

## **Charfield Parish Council response to the Joint Spatial Strategy**

### **Scope of Response**

The Joint Spatial Strategy (JSP) seeks to lay out a clear direction for the future development of the West of England Combined Authority area, covering the Unitary Authorities (UA) of Bath and North East Somerset (BANES), North Somerset, Bristol and South Gloucestershire – an area of more than 1300km<sup>2</sup> and home to more than a million people.

Charfield Parish comprises the village of Charfield and some surrounding hamlets and is home to less than 3,000 people.

It is clear therefore that our response is shaped entirely by the likely outcomes in our environment of the JSP and focuses sharply on the local sustainability of the Plan or lack thereof. It is clearly beyond our competence to remark on the whole JSP. Nonetheless we feel well placed to comment on those parts of the Plan that apply to us.

### **Summary**

Our response identifies that the Plan proposes unsustainable development and fails to offer sufficient adequate improvement to the infrastructure in this area. It shows that in particular the transport infrastructure is already well beyond capacity (in part already identified as not fit for purpose) and that the mitigating proposals to address strategic development are phased to come long after the need for it arises, and may not come at all. The Duty to Cooperate does not guarantee infrastructure provision, and the JSP relies totally on such provision by Network Rail and Highways England amongst others for it to have any chance of meeting sustainability requirements. Despite the assertion in the JSP to the contrary, the plans do not make Charfield a more sustainable settlement, but rather exacerbate the existing problems.

Most importantly, we show that the failure to reasonably address the impact of expanding this rural car-dependent dormitory village, as well as planning a closely adjacent new and equally car-dependent “garden village” puts in jeopardy the national transport infrastructure with consequent risks to the local economy.

In a period when impending climate chaos and the fossil fuelled causes of it have never been plainer, the plans for Charfield could not be more counter-policy. To create and expand dormitory dwellings that are located as far as is practically possible in the region from centres of employment, retail and recreation is to plan for increased vehicle dependence, increased congestion, increased pollution and increased commuting times. This is not a competent plan.

Finally we present our view that Charfield and the area at the northern-most fringe of the West of England Combined Authority (WECA) area has been poorly dealt with for service infrastructure and that our heavy reliance upon Gloucestershire County for many of our health and medical, educational, shopping, recreational and social needs has been entirely neglected. The impact of excessive development of Charfield village upon local services in Stroud District in Gloucestershire has not been analysed nor has any mitigation been put forward.

Charfield Parish Council welcomes the fact that this consultation is held under the Town and Country Planning (Local Planning) Regulations, regulation 19, and is dealt with by an Inspector appointed by the Secretary of State for Communities and Local Government. It feels strongly that local authority consultations thus far have failed to address the points we raised in earlier drafts of the Plan (largely, we feel, because they have no Plan B). We feel there are indeed alternatives including consolidating the unsustainable build planned for Charfield at the recently promoted land at Woodlands Golf Club, close by the M4/M5 interchange, employment centres and retail facilities and easily linked to the Metrobus network.

## **The Joint Spatial Plan**

The Joint Spatial Plan (JSP) is a Local Plan, informed by the National Planning Policy Framework (NPPF). Paragraphs 150 to 185 identify core requirements of Local Plans. It identifies that Local Plans must be sustainable and make possible sustainable development – in these terms sustainable development means *“meets the needs of the present without compromising the ability of future generations to meet their own needs. It is central to the economic, environmental and social success of the country and is the core principle underpinning planning”*

The JSP has been put to consultation before the Joint Transport Plan (JTP) upon which it depends has been written. It is hardly surprising therefore that the JSP fails to adequately identify the definite transport infrastructure improvements and mitigation necessary to enable any sustainable development. This alone makes the JSP unsound as a planning document.

## **Inconsistency in the Plan within the four Unitary Authorities**

It has been noted that of all four Unitary Authorities, only South Gloucestershire fails to state categorically that infrastructure must precede housing. They voice aspirations rather any commitment to costed plans. For example in North Keynsham (BANES):

*No housing will be completed at the North Keynsham SDL ahead of the Avon Mill Lane to A4 link, Keynsham rail station improvements and Metrobus (high quality public transport) route from Bristol to Keynsham on the A4 corridor being completed.*

In the Bath Road (Bristol) plans:

*The provision of key transport infrastructure in advance of development*

In Banwell (North Somerset):

*Development will not commence until the construction of the Banwell Bypass is delivered as part of the M5 to A38 highway improvements with connection to a new M5 Junction 21a at a location to be confirmed, and onward connection to the Sandford/Churchill Bypass.*

In the South Gloucestershire plans for Charfield it is only allowed that *new development should comply with and or contribute towards infrastructure improvements*. This is totally unacceptable and unsustainable, because the corollary of this is that housing will be built and lived in without the necessary infrastructure being available.

### **Inconsistency with national government proposals**

In the recent Autumn Budget Statement, the Chancellor of the Exchequer stated

*“We will focus on the urban areas where people want to live and where most jobs are created. Making best use of our urban land, and continuing the strong protection of our green belt. In particular, building high quality, high density homes in city centres and around transport hubs”.* (Hansard Column 1058)

In planning to increase unsustainable housebuilding in Charfield the JSP presents itself contrary to its own mission statement (to be consistent with national policy) and sets itself directly against central government policy and aspirations.

It is appreciated that the adjacent large developments in Charfield and Buckover may each contribute toward the transport infrastructure that would mitigate some of the impact of both proposals. However, the fact stands that these mitigating improvements must be in place and operational long before housing is occupied and transport demand created, and the Plan simply does not reflect this.

## **Transportation**

A lack of transport infrastructure at new home take-up will inevitably lead to habituated lifestyle choices including personal vehicle use, adding to carbon and congestion and proving utterly unsustainable.

Charfield village is built on the narrow B4058 that carries also commuter traffic from Stroud District in Gloucestershire to the M5 motorway. Historic expansion of the village has always added traffic to this main route but has seldom created serious congestion except when roadworks or breakdowns occur.

More recent developments in Charfield – (Crest Nicholson 106 houses) and (Bellway Homes 64 houses) – have impacted traffic flows to the point that currently peak time traffic is at a standstill from the B4059 in Tortworth through to the Renishaw roundabout near Kingswood. Planning twenty years of such congestion is irrational and abusive of any sustainable strategy.

The M5 motorway at Junction 14 is deemed by Highways England as no longer fit for purpose. In part this is likely due to the potential for motorway collisions when traffic backs up on the off-lanes but the congestion at this location is very much experienced on the B-road local roads network as well.

The M5 junction 14 also feeds to the A38 running between Bristol and Gloucester. The A38 performs a secondary but important function as relief road to the motorway in the event of a motorway closure. Motorway closures in the area have occurred regularly and with increasing frequency as the national infrastructure becomes ever busier.

If the A38 were to be overloaded by local vehicles resulting from over-development at, say, Charfield (another 1200 houses means perhaps two thousand more vehicles) and also Buckover (3000 houses, up to six thousand vehicles), as well as the Thornbury expansion proposals then the A38 would no longer serve as relief to the motorway meaning the national infrastructure would come to a standstill. The economic impacts of this are beyond the

ability of Charfield Parish Council to calculate but would be seriously significant.

At the time of writing there appears to be no published plan to improve the motorway junction. Nor does there appear a costed and feasible plan to re-open Charfield Railway Station – the only option the JSP offers Charfield to a fully car-focused expansion plan, and one that potentially increases car traffic\*. Even the ambitious and expensive Metrobus doesn't come to Charfield. Even if it did, it shares the A38 with the rest of the traffic and is as likely to sit in traffic congestion as any other vehicle. Relying on duties of cooperation from infrastructure providers is unlikely to result in a sustainable development in Charfield.

\*Charfield Parish Council is ambivalent to the prospect of re-opening the railway station since it is as likely that users outside of the village would drive into Charfield to use the station as it is local residents would walk to it. The likely impact of a re-opened Charfield Railway Station could be to increase vehicle traffic, congestion and pollution in the village!

### **Interfacing with Gloucestershire**

It is clear that the JSP fails to recognize the role that neighbouring authorities play in the life of Charfield. A significant majority of the existing residents of Charfield make use of health provision – doctors, dentists, out-patient support and even some hospital services – in Gloucestershire. Most use practices in the nearby town of Wotton Under Edge, some three miles over the border. In proposing to more than double the size of Charfield, the JSP has failed to assess how these new residents would reasonably access health services, because the Plan makes no reference to out of WECA service provision.

While the JSP presents a case for a larger in-village primary school it does not address the needs for secondary education. A large proportion of secondary school aged pupils in Charfield study at Katherine Lady Berkeley's school in Kingswood, Gloucestershire.

In proposing to double the number of houses in Charfield there is a consequent assumption of the doubling of secondary school age children. The only recognition of this is a possible foot and cycle way that would allow children to walk or cycle to school. It does not in any way speak of increasing the capacity of this Gloucestershire school nor offer any other feasible means for children to access the next nearest secondary school seven miles away in Thornbury (itself under increasing burden of over development and consequential school place deficit).

## **Conclusion**

Previous consultation phases failed to realise the issues inherent in expanding a car-reliant village and even envisaged a whole new “garden” village with equally car-dependent homes, immediately adjacent an overloaded motorway junction and trunk network. This has come about through designing the JSP before the JTP – a case of putting the cart before the horse. This JSP is flawed because of that failure, because it is unable to address the findings of the JTP upon which it should be founded.

Unsustainable development ought not to be allowed. Houses have to come after the infrastructure is built, and come organically once that infrastructure is proved to exist. To build houses and hope some solutions come that will sort out all the problems is irrational and an insult to the people expected to live in them.

Charfield Parish Council calls for the Secretary of State through his Planning Inspector to require this Plan to be withdrawn with a view to sustainable development being the core principle.

Agreed by the Charfield Parish Council at the full meeting of the Council on 12<sup>th</sup> December 2017

Councillor Mark Rosher – Chairman

Councillor Mike Cheskin

Councillor Paul Garside

Councillor Judy Law

Councillor Naomi News

Councillor Tony Parker

Councillor Richard Rawlings

Councillor Vanessa Roberts

Councillor Alex Threlfall

Parish Clerk Paula Evans

**CHARFIELD PARISH COUNCIL**

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