

Wraxall & Failand Parish Council's consultation response on the Site Allocations Plan 2016

We welcome the fact that the Site Allocations Plan does not place any development within our parish of Wraxall but are concerned about the proposed expansion of Nailsea and its detrimental impact on the rural transport infrastructure.

We consider that the rural road network does not have the capacity, particularly during commuting times, to support growth away from the motorway or from the cities. The B3130, B3128 and Wraxall Hill are all very busy commuter routes linking to Bristol and the M5. The B3128 junctions with the B3130 at Stone Edge Batch and with Portbury Lane are also significant at peak times with traffic queues. Our concern is that infrastructure is likely to follow development, which will only compound the existing issues.

We note with concern that during the consultation process Land Value Alliances (LVA) proposed that land to the north east of Nailsea, which lies within Green Belt and within our parish of Wraxall, should be included as a residential/mixed use allocation. We are supportive of North Somerset Council's (NSC) rejection of this proposal in that exceptional circumstances do not exist to warrant a review of this Green Belt.

We consider that this Green Belt land is unsuitable for residential/mixed use allocation and would make the following comments:

- 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.
- 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 and prevent the merger of Nailsea and Wraxall. The site is a visual open separation between urban areas and 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. LVA's proposal is for development to extend to the edge of the Land Yeo. 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.

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.

LVA state “There is no compelling need to retain this land as Green Belt or keep it permanently open. Development of the site would also be consistent with promoting sustainable patterns of development.”

We strongly disagree with LVA’s statement as we believe that any development that increases the flood risk would not be sustainable development.

- Any development as proposed by LVA would add an extra burden onto the B3130, B3128 and Wraxall Hill. We refer to our comments above with regard to the detrimental impact on the rural road network. 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 archeology existing.
- An oil pipeline travels through the land.
- The land is a green corridor for wild life and a wild life habitat.

We have received a number of comments from concerned residents in Nailsea and Wraxall and we attach these for your attention at Appendix 2.

We note the work done to support the JSP in the supplementary documents in the ‘*Sustainability Appraisal*’ and the ‘*Location Dashboards*’ components of ‘*Towards the Emerging Spatial Strategy*’ for the town expansion of Nailsea. We are concerned about development in the other areas to the north and east of Nailsea within our parish. We consider that many of the above reasons for opposing the LVA development proposal apply and that this is partially recognised in the Dashboard for expansion of Nailsea.

We are aware of Nailsea Town Council meeting with the planning team and if options for development in our parish are being considered then we wish to be consulted.

Comments received by the Parish Council from local residents (cut and pasted without editing)

The green belt, which is at risk, serves five important purposes:

- to check the unrestricted sprawl of large built-up areas,
- to prevent neighbouring towns merging into one another,
- to assist in safeguarding the countryside from encroachment by providing a buffer zone,
- to preserve the setting and special character of historic towns,

- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land (brownfield sites).

There is a need to preserve the greenbelt as a buffer between the village of Wraxall and the town of Nailsea, thus preserving the special character of the village and preventing merger of the two. Land north of Greenfield Crescent is used as a sports field by many local groups and is the site of an air/army cadet building and the surrounding open country is used as part of the training experience for these groups. The existing open fields, traversed by footpaths, provide free amenity to walkers, dog owners, children, ramblers clubs and runners at a time when the nation is been encouraged to get outside and exercise. The footpaths are used by folk of all ages and local scout/guide groups as well as groups of school children under teacher supervision are learning to appreciate the countryside. Jacklands Trout Farm, a small local business working sympathetically with wildlife, not only teaches people of all ages to fish but provides them with the chance to engage with habitat, learn about diversity of nature and take part in pond dipping activities which are particularly beneficial for small children. The business welcomes local school groups, disabled and disadvantaged children and adults. The business acts as a valuable educational resource, as well a small commercial business. The adjacent lake(s) habitat provides rich wildlife resources for barn and tawny owls, herons, cormorants, kingfishers, voles, newts, swifts and swallows. Bats, ducks, hawks, buzzards, moorhens and other wetlands birds all appreciate this rich natural wetland habitat which would be threatened by encroachment of housing and commercial businesses and the associated transport links.

The wildlife corridor between Wraxall and Tickenham Moors is a buffer to the edge of Towerhouse Wood preserving rich habitat and a natural food chain for wildlife. The suggestion of a transport link from Clevedon Road to Wraxall, avoiding Nailsea traffic lights, is unworkable because the traffic pinch points are at Stone Edge Batch and within Wraxall village. This is further compounded by the low rail bridge at Backwell. Any link road to the north of Greenfield Crescent / Woodlands would not alleviate traffic congestion but merely add to the existing strain due to the inadequate infrastructure of the surrounding roads. The capacity for commercial/light industrial business premises already exists within the local area as there are many vacant offices, retail and commercial premises.. There is no suggestion that there is a need for further commercial, residential or retail facilities on an existing greenfield site when there is a vast opportunity to redevelop existing brownfield areas to provide the necessary capacity of business and residential accommodation.

Whilst the development of greenfield sites may be a better opportunity for developers and the council, i.e. rich pickings, this is not necessarily the best solution for the local community.

A better option would be for some of the greenbelt north of the Greenfields Crescent / Woodlands area to be planted with trees to enhance the habitat and reduce water run-off whilst redeveloping existing underutilised brownfield sites in the local area. This opportunity does not appear to be included within

any wide consultation involving local inhabitants as decisions appear to be made by Nailsea Council in closed sessions regarding Wraxhall land.

The key points that seem to have been overlooked are as follows:

- increasing noise level and disruption to existing established residences,
- increasing light spill and disruption to existing established residences and wildlife,
- degradation of diversity of local flora and fauna and ecosystem,
- inability of the transport and road infrastructure to accommodate additional traffic volumes,
- a lack of a traffic impact assessment,
- a lack of environmental impact assessment,
- a lack of an ecology assessment,
- the complete omission to understand the impact of the resulting increased flood risk to existing residences and business properties within the Nailsea, Tickenham and Clevedon flood risk zones.

development of land to the north of Nailsea:

To build on land north of Nailsea, in the valley of the Land Yeo, is wholly inappropriate:- The land has issues with drainage and frequently floods. This will worsen with climate change.

The potential for a road through this development site to encourage traffic to bypass the town centre has economic implications. Such a road would also potentially increase the volume of traffic passing Wraxall school, where North Somerset council already refuse to fund a crossing patrol, as traffic may opt for this route from Clevedon to Bristol rather than to follow the B3128.

The location north of Nailsea does not facilitate the use of the rail network for commuters, as they would need to drive to the station where parking is difficult and an expense. To use land nearer to the station would make far more sense in this respect.

Although this land is in the parish of Wraxall, the impact would be far more keenly felt by Nailsea residents.

This land is green belt. There are no exceptional circumstances to warrant its use and it is a stated priority that green belt land should only be considered for development in exceptional circumstances.

It is home to many species of wildlife, some rare eg. kingfishers.

It is a Mesolithic site

As a resident of Nailsea I do not believe that major development in any greenfield site around the town is either desirable or sustainable.

I fully support North Somerset Council's decision not to review the Greenbelt around Nailsea.

Nailsea Town Council's policy to press for realignment of the Greenbelt, to permit development of the land North of Nailsea between the settlement boundary and the Land Yeo, was made with no consultation. There are many members of the community who value the land highly for its landscape and ecological value and their views were not taken into account. The area is of huge benefit to the health and well being of those who walk there, or visit

Jacklands Fishing Lakes nearby, and enjoy the unspoilt natural beauty of the valley on a regular basis. The business at the fishing lakes would be severely affected by development there.

I am aware that Land Value Associates made a representation in response to the Site Allocations Plan March 2016 proposing the land North of Nailsea as a suitable site for development, quoting Nailsea Town Council's stated policy in support of their proposal. The existing road network is already under pressure. Traffic from the 600 dwellings proposed by Land Value Associates in their concept plan would exacerbate problems already experienced on the B3130 at Tickenham and Wraxall. The northern bypass, which Nailsea Town Council aspires to, would do nothing to reduce local congestion, and would certainly not compensate for the extra traffic generated by such a development.

Finally, although this area is not in the flood plain, development would lead to increasing runoff into the Land Yeo. This would be likely to cause problems with diffuse pollution in the SSSI downstream and exacerbate flooding in other areas.

I am very concerned that there is insufficient road improvements as the B3130 is already a busy B road especially during commuter times and from tower house lane it is often difficult to turn right into Nailsea. A further 600 houses would dramatically increase the traffic flow and I cannot see that this has been adequately considered.

Also Tower house lane itself, as you will know from others previous complaints, is already well used as a cut through from the Failand road when wraxall hill is busy. given the single track nature of tower house lane the current traffic increase is already dangerous.

The farm on tower house also has an entrance onto the B3130 which would be very close to the new development exit and again this already causes some problems and the additional traffic would make this even more dangerous.

Living at the bottom of townhouse lane I must notice at least one accident a month on the b3130 tower house lane entry (The lay-by is well used and tower house lane is too often used as a short cut.) The police are frequently called to this and similarly accidents at the top of wraxall hill onto the failand road and both of these black spots will see significant increase in traffic from this development.

In summary I can accept the need to affordable housing to be built nearby but I'm VERY concerned that the road infrastructure which is already challenging will be stretched dangerously far.

I wish to object to the proposal by LVA to develop land north east of Nailsea in the Parish of Wraxall and Failand.

1) The site is a flood plain due to its proximity to the Land Yeo, as evidenced by the attached photos taken this November.

2) The land is in the Green Belt which acts as a buffer preventing Nailsea Town sprawling into the ancient village of Wraxall.

3) The proposed 600 houses (double the size of The Elms in Wraxall) cannot be supported by local employment.

This could mean 1000+ cars commuting to Bristol and WSM further clogging up an already very busy country road, the B3130.

4) Putting a Nailsea by-pass through the middle of the proposed estate is crass.

Also any link from the M5 has to avoid

the narrow and dangerous bottle-neck on the hill between Jacklands Trout Farm and the T junction of the B3130 and B3128

I note NSC have stated they are committed to retaining this land as Green Belt which I welcome.

I have serious concerns about the proposals for the NE side of Nailsea. I also object to the fact that Wraxall Parish Council are proposing sites for new build on parts of "their" land that will have little impact on people who live in their parish. On the contrary, this will impact almost entirely on Nailsea residents. Presumably, this was also the case for the relatively recent new build in the Elm Lodge area of Nailsea (technically Wraxall) to the east of the town. Finally, we have had virtually no warning of these developments from Nailsea Town Council - it has for some reason, slipped under the radar from their point of view. We have gleaned more knowledge from friends living in the Wraxall area. Even our local Town Council rep had not heard of these proposals when asked. Building the proposed number of homes to the NE side of Nailsea involves ripping up our Greenbelt protection which is there for a reason. There are not many locations around Nailsea with the beauty and tranquility of the Yeo Valley, leading to Tower House Woods. By the same token, there are locations that are available for building that are not Greenbelt (e.g. to the South and South West). The argument that it is important to keep Nailsea separate from Backwell is spurious. Why is this so important? The two locations are virtually cheek by jowl as it stands. Nailsea-Backwell station is a very important communication link for local commuters therefore it makes sense to locate new homes close by, preferably within walking distance. New homes to the NE of Nailsea would require train commuters to drive their cars and park at the station, which is already full-up. The effect would be that commuters would take to their cars for the total journey and add to ever increasing congestion in Bristol and elsewhere. A further point is that extra building costs are involved in the NE Nailsea location due to drainage issues, as anyone who walks the footpaths will testify.

I am very disappointed that people of nailsea have not been informed of any of these details. It is a great concern to many of the residents who live in greenfield crescent nailsea as this is the land which is directly behind our houses. It would be very much appreciated if you could inform us of any intentions that you are planning for this land . It is prone to flooding and is green belt land, also there would be a great impact on the wild life that live around here and a great big disturbance in the country side, if you could let

us have more information please as we feel that you have been underhanded as this was only found on Wraxall and failand council

I wish to register my objection to this proposed development as it is totally unwarranted or needed.

This land is already GREENBELT and unsuitable for development. The land is a haven for wildlife and is also a flood plane, the fields also make for excellent walks for all.

This development is a very poor attempt at land grabbing by the backdoor by what can only be described as a bunch of Donald trump apprentices.

I would object strongly to any development beyond the existing northern edge of Nailsea. According to the JSP itself there are issues with flooding, Green Belt erosion and archaeological sites among other factors

Although I understand that the Planning Inspectorate are demanding that local councils throughout the country, supply more housing over the next 5 years, I trust that NSC continue to reject this development proposal by LVA, on the basis that the site lies within the Green Belt and that exceptional circumstances do not exist to warrant a review of the Green Belt in this area of Nailsea and I support NSC in this decision. This was stated in the national Planning Policy Framework published 2012:

“Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan”.

The Proposal

It is hard to make any rational observation on the ‘Concept Masterplan’ that was first drawn up by Thrive Architects on 4th November 2014. Such drawings alone can be misleading. It is just a feasibility study, with twenty-one brown coloured blocks that indicate residential development. At this stage, there are no details, elevations, or any other indication of design, but it is clearly going to consist of a mixture of affordable housing, flats and terraced houses. This has been confirmed by the architects. The figure of 600 homes has been calculated from the ‘Net Residential Area’ of 19.75 hectares, at a building ratio of 30 houses per hectare. The implication of this is high density mixed accommodation, comprising social housing and private residential, instead of the traditional properties with gardens that border this site. Such development would not only look out of proportion to the scale of the current homes and gardens in the adjacent Southfield Road, it would also be aesthetically inappropriate for this ‘green belt’ area bordering Nailsea.

I notice on the LVA’s planned proposal that a small amount of Public Open Spaces have been allocated within the proposed development. These would only serve the residents of this development, especially if some properties do not have gardens and would be inadequate, compared to the valuable natural habitat we enjoy now, which cannot be replaced by planned public spaces.

If this land is taken out of the green belt, it will be the beginning of a decline in our semi-rural local environment. The idea of Green Belt was created to protect areas from too much urban development taking place.

It appears that (LVA) are seizing the opportunity presenting itself, regarding the demands of the Planning Inspectorate and hoping their proposal will go 'under the radar', in the knowledge that NSC are struggling to meet the 5 year housing supply demand, and might give in, if put under pressure.

Infrastructure

The local highway infrastructure surely cannot sustain such development? The B3130 to the west is already a 'bottle neck', with cars and heavy lorries unable to pass easily through on Clevedon Road before the junction with Tickenham Hill. Tower House Lane is already used as a cut-through and is too narrow for cars travelling fast, which they frequently do. It is no longer enjoyable or safe to walk along the lane because of this. At the other end of the site, to the east, the B3130 from Bristol meets Budgens and the GE Oil and Gas roundabout, which is already under pressure from traffic. The existing road system is already suffering from an increase in population. If this development goes ahead, commuter traffic and pollution will increase in intensity.

Environment

Many people locally, care about and enjoy this piece of land for recreation, which includes the land adjacent to it along the Land Yeo, wetlands, trout farm and Tower House Woods. I have lived in the area for 15 years and have taken many walks with friends who live here and those from outside, who also now enjoy the habitat and wildlife that can frequently be seen due to its abundance. It is also an area rich in history. It is an important amenity for dog walkers, where cattle and horses graze on the pasture there. It is already a very small 'buffer' between the town and countryside.

Flooding

It is evident how seasonally wet the land is, running along from Jacklands. Building on this scale on the opposite side of the bank, could allow water to run off, causing more flooding.

Noise and Pollution

The building of 600 homes and roads combined, with the associated noise and pollution would cause irrevocable damage to this unique environment. The noise pollution is already high, due to the industrial estate, service roads and commuter traffic. The valley acts like an 'amplifier'; it is a bowl, from which the noise intensifies as it rises. If this land and other places like it are eroded from our environment, we will no longer live in a semi-rural community. Nailsea is popular with people who move out here to get away from urban areas and enjoy a bit of countryside, nature and tranquillity.

In view of my objections and those of other residents, I support NSC and urge them to maintain their stance and to continue to uphold that no exceptional circumstances exist to warrant a review of this Green Belt area in Nailsea.

I have lived all my life in woodland road playing in the fields behind our house provided hours of entertainment. Now my child has the same enjoyment and opportunity as I did. The views are spectacular and make the cost of living in Nailsea more bearable. The whole reason of living in Nailsea rather than Bristol is due to the quality of life. It's a safe space for dog walkers where they can walk up to the woods and spend time out of the house.

I currently live on woodland road, where there is an application for new housing. The housing will devalue my house as a lot of the value is with the view one of the reasons for buying this house. The river along the bottom won't be able to cope with the run off from the housing estates and has struggled in recent years. Also the hedgerows and fields provide homes for various different animals as well as protected oak trees. I appreciate a road may need to be there but there are no need for houses as there are other areas around Nailsea which need to be developed or redeveloped first.

With regards to the proposal to develop the land to the North East of nailsea. I regularly walk the right of way through this area and have to avoid after rain as it is always flooded. Any development of this land would require vast attenuation systems for rainwater to ensure betterment of the existing naturally draining open land. I also feel any development would adjoin Nailsea to the adjacent village and would destroy the natural border.

We are very much opposed to any proposed changes to the green belt land north of Greenfield Crescent, NE Nailsea. We are particularly concerned for the wildlife, as many bats live in the area and we understand otters also live on the site.

The proposal for a 600 house development would probably result in the addition of over 1000 cars in the area, damaging the environment these animals live in. Additionally we doubt that the surrounding roads will cope, nor will the schools, doctors etc. We are glad that you have asked for comments, however it is a shame that most residents concerned do not know about this issue as we come under the parish of Nailsea and not Wraxall and Failand. We have found it very difficult to get hold of any information about the proposed green belt changes and the development. Residents that do not have easy access to the on-line information will be in the dark. We believe NSC and Nailsea Town Council should have informed all residents affected by these proposals in order to allow them to comment

I feel this to be totally unacceptable as the land is agricultural appears to be on a flood plain and has the national fuel line running across its length

We write in connection with the above proposal, which lies just south of the Woodland Trust's Towerhouse Wood, which is designated as Ancient Woodland.

Ancient woodland is defined as an irreplaceable natural resource that has remained constantly wooded since AD1600. The length at which ancient woodland takes to develop and evolve (centuries, even millennia), coupled with the vital links it creates between plants, animals and soils accentuate its irreplaceable status. The varied and unique habitats ancient woodland sites provide for many of the UK's most important and threatened fauna and flora species cannot be re-created and cannot afford to be lost. As such, the Woodland Trust aims to prevent the damage, fragmentation and loss of these finite irreplaceable sites from any form of disruptive development.

National Planning Policy Framework, paragraph 118, states that "planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss."

Natural England's standing advice for Ancient Woodland and Veteran Trees, paragraph 4.8.1 states: "Ancient woodland is of prime ecological and landscape importance, providing a vital part of a rich and diverse countryside. In particular, ancient woodland:

- is exceptionally rich in wildlife, and supports many rare and threatened species;
- may contain surviving descendants and features from the original natural forests;
- acts as reservoirs from which wildlife can spread into new woodlands;
- has valuable soils due to their undisturbed nature;
- is an integral part of England's historic landscapes and the biological and visual functioning of a landscape;
- contains a wealth of features of historical and archaeological importance little altered by modern cultivation or disturbance;
- contributes to people's sense of place and imagination."

Even though the proposed development in this area does not directly abut Towerhouse Wood, it could still cause loss and damage to the site's ancient woodland. Development outside of the actual woodland site can have damaging impacts on woodland wildlife populations. Intensity of land use adjacent to ancient woodland results in an increase in external impacts, also known as edge effects. Detrimental edge effects have been shown to penetrate woodland causing changes in ancient woodland characteristics that extend up to three times the canopy height in from the forest edges.

The Woodland Trust is particularly concerned about the following impacts:

- Fragmentation and degradation of the surrounding natural environment as a result of the separation of adjacent semi-natural habitats, such as small wooded areas, hedgerows, individual trees and wetland habitats;
- Intensification of the recreational activity of humans and their pets cause disturbance to the habitats of breeding birds, vegetation damage and path erosion, litter, and fire damage;

- Large amounts of disturbance occurring from adjacent development, during both construction and operational phases, including noise, light and traffic;
- Pollution occurring from adjacent infrastructure particularly during construction phases, including dust and other waste materials;
- Development may aid the colonisation of non-native plant species;

In particular, the likely increased useage of the wood from the occupants of 600 new houses nearby will significantly increase the Woodland Trust's management liability for this relatively small woodland which may struggle to absorb extra visitor pressure – path erosion, increased litter, vandalism etc. We would expect any planning consent granted to require an 'endowment sum' as a developer obligation (section 106 agreement or CIL) that can be used to mitigate the extra pressures on the wood – eg upgraded secure visitor entrances, path improvement etc. We would also like to see provision for creation of additional publicly accessible green space nearby in the wider locality to help alleviate visitor pressure on Towerhouse Wood and other vulnerable locally accessible green spaces. I trust that these observations will be of interest to the Parish.

I read on the Wraxall and Failand Parish Council website that Land Value Alliances submitted to North Somerset Council in May 2016 a representation to request that land in the parish of Wraxall to the north east of Nailsea be considered for a significant residential/mixed use allocation.

In anticipation of the deadline for consultation of the North Somerset Site Allocations Plan on December 19th, I write to say I appreciate the good sense of North Somerset Council, supported by the Inspector, in rejecting LVA's request to have the land taken out of Green Belt and turned over to development.

This area, being Green Belt, is very special to the communities which lie both to the north and south of it. It is unique in character, and provides both tranquillity and recreational value to the community, who use it for walking and the chance to view and appreciate the abundant wildlife in the wetland area, along the banks of the Yeo and in Tower House Woods. The building of houses and roads with the associated noise and pollution would cause irrevocable damage to this unique environment. This stretch of land is also rich in historical significance, and includes numerous archaeological sites and an important Grade 2* listed Court.

Furthermore, having walked and lived in the area for many years, I see on a yearly basis how much flooding there is along this valley. It cannot be sensible for the Council to contemplate building here given the hardship and ensuing publicity Somerset and its residents has had over recent years with its catastrophic flooding. Surely 600 new dwellings, as proposed by LVA, and the associated run off which would lead to flooding of a serious nature. In

LVA's site plan I noted that Public Open Spaces have been allocated within the development. These cannot replace the valuable natural habitats we have now which would be gone for ever. We all trust and hope that North Somerset will continue to appreciate the value of preserving this green space as a buffer against encroaching development and preserve a legacy for the next generation to enjoy.

I appreciate your need to provide housing, but it would seem far more sensible and sensitive to the environment not to encroach upon this area. This particular area of Wraxall is considerable distance from the train station, and situated as it is near the road to Bristol, would surely become a commuter area, and create traffic issues at either end of the valley, both at the roundabout on the B3130 and at the Jacklands Farm end on the B3130. Bristol is a major economic centre, with city dwellers wanting to move out for 'lifestyle reasons', only to clog up our roads on their daily commute.

Once again, I extend my appreciation to the North Somerset Council for agreeing that this land should not be removed from the Green Belt, and for resisting the power of a large land bagging company and Nailsea Town Council, who seem to want to move the Green Belt to other areas less abundant and diverse in terms of natural environment, wildlife, tranquillity, recreational value and local history. It is an area which contributes greatly to the wellbeing of the local community. I urge the council to maintain this stance and to continue to uphold that no exceptional circumstances exist to warrant a review of this Green Belt area.

[Photographs of Flooding](#)







