

## West of England Joint Spatial Plan - Publication Representation Form

The West of England councils - Bath & North East Somerset, Bristol City, North Somerset and South Gloucestershire councils are inviting representations on the Publication Document of the West of England Joint Spatial Plan. These will be considered by the examining Inspector in the context of the soundness and legal compliance of the Plan.

**Please return this form by Wednesday 10<sup>th</sup> January 2018.**

**Email to:** [comment@jointplanningwofe.org.uk](mailto:comment@jointplanningwofe.org.uk) **or post to:** West of England Joint Spatial Plan, C/o South Gloucestershire Council, Planning, PO Box 1954, Bristol BS37 0DD

**This form has two parts:**

**Part A – Personal Details**

**Part B – Your representation.**

**Please fill in a separate sheet for each representation you wish to make.**

To ensure your representation is restricted to issues of soundness and legal compliance, you are advised to refer to the accompanying **Guidance Document** and make your representation on this official form that has been specifically designed to assist you in making your representation.

**Please be aware that all comments made on the Joint Spatial Plan will be publicly available.**

Anonymous forms cannot be accepted and so to submit your form you must include your details below.

You should refer to section 5 in the Guidance Document for advice on how to make a **joint representation**.

### Part A

1. **Personal Details\*** 2. **Agent's Details (if applicable)**

\* If an agent is appointed, complete only the Title, Name and Organisation boxes in 1. below adding the agent's details in 2 below.

Title*	Mr	
First Name*	Robert	
Last Name*	Taylor	
Job Title (where relevant)	Chairman	
Organisation* (where relevant)	Backwell Parish Council	
Address Line 1	43 Rodney Rd,	
Address Line 2	Backwell	
Address Line 3		
Address Line 4	North Somerset	
Post Code	BS48 3HW	
Telephone Number		
E-mail Address		

Signature R Taylor

Date 22 Dec 2017

# West of England Joint Spatial Plan - Publication Representation Form

## Part B - Your Representation

Please use a separate form for each representation made and read the accompanying **Guidance Note** that accompanies this form before you complete it.

Name or Organisation: **Backwell Parish Council**

**Q1. On which part of the Joint Spatial Plan are you commenting? Please see the note above.**

Chapter  Paragraph  Policy

Key Diagram

**Q2. Do you consider the Joint Spatial Plan to be:**

Legally compliant?	Yes	<input type="text"/>	No	<input checked="" type="checkbox"/>
Sound?	Yes	<input type="text"/>	No	<input checked="" type="checkbox"/>
Compliant with the Duty to co-operate?	Yes	<input type="text"/>	No	<input checked="" type="checkbox"/>

Please tick as appropriate

**Q3. Please give details of why you consider the Joint Spatial Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.**

**If you wish to support the legal compliance or soundness of the Joint Spatial Plan or its compliance with the duty to co-operate, please also use this box to set out your representation.**

The Joint Spatial Plan (JSP) suggests a major expansion of Backwell (700 houses) and a massive expansion (2400 houses) of the Youngwood Lane area of Nailsea. The Joint Transport Study (JTS)) includes proposals for a new road running between Nailsea and Backwell. Backwell Parish council considers these documents are unsound because a) they are not compliant with the Government's National Planning Policy Framework b) They do not ensure the vitality of town centres c) They are not promoting sustainable transport, d) They are not promoting healthy communities and e) they are not conserving and enhancing the natural environment. We hold those views for the following reasons:

1. The JSP does not provide evidence of the demand for this quantity of homes in North Somerset – for example Weston super Mare is currently behind its approved quota of houses because of low demand. **So, the JSP has not identified the needs for development on this scale.**
2. We disagree with the JSP's choice of the West of Backwell as a major development area. This area is NOT a suitable site for development because of the loss of open green fields, the adjacency of the West Town conservation area and the huge amount and high cost of new infrastructure that would be required. The village of Backwell already has about 100 houses in the "pipeline" and the further sites identified in our neighbourhood plan (please see later) represent sufficient growth for 2016 - 2026. Proposing 700 homes be added to a village of 1903 homes (including Downside) is not

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acceptable because (when added to the 100 already in the “pipeline”) that would be an increase of 40-50% in our village. Backwell has been identified by North Somerset Council as a 'Highly Sustainable' village and development on the scale proposed would make it unsustainable as a village. In fact, based on current records, the four Authorities in the West of England have between them enough brown-field sites to build at least 22,196 dwellings. In North Somerset alone there are 47 sites of a total area of 37 hectares. The National Land Use Database (2010-2012) shows a housing capacity of 5794. Therefore, green-field locations should not be put forward until brown-field site capacity has been allocated and used first. There are much better options than Backwell for example in the areas close to the new Bristol Southern Link road which is much closer to jobs in Bristol and already has excellent existing transport links (e.g. the MetroBus and Park and Ride links from the David Lloyd centre). While we recognise use of some areas may require a redrawing of the green-belt boundaries, moving a boundary does not need to reduce the size of the green-belt and could allow it to be better placed. The effects of development on our carbon footprint and traffic pollution should have been considered with more force. Shorter distances to travel with the associated reduced pollution and long queues passing through Backwell with the potential of additional 1000+ cars from 700 homes or indeed any developments further along A370. Ideal strategic options include poor land close to the city where the jobs are and with few of the transport problems that a development further down the A370 would have. ***The JSP is unsound because it does not represent the most appropriate strategy based on consideration of all reasonable alternative development scenarios, e.g. other better development locations have been ignored.***

3. The infrastructure required to service 700 houses in West Backwell would be the responsibility of North Somerset at a cost of at least **£100 million**. Since North Somerset does not have that resource, they would need to bid for national government funding to provide this. The Parish Council is concerned if building started before the required infrastructure has been installed because for example the central government might not provide the resources needed. Infrastructure, in particular roads and the railway, are key enablers to the JSP proposals. Without the infrastructure, no one can believe that the plans we have seen to date could work. So, the JSP proposals are unsound because they are not effective / capable of being delivered within the Plan period. The infrastructure costs of these proposals would be much more expensive than better options nearer Bristol and it seems unlikely that the required infrastructure would be funded and constructed in a timely manner alongside or ahead of new housing and employment. ***For this plan to be sound, North Somerset needs to be clear on how the transport infrastructure projects outlined are to be funded and over what period.***
4. The transport proposals in the JSP are unsound. The capacity of the A370 as the final common pathway is not able to take more volume of traffic. In addition to these proposals, other villages are currently being developed (such as Yatton) so before this possible development, they will be adding to the existing traffic problems. 700 houses with possible 200+ in Farleigh Fields and approximately 100 already agreed in the neighbourhood plan, would create a traffic nightmare in our village and reduce the viability of developments further South. The JSP document includes an extension of the Bristol MetroBus to Backwell and that has implications including the huge costs of a new road through Backwell Common. The possible new road located **between** Nailsea and Backwell would damage a beautiful and well used nature reserve <http://www.avonlocalnaturereserves.org.uk/backwell-lake-local-nature-reserve-backwell/> at Backwell Lake. In addition, a road within Backwell Common would destroy the **Strategic Gap** resulting in Nailsea and Backwell becoming a single urban entity. ***The JSP has not placed enough importance to the strategic gap between Backwell and Nailsea.***
5. The idea that the Railway Station is capable of extra capacity and could be the transport hub for Nailsea as well as Backwell, is not workable due to limited size of the area available. The land near the station is identified as Strategic Gap between the two settlements and this principle must be re-stated and supported. Given the recent national problems with flooding and the loss of flood plains, (in particular in Somerset), we need to emphasise that Backwell Common is not suitable for the Metro Bus. Backwell Lake is a water-holding pond controlling the level of all the adjoining rhyes to avoid

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flooding. The closest analogy is Chapel Hill and where that road goes under the railway, water pumps are installed permanently to avoid the road flooding and keep it clear for traffic. This is same water level as Backwell Common and next to Backwell / Nailsea Lake. In addition, access to the proposed transport hub would still be through the inadequate Station Road and indeed the traffic light controlled single-track road under the railway. Pedestrian access is a single pavement less than 1 metre wide and is subject to flooding on a regular basis. **A new road / MetroBus in that area would create many practical problems including potential for flooding and worsening of traffic on Station Road.**

6. The proposed new road between the M5 and the Long Ashton bypass would encourage traffic travelling to Bristol to depart the motorway and further increase congestion on the Clevedon Road and on to the Long Ashton bypass. The effects of development on our carbon footprint and traffic pollution should have been considered. Shorter distances to travel with the associated reduced pollution and long queues passing through Backwell.
7. The JSP ignores and rides “rough-shod” over the Backwell Neighbourhood plan (NP). Backwell is one of only two parishes with a 'made plan' and we were *leaders* in this process and it is therefore tantamount to a betrayal if our NP was ignored despite the principles of 'Localism'. We were one of the first parishes to undertake a NP and went successfully through the whole process, including a referendum and an official review by the Inspector and was agreed and approved in 2015. The JSP is not consistent with our NP to 2026 and we challenge this. Our neighbourhood plan suggested some housing development (about 100 houses) by the identification of suitable development sites that the village considered sustainable. Planning applications not taking account of the NP have been made for building several times over the years and not approved on enquiry, partly on the basis of the neighbourhood plan.

*Please continue on a separate sheet/expand box if necessary*

**Q4. Please set out what modification(s) you consider necessary to make the Joint Spatial Plan legally compliant or sound, having regard to the matter you have identified at Q3 above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at Examination.) You will need to say why this change will make the Joint Spatial Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible:**

As discussed above, the JSP's initial proposals are unsound because they breach the Government's National Planning Policy Framework. These breaches could be prevented or improved by the following modifications:

1. Backwell is primarily a commuter settlement and economic growth will be driven by employment in Bristol. So, options to build housing close to the source of employment should be taken before much more polluting and expensive options are selected. There are much better and more sound alternatives to Backwell, for example near the new Bristol Southern Link road which would be much closer to jobs in Bristol and already has excellent existing transport links (e.g. the MetroBus link and Park and Ride from the David Lloyd centre). While we recognise use of some areas may require a redrawing of the green belt boundary, moving a green-belt boundary does not need to reduce the overall size of the green belt and could allow it to be better placed. The advantage of preferring those locations include using less good quality land, being close to the city where the jobs are and with few of the transport problems that a development further down the A370 would have. **Options nearer Bristol provide much better strategic alternatives.**
2. Expansion of Nailsea to the North rather than South: A much better alternative for development of Nailsea would be use of the land to the North of the Town rather than the JSP's proposal of to the South. That would maintain the "Strategic Gap" between Backwell and Nailsea which is vital to preserve the nature of our village and supported by North Somerset. It is not logical or sound to build in the South of Nailsea which would require much more new infrastructure. With the development of Nailsea to the north of the Town, the link road being discussed should be north of Nailsea, providing the link between the M5 and the A370 Long Ashton bypass via the Tickenham route. **Any development of Nailsea should be to the North rather than the South of the existing town and that the new road being considered runs to the North of Nailsea rather than between Nailsea and Backwell.**
3. The JSP document includes an extension of the MetroBus to Backwell with the implications of the very large (and probably undeliverable) costs of the new road through Backwell Common and by the side of the local nature reserve at Backwell Lake. Such a road would be a major intrusion to this sensitive environment and landscape. As well as eliminating the important Strategic Gap, such a new road risks facilitating inappropriate development. Such a road would also cause a large increase in traffic for example from the M5 to Bristol and then further congest the A370. Indeed, the current traffic problems already require amelioration. A road to the North of Nailsea would not have the above risks while producing most of the benefits hoped for in the JSP. **Our Parishioners need evidence that the existing current transport inadequacies are being considered before future development will be felt to be infrastructure-led.**
4. If our proposals are accepted the infrastructure costs associated with the delivery of this number of homes would be much less, with a much smaller environmental footprint and avoiding the loss of the strategic gap to preserve the nature of our village. **The proposed adjustments would provide more economically viable and therefore deliverable proposals than those initially made in the JSP.**

*Please continue on a separate sheet/expand box if necessary*

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

**Q5. If your representation is seeking modification, do you consider it necessary to participate at the oral part of the Examination?**

No, I do not wish to participate at the examination hearings

Yes, I wish to participate at the examination hearings

**Q6. If you wish to participate, please outline why you consider this to be necessary.**

Mr Robert Taylor, Chairman Parish Council and / or other councillors as nominated by the Council Chairman.

*Please continue on a separate sheet/expand box if necessary*

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the Examination

Name

Mr Robert Taylor

Date

22 December 2017

**All representations must be received no later than Wednesday 10<sup>th</sup> January 2018**  
**Please keep a copy of this form for future reference.**