

*Q3. Do you agree with these or are there other challenges or issues which we have not included and how might the Local Plan address these?*

- Flax Bourton Parish Council believes the timing of the Local Plan – Issues and Options Consultation is premature given the Joint Spatial Plan (JSP) is still at a very early stage of development. It does not believe it is possible to move to the next stage until the JSP has been tested in a public forum in May 2019 and the Joint Transport Plan 4 is available for consideration in early 2019. In addition, the BRSWEL Study, the output of which is believed to be important, has not yet been made available. Also there is no study/report of railway capacity from Railtrack or train operating companies.
- Flax Bourton Parish Council objects to the Strategic Development Locations proposed in Nailsea and Backwell on the basis of soundness as they are unsustainable, undeliverable and in breach of national planning guidelines, particularly NPPF 11, 35, 102, 103 and 109, evidence for which is set out in our answers to questions to 19, 20 and 23.
- These locations have not been chosen to generate local employment opportunities. They assume the need for more outward commuting to Bristol. This has been confirmed at the Backwell and Nailsea Urban Extension Workshops to discuss the Local Plan with North Somerset's planners. Also document WED006 Updated Employment Evidence confirms.
- There is no assessment of the impact of further development including road infrastructure on the built environment – listed, heritage buildings etc. i.e. there are 12 listed buildings in the village of Flax Bourton, 7 on the main road (A370).
- No assessment is made of the economic benefit versus the infrastructure costs proposed in the JSP.
- No assessment is made of the impact of additional housing on local services – medical and dentistry facilities, schooling, post office etc. An assessment should be made and local planning should take into account the impact on nearby local villages. In the case of Flax Bourton village, Backwell is the principal service village.
- A full review of the greenbelt in North Somerset is requested along with a review of alternative Strategic Development Locations (SDLs) or Urban Living Locations such as The Vale, Portishead, Clevedon and Yatton.
- Flax Bourton Parish Council objects to the current proposed SDL's of Nailsea and Backwell given a sustainable and deliverable transport and infrastructure solution has not yet been proposed.
- Development to the South West of Nailsea encourages dormitory living. Development should be closer to the town centre on the North West of Nailsea.
- There is no assessment evidence to show that the A370 and proposed link E3 are the only deliverable option for linking Nailsea and Backwell to Bristol.

*Q4. Do you agree with these or are there other challenges or issues which we have not included and how might the Local Plan address these?*

- The improvement to the Sheepway and the well-researched Portishead rail connection has been postponed on more than one occasion but is readily achievable and would open up alternative development opportunities. It is

deliverable at a fraction of the cost of the proposed road infrastructure required for the proposed Strategic Development Locations.

- This is evidence of North Somerset Council's failure to secure vital infrastructure before allowing housing development.

*Q5. Green Belt - do you agree with these or are there other challenges or issues which we have not included and how might the Local Plan address these?*

- Flax Bourton Parish Council supports a full review of the Green Belt in North Somerset and notes that the other three Unitary authorities in the West of England development area propose minor changes to the Green Belt.
- It has also been noted that North Somerset Council has considered a review of the Green Belt at Bristol Airport so Flax Bourton Parish Council feels it is inconsistent not to review the whole of the Green Belt for Strategic Housing Development.
- Flax Bourton village is open to a very limited development extension of the existing settlement boundary on the basis that the area within the settlement boundary remains washed over by the Green Belt. Such development MUST be in line with the current character and rural setting of the village and in assessing sustainability, take into account the lack of any services (apart from a primary school) in the village.
- The principle of the Green Belt should give protection from "new" roads as well as housing development and the JSP/Local Plan is inconsistent in protecting Green Belt policy from housing yet proposing substantial road/MetroBus routes through quality Green Belt rather than developing housing where new road infrastructure with capacity has recently been built.
- We support a review of the Green Belt around the South Bristol Link Road to include "The Vale" and around urban living locations.

*Q8. What are your views on the options for a revised settlement hierarchy?*

- With the influence and limitations of the Green Belt, Areas of Outstanding Natural Beauty, Sites of Special Scientific Interest, Conservation Areas, Registered Parks and Gardens and Flood Plains in North Somerset, there is little scope for review and Option 1 is appropriate.

*Q9. What are your views on the options for revised settlement boundaries?*

- Option 2 provides for a 'clear cut' policy for a village of where development will or will not be considered – and under Q5, we have suggested some very minor adjustment to the settlement boundary of Flax Bourton village could be considered. Option 1 can lead to speculative applications by developers on what is or is not adjacent to a Settlement Boundary.
- In the case of Flax Bourton, the village is completely "washed over" by the Green Belt so any extension would fall outside current NPPF guidelines. Also, the village scores low on sustainability with no local services apart from a Primary School.

- Within the Landscape Character Assessment (March 2018) Flax Bourton is bounded on three sides by “Rolling Valley Farmland” and on the remaining side by “Cleeve Ridges and Combs”; the strategy for both is to conserve and strengthen. Also, on the north side by Registered Park and Garden land (Tyntesfield and Bathing Pond Wood).

*Q19. Do you have any comments on the proposed vision for Backwell?*

- Flax Bourton Council objects to the Strategic Development Locations Proposed in Nailsea and Backwell on the basis of soundness as they are unsustainable, undeliverable and in breach of national planning guidelines, particularly NPPF 11, 35, 102, 103, and 109.
- E3 and rephasing of Backwell traffic lights funnels all traffic from the Nailsea and Backwell SDLs currently totalling 2,900 houses in addition to the existing traffic and any additional traffic from the other SDLs through Flax Bourton which is split by the A370 which is the narrowest, slowest section of the A370 with blind bends, pedestrian pavement on only one side and then only single person width, 7 listed buildings fronting the road, concealed driveways, 5 road junctions, access to a children's nursery, primary school, working aggregates quarry and asphalt plant.
- The proposed E3 road link will increase traffic causing an unacceptable impact on highway safety see NPPF 109.
- The cumulative effect of the E3 and other proposed traffic mitigation works through Flax Bourton will be severe see NPPF 109.
- Moving traffic from Backwell traffic lights to Farleigh/Flax Bourton merely moves the problem at huge expense. It will not mitigate or reduce traffic. Existing traffic on the A370 is at capacity and the additional traffic from Nailsea and Backwell SDLs will exceed capacity. Not only will junction capacity be exceeded but also link capacity which will lead to flow breakdown.
- For the reasons stated above E3 and other traffic mitigation will have a negative impact on commuting times and economic activity.
- We will respond to the Transport Topic Paper 8 WED 007 and Emerging Findings Transport Report WED 008 in detail in the JSP consultation process. We do, however, comment now that these documents are flawed and do not give a plausible or credible basis to the transport proposals in this draft Local Plan. Transport Modelling is unsound, for example, it has failed to take account of the South Bristol Link Road in transferring congestion from Barrow Gurney to the A370. Also Figure 3.6 of Transport Topic Paper 8 (WED007) shows AM peak forecast traffic flow differences without mitigation and predicts surprising results, for example, A370 SW Brockley traffic lights increase of 300-600 PCU (from the SDLs of Banwell & Churchill) but traffic then disappears. Where does it go? Topic Papers show a peak hour increase of 600 vehicles through Flax Bourton. Up to date figures from a NSC assessment in November 2018 show that this represents a 60% increase in peak hour traffic which is unsustainable.
- Assessment evidence should be shown that the A370 and the proposed E3 link is the only deliverable option for linking Nailsea and Backwell to Bristol.
- We support E6 of the transport scheme as it will improve bus access to Bristol on the Long Ashton bypass which has become increasingly congested since the opening of the South Bristol Link Road.
- As stated in reply to Question 3 the absence of Joint Transport Plan 4, BRSWEL Study and any study or report from Railtrack or Train Operating Companies

prevents any reasonable discussion for the determination of the locations of SDLs and the transport serving them and therefore whether they are sustainable. This plan is unsound.

- No assessment is made of the impact of additional housing on local services - medical, dentistry, schooling, post office etc. An assessment should be made and local planning should take into account the impact on nearby local villages. In the case of Flax Bourton Backwell is the principle service village.

Q20. Do you agree with the principles set out for Backwell and would you suggest any changes to these?

- We consider that establishing the principles is a fundamental step towards developing the detail for development in these areas.
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*Q23. Do you have any comments on the proposed vision for Nailsea?*

- The consultation acknowledges that Nailsea population has fallen in recent years so on what basis is it reasonable to assume that there will be the need for a further 2575 residential units?
- Strong consideration should be given to the proposed new link to the B3130 at Clevedon Road, Tickenham (W4) leading to the B3128. This link to Bristol for both Nailsea and Backwell would avoid taking increased traffic volumes through existing villages and is probably a less expensive option than trying to funnel additional traffic onto the A370.
- Development to the South West of Nailsea encourages dormitory living. Development should be closer to the town centre on the North West of Nailsea.
- Flax Bourton Parish Council believes the timing of the Local Plan – Issues and Options Consultation is premature given the Joint Spatial Plan (JSP) is still at a very early stage of development. It does not believe it is possible to move to the next stage until the JSP has been tested in a public forum in May 2019 and the Joint Transport Plan 4 is available for consideration in early 2019. In addition, the BRSWEL Study, the output of which is believed to be important, has not yet been made available. Also there is no study/report of railway capacity from Railtrack or train operating companies.
- Flax Bourton Parish Council objects to the Strategic Development Locations proposed in Nailsea and Backwell on the basis of soundness as they are unsustainable, undeliverable and in breach of national planning guidelines, particularly NPPF 11, 35, 102, 103 and 109, evidence for which is set out in our answers to questions to 19, 20 and 23.
- These locations have not been chosen to generate local employment opportunities. They assume the need for more outward commuting to Bristol. This has been confirmed at the meetings in Backwell and Nailsea to discuss the Local Plan with North Somerset's planners. Also document WED006 Updated Employment Evidence confirms.
- There is no assessment of the impact of further development including road infrastructure on the built environment – listed, heritage buildings etc. i.e. there are 12 listed buildings in the village of Flax Bourton, 7 on the main road (A370).
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*Q39. Are there any other transport issues or challenges that have been missed? How can they be addressed in the Local Plan?*

- There is insufficient assessment and feasibility studies of the funding and viability issues of delivering the full transport vision which goes to the heart of the soundness of the plan.
- The concerns raised by the potential operators of the MetroBus have not been addressed. We refer to the submission on behalf of Stagecoach West to the JSP consultation on the Transport Vision. This submission questions the decision making for the Strategic Development Locations and the deliverability of the Transport Vision. It urges the undertaking of feasibility studies, we quote directly

as follows; "we urge feasibility studies on all MetroBus corridors which clearly has not been done by North Somerset Council".

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- The transport mitigation in the plan does not deal with the sheer scale of the proposed housing development.