

Whitchurch Village Council
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2nd March 2019

Dear Sir/Madam,

WVC: Objection to WECA JLTP4 2019-2036 Consultation

Please find enclosed an objection to the WECA Joint Local Transport Plan for 2019 – 2036 on behalf of Whitchurch Village Council (WVC). WVC has responsibility for the whole parish of Whitchurch, and plays a vital role in acting on behalf of the community it represents. The Council has a wide range of powers and responsibilities including:

- Administration of open spaces, play areas, bus shelters, cemeteries, allotments.
- Assessment of planning applications and other proposals which may affect the parish
- Undertaking projects and schemes that benefit local residents
- Helping other tiers of local government keep in touch with their local communities

The Village Council has previously objected to the Joint Spatial Plan (JSP). Specifically, it has significant concerns about, and has objected to the allocation of a strategic development location which allocates Whitchurch as an SDL in the JSP (7.2 Whitchurch).

The WVC objection to the JLTP4 is also an objection to the principle of further unnecessary road developments which is seen as a precursor to an urban extension for Bristol, within Whitchurch, which will harm the character, setting and environment of the village.

The JLTP is predicated on a false premise that the strategic development locations within the JSP are required, and are identified in the best locations. They are not. The only rationale for the relief road from Hicks Gate to Whitchurch is to open up land for development. As WVC and others have set out here and elsewhere, without this allocation, the need for the road cannot be demonstrated. Both the JSP and JLTP4 seek to retrofit a case for development in Whitchurch without fully testing a reasonable alternative strategy for accommodating the housing and transport needs of the wider area.

Yours faithfully,

J Medlin
OBO Whitchurch Village Council

Objection to Joint Local Transport Plan 4 2019 - 2036

The Village of Whitchurch lies adjoining the southern boundary of the City of Bristol but is not part of that city for administrative purposes. The village is a separate civil parish with its own parish council within the district of the Bath and North East Somerset. Adjacent areas within Bristol City Council, also called “Whitchurch”, are not within the civil parish. Whitchurch and the adjoining areas of Stockwood, Stockwood Vale, and Brislington will also share many concerns arising from the proposals.

Whitchurch village lies astride the A37 road which was formerly the toll road leading from Bristol to Wells to the south. It lies four miles from the centre of Bristol. This proximity has, in part, played a role in the enlargement of the village during the last 20 years, with further expansion, until recently, restricted by the surrounding green belt.

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WVC has already objected to the release of Green Belt for the strategic development location (SDL), and to the proposed new link road from Hick’s Gate Roundabout to the A37 (and beyond) within the JSP and the B&NES Local Plan (Options). The WVC objections to the JLTP build on these objections.

1. Summary and Background

This objection is an in principle objection to the JLTP4, and its proposals for a new road from Hicks Gate to the A37 and beyond. The proposal should be removed from the Joint Local Transport Plan, and these aspects of the JLTP4 should not form part of the evidence base for the JSP or B&NES Local Plan.

The objection sets out that the discharge of the proposed road on to the congested Whitchurch Lane via domestic housing and areas serving schools is totally wrong. Its alignment remains undetailed and unspecified, but we know that it will need to align close to large areas of existing housing within Stockwood, causing harm to existing communities. Beyond Stockwood, the alignment will impact on existing communities of Queen Charlton – a Conservation Area – the character of which will be irreversibly affected.

The consequential implications of the proposed road – for example, the further traffic implications for Whitchurch and Pensford are not included or set out, but they are immediately apparent. In fact, it would be more useful for the JLT to address the existing congestion and transport tissues in and

around the Whitchurch area. These are well known and documented, but little has been done to address them.

A fundamental concern with the JLTP (and the JSP) remains the scant detail of the route of the proposed new road. Without this, the community simply cannot take full account of the impact. There are no details as to whether or not this road unlocks the development at the SDL, or vice versa. The community has been led to believe that there would be no SDL without the proposed road. This JLTP appears to suggest that the road could go ahead irrespective of the supposed need for the SDL.

Furthermore, the long standing southern Bristol route, which has been reserved as a route for expansion for many years has not be considered within the document. This, and other route options need to be included.

The proposed Link Road is unjustified. The evidence and supporting work is imprecise and does not fully allow for the community to engage with the route, detail, and impact. Its timing in relation to the JSP is also prejudicial to community understanding of the impact. This JLTP ought to have been published before, or at the same time as, the JSP.

2. Introduction

WVC strongly objects to the proposed link road allocation and the further additional development which will accompany the proposed road. WVC objects to the removal of all land required to deliver the Link Road from Green Belt. The JLTP4 fails to demonstrate any exceptional circumstances to justify the road, and without these, there is no justification for the land to be removed from the Green Belt.

This objection sets out the objection to the proposed road for various reasons. It identifies the aspects of the JLTP which WVC feels are inadequately addressed. The objection is to the JLTP4 in its entirety as far as it promotes the relief road.

3. Detailed Objection

WVC objection to the JLTP covers the following points and sections:

- (a) Objection to the removal of land from the Green Belt to allow the proposed road to be developed, as well as all other land that would be needed in order to deliver the proposed road.
- (b) Inaccuracies and absence of information relating to new road proposals.
- (c) Inadequate assessment of alternatives and lack of exceptional circumstances.
- (d) Conflict with Neighbourhood Plan.
- (e) Inadequate assessment of impacts: air quality, noise, flooding.
- (f) Other issues.

(a) Objection to Green Belt development, and alignment through open countryside

It is clear that alternative, urban route alignments are available if the road is required. Presumably these are more costly than building a road through open countryside, and this has been factored in to the business case. The proposed alignment of the road would create two separate communities, as well as destroy protected areas of Green Belt.

Paragraph 133 of the NPPF (2018) states that *“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”*. WVC agrees with the NPPF and attaches significant weight to the aims of the Green Belt. The proposed Road will harm the Green Belt, and will undermine the Green Belt purposes by facilitating further encroachment and development within the Green Belt.

Para 134 of the NPPF confirms that Green Belts serve five purposes:

- a) to check the unrestricted sprawl of large built-up areas;*
- b) to prevent neighbouring towns merging into one another;*
- c) to assist in safeguarding the countryside from encroachment;*
- d) to preserve the setting and special character of historic towns; and*
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

Each of the 5 purposes above will be undermined by proposed road.

The road will result in sprawl of the southern edge of Bristol into the open countryside which is contrary to purpose a. The proposed road, and the SDL allocation will result in near coalescence of Whitchurch Village, Queen Charlton, Stockwood and a new community contrary to purpose b.

Purposes c and d (safeguarding countryside and preserving character) will be undermined by proposed development on this scale which directly results in encroachment into the countryside and results in greater pressure on an ongoing basis. The allocation will do nothing to promote urban regeneration and recycling of land, or sustainable transport modes within the city of Bristol itself (contrary to Purpose e).

Neither the JLTP4, nor the JSP can demonstrate that the evidence takes account of alternative reasonable options. Para 137 of the NPPF requires that proposals should have *“examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph....”*

In conclusion, the flawed SDL allocation within the JSP and B&NES Local Plan is the only rationale which supports the extension of the Ring Road from Hicks Gate. WVC has demonstrated that the SDL is not sound, and without the SDL there is no justification for the road.

(b) Inaccuracies and unavailability of information relating to boundaries of proposals, and alignment of proposed link road.

The JSP has been prepared, and consultation has taken place on it, ahead of the publication of the JLTP4 2019-2036 consultation. It is inconceivable that the transport evidence has informed the site selection and policy development approach for the JSP and its SDLs, including the proposed SDL at Whitchurch.

It now appears likely that the JLTP4 has been prepared to justify the decisions and approach within the JSP. This is back-to-front, and wholly unsatisfactory.

Within the JLTP there is an absence of available transportation evidence, and the vision for transport and highways has been out of synch with the emerging land-use plans throughout the consultation and plan preparation process. Earlier Transport Vision evidence documents are clearly flawed and did not coincide with the JSP papers in relation to roads and metro link ideas in relation to Whitchurch Village.

Further, despite frequent queries from WVC, there is still an alarming lack of detail as to the alignment of the road. The alignment of the road remains indicative. This gives the community no ability to engage or comment in any meaningful sense. It creates further uncertainty and bad feelings within the community.

As has been set out previously, absent the additional housing within the SDL, there is absolutely no justification for the road. The route will, necessarily be required to cut into and through important ecology areas, and will in itself result in increased congestion and pollution. It is WVC's view that the road is totally unnecessary. The population and housing growth is capable of being addressed at alternative locations. By using alternative locations, there will be no justification whatever for the proposed relief road. It will be obsolete.

Throughout all consultations there has been an absence of information in relation to the proposed link road from Hicks Gate to the A37. The limited information identifies the proposed roundabout to be placed on site of the Whitchurch Village Playpark & Allotment site. This area was achieved by donations from villagers with the sole purpose of purchasing the land for a community play area in 1985. It is a very well used Play park and the Village Council have recently secured funds to enhance and develop the facilities further for the benefit of the whole community.

B&NES Council have an Allotment Management Plan 2015 and in it states that 'the Council recognises the importance of allotments as a leisure and recreational facility – they benefit the health and wellbeing of communities, green spaces and wildlife, and are a means of producing low cost locally produced food in a sustainable way'. Also Policy CF8, which protects allotments and land used for allotments, is one of the policies saved from the Adopted Local Plan 2007.

So why then would a proposal include a roundabout to be delivered on the Playpark & Allotment site, taking away all the benefits that residents have enjoyed since they were established and wish to continue benefiting from? Furthermore, the proposed road plan would utterly contradict the policies mentioned above.

The whole site is protected by the Fields in Trust - Queen Elizabeth II Fields, Deed of Dedication dated 28th January 2013. As crown land, this could end up being undeliverable.

(c) Alternative Sites for SDL

The business case justification for the road depends entirely on the SDL. It is required **only** to deliver the SDL. It is noted that the SDL is not a fixed or guaranteed requirement as it does not have material weight in planning terms. It is premature to remove land from the Green Belt – for housing development or for new road alignment – either through the JSP/Local Plan (Options) or the JLTP. It remains entirely possible that alternative appropriate sites will come forward of sufficient size and at more sustainable locations.

In relation to the SDL, there are clearly identifiable allocations elsewhere which are in more suitable locations, and are equally deliverable either with or without additional highways infrastructure. Those which have previously been considered but have been ruled out following assessment have not been sufficiently robustly assessed. The rationale for their removal is weak, and further studies and evidence is required for justification. For example, other sites could have been progressed further if they had the additional supporting infrastructure equivalent to that proposed in extension to the Ring Road from Hick's Gate.

(d) Conflict with, and undermining of the value of, the Whitchurch Village NDP

Following extensive and full local consultation on the JLTP, it is clear that the local communities are overwhelmingly against the proposed link road.

This fact is already enshrined within the Neighbourhood Development Plan for the area (NDP). This is a 'made' NDP, having been confirmed by referendum in 2017. Although the NDP is considered as 'pro-growth', it supports Green Belt protection and does not envisage development on the scale proposed through the JSP/Local Plan or as identified as required within the JLTP.

There is a clear conflict between the NDP and the alignment of the proposed road which would be contradictory to the implementation of the NDP. The NDP was submitted to the Council in November 2016. It retains part of the land as a 'Green Gap' between the village and the boundary of Bristol City Council. The exact alignment of the proposed road is unknown but it is likely to occupy part of this gap, or to bring about pressure to close this gap, which undermines the vision of the NDP.

(e) Inadequate Evidence and Assessment of Impacts

If the proposed road allocation goes ahead, it will increase the risk of flooding. The area already suffers from flooding from surface water. The surface water flooding is largely as a result of inadequate storm drainage infrastructure. Drainage infrastructure in the area is also inadequate. Whilst this could be improved, it remains unaddressed through the JLTP. The sewers have from time to time overflowed, and will not cope with additional development.

The increase in vehicle use and impact on roads is also unacceptable. Air quality along A37 is already above European air quality pollution limits. Additional road infrastructure will endanger both the new and existing population. Increases in illness and poor health will accompany the increase in traffic and noise pollution. The suggested alignment for the road uses some existing road network directly adjacent to local schools. This is entirely unacceptable, and will expose young people to toxic vehicle pollution.

(f) Other Matters

The JLTP fails to address the additional impact that a park and ride on the A37 will have on the proposed new link road. It does not provide an adequate assessment of the impact, locally, of the SDL which will discharge cars on to narrow minor village roads will cause local chaos on distributor roads before accessing the strategic highways network.

The proposed new road will significantly affect the setting of, and directly impact on Conservation Areas. The setting of, and character of the heritage assets affected must be recognised.

The A37 is already above the European pollution level. Any increase in traffic by will bring this level significantly higher. The Green Belt fields are there to counteract pollution. They should not be forfeited and endanger residents' health. Additionally, these fields across which the proposed road will cut have been farmed for centuries. They are of good quality (grade 3A) and should be safeguarded in their own right. They support a great deal of wild life - Greater Crested newts, bats, water parsnips, deer and a host of birds, including owls, red kites and woodpeckers.

4. Conclusion

The benefits that the Green Belt provides are vital. Without the protection the Green Belt offers against development, more countryside would be consumed by urban sprawl. WVC objects to the JLTP4, proposed link road and all infrastructure or attendant development associated with both this and the SDL. The proposal should be removed from the JSP /Local Plan, and the JLTP.

Neither JSP nor JLTP provide a real vision for the area, nor recognisable transport strategy. The sequencing of the justification for the proposed transport measures, following on from the SDL consultation is wrong. This gives no reassurance that the impact of this on already overstretched infrastructure and services has been thought through.

WVC and the community it represents is keen to develop strategies in accordance with a shared and understood vision, informed by well researched evidence, meaningful consultation, proper cross-boundary cooperation with neighbouring authorities, and with full transparency. The JLTP has been prepared in isolation, as evidence to the JSP. There remain significant concerns.

The community is against the JSP SDL, and the JLTP which proposes the new relief road. It is clear that the JLTP serves to add justification to the SDL at Whitchurch, rather than to propose a road that responds to a need *per se*.

For this reason it is hoped that the West of England Combined Authority will withdraw the proposed relief road from the JSP and the JLTP as soon as practicable. It should resolve to produce a fresh Plan fully involving local people, organisations and communities, and truly engaging with them.