



# CHURCHILL PARISH COUNCIL

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03 January 2019

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.

### **Summary**

Churchill Parish Council (CPC) argues that the additional technical documentation does not remedy any of the flaws in the original arguments by WECA in favour of the Churchill SDL. In particular there is no useful additional data to support the development of the location from either transport or sustainability perspectives.

The documents are complex, inconsistent and difficult for laymen to understand. We set out below, however, some feedback on the suite of documents provided to us which highlight our continued alarm at the lack of vision and practical good sense in the planning of the JSP and, in particular, the Churchill SDL, the proposal for which we strongly oppose.

Throughout the documents there is a strong sense that insubstantial evidence is being used to justify decisions already made and that there is no meaningful attempt to review with an open mind (as requested by the Planning Inspectorate) the SDL choices.

### **WED 002 – Schedule of Proposed Changes**

PC/01 (68) the proposed change states that exceptional circumstances apply for the removal of 5 SDL locations from the green belt *“in order to provide the most appropriate spatial strategy”*. Why are none of these areas in North Somerset where surely the same spatial strategy considerations apply?

PC12 it states (referring to WED 008) that the M5 junction will be removed from the package of highway schemes relating to the Churchill SDL. This seemingly casual removal of J21A from the JSP is just one example of how critical strategic decisions which should be central to a 20 year spatial plan are made apparently on a whim, and without impact on other areas of the plan such as housing or local road improvements.

The evidence behind WED 008 seems totally inadequate for an SDL of 2,900 houses and it appears that no infrastructure works are required as a pre-condition to development of the Churchill SDL. This is in spite of serious existing congestion on the network and the risk of increased congestion at the Churchill traffic lights in the event that the Banwell by-pass is constructed.

Surprisingly there is no mention of improving the already-congested North-South route (B3133, Stock Lane) which connects the SDL with Yatton train station and the A370 bus services. The failure to consider better connectivity along this axis is, in our view, a major failing of the transport plan and has been raised on several occasions with NSC and WECA representatives.

## **WED 004 7.6 - Justification for the requirement of Churchill SDL**

We would make the following high level arguments relating to the introductory remark in this paper:

1. The location is justified in part by the development of the by-passes. With the removal of J21A it seems that one of the key reasons to build the Banwell and Churchill by-passes has been removed and that these new roads can no longer be justified.
2. The location is justified in part by the provision of employment land although zoning land for employment uses does not *per se* attract businesses. There are still large commercially-zoned areas of land in superior locations around J21 which are still to be developed and some completed office space in the J21 location has been vacant for several years.
3. The location is justified by land availability. To date no sites have been secured and the best that can be hoped for, without use of compulsory purchase powers, is the piecemeal assembly of parts of the SDL land, which will not allow for the development of a meaningful 'garden village' settlement, but an unplanned and unconnected sprawl of estates.

In response to some of the other 'justifications', we see generally just a repeat of the original justifications for development without any reasoned thought. We would like to highlight the following points:

(2) The area is high value agricultural land with important habitats, the destruction of which is inevitable, with or without "*an interconnected and multifunctional network of green infrastructure*".

(3) While not in a designated flood zone, the area suffers from serious flooding as a result of Mendip Hill subterranean run-off. The increased urbanization of this area will exacerbate this problem and is already being felt by the recently-approved developments in the parish (Crest Nicholson and Bellway Homes).

(7) It is inevitable that the SDL will rely extremely heavily on car use. There is no public transport covering the site at present and the distance to Bristol is too far to have justified un-sponsored bus links to date. The journey times to travel the 16 miles would be too long to make such a service between Churchill and Bristol viable. There isn't even a service from Churchill to Weston-S-Mare (9 miles). This situation is likely to continue. The idea of relying on a cycle path between Yatton and Cheddar as a backbone of a green infrastructure policy for the SDL is fabulous at best, and farcical at worst. Due to the distances involved, cycling will never be more than a leisure activity in this area.

## **WED 006 Updated Employment Evidence**

There is clearly some doubt as to the likelihood of being able to market over 40,000sqm of class B accommodation at the Churchill SDL as stated in Appendix 6 of the report specifically relating to Churchill: "*Further investigation of SDL self-containment, target sectors and other related issues such as access to employment outside of the SDL will be undertaken and this may alter the scale of land required.*"

We believe that the above comment further undermines the assumption that a percentage of

residents of the SDL will be able to work within the area as per Garden Village Principles to which the reports consistently refer to the SDL of Churchill being built - as set out by MHCLG August 2018. As stated above there are still large areas of better-located, commercially-zoned land in Weston super mare that have not been acquired or developed.

## **WED 007 Transport Topic**

2.4.1 States the importance of sustainable travel choices although there are no concrete proposals relating to the Churchill SDL relating to public transport by improving access to Yatton station or creating bus or Metrobus services. Indeed there appear to be no planned station improvements to Yatton station, the area's only access to the rail network. Access to Yatton station from Churchill will involve an increase in traffic through Stock Lane (B3133) and at the already-congested traffic lights from the B3133 onto the A370 and then again onto the B3133 to travel through Yatton. There are no proposed solutions to this problem set out in the plan.

2.5 The removal of the M5 Junction 21A from the JSP is surprising at this late stage and is inconsistently followed through in both WED 007 and in other documents, including the Sustainability Assessment (which often makes reference to the now defunct junction).

It is surprising that the removal of a major piece infrastructure, which must surely be one of the most critical elements of any long-term regional spatial plan, could lead to absolutely **no** variation in planned improvements to the surrounding road network or indeed to the proposed distribution of new housing. The lack of a new junction must surely affect the viability of the Banwell and Churchill by-passes, which will no longer be needed to carry Bristol Airport traffic from the South West (one of the original primary justifications for these new roads). It must also have an impact on the ability of the proposed Churchill employment zone to attract businesses to the area, which will now not be directly accessible from the motorway network.

2.5 Junction improvements are highlighted on the A368/A38 junction in the heart of Churchill Parish. This would presumably indicate that it is thought unlikely that the Churchill by-pass will be built. This is a grave source of concern to CPC as we see the Banwell by-pass funnelling high traffic volumes through Churchill village, where there are several narrow choke points, greatly increasing congestion both through the village and at the junction. There seems to be no assessment of changes in traffic congestion in Churchill in the event that the Banwell bypass is constructed without the Churchill bypass.

2.5 The paper highlights that travel times will be greatly increased in North Somerset due to the locations of the SDLs, outside the Green Belt. This is persuasive of the need to move development which will largely serve Bristol employment into the Green Belt and closer to jobs and public transport giving rise to the Exceptional Circumstances that enable Green Belt land to be used for development.

3.3.4 The study assumes that locally-generated employment will assist in reducing trip generation from the Churchill SDL. It should be pointed out that the area has no current business and employment infrastructure and is unlikely to attract significant numbers of new businesses, which would most likely wish to relocate closer to the motorway network in Weston or Bristol. This is supported by comments in WED 006 (see above).

3.4.3 In spite of very large predicted increases in traffic flows on Stock Lane (B3133), there is no proposal to enhance this road which will be the principle North-South route for residents of the Churchill SDL. Stock Lane is extremely narrow and does not, in several places, allow lorries to pass each other leading to severe congestion even prior to the commencement of SDL developments. Can we see the evidence that Stock Lane will be able to accommodate the increase in traffic flows?

4.3 Commentary about the possibility of increasing bicycle usage to access the SDL is thought to be ridiculous as the distance are far too great to be able to access any current employment or rail facilities.

4.5 The distance between the Churchill SDL and central Bristol is too great to be able to rely on bus transport and we do not believe that it will ever be deemed viable to extend Metrobus to Churchill due to the very low green belt population density in between Churchill and the edge of Bristol.

5.4 As the Churchill by-pass is not scheduled to be completed until 2028, we would strongly urge

WECA not to permit any housing development on the Churchill SDL until these improvements are completed and the necessary improvements to Stock Lane are planned and completed.

## **WED 009 Sustainability Appraisal**

This document is complicated, inconsistent, difficult to read and ultimately seems to contain little information of any use. In summary it appears to seek to justify the original SDL location decisions through a range of arbitrary and subjective value judgements without reference to realistic alternative locations either in the green belt or in flood plains.

Contrary to the inspectors' request, there is no meaningful additional information to justify the selection of the SDL locations and no thorough comparable review of alternative options. This is particularly evident in relations to the option of removing land in the North Somerset Green Belt which would be more sustainably located in proximity to employment and infrastructure.

3.25 The SA refers to the NPPF requirement that: *“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 see no evidence that the proposed Churchill SDL can be regarded as sustainable, given the many factors highlighted in the report and in our consultation response.

## **Conclusion**

In summary, Churchill Parish Council would like to reassert its earlier objections to the location of the Churchill SDL, as set out in our consultation response of 8<sup>th</sup> January 2018. We see that the development of the SDL remains very much contrary to the desire for sustainability as enshrined in the National Planning Policy Framework and will leave a legacy of a disconnected, poorly-planned dormitory settlements carved out of high quality countryside and sacrificing landscapes seen from the Mendip Hills AONB at the expense of its rural community and natural environment. Door-to-door polling has indicated that this view is shared by around 98% of the residents of the parish, who share our very grave concerns about the poor planning and place-making which is evident in the draft spatial plan.

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