

# Churchill Parish Council

Banwell Bypass Working Group

Response to Banwell Bypass and Highways Improvements  
consultation

Summer 2021

Churchill Parish Council (CPC) recognises that it would be desirable to seek relief from the traffic congestion at peak times in Banwell. The traffic flowing through Banwell arrives and departs through routes in neighbouring villages subject to congestion. This is particularly true of the A368, its junction with the A38 at Churchill Gate and the A371 route to the A38 through Winscombe. At present these carry similar amounts of traffic. These routes are already substantially congested at peak periods; they are also, over substantial stretches, both narrow and very difficult to widen or otherwise modify to increase capacity. Ironically, stretches of the A368 and A371 resemble Banwell's West Street but do have benefit of pavements on both sides as in West St. Furthermore, the anticipated highway and housing changes centred on Banwell (which are required to promote the substantial new housebuilding required by the funding) will inevitably lead to much larger traffic flows on the routes thus facilitated. Consequently, the displaced traffic flow from the present Banwell bottleneck will greatly exacerbate congestion and increase dangers to pedestrians and cyclists in the surrounding villages, particularly Churchill and Langford.

Churchill Parish Council responds to the eight 'Scheme Objectives' (page 8 of the consultation document) as follows:

## ± Improve the local road network to deal with existing congestion issues.

**1.1.●** CPC is concerned that the traffic modelling impact assessments which have made public are do not include the increased traffic that will result from the additional houses intended as part of the HIF. CPC draws attention to the Atkins' [Transport Appraisal Advice document for West of England Combined Authority \(WECA\)](#) which notes that for small developments, it is reasonable to execute industry-wide procedures for traffic modelling. However for larger developments, such as the very much larger development of homes to be facilitated by the Banwell Bypass, a very much larger area must be adopted for modelling purposes.

**1.2.●** CPC notes this consultation is called the Banwell Bypass and 'Highways improvements' yet there are no specific 'highways improvements' included in the consultation documents that would relieve current congestion in Churchill and Langford and other parts of the 'local road network'.

**1.3.●** The increase in vehicle numbers as a result of the bypass/hour at peak times is stated to be 275(max.). The consultation did not include any data on expected base-line traffic flows. (Ref Objective 8 – "Proactively engage with stakeholders in a way that is both clear and transparent".)

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1.4.● The predicted 275 extra vehicle movements on the A368 as a result of the bypass does not include vehicles generated by the 1,900 houses (plus the delivery vehicles associated with them) with a further 1,300 (JSP figures) towards the end of the Local Plan period.

1.5.● CPC noted the lack of evidence on the effect that the bypass with the facilitated houses would have on the already congested Churchill traffic lights.

1.6.● CPC is concerned that rat-runs throughout the parish have not been addressed and are not mentioned in the consultation documentation. These are already causing serious congestion particularly in Ladymead Lane, Langford Road, Churchill Green, Hilliers Lane and Front Street.

1.7.● The A368 Dinghurst Road in Churchill is, in several places, too narrow to permit full-width vehicles to pass safely and yet roadside buildings prevent road widening – other than by expensive and time-consuming compulsory purchase. Some such features are listed buildings – Churchill Clock Tower (1.8 below). Pedestrians, lacking any footway, go in fear of their lives. The junction with the A38 is already problematically congested.

1.8.● Residents were informed at the consultation that the two narrow sections on Dinghurst Road which would cause congestion would be widened. A wider road will however result in greater traffic speeds and, as such, any road widening along the A368 in Churchill is considered undesirable unless strict self-enforcing speed control is implemented.

1.9.● Churchill Clock Tower (particularly the surrounding walls adjacent to the A368) is being damaged by the current vehicle traffic. What mitigation measures will be used to ensure the safety of the building and its surrounding walls immediately fronting onto Dinghurst Road.

#### **Provide the opportunity to increase ‘Active and Sustainable’ travel between local villages and Weston-S-Mare.**

2.1.● CPC is concerned that the proposed Banwell bypass will **greatly decrease** the opportunities for active travel for those living in Churchill and Langford especially along the Dinghurst Road due to the increased traffic. Recent increases in traffic have prevented residents from being able to leave their homes to walk elsewhere in the villages. It is simply too dangerous due to the speed and volume of traffic.

2.2.● No evidence is presented to support this objective for the residents in Churchill and Langford. The effect of this bypass will ensure that there are fewer opportunities for Active and Sustainable travel for our seniors and of course children attending Churchill Academy due to increased dangers to pedestrians and cyclists.

2.3.● There is no indication if funding has been allocated to mitigate against this very clear disadvantage to Churchill Parish residents.

2.4.● The Banwell Bypass team requested that the CPC and Residents Banwell Bypass Working Group submit a paper outlining our Concerns and Aspirations with a fine deadline. This was submitted on 28<sup>th</sup> May 2021 and, as yet, no response has been received. Appendix A

#### **Ensure Development respects the local area and minimises visual impact upon the surrounding countryside and Mendip Hill AONB.**

3.1.● The proposed Southern Link is deemed essential to provide adequate traffic-relief in West Street and on Castle Hill. This represents the construction of a steep and highly

conspicuous new road, carved into the north-facing slopes of the Mendip Hills AONB. How does this fit in with respecting the local area and minimising the visual impact on the AONB? What measures have been costed to mitigate against this?

- 3.2.● All three proposed Northern Routes encounter major difficulties which arise from inter-related engineering and environmental considerations; these will prove expensive to resolve. Moreover, these major considerations concern profoundly the flood water flows and issues of ecosystem and water quality and, as yet, there is remarkably little evidence of work done to investigate and deal with these complex matters.
- 3.3.● Especially difficult problems will appear in the region around the junction between the Bypass and Riverside. And at the eastern end, the presence of an internationally recognised Special Area of Conservation, adjacent to the new road system, will pose an additional serious constraint. The Greater Horseshoe Bat is protected under international law.
- 3.4.● It is anticipated that this Southern Link will meet various major legal obstacles as well as requiring challenging and expensive engineering. Will this carry a 7.5tonne limit? What will happen to the existing 7.5tonne limit? The consultation does not answer this important question.

**Ensure the development provides the opportunity to increase Bio-Diversity Net Gain by at least 10%.**

- 4.1.● CPC is concerned about the considerable amount of work and land purchase that will be required to achieve this 10% required Bio-Diversity Net Gain particularly concerning the favoured Route 2's impact on the North Somerset and Mendips Bats Sites SAC and the roosts at Ochre Caves SSSI.
- 4.2.● How will this Biodiversity net gain be assessed and when? The consultation was lacking in evidence to support this objective and the costs involved.

**Improve and enhance Banwell's Public spaces by reducing traffic severance and improving the public realm.**

- 5.1.● This may well be the result of the proposed bypass for Banwell but CPC is concerned that it will be entirely at the expense of Churchill and Langford's public realm. Churchill is already divided by the traffic flows on the A368 and the A38.
- 5.2.● The study area for health screening is based on the wards considered to be most likely to be directly and indirectly affected by the scheme within only 500m namely Banwell and Winscombe and Hutton and Locking. However, Churchill residents will also be affected through the increased congestion along the A38, A368 Dinghurst Road, Ladymead Lane, Churchill Green, Front Street and other rat-runs close to Churchill Academy and yet this appears not to part of the considerations.
- 5.3.● Solving the congestion issue that already exists at the traffic lights at Churchill Gate and the even bigger problem when it needs to cope with the vast increase in traffic particularly at peak times will require measures that CPC is concerned will simply sever the Parish due to the greatly increased traffic and cause it to lose a valuable green space in the heart of the two villages.

**Deliver infrastructure that enables housing development (subject to the Local Plan).**

- 6.1.● The Inspectors of the West of England Joint Spatial Plan expressed serious concerns about remote Strategic Development Locations such as Banwell and

Churchill/Mendip Spring due to their remoteness from centres of employment and train-stations.

- 7.● Innovative and efficient in reducing and offsetting carbon from the design and construction of the infrastructure.
- 7.1.● No evidence was given at the consultation to demonstrate that building a new road and facilitating the building of 1,900 houses plus a further 1,300 at a later date, (JSP figures) remote from a train station and requiring cars and delivery vans to service them, could possibly reduce and offset carbon. Given the UK government's aim to reduce the UK's emissions to almost nil by 2050 the plan to build a new road appears a poor choice.
- 7.2.● With the COP26 conference taking place in the UK later this year and NSC's commitment to its Climate Change Emergency, to ensure reduction and offsetting carbon from the design and construction of the infrastructure, house-building could and should take place on the Green Belt close to Bristol's centre of employment where Active and Sustainable travel will be easy to encourage and where the infrastructure is already in place in terms of public transport.

**Proactively engage with stakeholders in a way that is both clear and transparent.**

- 8.1.● Churchill Parish Council engaged with the Banwell Bypass team and was asked to produce our Concerns and Aspirations (Appendix A) with a short deadline to meet. As yet, CPC has not even received the courtesy of a response from NSC to the submitted document.
- 8.2.● Refer to 1.3 on page 1 above.
- 9.● In addition to the 8 objectives above, Churchill Parish Councillors are further concerned and confused by the *initial draft findings* from traffic modelling – see Table 3 page 20 of the consultation document. How is this table derived? The figures appear to be unidirectional, east-bound, for the morning peak. It is further confusing for example, that it would appear that east-going traffic is generated in very large amounts somewhere within Banwell itself.

**Conclusion:**

- 10.1.● CPC is concerned that the assessments on Health Impact Screening and Equality Impact Screening (June 2021) are extremely limited in the residential and amenity areas covered and 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?
- 10.2.● CPC is concerned that as yet, insufficient modelling within a wider area and including Churchill traffic lights has been shared to assure that the proposed bypass will not create even greater congestion in Churchill than currently exists in Banwell. The shared modelling results should include the impacts of the release of the deterrent of the current Banwell bottleneck *and* the additional housing that the bypass will enable. Furthermore, the table mentioned in #9 above does not reflect a coherent modelling approach.
- 10.3.● Positive suggestions were put forward by CPC in response to engagement with the Banwell Bypass Team namely:
  - 10.3.1.● Reducing the speed of traffic on the Dinghurst Rd through self-enforcing measures;
  - 10.3.2.● Improving/adding pavements where possible;

| 10.3.3.● Implementing a 20mph villages of Langford-and-Churchill-wide monitored, speed limit without engineering;

| 10.3.4.● Cycleways to link Ladymead Lane and Church Lane etc. as per our Concerns and Aspirations document. (Appendix A)

| 10.4.● The proposed mitigation measures appear little more than platitudes which give the impression that Churchill and Langford Residents have not been given serious consideration. CPC reminds NSC of their common law duty towards Banwell, Sanford Churchill and Winscombe residents to protect them from the harmful impacts of the Bypass including noise, pollution and pedestrian safety. This duty of care takes precedence in law over Housing Infrastructure Fund considerations.

Appendix A



Re: Banwell bypass working group - Tuesday 18 May

To: Banwell Bypass, Cc: Churchill PC Clerk PC Clerk, Claudia McVie, Bill Carruthers, Bill Wilkinson & 17 more

[Details](#)



Joseph,

Following the Banwell bypass working group session 18th May, members of the Churchill and Langford Parish Council and residents met to discuss the issues and aspirations raised. Below is a summary of these discussions.

Concerns for residents of Churchill and Langford in relation to a Banwell bypass:

1. A bypass at Banwell will greatly increase the traffic along the A368 and to the junction with the A38 at Churchill Gate, and negatively impact many areas in Churchill and Langford. There is a very real risk that the Banwell pinch-point will be displaced to Churchill; N.B. the Banwell Area Traffic Study (2001) predicted a 40% increase in traffic on the A368 within five years of completing a Banwell bypass on the current "safe-guarded route".
2. Excessive traffic speeds in Churchill and Langford already cause considerable concern and anxiety for pedestrians, cyclists and local motorists. Increased vehicle numbers due to a bypass will exacerbate this problem. On the A368 the pavements either do not exist or are inadequate. Front Street and Church Lane are likely to become a rat-runs during periods of congestion; these roads are narrow and lack pavements.
3. The number of HGV / lorries transiting through the parish has already increased and will increase still further, which will make for more congestion, pollution and damage to buildings, the latter including several listed buildings and structures.

Aspirations of residents of Churchill and Langford:

1. 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 within the parish of Churchill and Langford should become subject to an "area wide default 20 mph speed limit" as soon as possible.
2. 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.
3. The numbers of HGV / lorries transiting through the parish will be reduced through effective governance and restrictions.

Additional points:

4. Churchill and Langford residents should enjoy greater access to public transport to local / regional destinations which can be developed through NSC / regional initiatives.
5. Air pollution due to rising levels of vehicle traffic is a concern in the parish and, in particular, along the Dinghurst Rd between the Jubilee Clock tower and the traffic lights, where large numbers of school children are exposed. The current monitoring station on the east side of the A38 is poorly sited to monitor this issue and requires re-siting.

Concerns on the North Somerset Council's consultation process with Churchill and Langford:

The community has been asked to comment on the proposals for the Banwell bypass and contribute to the planning without having been informed of the expected impacts, particularly in terms of traffic modelling, even though the bypass has been talked about for some considerable time. The expected impacts of the Banwell bypass should be immediately shared with the community to allow it to contribute to the planning and evaluation.

To allow implementation of the above suggestions, at the soonest opportunity, NSC should appoint a planner / traffic management specialist to liaise with the Churchill and Langford community on the development of an effective traffic management plan.

We will follow up this e-mail with a formal letter from the Parish Council and have copied in the Clerk to this effect.

Kind Regards

**James Hoddell**

Chair of the Planning Committee

On behalf of Churchill Parish Council and the local working group