**BACKWELL RESIDENTS’ ASSOCIATION**

Hon Secretary Mike Veal, 36 Long-thorn, Backwell, BS48 3GY

Tel No. 01275 461187 – E-mail address: [smveal@talktalk.net](mailto:smveal@talktalk.net)

4 December 2018

Planning Policy Team

Post Point 15

Town Hall

Walliscote Grove Road

Weston-Super-Mare

BS23 1UJ

Dear Sirs,

**north somerset local plan 2036: representations to issues and options paper**

Established in the 1960s, Backwell Residents Association (BRA) works to safeguard and promote the collective interests of local residents of Backwell. The Association has over 700 paid up members and has represented the community in respect of a number of development proposals affecting the village.

The Backwell Resistance (BR) is a local community group established in response to the strategic development proposals within the West of England Joint Spatial Plan at Backwell and Nailsea to ensure local residents are fully informed of the proposals and empowered to engage in the planning process.

The combined membership of the groups is estimated to be around 1300. The two community groups share common views on the strategic proposals and how Backwell should accommodate growth in the future and have come together to prepare an agreed response to the North Somerset Local Plan Issues and Options Paper.

Backwell Residents’ Association (BRA) submits the following representations with the full support and endorsement of Backwell Resistance (BR). BRA and BR fully endorse the representations made by Backwell Parish Council (BPC) in response to this document and does not propose to repeat these points within its own representations. In particular, BRA and BR echo BPC’s concerns regarding North Somerset Council’s (NSC) decision to progress with proposals which have yet to be subject to independent scrutiny through the West of England Joint Spatial Plan (JSP).

Notwithstanding these concerns and without prejudice to their objections in principle to the development proposals for Backwell and Nailsea (Policies 7.4 and 7.7 of the JSP), BRA and BR would like to take this opportunity to raise the following points.

These representations should be read in conjunction with BRA’s representations to the West of England Joint Spatial Plan (Submission Version) November 2017 (JSP) which were also supported by Backwell Resistance.

**Section 3: Nailsea and Backwell**

**Question 3: Do you agree with these or are there other challenges or issues which we have not included and how might the Local Plan address these?**

*Agricultural Land*

BRA does not agree that Section 3 of the Paper addresses all the challenges and issues associated with delivering strategic scale housing at Nailsea and Backwell. The Council’s key issues fail to address the loss of high-quality agricultural land. The development of land West of Backwell and South West of Nailsea would result in the loss of large swathes of Grade 1-3 agricultural land and the fragmentation of existing farm holdings. However, no consideration has been given to the detrimental impact of development upon regional food production.

*Road Improvements*

Whilst reference is made to proposed strategic road infrastructure, improvements to the existing road network are largely overlooked. A cursory reference is made to addressing the traffic issues on the A370, however this does not tackle the capacity and safety issues already affecting Station Road and the Station Road/A370 crossroads, which would be exacerbated by the proposed strategic development. The Issues and Options Paper offers no explanation of how the capacity of the crossroads junction could be improved or how traffic flows through the junction could be reduced.

Delivery of new road infrastructure between Farleigh and Nailsea & Backwell Station (M3) will not alleviate the congestion issues within the village, or offset the additional traffic associated with Backwell Strategic Development Location (SDL), which as currently indicated would be wholly reliant upon the A370 corridor to access employment and services. The planned new infrastructure to the east of the village provides no benefit to residents of the new development at Backwell, serving only the needs of some residents travelling to Nailsea from the Bristol direction.

*Schools*

Specific reference should be to the provision of schools within the local area and how this will cater for new residents of the proposed development. In respect of primary school provision, Backwell is currently served by an infant school, located close to the proposed Backwell SDL and a junior school on a separate campus to the south of the village. The JSP refers to the provision of a new primary school within the Backwell SDL which we understand could be located at the western edge of the development site, resulting in a further, separate school campus within the village. This would result in a disjointed, inefficient provision of primary school facilities within the village.

Should the Backwell SDL be confirmed, the Local Plan should take the lead to deliver comprehensive improvements to the educational offer in Backwell, by exploring the potential for a single campus for primary facilities in the heart of the village, closely linked to both the existing and new residential areas. A single campus offers the potential to significantly reduce trips to school by car, create attractive, safe routes to school and manage parking, to alleviate existing parking and traffic issues on local streets. Similarly, any new school provision should operate within the same multi-academy trust as existing schools within Backwell to facilitate shared use of resources.

In respect of secondary school provision, Backwell School’s catchment area currently accommodates pupils from Yatton, Nailsea and outlying areas. Careful consideration needs to be given to the implications of introducing 700 new homes into Backwell for this catchment area. If the catchment area shrinks in response to increased local need, what education provision is planned for the pupils of Yatton who may no longer be able to gain a place at Backwell? Expansion of Backwell School is not a realistic option given the current size of the school roll and the physical constraints to the site.

*Green Belt*

BRA supports the exploration of local amendments to the Green Belt around Backwell in the interests of securing sustainable, gradual growth at the village, in place of strategic expansion. Amendments to the Green Belt could offer the potential for non-strategic housing development to the east of the village, which could be better related to Bristol and planned infrastructure. However, Green Belt must be protected and could be extended where it serves to retain the separate identify of Backwell and Nailsea.

The Issues and Options paper outlines the key issues NSC intends to address in respect of development at Nailsea and Backwell, if the strategic growth identified by the JSP is accepted. BRA is concerned that matters which affect the suitability of sites for residential development are deferred to the Local Plan stage, after the broad location has been identified for development through the JSP. Matters which affect the suitability of sites to accommodate residential development must be considered comprehensively at the strategic policy level to ensure the principle of development is sound and the delivery of such schemes is sustainable.

**5. Green Belt**

**Q5: Do you agree with these or are there other challenges or issues which we have not included and how might the Local Plan address these?**

As outlined above, BRA supports the key issues identified by NSC in respect of Green Belt to ensure the boundaries are fit for purpose and capable of meeting the long-term development needs of the District, beyond the plan period to 2036. Where land makes a limited contribution to the purposes of the Green Belt, its removal should be considered, in order to accommodate sustainable growth. In addition, the designation of other land as Green Belt should be considered, particularly where the separate identify of settlements could be compromised by future planned development.

A comprehensive review of the Green Belt is still required at the strategic policy level, through the JSP to ensure new housing is in the most sustainable locations, well-related to employment, retail, higher order services and infrastructure. In the absence of strategic modifications, the Green Belt restricts growth to the major urban areas, particularly Bristol, and forces development to leapfrog its boundaries to more rural locations which are heavily reliant upon the private car, such as Backwell.

**3.1 Settlement Hierarchy**

**Q8: What are your views on the options for a revised settlement hierarchy?**

BRA broadly supports Options 1 and 2 for a revised settlement hierarchy. This would retain the current hierarchy but with a review of all settlements and inclusion of an additional tier for larger infill settlements and smaller service villages giving capacity for small scale growth, where appropriate.

Backwell should remain as a Service Village which should continue to be recognised as having the potential to accommodate “small-scale development” commensurate with the size of the village and the provision of services and infrastructure. The SDL proposal, due to its sheer size and associated infrastructure, would have a significantly negative effect on the village of Backwell and its immediate environs.

**3.2 Settlement Boundaries**

**Q9. What are your views on the options for revised settlement boundaries?**

BRA supports Option 2, to ensure a plan-led, co-ordinated approach to housing, employment and infrastructure delivery and agrees with the benefits of this option as outlined within the Issues and Options paper.

Revisions to the settlement boundaries should serve to deliver a robust plan, capable of meeting development needs to 2036. The flexibility incorporated into the current Local Plan policies to allow development adjacent to settlement boundaries was introduced by the examining Inspector to address shortcomings within the draft plan. Such a policy provision should not be considered at the outset of plan preparation, when the focus should be upon identifying sufficient land to meet the identified development needs.

**4. Garden Villages and New Communities**

At page 29 of the Issues and Options Paper it states that ***“at this stage the specific boundaries of the development are not confirmed…the potential capacity of the locations will vary in relation to the extent of developable land identified and assumptions about densities.”***

BRA notes that the West of Backwell SDL as identified within the JSP covers a significant area of land controlled by Taylor Wimpey at Grove Farm. It is understood that Taylor Wimpey does not control the land occupied by the farm buildings at Grove Farm which lie in a central location within the potential future housing site. Should the Backwell SDL be confirmed through the JSP, BRA questions the future role and function of the farm building complex when surrounded by new housing. The Local Plan should consider the implications of the retained buildings and potential operations, in close proximity to new housing and the potential future use of the land and buildings, in the event current uses cease to operate.

**Section 7: Bristol Airport**

**Q38. What are your thoughts on the four proposed options for a Bristol Airport policy in the new Local Plan 2036? Do you have a preferred option?**

BRA is concerned about the potential impact of future airport expansion upon Backwell the implications of possible future infrastructure and the Airport’s desire to create improved access from the M5 corridor. Such proposals could result in significant harm to the Backwell area, urbanising the character of the area, introducing further traffic and congestion and compounding issues of air quality and noise. Any proposals for future expansion of the Airport must ensure that its transport needs can be met through sustainable transport modes and infrastructure, enhancing connections to Bristol and the M5 along the existing A38 corridor.

The above comments are intended to provide constructive input to this early stage in the Local Plan process and are without prejudice to BRA’s objections to the JSP. BRA welcomes the opportunity to engage with NSC throughout the plan-making process. Please keep us updated on future consultation events.

Yours sincerely,

**M J Veal, Hon Secretary, Backwell Residents Association**