to preserve the character of the villages of Churchill and Langford. 33% were against any further development and 50% were in favour of some new housing but for local people or those in vital services (notably before the approval of over 200 new homes in the parish over the last 24 months). Whilst this document doesn't have the legal standing of a Neighbourhood Plan, which the parish has begun the process of producing⁷, it still has substantial relevance today as the village has changed very little since it was completed in 2008.

In summary, the vast majority of residents of the Churchill and Langford communities do not agree with the proposed Churchill SDL development, not because they are NIMBYs but because the development would transform a close-knit rural community into an unsustainable urban sprawl of poor quality design and conception, placing enormous pressure on local services and road infrastructure.

Alternative Development Locations:

Section 3, 18 of the JSP refers to the NPPF advice that "*green belt boundaries should only be altered in exceptional circumstances*".

This parish would argue that exceptional circumstances exist in that: (i) there is a current, unprecedented government drive for sustainably-located new housing and (ii) the alternative to development of housing on low-value green belt land is the building over higher-value agricultural land which is in immediate proximity to one of the regions 2 AONBs.

This parish would argue that a green belt which is forcing development to leapfrog over lower-grade, urban-accessible land to unsustainable, inaccessible, environmentally-high-value locations is not serving its purpose. Indeed this has been recognised by BANES and South Gloucestershire, who have allowed some limited releases of green belt land to assist with housing delivery.

It is therefore the opinion of the Parish that the authorities should look at options of:

- (i) Releasing further land allocations from the green belt, particularly land adjacent to Bristol for the current proposed development, known as 'The Vale', which would require a release of only 2% of the North Somerset Green Belt.

This proposal benefits from proximity to employment and proximity to sustainable transportation, including the Metrobus. The authorities' housing delivery goals will also be met much faster due to the fact that the land has already been acquired by a developer who has significantly advanced plans for its development.

N.B. It should be noted that the land for the 'Garden Village' is largely marked as 'Good to Moderate' agricultural land by DEFRA (2010) while the South Bristol land is regarded as generally 'Poor'.

⁷ With regards production of the Neighbourhood plan, Parish activity stopped after parish representatives were warned by NSC not to include anything about new development in the document.

- (ii) Creating greater density on brownfield land in Weston-super-Mare and close to other stations or transport nodes (as recently promoted by John Penrose MP)

Conclusion

The Churchill SDL is a last century, car-dominated solution to this century's new challenges of sustainable place-making. It is consequently in breach of NPPF guidance and even the majority of the plan's own policies.

It is an entirely unsuitable and unsustainable proposal as a means of increasing housing stock in the region. It appears to be a political compromise which concentrates theoretical housing delivery numbers in an area unserved by transport or employment and which will seriously damage the communities and rural character of a number of villages nestling at the foot of the Mendip Hills and will profoundly negatively impact the Mendip Hills Area of Outstanding Natural Beauty.

Furthermore the proposal fails the test of all of the 'place shaping principles' set out in policy 5 of the Joint Spatial Plan.

This parish would argue that far better opportunities exist for large-scale sustainable and affordable development by increasing density around sustainable transport nodes and through further allocations within the Bristol Green Belt.

Yours faithfully

M G Dolton

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Clerk to the Council
Responsible Financial Officer
Churchill Parish Council

On behalf of the elected members of Churchill Parish Council