

## **Representations of Flax Bourton Parish Council to North Somerset Council Local Plan 2038 Preferred Options (Consultation Draft) April 2022**

### **Introduction**

We recognise NSC's difficulties in identifying preferred sites given the constraints of North Somerset. We support much of the aims and aspirations of the draft Local Plan particularly the promotion of public transport as an alternative to cars. As a small village located on one of the busiest commuter routes into Bristol and a popular sat nav route to avoid delays and closures on the M5, road congestion continues to be a daily problem. The draft Local Plan's concentration of preferred development in WSM, Banwell, Nailsea and Backwell (the West of the plan area) will bring increased traffic through Flax Bourton severely affecting the health and well-being of our residents. Unless alternatives to car commuting can be delivered and are sustainable combined with suitable mitigation measures through Flax Bourton, we cannot support the proposed preferred development sites and therefore the draft Local Plan. These comments apply to the specific responses in this consultation. Transport and retaining the Green Belt around Flax Bourton are the main concerns of our residents.

### **3. Strategic Policies**

**SP1 Sustainable development** – Whilst we agree overall with the objectives set out in the SA, we have no confidence that the way in which values for each objective were assigned to each area under consideration were consistent and no explanation was given as to how they were weighted. The authors themselves admitted there were many limitations to the assessment.

For example; the development of Backwell in relation to a reduction in car use was rated positively. This makes no logical sense.

The developments in Nailsea and Backwell would create an extra 3120 houses. The stage 3 transport assessment states that 84% of people travel to work by car, 3% by bus and 2% by train. Bus services are currently being reduced and train services appear to be at maximum capacity. Nailsea train station is unsuitable for anyone with mobility issues and the single lane under the railway precludes access by double decker buses travelling between Nailsea and Backwell. While improved links between Nailsea and Backwell would be welcome, the proposed "flyover" the rail line is un-costed and undeliverable.

There was an assumption in the SA of a "modal shift in transport" but no explanation was given of how this would be achieved and given the situation this seems unlikely. More likely would be a substantial increase in traffic on the A370, especially at rush hours. North Somerset Council should already be aware of the concerns of Flax Bourton residents with regards to the dangerous and difficult conditions for pedestrians within our village and of the Parish Council's attempts to ameliorate the situation.

As Flax Bourton has pinch points for traffic and already suffers significantly from congestion, the considerable increase in traffic which will arise means that we cannot support the levels of development proposed in Backwell and Nailsea.

### **SP3 Spatial Strategy**

We agree with draft policy SP3. We do not agree how this policy has been applied in the selection of development location LP3. Please see our comments at LP3. Also we are concerned at the lack of development sites in the North of the plan area away from the already overloaded A370 and A38.

The concentration of sites to the west depends on substantial infrastructure investment which has not been costed and will delay the delivery of housing within the plan period.

### **SP5 Towns**

We agree with the draft policy SP5 Towns.

We are, however, concerned that these stated principles are not being followed in the selection of preferred development sites around Nailsea. Following these principles, sites to the north of the town should be developed rather than those distant from the town centre to the southwest of Nailsea and in the east of Backwell. The development east of Backwell is dependent upon an un-costed and probably unaffordable crossing of the railway to connect areas south of the railway to Nailsea. Without this link the Bus Service Improvement Plan along the A370 is undeliverable. Developments to the north of Nailsea would require no infrastructure to give active travel and bus access to the town centre and Nailsea Station. There should be a proper assessment of the B3128 to provide additional Metrobus services from Bristol to Nailsea and Clevedon. This route does not suffer from the choke points that the A370 suffers, has capacity for more traffic and crucially does not need to cross the railway. The B3128 goes directly to the Long Ashton Park and Ride.

### **SP7 Green Belt**

We agree with draft policy SP7 except for the following concerns:

Given the enormous value of Green Belt land, we would urge that those locations closest to urban locations and Bristol contain high density housing rather than rural density and be constrained to areas close to the urban boundary.

We question why no Green Belt has been identified for development (other than a minimal amount) around the North of Nailsea, Portishead, Pill and Ham Green all of which are better located for urban services and proximity to transport (Portishead railway and a designated rapid bus service route) and employment in Bristol, Aztec West and at Portbury Docks. This is a distinct contrast to the use of grade one agricultural land in East Backwell which without an unaffordable road across the railway to link with Nailsea Station provides no locational benefits over development North of Nailsea and many other Green Belt locations. The lack of a Green Belt review in North Somerset to the North of the railway away from the flood plain but close to the M5, rapid bus routes, a new railway and close to Bristol, Portbury Docks and Aztec West employment areas seems to be a serious omission when considering the Spatial and Location Policies of the draft Plan.

We strongly challenge the inconsistent and subjective reassessment of the openness of the rural villages which has resulted in Flax Bourton being inset from the Green Belt. The assessment failed to mention Flax Bourton's immediate proximity to the Tyntesfield historic park and garden including the listed bathing pond which is within our Parish boundary, the many listed and ancient buildings and openness of the main village which directly impacts on the valley of the Tyntesfield Estate and has previously been vigorously protected by North Somerset Council. Comments concentrate on the Farleigh Green area which is set some distance from the main village. The assessment is inconsistent with the neighbouring villages of Barrow Gurney and Wraxall where such features were reasons to keep the villages washed over by Green Belt. Although deeply affected by busy roads cutting through other villages which remain washed over, it was assessed as a reason to inset Flax Bourton. This policy is not being consistently applied. By insetting Flax Bourton there is a break in the important arc of fully protected Green Belt from Barrow Gurney through to Portbury. Greater protection of the openness of Flax Bourton is required to ensure there is no further ribbon

development of urban sprawl from Bristol along the A370 corridor to beyond Backwell and Nailsea. At present the gaps between Flax Bourton and Long Ashton and Flax Bourton and Backwell are the last lines of defence preventing urban sprawl from Bristol into the centre of North Somerset.

### **SP10 Transport**

This Policy lists laudable principles. It does not, however, address the transport reality that North Somerset already struggles to cope with travel to and from Bristol for employment and major services without an additional 20,800 homes. There are serious infrastructure problems which must be addressed before a Bus Service Improvement Plan or an improved train service can be delivered to provide an alternative to car use.

It will not be until Stages 6&7 of the Transport Assessment that there will be detailed modelling of the impact of the proposed development sites and for a mitigation plan to be prepared. This information will not be available during the consultation process. We have considered the WECA Bus Services Improvement Plan which is the only completed plan for improved public bus services available for our consideration. This only contains limited mitigation measures at interchanges, bus stops and bus priority measures. There are no mitigation proposals for the already failing A370 except for a proposed road link from Nailsea Station to the A370 at the west end of Flax Bourton. Even if this road is technically feasible and can be funded, it will only deliver higher volumes of traffic from a wider area to an enormous road bottle neck at Flax Bourton where no mitigation measures can improve the restricted road. We have investigated available Bus Priority Measures but there are none relevant to a rural village setting.

We are disappointed to conclude from the limited transport evidence available for consultation that there is not a deliverable or sustainable public transport offering to shift transport along the A370 from cars to active travel and public transport.

The absence of completed Transport Assessments (only Stages 4&5 to date), a fully consulted Transport Plan to replace JLTP4 and only the bare bones of an Infrastructure Delivery Plan mean there is insufficient evidence in this consultation to test whether SP10 is deliverable or sustainable.

## **4 Locational Policies**

### **LP2 Yanley Lane**

Urban density of housing rather than rural density should be built in locations closer to the edge of Bristol.

### **LP3 Nailsea and Backwell**

The selection of Nailsea and Backwell does not comply with draft policy SP3 (see our SP3 response). Active travel will have limited use outside the immediate area and commuter traffic will continue and increase with the housing numbers at this location and additionally from WSM and Banwell due to the unavoidable truth that Bristol is the main employment area with over 23,000 residents working in Bristol of which 84% travel by car. The only realistic option is for rail or rapid bus transport. This further requires car or bus access to Nailsea Station which must become an effective Transport Hub. These options are not deliverable without increased train services and an improved road link for buses to travel rapidly to Bristol. The only proposal in the draft Local Plan is an un-costed and probably unaffordable road crossing of the railway which will then create greater quantities of traffic being delivered to Flax Bourton creating a bigger choke point on the A370. The

selection of LP3 has been made due to its proximity to Nailsea Station which requires significant infrastructure investment before it can become an effective Transport Hub.

Our local community wishes to use improved rail and bus services but the lack of transport assessments, particularly detail on required mitigation measures and infrastructure and the bare bones of an Infrastructure Delivery Plan, means the proposed development location will result in an unmitigable increase in congestion through Flax Bourton resulting in the deteriorating health and increased isolation of residents.

#### **LP8 Extent of the Green Belt**

We do not agree with draft policy LP8 in that it proposes that Flax Bourton be inset from the Green Belt. We strongly challenge the inconsistent and subjective reassessment of the openness of the rural villages which has resulted in Flax Bourton being inset from the Green Belt. The assessment failed to mention the immediate proximity to the Tyntesfield historic park and garden including the listed bathing pond which is within our Parish boundary, the many ancient buildings and openness of the main village which directly affects the valley of the Tyntesfield Estate and has been vigorously protected by North Somerset Council from development. Comments concentrate on the Farleigh Green area which is set some distance from the main village. Strangely also the surrounding and in several areas integrated agricultural land was ignored. The assessment is inconsistent with the neighbouring villages of Barrow Gurney and Wraxall where such features were reasons to keep the villages washed over by Green Belt. Although deeply affected by busy roads cutting through other villages which remain washed over, it was assessed as a reason to inset Flax Bourton. This policy is not being consistently applied. By in setting Flax Bourton there is a break in the important arc of fully protected Green Belt from Barrow Gurney through to Portbury. Greater protection of the openness of Flax Bourton is required to ensure there is no further ribbon development of urban sprawl from Bristol along the A370 corridor to beyond Backwell and Nailsea. At present the gaps between Flax Bourton and Long Ashton and Flax Bourton and Backwell are the last lines of defence preventing a complete breach of this first principle of Green Belt.

#### **LP10 Transport Infrastructure allocations and safeguarding**

This policy refers to infrastructure which has not been identified other than in very broad terms and refers to mitigations in JLTP4 which have still not been detailed and consulted upon. We can only conclude that the transport infrastructure and mitigation measures have not been properly identified, costed or feasibility tested.

### **5 Development Management Policies**

#### **DP13 Highway safety, traffic and provision of infrastructure associated with development**

We support Policy DP13. Surely this policy should have been more fully considered in the preparation of this Draft Local Plan before development locations were identified.