

To the Secretary of State for Transport at Tyneside House, Skinnerburn Road,
Newcastle Business Park, Newcastle upon Tyne, NE4 7AR

via email at nationalcasework@dft.gov.uk

**Compulsory Purchase Order 2022, Statement of Reasons, North Somerset Council
(Banwell Bypass and Southern Link), October 2022**

North Somerset Council (Banwell Bypass and Southern Link) Compulsory Purchase Order 2022, made 6 October. The Highways Act 1980 and the Acquisition of Land Act 1981.

Grounds of objection

North Somerset Council asserts a compelling case exists for compulsory purchase, yet it has failed to present the impacts and costs of the development on residents of neighbouring villages or the environment.

Referring to the Statement of Reasons ("Statement") prepared by North Somerset Council (the Council):

1. The area covered

The Statement focuses Banwell apart from the section called "*Improvements to the wider local road network*" [4.13]. This describes improvements to the local road network in the surrounding villages proposed to mitigate increases in traffic as a result of the Banwell Bypass." But there is no analysis of how effective these are expected to be, nor any criteria against which effectiveness can be measured. There is a so-called cost-benefit analysis of the Scheme that does not include neighbouring villages of Churchill, Winscombe and Sandford that are all within just 3 km of the eastern end of the bypass.

2. Transport needs and benefits

The Statement describes [5.3] the A371 and A368 as "*strategic routes providing critical connectivity through North Somerset.*" The Council does not refer to a hierarchy of roads in North Somerset with the M5, A370 and A38 at the top level and inter-village roads at a lower level. Instead the Council promotes these latter roads as strategic routes 'across the corridor' for business; as diversions from the top level roads and as transport infrastructure for the building of 2800 new houses at Wolvershill Village. It has allowed our roads and lanes to become rat-runs for drivers whose satnavs direct them to roads that are totally unsuitable. We reject this misrepresentation of our village roads and lanes which were never designed to be strategic routes for through traffic in the 21st century between the M5 and the A38.

The Statement describes “*The existing volumes of traffic result in significant congestion and delay, particularly on the narrow sections of the A371 within Banwell.*” [5.3] and the benefits to Banwell of the bypass [5.5] and yet omits to describe the impact of the increased traffic from the bypass on the village of Winscombe [5.6]. Considered more broadly, the bypass just transfers the problems of Banwell to neighbouring villages of Winscombe, only more so as we know that bypasses generate a considerable amount of new traffic. The housing development associated with the Banwell Bypass scheme, will exacerbate this situation considerably, as the Council’s own planning application plainly shows.

The Statement describes “*the significant overall decreases in journey times on the A368 (between Weston-super-Mare and Churchill) and A371 (between Weston-super-Mare and Sidcot) corridors.*” [5.7]. This is incorrect as no mention is made of the predicted increases in journey times from Banwell to Sidcot along our roads, i.e. between the eastern end of the Banwell Bypass and the A38.

The Council’s plans for the Banwell Bypass contain traffic data which disputes their claims above. More recently we have been told to expect increased journey times of **up to 20 minutes** through the centre of Winscombe. We have repeatedly been denied access to traffic forecasts which NSC was forced to eventually release through a successful appeal to the Freedom of Information Commissioners. The unacceptable revised forecasts were then revealed at a small Zoom meeting with the Council two months after the end of the public consultation on the planning application. This practice, lack of transparency and consideration is totally unacceptable. It has been a theme running through the whole of NSC’s management of their plans for the Banwell Bypass.

3. Economic needs and benefits

The Statement claims the scheme “*will unlock new residential and employment opportunities and address longstanding local transport issues*” [5.10] but there is no mention here of the negative impacts of the increased traffic from the Scheme or the local transport problems of Winscombe (from which bus services have recently been withdrawn).

It is suggested that “*Transport user benefits of the Scheme (travel time, travel cost and wider public finances) are large; totalling around £130.6 million* [5.11].”

This figure is misleading (incorrect) as no account is taken of the costs incurred by the increased traffic and congestion at other points on the routes between the A370 and A38, ie through Winscombe. There will be at least a 2.5-fold increase in traffic through Winscombe from the impact of the Banwell Bypass itself plus the development at Wolvershill Village. This is totally unacceptable.

4. Congestion

It is claimed “*overall, there is a beneficial change in noise impacts.*” The net present value of change in noise is around £3.2 million [5.12] but the noise pollution will be transferred to the centres of Churchill, Winscombe and Sandford villages due to the increased traffic and this will counter the gains made in Banwell. There are no plans to measure, monitor or mitigate the impact of the bypass on air and noise pollution in Winscombe. Such action is reserved exclusively for Banwell.

5. Economic benefits

Analyses suggest that while “*there are some adverse economic impacts, the initial benefit cost ratio (“BCR”) for the Scheme is 2.83, meaning that for every £1 in cost, £2.83 is returned in benefit.*” [5.14]. The adverse benefits of the scheme are not fully assessed as the analyses have focused on Banwell and do not include an evaluation of the negative impacts on Winscombe and Sandford, including local businesses who fear a dramatic loss of trade from the congestion outside their premises.

The Statement indicates “*the free-flowing Bypass and removal of traffic from the A371 through the centre of Banwell will improve journey quality and reduce travel time variability.... the Scheme would provide significant monetary benefits that justify the cost of the Scheme.*” [5.15]. This however does not include the disbenefits of noise and congestion in the villages of Churchill, Winscombe and Sandford. Cost-benefit analyses should fully consider the wider implications of the Scheme.

6. Planning

The order states that “*Subject to the consideration of the planning application by the LPA, the Council (in its capacity as promotor of the Scheme) is not aware of any reason why the planning permission would not be granted* [8.5].” The Council has a conflict of interest regarding the Scheme. It is the promoter of the scheme, the adjudicator and a significant source of funding. It is essential that the case for compulsory purchases and planning approval are exposed to independent scrutiny.

7. Public sector equality duty.

According to the Order, “*None of the impacts identified in the Equality Impact Assessment (EqIA) relate to land acquisition* [10.2].” An Equality Impact Assessment (“EqIA”) for the Scheme has however only been undertaken in Banwell. There are likely impacts of the scheme, relevant to EqIA, that are related to aspects other than land acquisition. The Equality Impact Assessments have not been undertaken in Winscombe which will be adversely affected by the scheme.

Given the above evidence to the contrary, I do not believe that North Somerset Council has presented a compelling case for compulsory purchase. IT HAS NOT PRESENTED THE

IMPACTS AND COSTS OF THE DEVELOPMENT ON WINSCOMBE, ITS RESIDENTS, BUSINESSES AND THE ENVIRONMENT.

Please do not allow this order to go through.

Objector's address

Miranda Pickersgill, [REDACTED]

Interest in the land.

The land described in the compulsory purchase order, is in the parishes of neighbouring villages, of which I am a resident of Winscombe. The Scheme will affect residents of Winscombe causing untold damage to our village, our community and environment. We are very proud of our AONB and find it unacceptable that North Somerset Council are planning to build a new road through it. This scheme is opposed by the majority of residents in Winscombe and in fact the overall number of objections registered to the planning application exceeded the number of supporters. Please do not allow this order to go through.

Miranda Pickersgill, 18.11.22