



### Wraxall and Failand Parish Council's comments on the Joint Spatial Plan. 9.1.18

1. W&F PC is concerned that the economic growth forecast from which the housing numbers are derived is highly optimistic, given that there has been little economic growth since the referendum on leaving the European Union and the latest forecasts predict minimal growth. It is suggested that a more realistic approach is needed, ie there should be an 85% confidence in the economic growth forecast being achieved. This would reduce the housing number requirement for the JSP and allow growth to be planned in more sustainable locations.
2. The JSP proposes housing development in Nailsea, Backwell, Banwell and Churchill, in addition to further housing at Weston. The former can be considered to be 'dormitory' developments resulting in increased commuting to Bristol. New transport corridors (roads and MetroBus links) are proposed to take the additional commuter traffic, feeding into the Cumberland Basin road network that is already at capacity. The JSP does not propose improvements to this critical river crossing. W&F PC considers this to be fundamentally the wrong approach. Homes should be built close to the areas of significant employment. Bristol University is proposing a significant new campus close to Temple Meads. The proposal for housing at Ashton Vale is considerably more sustainable than the developments that the JSP proposes, as the basis for road, cycling and MetroBus networks is already in place.
3. Notwithstanding, W&F PC supports the protection of the Green Belt, and priority for building on 'brown field' sites before development around rural towns and villages in North Somerset.
4. The area to the north and east of Nailsea, which incorporates much of our parish, being an attractive section of the Green Belt and includes the Tyntesfield estate, is an essential divide between the Bristol conurbation and the outlying townships.
5. Nailsea Town Council has rejected the proposal to build 2,575 new homes in an urban extension to the south west of Nailsea by 2036 and a further 725 homes beyond then. As an alternative they have requested a review of the Green Belt to enable their suggestion of a wrapping development and link road around the existing settlement boundary on the land to the north and east of Nailsea, but which is in the parish of Wraxall (our parish).
6. W&F PC strongly opposes the removal of land to the north and east of Nailsea from the Green Belt and the suggested development of a link road around the existing settlement boundary on the land to the north and east of Nailsea, for the following reasons:
  - a. Exceptional circumstances do not exist to warrant a review of this Green Belt.
  - b. The Green Belt Assessment in the Joint Spatial Plan (JSP) shows the land as 'contributing'. So not only is it Green Belt, but it is in roughly the top 20% of significant Green Belt.

- c. It is a sensitive landscape and we support NSC's view as stated in the JSP supplementary documents that the expansion of Nailsea into it should be avoided. The Green Belt acts to safeguard the countryside from encroachment. The site acts as a clear distinction between town and country.
  - d. The land is low lying and flood risk affects part of it, while other parts abut the flood plain. Heavy rain causes the river to swell and for floodwater to settle on the land. (See photos at Appendix 1 taken on 22 November 2016). With climate change accelerating we can expect flood zones to increase in size.
  - e. Development will increase run off into the river and increase flooding. Increased run off into the river is likely to cause pollution that will affect the trout farm at Jacklands and the SSSI on the other side of the B3130 at Tickenham that is fed by the river.
  - f. W&F PC believe that any development that increases the flood risk would not be sustainable development.
  - g. Any development would add an extra burden onto the B3130, B3128 and Wraxall Hill. The detrimental impact on the rural road network is addressed at para 7. We believe that residents on this proposed development would mainly commute into Bristol rather than work in Nailsea.
  - h. The land is archeologically sensitive, with Roman and medieval archeology existing.
  - i. An oil pipeline travels through the land.
  - j. The land is a green corridor for wild life and a wild life habitat.
7. Given that economic development and employment for the northern and eastern part of North Somerset is likely to be in or around Bristol, then it is considered that this is not given sufficient weight in the sustainability aspect of appraisal for Nailsea. The assumption that there will be a significant increase in the use of public transport is considered to be highly optimistic, noting that local rail services already have a greater than 85% load factor and the long distance rail services have a greater than 100% load factor (JTS Figure 11-1) and that new and improved Metrobus services are deemed necessary.
  8. Our concern is that there has not been sufficient analysis of the impact on the rural road network, as commuters may not find that public transport will be a timely and cost effective option for their place of work, and motorists will not be constrained to use the main road network. In view of the proposed housing development to the west of Nailsea and Backwell, there will be an increase in the amount of vehicles which may see the existing routes to Bristol, B3130 and B3128, to be more suitable to them. It is considered that there is a greater need for appropriate speed limits and traffic signals on those routes.
  9. There is an assumption that the transport infrastructure should be in place before housing development starts in 2025 (para 7 of the Nailsea assessment and associated table). This is considered vital.
  10. It is welcomed that the JTS recognises that:
    - a. the Stone-edge Batch (B3128 / B3130) junction is a pinch point
    - b. the impact of traffic to the north of Nailsea (eg using roads through Portbury) will need to be addressed.
  11. It is requested that consideration be given to:
    - a. constructing a roundabout at the junction of B3128 with Portbury Lane, as this is heavily used by commuters and visitors (using satnavs) to the National Trust at Tyntesfield and as a secondary route to Bristol Airport.

- b. increased traffic through Wraxall village associated with any new development around Nailsea.
  - c. supporting the introduction of Quiet Lanes to the small narrow minor roads around Failand to discourage their use as 'rat runs'.
12. W&F PC are concerned about the visual and environmental impact that any multi-modal corridor improvement proposed between Nailsea and Bristol, particularly a highway or MetroBus route, will have on the historic landscape, including that associated with Tyntesfield, Birdcombe Court, Wraxall Court, Belmont House and the Bathing Ponds near the Land Yeo. A Site of Nature Conservation Interest is near the Bathing Ponds.
  13. Land to the west and south of our parish is in the valley of the Land Yeo, where surface water and flood zones are very significant. Furthermore, the noise pollution would be amplified by the topography of the valley to the detriment of residents in this and neighbouring parishes. This transport corridor could affect agricultural use and the movement of wildlife.
  14. Taking all these factors into consideration, it is likely that the engineering solutions and construction associated with any transport corridor in this area would be complex and costly.
  15. Given the lack of detail, W&F PC wishes to raise a holding objection. It is requested that if the Planning Inspector wishes to consider any development to the north and east of Nailsea and new transport infrastructure in the Nailsea to Bristol corridor during the examination of the JSP, then W&F PC be represented and have the opportunity to submit an addendum to these comments to make our case in more detail, given the short time-scale to submit comments over a holiday period.

See appendix 1

Appendix 1





