

# Wraxall & Failand Parish Council Response to North Somerset Council's Local Plan 2036 Issue and Options Document

Wraxall & Failand Parish Council (W&FPC) has comments on the following questions.

- Q3. It is considered that the published feedback from the Nailsea Urban Extension Workshop held on 20 November 2018 reflected differing views on the challenges and issues.

The Strategic Development Location to the south west of Nailsea (SDL-N) can be considered to be a 'dormitory' development 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 West of England Joint Spatial Plan (JSP) does not propose improvements to this critical river crossing. A development within the SDL-N will result in commuters adding congestion to the rural road network. A sustainable and deliverable transport infrastructure solution has not been proposed. W&FPC considers this to be fundamentally the wrong approach.

Homes should be built close to the areas of significant employment and transport infrastructure. The proposal for housing inside the South Bristol Link (SBL) is considerably more sustainable than the developments proposed by the JSP, as the basis for road, cycling and MetroBus networks is already in place.

Nailsea Town Council's (NTC) Vision, as an alternative to the SDL-N, to expand radially and construct a link road on the land to the north and east of Nailsea in Valley of the Land Yeo (VLY) is strongly opposed by W&F PC. Development and new roads in this area are significantly constrained by flood zones and surface water and will have a detrimental impact on ecology, wildlife and archaeology. W&F PC's views on local Green Belt amendments are addressed under the response to Q5.

- Q5. The key issues in this section are agreed. The Core Strategy and its supporting policies have served the communities within the Green Belt well and W&F PC believes that there is no need to change them.

W&F PC strongly opposes the removal of land to the north and east of Nailsea from the Green Belt for the following reasons:

- Exceptional circumstances do not exist to warrant a review of this Green Belt.
- The Green Belt Assessment in the 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.
- It is a sensitive landscape and we support North Somerset Council'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.
- 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. With climate change accelerating we can expect flood zones to increase in size.
- 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 local businesses such as the trout farm at Jacklands and the SSSI on the other side of the B3130 at Tickenham that is fed by the river.
- W&F PC believes that any development that increases the flood risk would not be sustainable development.
- Any development would add an extra burden onto the B3130, B3128 and Wraxall Hill. The detrimental impact on the rural road network is addressed further within this response. We

believe that residents on this proposed development would mainly commute into Bristol rather than work in Nailsea.

- The land is archeologically sensitive, with Roman and medieval archaeology existing.
- An oil pipeline travels through the land.
- The land is a green corridor for wildlife and a wildlife habitat.

W&F PC supports the views expressed in the Parish Council's Airport Association submission against further expansion of Bristol Airport.

W&F PC believes that development in the land parcels in the Green Belt now contained by the SBL is a more sustainable approach, as this will reduce commuting distances and the impact on an already stretched transport network, given that economic development and employment for the northern and eastern part of North Somerset is likely to be in or around Bristol.

- Q8. Whilst many residents in the villages of Wraxall and Failand can easily access services and facilities through private transport, there are residents that rely on the local bus service, particularly the elderly who are less able and those in social housing in the village of Wraxall. Thus Options 2 and 3 would disadvantage those residents. Our preference is to retain the policies in The Core Strategy and its supporting documents that have served our communities well.
- Q9. Wraxall and Lower Failand are the result of disparate ribbon development but have a strong rural character and it would be difficult to draw settlement boundaries that would be readily accepted by residents. The rural character of these areas should be conserved and remain as "Countryside". Failand has been to some extent overdeveloped, such that the only facilities, the Post Office and Village Hall, are at the NE edge of the community, with residents strongly opposed to any expansion of the settlement. Neither Wraxall nor Failand can be classified as "Service Villages". As stated in our response to Q8, W&F PC's preference is to retain the policies in the Core Strategy and its supporting documents that have served our communities well.
- Q23. The underlying concept appears to be provision of some employment but reliance on good commuting links to Bristol and Weston-super-Mare; this conflicts with the good sustainability principles for housing to be near employment. Hence, it is considered that there is little merit in high density housing near the railway station; flood zones and surface water also constrain development in this area. Whilst improvements in public transport are to be welcomed, the journey times to work places are unlikely to be short. It is considered that commuters are likely to opt for private transport with new development leading to additional traffic on the already stretched local road network.
- The measures shown in Plan A do not address fundamental traffic infrastructure problems to properly serve the SDL-N. The measures proposed seem to merely move the problem around at certain pinch points. See also our response to Q39.
- Q24. W&F PC recommends the protection of the recreational green space north of the Elms and sensitive landscape of the VLY to set a clear distinction between town and countryside. The land is often flooded and land to the north of the Elms estate and south of the Land Yeo already incorporates a water storage area.

NTC's Vision to expand radially and construct a link road in the VLY is strongly opposed by W&F PC. Development and new roads in this area are significantly constrained by flood zones and surface water. Development in this area will have a detrimental impact on ecology, wildlife and archaeology. W&F PC's views on local Green Belt amendments are addressed under the response to Q5.

It is considered that NTC's Vision for the VLY would be no more of a job creator than that anticipated in the SDL-N. NTC states in its response to the Issues and Options Document that development to the north (i.e. in the VLY) will open up the existing commercial sites/employment sites for further development and lead to the creation of jobs, which no other proposed scenario achieves. WFPC strongly disagree with this as the JSP proposes 10.5 ha of employment land as part of the SDL-N, as opposed to approximately 2 ha anticipated by NTC's Vision.

Part of NTC's Vision for development on the VLY is that commuting traffic should be funnelled to the B3128, in order to avoid the B3130 and A370, for access to in and around Bristol. Whilst this may seek to limit congestion on those roads it merely moves the problem to the village of Failand and then ultimately on to either the A370 or the B3129 and potentially Clifton Suspension Bridge.

The number of houses that could be developed on the VLY as part of NTC's Vision would not be sufficient to meet the housing numbers proposed by the JSP.

It is considered naive to assume that people living in any development on the VLY as proposed by NTC's Vision would not drive to access shops within and beyond Nailsea. Despite its proximity to Nailsea town centre it is still too far for people to walk with bags of the weekly shop and so shoppers would still get in their cars. It is considered that Nailsea town centre has very little scope to accommodate a further demand on its limited parking facilities

Q27. The advantages and disadvantages for the options have been clearly expressed and are agreed.

The following comments from the published feedback from the Nailsea Urban Extension Workshop held on 20 November 2018 are agreed:

- That there will be a genuine mix of housing types and tenures including more affordable homes for young people and young families.
- The Elms has a mix of housing styles, has social housing and play areas – good example of mix of housing types and tenures.
- Need to have different developers so there is a diversity of design.
- It is important to have green space that is easy to access. A main attraction of North Somerset is the ease of access to beautiful countryside.
- Fear that the new development would create 'urban sprawl' which would make access to the countryside more difficult.
- Need a local centre/central community meeting space in new development as a focal point; this should be built at the beginning.

It is recommended that consideration should be given to the examples of greenfield developments shortlisted for RIBA awards with appropriate facilities. For these reasons Option 4 is preferred.

Q38. W&F PC supports the views expressed in the Parish Councils' Airport Association response to WoE Transport Topic Paper 8 update dated November 2018 against further expansion of Bristol Airport and wishes any development of and around the airport to be under tight control. For this reason Option 1 is strongly supported.

Q39. It is recognised that transport infrastructure changes and mitigation would be necessary to deliver the proposed SDL-N but it is considered that the proposals do not deliver a fully integrated and viable transport solution and as such the proposed SDL-N are unsustainable.

The proposals do not adequately address:

- the important issues of traffic congestion across the Cumberland Basin
- the issue of traffic associated with Bristol Airport (It is understood that a mass transit proposal was discounted in previous studies as being too expensive).
- 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 B3128 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”.

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.

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.

If the SDL-N, 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.

We will be responding in more detail in the JSP consultation process but we comment here that there is concern that the modelling described in the JSP Transport Topic Paper 8 (TTP8) update has not been validated using the current traffic flows on the SBL and at the A370 roundabout. 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.. It is difficult to see the improvements to traffic flow that the mitigation measures bring when comparing figures 3.6 and 4.4 of TTP8.

- Q42. W & F PC consider that a relaxation on assessing whether the size of an extension is proportionate in a “Woodland Neighbourhood” is appropriate, provided the development remains under tight control, so not to conflict with erosion of the Green Belt and the Landscape Characterisation. Trees should only be removed or their growth impaired in exceptional circumstances. If the development can be seen from the highway or PRoW, then the proportionality and choice of materials should be a consideration. If an extension is likely to increase the number of highway movements to and from the property on a road with a speed limit greater than 40 mph, then the creation of adequate visibility splays may detract from the rural nature of the road.
- Q44. Yes but only if Building Regulations are not sufficiently robust.
- Q45. Yes, particularly for incorporating solar PV in the construction of the buildings and for social and affordable housing
- Q46. No

- Q47. No, it is better to have an incentive rather than a punitive measure that has little impact on Climate Change.
- Q48. W&F PC support the suggested approach.
- Q49. W&F PC would be supportive of this approach.
- Q50. The re-use of isolated rural buildings in the countryside should be encouraged for rural and agricultural workers, provided that they are no longer suitable for agricultural use. If buildings are being used for a holiday accommodation, then they are brought to the standards required for residential use as a Condition for change of use.
- Q51. W&F PC is opposed to permitted development rights being used for non-hydraulic fracturing shale gas exploration development ("exploration for fracking") .
- Q53. In all Strategic Development Locations it is considered important to address the need for mitigation to ensure surface water is effectively managed and the wider ecological impacts. A Natural Capital approach to parks and gardens is acceptable but it may be difficult to apply this to lightly managed green space. However, removal of land from the Green Belt with natural wildlife habitats, particularly in sensitive ecological areas, to enable development, such as to satisfy NTC's Vision, is not coherent. See responses to Q3, Q5 and Q24.