

## Wraxall and Failand Parish Council Response to The West of England Joint Spatial Plan 2036 (JSP) - Technical Evidence Consultation, November 2018

1. Wraxall and Failand Parish Council (W&FPC) refers to submissions it made in January 2018 to the initial consultation on the JSP in which the main concerns highlighted were :
  - economic growth was unrealistic and has driven up the housing numbers in the Strategic Development Locations (SDL), and
  - the SDLs in North Somerset are not sustainable.
2. The Emerging Findings Transport Report WED 008 identifies proposed highway improvements and infrastructure for Nailsea and Backwell, at packages 1 – 4, designed to mitigate the development of the SDL in Nailsea. The total of these packages are estimated to cost £168m. However, it is unclear as to how this will be delivered in terms of precise location, route or technical detail. This is of concern, particularly as the JSP identifies that infrastructure is fundamental to mitigating the impact of the SDL in Nailsea.
3. It is recognised that transport infrastructure changes and mitigation would be necessary to deliver the proposed SDL in Nailsea . However it is considered that the proposals in Packages 1 – 4 referred to above do not deliver a fully integrated and viable transport solution. They do not address the fundamental traffic infrastructure problems to properly serve the SDL. The measures proposed seem to mainly move the problem around at certain pinch points. As such the proposed SDL in Nailsea is unsustainable.
4. The proposals do not adequately address:
  - the important issues of traffic congestion across the Cumberland Basin.
  - the issue of traffic associated with Bristol Airport.
  - how funding will be achieved to allow transport infrastructure to be in place before significant development.
  - the impact of the removal of bridge tolls on the Severn crossings in December 2018 (those using Bristol airport from South Wales already use the rural road network, including Portbury Lane, B3128 and B3130 through Wraxall and Failand).
  - the introduction of Quiet Lanes to small narrow minor roads to discourage their use as “rat runs” and support their use for “active modes of travel”.
5. The assumption that there will be a significant increase in the use of public transport is considered to be highly optimistic. There is no study or report from Railtrack or any train operating companies about capacity and improvements capable at Nailsea and Backwell station to serve the SDL. There have been concerns raised by potential operators of MetroBus about the SDL and the lack of feasibility studies on all MetroBus corridors.

**Comment [AL1]:** David – do we want to mention this bullet point ? I think we said remove it elsewhere so probable remove here too.

**Comment [AL2]:** Not sure this is relevant to the JSP – what do you think ?

6. It is of concern 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.
7. If the SDL in Nailsea, which rely on the A370, B3130, B3128 and Portbury Lane for commuting, are approved then further mitigations to the road network need to be considered to reflect local detail.
8. There is an assumption that the transport infrastructure should be in place before housing development starts. This is considered vital. However, it is clear from WED007 that packages 1-4 referred to above, that are designed to mitigate the SDL in Nailsea, will not be completed when all the houses are developed. This is concerning as it will result in significant additional pressure on the rural road network, already identified in WED007 as having inadequate capacity to support such development and currently of poor standard in areas, particularly on minor roads through Nailsea and Backwell, as well as in Wraxall and Failand.
9. It is understood that the modelling described in the JSP Transport Topic Paper 8 (TTP8) update has not been validated using the current traffic flows on the South Bristol Link (SBL) and at the A370 roundabout.
10. The current traffic flows on the SBL are far greater than predicted, particularly during peak commuting times. This raises questions on the rationale and sustainability of the SDL which rely on the A370 to a greater or lesser extent.
11. It is difficult to see the improvements to traffic flow that the mitigation measures bring for the SDL in Nailsea when comparing figures 3.6 and 4.4 of TTP8 and that furthermore, these do not appear to be quantified elsewhere in the document.
12. The model currently does not have the detail to consider the impact of road narrowing, such as through Wraxall village on the B3130.
13. W&FPC believe that there is a significant risk of insufficient funding to deliver a transport infrastructure, especially if reliance is placed on central government. WED007 estimates the cost of delivering the transport infrastructure of up to £2billion and that that is an ambitious programme. However, it is understood that the draft Joint Transport Local Plan 4 (JLTP4,) to be consulted on in January 2019, estimates costs of £8.9 billion. The figures are significantly different which is of concern. Why is JLTP4 not being consulted on at the same time as the JSP as they are clearly linked ?
14. SD16C Transport Topic Paper dated November 2016 (SDL16C) recognised that :
  - *“locating development beyond the Green Belt results in large volumes of travel on sub-regional corridors, with poor travel choices in many cases. The road network has a number of capacity constraints, causing serious congestion problems at a number of locations. ... The mitigation package is estimated to cost around £2.0 billion, and the mitigation package cannot fully address the journey time impact of the developments ...”* (page 55)

- *“many of the areas located beyond the Green Belt have relatively poor travel choices and therefore pose challenges in improving travel choices and mitigation of their impacts: .. Parts of Nailsea are isolated, with poor travel choices and poor road connectivity: this would require new MetroBus connections and improved road links – it will be challenging to provide new infrastructure to cross the railway, serve the housing sites in this area and relieve congestion on the A370”.*

These points are of concern as it is not apparent from the latest technical evidence that they have been resolved.

15. One conclusion in SDL16C is *“it was previously shown that areas closer to the urban area are, in general, easier to serve with good quality public transport options. This was confirmed in the testing for most of the strategic locations considered in the testing for Test 4 and the Sensitivity Test: .. The South West Urban Extension is close to central Bristol and can be easily served by MetroBus – this would also enhance the business case for a MetroBus or other rapid transit extension to the Airport”*

W&FPC consider this a good reason to site development at this location instead of the proposed SDL in Nailsea where transport infrastructure costs will be very high and will not adequately deal with resulting road congestion on the B3130, B3128 , A370 , Portbury Lane and rural roads through the villages of Wraxall, Failand and Lower Failand.

16. Bristol Airport has recently submitted a planning application. The JSP does not reflect the prospective growth of the airport and the impact this will have on the road network. There are already a significant number of passengers from South Wales and this will increase with airport expansion, putting pressure on the rural road network.
17. W&FPC may wish to make further comments once JLTP4 has been released for consultation.
18. W&FPC request the opportunity to attend and be represented at any hearings during the examination process of the JSP.