



CHURCHILL PARISH COUNCIL

Clerk of The Council: Mrs Sally Diaz
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To the Secretary of State for Transport
Tyneside House,
Skinnerburn Road,
Newcastle Business Park,
Newcastle upon Tyne,
NE4 7AR

21st November 2022

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.

Dear Secretary of State for Transport,

Churchill Parish Council would like to draw your attention below on the above matter:

Grounds of objection

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

Referring to the Statement of Reasons ("Statement", with paragraph references [x.xx]), supporting the compulsory purchase for the Banwell Bypass and Southern Link ("Scheme"), prepared by North Somerset Council (the Council):

1. The area covered

The Statement focuses on 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 because of the Banwell Bypass. There is however no analysis of how effective these are expected to be nor the criteria against which effectiveness would be measured. There is a cost-benefit analyses of the Scheme that does not include neighbouring villages of Churchill, Winscombe and Sandford that are all within 3 km (1.86 miles) 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*. Roads in our parish form part of this 'strategic route' between the east of the bypass (A368) and the A38 including the narrow village lanes along the border of the Mendip ANOB. These roads have become congested and more dangerous as they are unsuitable as a strategic route between the M5 and the A38. These roads are now being promoted as transport infrastructure for the housing development of Wolvershill Village. The Council does not refer to a hierarchy of roads in North Somerset, and instead promotes these roads in this way even though the village roads are not designed to be strategic routes for through traffic in the 21st century.

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 understates the impacts of the increased traffic due to the bypass on the villages of Churchill, Winscombe and Sandford [5.6] i.e. on the A368 from the end of the bypass to the A38. Considered more broadly, the bypass just transfers and exacerbates the problems of Banwell to neighbouring villages of Churchill, Winscombe and Sandford.

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 misleading as no mention is made of the predicted increases in journey times along the same roads e.g. from Banwell to Churchill which will increase by 50% with the Scheme opening in 2024, at peak flows, and almost double in time to 17 minutes in 2039.

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 Churchill, Winscombe and Sandford.

It is suggested there will be large *Transport user benefits of the Scheme (travel time, travel cost and wider public finances)*; totalling around £130.6 million [5.11] but this figure is misleading as no account is taken of the increased congestion at other points on the routes between the A368 and A38, ie through Churchill, Winscombe and Sandford that will be of disbenefit to residents and businesses.

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 stated plans to measure, monitor or mitigate the impact of the bypass on air and noise pollution in Winscombe, Sandford and Churchill, while there are 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 Churchill, Winscombe and Sandford.

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 whole Scheme.

6. Planning

Subject to the consideration of the planning application by the LPA, the Council (in its capacity as promoter of the Scheme) is not aware of any reason why the planning permission would not be granted [8.5]. The Council is the promoter of the scheme, the adjudicator and a significant source of funding having agreed to cover all overspend of the project. The leader of the council has openly stated at a public meeting, during the period that the planning application was open for comment and the decision yet to be taken, that the scheme will go ahead. It is desirable that the case for compulsory purchases and planning approval are exposed to independent scrutiny.

7. Public sector equality duty.

None of the impacts identified in the Equality Impact Assessment (EqIA) relate to land acquisition [10.2] An Equality Impact Assessment ("EqIA") has however been undertaken for the Scheme only 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 neighbouring villages of Churchill, Winscombe and Sandford.

8. Environment

The proposed Scheme is within areas that border the Mendip AONB and involve building a new road within it. We do not believe there has been adequate justification that this is in the public interest as required by the National Planning Policy Framework (NPPF). Further, we do not consider there are adequate plans to mitigate against damage to populations of Horseshoe bats and other species, nor to limit the impact on future climate of the Scheme's construction or the expected increases in road traffic.

The proposed development as it stands is projected to have a significant deleterious impact upon the residents of our villages, including (but not limited to) enormous increases in traffic congestion, noise, light and air pollution, all of which stand to significantly decrease living standards. Churchill Parish Council does not believe that North Somerset Council has presented a compelling case for compulsory purchase as it has not fully presented the impacts and costs of the development on residents and businesses of neighbouring villages or the environment.

Objectors address
Churchill and Langford Parish Council
17 Sealey Close
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Somerset
BS27 3UA

Interest in the land.

Land described in the compulsory purchase order are in the parishes of neighbouring villages or within Churchill and Langford Parish. The Scheme will affect residents of Churchill and Langford Parish.

Yours sincerely

A handwritten signature in dark ink, appearing to be 'Sally Diaz', written on a light blue background.

Sally Diaz
Clerk to the Council