

REPRESENTATIONS TO TECHNICAL EVIDENCE CONSULTATION, NOVEMBER 2018 – JANUARY 2019 ON BEHALF OF BACKWELL PARISH COUNCIL, BACKWELL RESIDENTS’ ASSOCIATION AND BACKWELL RESISTANCE

1. Representations are prepared by Lucy White Planning Limited on behalf of Backwell Parish Council (BPC), Backwell Residents’ Association (BRA) and Backwell Resistance (BR) to the Technical Evidence prepared by the West of England authorities in respect of the Joint Spatial Plan 2036 (JSP).
2. In the interests of expediency to assist the examination process, the three parties have provided a joint response on the issues raised by the technical evidence. These representations should be read in conjunction with the representations submitted by BPC and BRA supported by BR to the JSP in January 2018.
3. These representations respond to the following evidence:
 - WED 002 – Schedule of Proposed Changes
 - WED 004 – Justification of the requirements for the 12 Strategic Development Locations Policy 7 – 7.12
 - WED 007 – Transport Topic Paper 8 (update November 2018) (See Appendix A – Representations prepared by Peter Evans Partnership)
 - WED 008 – Emerging Findings Transport Report (November 2018) (See Appendix A – Representations prepared by Peter Evans Partnership)
 - WED 009 – Consolidated Sustainability Appraisal Report (November 2018)
 - WED 010 – Updated Habitats Regulations Assessment (November 2018)

Executive Summary

4. These representations raise the following concerns regarding the evidence which underpins the spatial strategy and policies of the JSP:
5. The **Consolidated Sustainability Appraisal (CSA)** fails to provide a transparent explanation of why the JSP selected a spatial strategy based on Scenario 3, in preference to Scenario 2 (focused at the urban areas) given the comparable findings of the CSA in respect of both options.
6. The findings of the CSA are based on some inaccurate data which have distorted the comparative assessment of development options.
7. The **Updated Habitat Regulations Assessment (HRA)** provides a strategic overview of the impacts of the JSP upon the European habitat sites. The HRA concludes that an adverse effect upon the protected sites by the proposed development cannot be excluded. However, no assessment is made of alternative solutions, including alternative development locations and/or alternative levels of development on the selected development sites. The mitigation proposed through the Appropriate Assessment to address the uncertain impacts of the development, are strategic in nature, including the provision of Green Infrastructure and Suitable Alternative Greenspaces (SANGS), which cannot be relied upon to satisfy the Appropriate Assessment screening.
8. In respect of **Backwell**, the revised infrastructure proposals identified through the technical evidence fail to resolve the adverse impacts of the previous infrastructure proposals (See WED 009) upon the local environment. However, the revised proposals now offer no mitigation for the impact of the Backwell Strategic Development Location (SDL) upon the local transport network. Moreover, the transport modelling conducted to inform the proposed spatial strategy and infrastructure is conducted at a strategic / regional level without any assessment of local junctions affected by proposed development, such as the A370 crossroads. In the absence of detailed assessments of junction capacity, the transport modelling cannot be relied upon to influence the locations of strategic development or the associated infrastructure proposals.

WED 002 – Schedule of Proposed Changes

PC07 – Policy 7.4 Backwell, bullet 10 (page 36)

9. In respect of the proposed changes expressed through PC07, it is noted that:

- The revised wording refers to an unspecified “new development area” in lieu of the Nailsea SDL. Further clarity should be provided by the West of England Authorities on the intended purpose of this amendment. Is it intended to delete the Nailsea SDL from the JSP and replace it with an alternative development strategy for Nailsea? In which case, where is the evidence to demonstrate that the proposed transport infrastructure, its route through Backwell Common and Backwell Lake to serve the south west of Nailsea remains appropriate, to mitigate the impact of new development at Nailsea?
- The proposed changes remove reference to a western connection to the A370 yet fail to specify where the new multi-modal link would connect to the A370. Based on the indicative plans and information provided by Officers, it is understood that the only feasible connection point would be east of Farleigh, between the villages of Backwell and Flax Bourton. The provision of a road link to the east of Backwell raises a number of concerns:
 - Increased traffic flows along the A370, particularly around Chapel Hill and through the village of Flax Bourton, exacerbating existing issues with traffic flows, narrow footways and pedestrian safety.
 - The deliverability of a crossing over or under the railway line. There is no evidence of agreement being reached with Network Rail to a crossing of the railway line. Options for a tunnel under the railway line are likely to be restricted by flooding whilst a bridge over the railway line could raise issues of landscape impact, taking into account the extent of potentially elevated road required across agricultural land to achieve a suitable crossing.
 - A new road to the east of Backwell fails to accommodate traffic flows generated by residents of the Backwell SDL. The proposed SDL would be reliant upon a single

main point of access for circa 700 homes onto the A370 to the west of the crossroads. All trips from the SDL towards Nailsea and Bristol would need to travel through the A370 crossroads which is already operating above capacity during peak hours, with no opportunities to materially improve the capacity of the junction due to the physical constraints at the crossroads.

- If proposals to close Station Road to through traffic (WED008 Table 5.2 Option E3) are taken forward, the West of England's (WoE) aspiration for the Backwell SDL to be well-connected with employment and services at Nailsea will be unobtainable, with residents using their cars to take a convoluted route through Backwell and along the new multi-modal route, more than doubling the distance travelled to reach Nailsea and Backwell Station (4.6 km compared with 2.2 km using Station Road).
- The Proposed Changes continue to refer to a new or improved connection to the M5. However, it is understood (WED008 Table 5.2 Option W1 or W2) that the West of England authorities no longer anticipate delivery of this connection in the context of the SDLs through the JSP.
- The E3 proposals are entirely disconnected from the proposed housing growth at Backwell, both physically and functionally. The new road link would be constructed within Green Belt land. Whilst it is acknowledged that road infrastructure can be deemed to be appropriate development within the Green Belt, the construction of a new road around the outskirts of Backwell would inevitably affect the long-term contribution of land inside the road towards the function of the Green Belt. The consequence of which would be a large area of agricultural land to the east of Backwell could become vulnerable to removal from the Green Belt and further residential development.

WED 004D – 7.4 Backwell

10. The following comments are submitted in respect of WED 004D:

11. The opening statement of paragraph 1 is central to understanding the flawed approach taken by the WoE authorities in developing proposals for strategic development at Backwell through the JSP. It states that,

“The Backwell SDL is closely related to strategic development proposed at Nailsea, with a package of transport interventions devised to facilitate both.”

12. The draft JSP published in 2016, “Towards the Emerging Spatial Strategy” proposed a combined SDL for Nailsea and Backwell. The Submission Version of the JSP published in 2017 separated the SDLS but maintained a combined package of infrastructure measures which provided direct connections from the multi-modal corridor to both development locations. The latest iteration of the proposals, set out within this Technical Evidence amends the infrastructure proposals serving the SDLs, severing the connection between the Backwell SDL and the multi-modal link. BPC, BRA and BR had expressed their strong objection to the proposed infrastructure at the Submission Stage based on the absence of evidence to demonstrate its i) deliverability ii) ability to mitigate or iii) taking account of the significant adverse impact of the proposals upon the local environment.
13. Our concerns are realised in part through the conclusions of WED008 Table 5.2 which state that plans for a proposed highway link from the multi-modal link to the A370 west of Backwell can no longer be brought forward through the JSP on the basis that:

“Options are not considered to be deliverable in construction terms and would still require traffic from Nailsea SDL bound for Bristol to pass through the congested Backwell Crossroads junction.”
(Option S1, S2, S3 (Three route variants))
14. The CSA (WED009B Addendum, page 8, PC07) confirms that despite the amendments to the infrastructure package, the impact of the revised proposals remains the same. The revised proposals have an estimated cost of £168m for the new multi-modal link alone (WED007 Table 4-2) equivalent to circa £52,000 per new housing unit (Nailsea and Backwell SDLs).
15. The corollary of the revisions to the transport infrastructure package is Backwell SDL is no longer “closely related” to the Nailsea SDL; it would be a free-standing development, divorced from the proposed highway connections and reliant upon the A370 for the majority of car trips, placing a significant additional burden upon the “congested Backwell Crossroads junction”¹.
16. The potential closure of Station Road to through traffic, would cause further severance between Backwell and Nailsea as outlined at paragraph 9 above, hindering access to employment opportunities, convenient retail and higher order facilities to which Backwell is reliant in absence

¹ WED008 Table 5.2, S1, S2, S3

of local provision. Closure of Station Road would be entirely impractical and illogical given the importance of this direct route between Nailsea and Backwell.

17. Paragraph 1 claims that the extension of the Metrobus to Nailsea and Backwell Station will improve sustainable access to major employment opportunities, services and facilities. Whilst the Metrobus may improve connections to some employment opportunities in Bristol, the modal shift from car to Metrobus in this relatively rural location would be insignificant and therefore the proposed SDLs will perpetuate existing patterns of unsustainable long-distance commuting by car.
18. Paragraph 1 purports that the separate identity of Backwell and Nailsea will be maintained and important environmental and heritage assets sensitively treated, whilst maintaining the extent of the Green Belt. These statements are unsubstantiated by the evidence submitted in support of the JSP. The proposals would involve substantial new development within the narrow gap between the settlements of Backwell and Nailsea, including new road/metrobus infrastructure (potentially elevated), an expanded, decked car park to serve the station and new housing to the south west of Nailsea. These new features will inevitably degrade the current open, agricultural landscape and physical separation of the two settlements.
19. Paragraph 2 refers to the Technical work published through the Locational Dashboards (SD11C) and SDL Templates (SDL11A) which identified potential for strategic growth in this location. With reference to the JSP Criteria, the subsequent table (2) states that “the significance of heritage assets and ecological features in the general area has been identified (see SD11C).” However, the dashboard for Backwell fails to acknowledge the crucial foraging grounds within the area of the SDL, identifying only a “Horseshoe Bat Strategic Flyway” and with no reference given to the Brockley Hall Stables SSSI or associated Mendip and North Somerset SAC. This fails to recognise the full extent of the development constraint imposed by the Greater and Lesser Horseshoe bats.
20. JSP Criteria (3) deals with the sustainable transport infrastructure. It references SD16A which aims to “minimise car-based travel to/from the development areas” across the West of England. However, although this is a strategic aim across the whole West of England area, it does not take account of the variations in mode shift which can be expected in different locations across the region.
21. JSP Criteria (8) deals with the Greater and Lesser Horseshoe Bat habitat. The impact of the development upon the European Protected Habitat of the Brockley Hall Stables SSSI and

associated Mendip and North Somerset SAC is underplayed within the justification for identifying the Backwell SDL. The Updated HRA recognises that the impact of the proposed development upon this SAC, even with mitigation, remains uncertain.

22. The proposed strategic approach to ecological mitigation is insufficient. The document recognises that:

“particular care needs to be given to the sensitive areas, and in this case, the area identified in the criterion [i.e the Juvenile Sustenance Zone between the A370 and Chelvey Road), and Tickenham; Nailsea and Kenn Moor SSSI interests]. This will be a key consideration in bringing forward land allocation for the SDL and detailed proposals.”

23. Further work is in progress to understand the requirements upon the SDLs and this is intended to inform more detailed policy formulation and master-planning through the Local Plan process. However, it is not appropriate to defer consideration of these matters to the Local Plans until the Appropriate Assessment stage of the HRA is concluded.

24. In the absence of a conclusive HRA which is unable to rule out adverse impacts arising from the planned development, the spatial strategy cannot be sound without further work, which needs to include:

- a) A thorough exploration of the alternative development solutions through the HRA and an assessment of whether these could reduce or avoid harm to the protected habitats; and
- b) Where mitigation remains necessary, to ensure mitigation measures specific to the individual SDLs are robust, deliverable and demonstrably alleviate any harm to the protected habitats.

25. Criteria (9) aims to avoid the flood plain and reduction in run-off rates through new development. In respect of Backwell it claims that the area of search is outside the identified fluvial and tidal flood zone and an integral approach will be taken to managing surface water, environmental and ecological issues. Whilst it is recognised that the extent of fluvial flood risk falls outside the Backwell SDL, the Backwell Dashboard illustrates the extent of Flood Zone 3b to the north of Backwell, immediately adjoining the SDL boundary. Planned transport infrastructure through the gap between Nailsea and Backwell would traverse the areas at highest risk of flooding, particularly to the south of Backwell Lake. Surface water flooding is not recorded on the Backwell Dashboard, however, this affects areas within the Backwell SDL and is an issue throughout Backwell, affecting

the A370, Backwell Common and Station Road². The evidence prepared to support the JSP proposals for Backwell SDL have failed to demonstrate that the planned new infrastructure is deliverable in these locations, or that it would not adversely impact upon an area already prone to flooding.

26. Criteria (10) aims to mitigate development with the delivery of the new multi-modal link from the A370 Long Ashton Bypass to the station. For the reasons set out above, the proposed works would not mitigate the impact of the Backwell SDL upon the local highway network, particularly the A370 crossroads. Peter Evans Partnership (PEP) has reviewed the Transport Emerging Findings paper which has led to the amendments to the infrastructure proposals (see comments below). PEP is concerned that the findings are based on strategic transport modelling, without regard to the capacity of specific junctions local to SDLs. In respect of Backwell, no assessment has been made of the capacity of the A370 crossroads, the existing traffic flows or the likely traffic flows post-development. In the absence of this data, the JSP is unable to demonstrate that the SDL is capable of delivery without significant adverse impacts upon the existing highway network, or that planned infrastructure would mitigate the impact of the proposed development. Accordingly, the proposed development cannot be proven to be sound without further detailed technical transport assessments.

WED 009 CONSOLIDATED SUSTAINABILITY APPRAISAL MAIN REPORT

27. The purpose of the Consolidated Sustainability Appraisal (CSA) is to respond to points raised by the Inspectors in their letters ED01 and ED02 and the specific request that the Councils consider the need for further Sustainability Appraisal (SA) work in respect of the spatial strategy and employment. In respect of the SDLs, the Inspectors questioned whether the Councils are confident that:

- “The seven bullet point factors at paragraph 28 of SD9L are consistent with the objectives by which the locations were appraised in the earlier SA work (notably the SD9I Locational Assessments)?

² <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>

- The reasons given in pages 9-15 of SD9L comprehensively and consistently explain why locations for development were selected in the light of the paragraph 28 bullet point factors? (ED01, page2).”

28. The CSA also presents new supplementary SA work, including:

- a. An appraisal of three reasonable alternatives for the quantum of housing;
- b. Re-appraisal of the five reasonable alternatives considered at the 2015 Issues and Options stage for the overall spatial distribution of development within the JSP plan area;
- c. Appraisal of three reasonable alternatives for the overall spatial distribution of development set out in the JSP.

29. The Sustainability Appraisal SD9 and the associated Appraisal Tables (SD9D) provide a detailed appraisal of the selected SDL locations, but do not appraise the reasonable alternative sites. Once again, it cannot be ascertained from the submitted SA or the CSA how the JSP spatial strategy and selected SDLs were chosen in preference to alternative combinations of SDLs.

30. Paragraph 4.48 onwards compares the performance of each scenario against various SA Objectives. BPC, BRA and BR are concerned that broad assumptions regarding the performance of certain scenarios are misleading and, in some instances, based on bold, unsubstantiated assumptions. In particular:

- Para 4.52 assumes Scenario 3 (Transport Focussed) will provide many residents with **immediate** access to sustainable transport links. The use of the term “immediate” is misleading and unduly positive.
- Para 4.57 refers to Scenario 1 (Protection of the Green Belt) resulting in less development on greenfield land at locations which are in the open countryside. This statement is disingenuous given that the scenario would involve delivery of circa 14,000 homes on greenfield land within the West of England and a further 2,500 homes at Burnham on Sea, in Sedgemoor District Council. Scenario 2 would deliver 17,375 dwellings, although this scenario delivers nearly 1,000 more dwellings overall than Scenario 1 and does not rely upon Sedgemoor District Council to deliver housing. Therefore, the amount of greenfield land required within the West of England is broadly comparable between the two scenarios.

- Para 4.58 suggests that Scenarios 2 and 4 would be well-related to Bristol but as a result would lead to increased levels of development in areas which are historically at risk of flooding. However, there is no specific evidence that flood risk is greater under these scenarios. Indeed, the majority of the development locations have a low risk of flooding under Scenario 2.
31. The summary of the SA findings at paragraphs 4.73 – 4.74 fails to explain the rationale for site selection or how the JSP strategy can be deemed preferable to one of the original Scenarios, all of which can meet the Objectively Assessed Need identified by the Submission JSP.
32. **Scenario 2** proposed to concentrate development at the Bristol Urban Area. It performed highly in respect of many the SA objectives. Indeed, Table 4.5 illustrates that Scenario 2 performs better than Scenarios 1, 3, 4 and 5. When Scenario 2 is compared against Scenarios 1 and 3, it can be concluded that:
- Scenarios 2 has a better or equal score to Scenario 3 against 17 objectives, compared with Scenario 3 scoring better or equal to Scenario 2 for only 14 objectives;
 - Scenario 2 has a better or equal score to Scenario 1 against 16 objectives, compared with Scenario 1 scoring better or equal to Scenario 2 for only 11 objectives.
33. Given the strong performance of Scenario 2 with the SA, the CSA fails to explain the rationale for developing a spatial strategy which is a hybrid of the various scenarios, which when assessed against the SA objectives performs less well than Scenario 2 (See Table 4.7). Scenario 2 has a better or equal score to the “Towards the Emerging Spatial Strategy JSP” (TESS) against 15 objectives, compared with the TESS scoring better or equal to Scenario 2 for only 13 objectives. For these reasons, it is evident that **Scenario 2 is the most sustainable development option** which should be carried forward through the JSP.
34. Alternatives relating to higher / lower urban living and higher non-strategic growth are considered at paragraph 4.61 onwards of the CSA. Its conclusions at paragraph 4.61 (see below) are endorsed by BPC, BRA and BR as further justification for the JSP’s spatial strategy to align with Scenario 2, maximising the opportunities for urban living and sustainable extensions to the urban area of Bristol identifying the benefits of this strategy. It states:

“As shown in Table 4.6, Alternative 1: higher urban living would have the most significant positive effects due mainly to the urban areas being more accessible to existing services, facilities and job opportunities as well as sustainable transport links...Conversely,

Alternative 3: lower urban living would be likely to have more significant negative effects and fewer significant positive effects, as it requires more development to occur on greenfield sites that are not well located in relation to the urban areas or sustainable transport links for access to services and facilities.”

WED010 Updated Habitats Regulations Assessment (November 2018)

35. The Updated HRA serves to revisit the HRA in light of the recent European Courts of Justice decision, *People Over Wind, Sweetman v Coillte Teoranta* (Case C-323-17), published in April 2018.
36. To align with the Habitat Regulations as transposed into the Conservation of Habitats and Species Regulations 2017, the HRA process should follow three stages:

Stage 1 – To identify whether the Plan is likely to have a significant effect

European sites which could be affected by the Plan should be identified, reviewing the conservation objectives for each feature of the site. Consideration should be given to the change which policies or proposals may cause and the likely effects on the interest features of the site either indirectly, directly, alone or in combination with other projects and plans. Where no likely significant effects occur as a result of implementation, no further assessment is required.

Stage 2 – Appropriate Assessment

An appropriate assessment (AA) is required where significant effects cannot be ruled out at Stage 1. The AA assesses the implications of the plan for each European site likely to be affected, considering their conservation objectives. It should review how the plan in combination with other plans or projects will interact and affect the site when implemented and consider:

1. How the effects of the plan on the integrity of the site could be mitigated;
2. What alternative solutions are available.

If it can be demonstrated that the plan will not have an adverse effect on the European sites, the plan can proceed to adoption. If the plan is still likely to have an adverse impact on the site(s), the competent authority must progress to Stage 3.

Stage 3 – Assessment where no alternatives exist

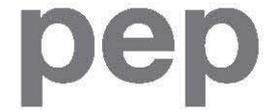
The competent authority must demonstrate that there are no alternative solutions to the plan which are less damaging. The competent authority must establish whether there are “imperative

reasons of overriding public interest” making it necessary to proceed with the plan or policy and identify and agree compensation measures.

37. Section 4 of the Updated HRA explains the screening assessment process undertaken for the JSP. It assesses the likelihood of effects upon the SACs from the policies of the JSP and in combination with other plans or projects. Chapter 5 represents the findings of the Appropriate Assessment stage of the HRA. This incorporates the mitigation measures and amendments to the policy which were included in the Publication JSP, together with additional mitigation measures recommended through the Updated HRA.
38. In respect of the North Somerset and Mendip SAC, which is of relevance to Backwell, the Summary of Appropriate Assessment Conclusions for the SAC cannot rule out adverse effects on the integrity of the SAC from off-site habitat loss or damage. These effects remain uncertain. In accordance with Stage 2 of the assessment process, it has considered mitigation measures and whether these could ameliorate the impact on the integrity of the SAC. However, these mitigation measures are limited to a JSP-wide Green Infrastructure network and other strategic mitigation measures which are expected to “help to avoid” adverse effects on integrity from off-site habitat loss/damage and recreation pressure. Accordingly, strategic scale development west of Backwell cannot be brought forward with any certainty that it would not harm the integrity of the North Somerset and Mendip SAC, contrary to the Habitat Regulations.
39. Indeed, Table 5.7 summaries the conclusions of Appropriate Assessment and identifies uncertain impacts remaining in respect of 7 of the 9 relevant SACs as a result of the SDLs planned through the JSP. The Habitat Regulations are clear that where mitigation measures have been employed and are unable to ameliorate harm to the protected sites, consideration should be given to alternative solutions. This should include alternative development locations and alternative levels of development.
40. However, paragraph 5.111 of the Updated HRA concludes that given the uncertainty identified through the Appropriate Assessment findings, it is considered necessary for the JSP to acknowledge and / or include a framework for strategic mitigation solutions to help to avoid and reduce the scale of these impacts, in order to conclude with certainty that there will be no adverse effects on the integrity of the SACs.

41. The Updated HRA outlines several measures for the provision of Green Infrastructure and Suitable Alternative Natural Greenspace as strategic mitigation solutions. At this stage, there are no details available to demonstrate how the proposed strategic mitigation solutions would be delivered or whether they could mitigate the outstanding impacts of the JSP policies upon the SACs. However, the Updated HRA concludes that ***“the JSP will not have an adverse effect on the integrity of any of the European sites”*** (paragraph 6.1).
42. These conclusions are premature without first considering:
- Whether there are any alternative development sites which would deliver the requirements of the JSP without harm to the integrity of the SACs;
 - Having considered alternative solutions, if the JSP would continue to have an adverse impact on the SACs, that there are imperative reasons of public interest which warrant the harm to these protected sites.
43. In the absence of detailed consideration of mitigation measures for the individual SDLs and any assessment of alternative sites as outlined above, the Appropriate Assessment stage of the HRA is incomplete and fails to comply with the Habitat Regulations. Accordingly, it cannot be relied upon to support the JSP. Further work is required, as outlined above to achieve a robust assessment which meets the legal requirements for plan-making.

APPENDIX A – REPRESENTATIONS BY PETER EVANS PARTNERSHIP



Peter Evans Partnership
Transport Planning
& Highway Consultants

REPRESENTATIONS TO THE JOINT SPATIAL PLAN

BACKWELL PARISH COUNCIL,
BACKWELL RESIDENTS' ASSOCIATION
AND BACKWELL RESISTANCE

REVIEW OF NOVEMBER 2018
TRANSPORT EVIDENCE BASE

JANUARY 2019

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1.0 INTRODUCTION

1.1 Background

1.1.1 Backwell has been identified as a Strategic Development Location (SDL) in the Joint Spatial Plan (JSP), with land to the west of Backwell identified as being capable of accommodating 700 dwellings.

1.1.2 The JSP and JTS has been subject to three periods of consultation starting in November 2015 and November 2016. The last consultation period on the final draft documents commenced in November 2017 and closed in January 2018.

1.1.3 Backwell Parish Council (BPC) has submitted representations relating to transport in liaison with Peter Evans Partnership (PEP) on the past consultations on the emerging spatial strategy and on the JSP Publication Document. In particular, concerns were raised over the extent to which the transport evidence on location and infrastructure, supported the suggested SDL at Backwell.

1.1.4 The Planning Inspectors assigned to the JSP Examination have raised a number of queries to the West of England Combined Authority (WECA), in respect of the additional evidence base and this latest round of consultation. Two of the queries raised are broadly:

- Is WECA confident that the submitted evidence as a whole demonstrates that the SDLs have been selected on the basis of a robust, consistent and objective approach?
- Does the additional evidence base consider whether there are any, as yet untested, reasonable alternatives to any element of the plan, and this work is carried out with an “open mind” and does not seek to simply justify the approach currently set out in the draft plan?

1.1.5 WECA submitted additional information and technical evidence in November 2018 to support the JSP. Consultation on this is running between Monday 26th November 2018 and Monday 7th January 2019. In respect of transport matters, the main JSP documents submitted in November 2018 for consultation are:

- Transport Topic Paper 8 (Update); and
- Emerging Findings Transport Report.

1.2 Representations to Transport Evidence

- 1.1.6 This note sets out PEP’s review and critique of the findings of the latest JSP Technical Evidence Work presented in the Transport Topic Paper Update (WED007) and the Emerging Findings Transport Report (WED008). The note constitutes the representations prepared on behalf of BPC, Backwell Residents’ Association and Backwell Resistance in response to these documents, and should be read in conjunction with representations prepared by Lucy White Planning Limited in respect of other technical documents published for consultation in November 2018 and the representations submitted by the three organisations to the Pre-Submission JSP in January 2018.
- 1.1.7 The current consultation on these two documents provides the opportunity to consider the extent to which past comments made by BPC and the planning inspectors have been addressed.
- 1.1.8 It was our expectation that the technical reports published in November 2018 would provide the clarification and technical justification for the SDL site selection in transport terms, compared to those locations not selected or any new locations; together with sufficient justification for the infrastructure required to mitigate the transport impact.
- 1.1.9 However, our representations conclude that past concerns raised by BPC have not been addressed satisfactorily, and that the tests of soundness from a transport perspective have not been satisfied. The main concerns raised by the current consultation include:
- insufficient justification for Backwell SDL infrastructure provision purposes;
 - inadequate clarity over the relationship between transport infrastructure intended to address existing transport shortcomings and that required to mitigate individual JSP proposals;
 - lack of analysis of individual SDLs e.g. impact of Nailsea SDL and Backwell SDL;
 - insufficient justification for rejecting reasonable, more sustainable and more effective options from a transport perspective; and
 - lack of clarity over transport assessment methodology or the decision-making process.

2.0 TRANSPORT TOPIC PAPER 8 (UPDATE)

2.1 Summary of Topic Paper

2.1.1 This document was intended to set out evidence to demonstrate that appropriate consideration has been given to the critical transport issues in developing the spatial strategy and the transport interventions to mitigate the impact from the SDLs. It builds on the findings of the Emerging Spatial Strategy Transport Topic Paper dated November 2016, the final publication version of the Joint Transport Study (JTS) dated October 2017 and the publication version of the Transport Topic Paper dated April 2018.

2.1.2 This November 2018 Transport Topic Paper provides an update of the April 2018 version and principally updates the strategic traffic modelling based on amendments to the SDLs and the transport mitigation strategy. However, there are no further details of the technical studies undertaken. There is insufficient explanation of the effect of the changes to the mitigation strategy. It is not possible to understand what mitigation is being considered and the outcome of different mitigation options.

2.1.3 The document does not assess Backwell and Nailsea separately in terms of traffic impact or mitigation requirements and therefore it is not possible to identify the level of impact or the need for mitigation measures associated with either of the sites. It is also not possible to identify what is the impact or mitigation required without either of the SDLs.

2.2 Chapter 3 Transport challenges

Planning Assumptions

2.1.1 Table 3.2 sets out the planning assumptions for the transport modelling, comparing industry standard TEMPro growth forecasts with and specific JSP growth scenarios.

2.1.2 There are differences in the household numbers and job numbers between the November 2018 Transport Topic Paper compared to April 2018 version of the document, but no clear explanation as to why. The total number of vehicle trips in Table 3.6 have not been amended from the previous paper. Therefore there is no certainty that the correct assumptions have been applied to the modelling.

Strategic Development Locations

2.1.3 Table 3.5 identifies the combined total number of vehicular trips that could be associated with both the Nailsea and Backwell SDLs. It also assumes that the employment allocation of 10.5 hectares will be in Backwell SDL, contrary to the JSP Policy 7.4 which makes no provision for employment within the Backwell SDL.

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- 2.1.4 The same vehicular trip rate has been applied across the JSP area, with no difference allowed to reflect the different characteristics based, for example on location and facilities provided.
 - 2.1.5 The site at Backwell will clearly demonstrate different travel characteristics to one on the edge of Bristol or Yate for example. There is a concern the level of traffic forecast for Backwell SDL is an underestimation of the number of vehicular trips that could be associated with Backwell SDL.

Quality of Travel Choices

- 2.1.6 Section 3.4.1 highlights that in many cases, the SDLs will have a high level of dependency on travel by car with significant investment needed to improve public transport choices. It recognises that increasing public transport mode share will be challenging due to the relatively low levels of service provision and long journey times to key destinations.
- 2.1.7 Section 3.4.1 also states that rail services play a relatively small role in the overall market for travel, with demand largely limited to areas within 1km of stations.
- 2.1.8 There has been no evidence presented to show that the improvements at Backwell station will create a significant shift in mode share through changes in travel behaviour. There are concerns that any meaningful modal shift will be hindered by capacity constraints and service frequency on the rail network. Furthermore, it has not been demonstrated that Metrobus or similar improved viable bus provision can be delivered to Backwell. Therefore, there appears to be a reliance on highway improvements to mitigate the traffic problems.

Trips Generated by Strategic Development Locations

- 2.1.9 In the April 2018 Transport Topic Paper, Figure 3.6 showed very high increases in trips from Backwell SDL onto the A370 and to the Station Road crossroads. However, the current November 2018 document shows a low level of traffic from the Backwell SDL going onto the A370 northbound, and a reduction in traffic southbound on the A370 through Backwell towards the SDL. There is a large increase in trips on Bristol Road between Nailsea and Flax Bourton. There is also no traffic from the SDLs shown using Station Road between Backwell and Nailsea, which is questionable, as some traffic associated with Backwell and Nailsea SDLs would be expected to use this link.
- 2.1.10 The traffic modelling presented does not provide confidence that the Backwell SDL, or the local road network has been assessed correctly.

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- 2.1.11 A shortcoming of the transport work is that it is not possible to extract from the information the traffic associated with Backwell SDL, as the traffic modelling incorporate traffic from all the housing and employment proposals in the JSP and does not assess the SDLs independently from one another.
 - 2.1.12 The description of the findings shown in Figure 3.6 highlights the traffic bottleneck at Backwell on the A370 which would constrain traffic flows in this area. This was not reported in the April 2018 document.
 - 2.1.13 The congestion at the Backwell crossroads is forcing some drivers to take alternative “rat-runs” along less suitable narrow lanes such as Chapel Hill, Backwell Common and Chelvey Road.

Impacts to be Mitigated

- 2.1.14 Section 3.4.4 summarises where there will be an increase in delay to traffic arising from the JSP allocations. This highlights that in the AM peak hour there will be an increase in delay for traffic leaving Nailsea caused by the A370 in Backwell and along Portbury Lane north of Nailsea towards M5 J19. In the PM there will be an increase in delay on the A370 at the Backwell traffic lights.
- 2.1.15 There has been no clear picture presented of the PM peak hour to understand the traffic impacts from Backwell or other JSP proposals and what mitigation may be required for this, or evidence to show that the proposed mitigation is suitable for both the AM and PM peak hours. It is not possible to draw these conclusions from Figure 3.6 and more detailed analysis is required to understand the specific impact.

2.2 Chapter 4 Transport programme

Overview of transport programme

- 2.2.1 Section 4.1 - 4.3 describes the development of the transport programme and its contribution towards mitigating the impact from the JSP proposals. It states further technical studies are currently taking place focusing on key corridors including the A370. The April 2018 document also said further technical studies were taking place.
- 2.2.2 It is stated that the technical assessments include such detail as concept design and engineering assessments, highway modelling, costing and deliverability for example. The report and proposals are drawing on the emerging findings from these studies.
- 2.2.3 These technical studies should be available to review as part of the evidence base. There are concerns that studies are still ongoing. Clear analysis needs to be presented and conclusions drawn to allow for public inspection of the findings in a fair and transparent manner.

- 2.2.4 Table 4.1 and Figure 4.2 identify the shortlisted improvement schemes associated with each corridor or SDL, based on the emerging findings.
- 2.2.5 The improvement packages for Nailsea and Backwell has been combined, which is similar to previous reporting. The number of packages has increased to 4, from 3 previously. The key changes are:
- the link between Nailsea and the M5 J20 has been dropped;
 - the link between the A370 and Nailsea east of Backwell has been scaled back and now connects with the A370 west of Farleigh, not east of Flax Bourton as previously proposed;
 - the link between the A370 and Nailsea east of Backwell is not combined with a new sustainable travel link. The sustainable travel link is only on the A370 Long Ashton bypass.
 - the link between Nailsea and the A370 west of Backwell has been dropped; and
 - new highway improvement schemes are listed at Portbury, Stone-edge-Batch and M5 J20 together with a new road to the west of Nailsea to connect with the B3130 at Tickenham.
- 2.2.6 There are clearly different issues, impact and mitigation requirements between Nailsea SDL and Backwell SDL. The assessment process is flawed as it is not possible to see how the mitigation packages will apply to each SDL. It is also not clear what mitigation is required to address existing traffic issues. If different SDL locations result following the examination, alternative mitigation may be appropriate.
- 2.2.7 The exclusion of the A370 link west of Backwell will require all traffic from Backwell SDL travelling towards Bristol to use the A370 at Backwell and a large proportion of this will travel through the signal crossroads at the centre of Backwell.
- 2.2.8 Based on the trip rates presented in the Transport Topic Paper and Census 2011 Travel to Work data, it is estimated that there could be an additional 300 vehicles in the morning peak hour and 301 vehicles in the evening peak hour using the Backwell crossroads. This is estimated to be an increase of some 14% in the AM and 13% in the PM compared to existing traffic numbers at the junction.
- 2.2.9 The additional vehicles from the Backwell SDL would therefore create further queuing and delay to a junction that is identified as a congestion hotspot. At this stage, there is not sufficient evidence that this level of traffic can be mitigated.
- 2.2.10 The new route of the A370 link east of Backwell and the closure of Station Road will result in the traffic increase from the SDLs using the A370 through the villages of Farleigh and Flax Bourton.

- 2.2.11 The absence of the A370 link west of Backwell will result in some traffic from the SDL using the unsuitable Chelvey Lane to travel to and from Nailsea, instead of travelling through Backwell and using Station Road, or the new link road east of Backwell.
- 2.2.12 There is no reference to a Metrobus service serving Backwell or Nailsea, only bus priority improvements along the A370 Long Ashton bypass towards Bristol. The bus priority or sustainable travel link from the A370 to the station and Nailsea is not included in the current transport programme.

Modelling of programme benefits

- 2.2.13 Section 4.5 gives a summary of the traffic modelling of the transport programme interventions. This confirms that local highway improvements have not been included and will be a matter for the Local Plans or individual planning applications.
- 2.2.14 There is a significant risk in not assessing in detail some local junctions such as the Backwell crossroads, as it has been identified as a major constraint and problem location on the A370 corridor and is intrinsically linked to both the Nailsea and Backwell SDLs. A clear understanding of junction operation and any mitigation is required before committing to the level of development proposed. It is known from recent planning applications in the area that the Backwell crossroads is operating over capacity with long queues and delay and NSC confirm there is no further physical measures that can be implemented within the existing highway boundary to try and address the problem.
- 2.2.15 Section 4.5 also explains that the impact of the public transport schemes in North Somerset, including Nailsea and Backwell have not been modelled, as the schemes are not yet sufficient developed.
- 2.2.16 There is again a significant risk in not having a public transport scheme sufficiently developed at this stage and the modelling output therefore cannot be fully relied upon if it does not take account of the trips made by public transport and the potential for modal shift.
- 2.2.17 Table 4.4 shows the network performance following the transport interventions. The text states that mitigation would reduce the traffic impact of the JSP allocations by 50%. However, it is not clear whether any improvement packages are assumed to be in place to mitigate the existing problems (without JSP growth). This is a key element of the overall Joint Transport Strategy.

- 2.2.18 The report states that the modelling has assumed a conservative level of mode shift to other modes and suggests further mode shift and local junction improvements should gain further improvements. However, no detail is provided to say what has been assumed in terms of modal shift and whether this is realistic, particularly as the public transport improvement schemes have not been developed or modelled for the North Somerset area. Network Rail has confirmed to BPC that there are challenges to develop the rail services from Nailsea and Backwell station, such as extra signalling, timetable planning, the capacity of trains and funding.
- 2.2.19 Over 75% of people travelling out of Backwell to work do so by car. Existing public transport use in Backwell is relatively low at around 4.8% train passenger and 3.1% bus passenger for those travelling to work. There is no detail on how the modal share will change due to the sustainable transport measures proposed as part of the Nailsea packages. The sustainable travel package is also now reduced compared to the April 2018 submission.
- 2.2.20 Figure 4.4 shows the traffic flow change in the AM peak hour with the mitigation associated with the transport programme in place.
- 2.2.21 There is a resulting decrease in traffic southbound on the A370 through Backwell. Northbound traffic through Backwell will increase, as previously reported in April 2018. It is not clear whether the modelling assumes that Station Road will be closed to through traffic. The analysis does not provide clarity on the traffic impact and effects of the mitigation packages for Backwell and Nailsea. This casts doubts on the modelling and the results.
- 2.2.22 The report indicates a high level of flow on the A370 at Farleigh. There is no evidence to confirm that this section of the A370 is suitable to accommodate the increase in traffic flows expected.
- 2.2.23 It is suggested in the report that the new road link between Nailsea and the A370 will offer the ability to improve the management of traffic on the A370 corridor through Backwell and routes towards Portbury and Clevedon, but inadequate detail is presented on how this traffic can be better managed. There is insufficient justification on whether there is suitable mitigation for the level of development proposed on the A370 corridor.
- 2.2.24 Table 4.5 shows where there may still be residual impacts and further mitigation will be required. This includes M5 J19 and 20. To further mitigate it suggests reducing the number of car trips from Nailsea, Backwell and Clevedon through rail and bus improvements. There is no evidence on how this could be achieved.

2.3 Chapter 5 Delivery of the transport programme

Technical Feasibility

- 2.3.1 Table 5.1 states that the new highway crossing of the railway line to the east of Backwell and connection to A370 will be one of the key technical challenges. The construction of new sections of highway connecting Nailsea and Backwell to M5 J20, including mitigation of significant landscape, biodiversity and flood zone impacts, is also a key challenge.
- 2.3.2 The document states that further technical work to refine the schemes will take place to allow their inclusion in the Local Plans, which will also provide the policy justification for each scheme. They will also identify the specific planning processes or powers to acquire land that will be needed, together with more detailed traffic modelling and EIA requirements.
- 2.3.3 The document does not provide enough certainty at this stage that the schemes can be delivered and Nailsea and Backwell SDL are reliant on large and challenging infrastructure components. There is no certainty of achieving adequate modal shift and public transport to achieve an acceptable package to mitigate the SDL.

Delivery during plan period

- 2.3.4 Figure 5.1 shows the indicative programme for delivery, assuming a 2019 start date for the transport scheme preparatory work. As the schemes still need to be tested through the JSP examination and subsequent Local Plan process, a start date of 2019 is unrealistic and if this is delayed there are no guarantees that the necessary infrastructure can be delivered in advance of the housing development.
- 2.3.5 The report states that in most cases anticipated transport schemes will be delivered in advance or during early phasing of housing build out, but Nailsea Packages 3 and 4 are two of the three exceptions, therefore casting doubt on the ability to mitigate the impacts. The Nailsea Package 3 is due to be completed in the middle phase of the Nailsea SDL build out (2030-2032) and Nailsea package 4 built in phases as part of the Nailsea SDL build out (2024-2034).
- 2.3.6 Table 5.2 highlights the transport programme risks and proposed mitigation. The key themes are funding, planning, technical, market capacity. There are significant challenges in getting the funding for the major elements of the schemes, the planning process would not be straightforward and there are clearly technical challenges to overcome and the agreement of numerous third parties to secure including Network Rail. This note has not resolved the shortcomings identified in the previous consultations in respect of the timescale and ability to deliver the infrastructure proposed.

Potential funding sources

- 2.3.7 This November 2018 update to the transport topic paper provides more detail on the anticipated costs of the projects and the potential funding sources.
- 2.3.8 The overall amount is still significant at £1.1-1.4bn. This is slightly less than the £1.1 - £1.6bn in April 2018. It will require a maximum of £200m a year to deliver. It is acknowledged to be ambitious.
- 2.3.9 There is still a fragmented source of potential funding and there is no control over the availability of funding. For deliverability to be sound, there must be reasonable certainty over the level and timing of mitigation infrastructure funding.

2.4 Conclusions on Transport Topic Paper 8 (update)

- 2.4.1 The following key information and conclusions can be drawn from the Transport Topic Paper:
- i. Additional technical studies underway, but further detail needs to be presented on the traffic modelling and mitigation strategy and why options have been discounted, to provide transparency and clarity.
 - ii. Nailsea and Backwell SDLs assessed together, therefore no clear evidence of the impact from either SDL or the measures required to mitigate the traffic from each of these sites.
 - iii. The same vehicle trip rates applied to all SDLs across the WoE; the Backwell SDL trip rates will differ from urban extensions. The trips for Backwell SDL are an underestimation.
 - iv. No clarification or modelling evidence provided as to the mitigation measures required to resolve existing problems, before the JSP proposals.
 - v. Reliance on highway improvements to mitigate traffic impact from Backwell and Nailsea SDLs. Bus priority has been removed from the A370 link.
 - vi. Concerns that the traffic modelling is not accurately representing traffic patterns in and around Backwell with the addition of the SDLs, with or without mitigation.
 - vii. No evidence of the PM peak hour impact from the SDLs or confirmation the proposed mitigation addresses the issues in the PM peak hour.
 - viii. All traffic from Backwell SDL will be required to use the A370 and it could increase traffic by some 14% at the Backwell crossroads.

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- ix. The additional vehicles from the Backwell SDL would therefore create further queuing and delay to a junction identified as a congestion hotspot. Insufficient evidence provided that this problem can be mitigated, but this is a major constraint on the network and should be examined further before commitment is made to including 700 houses at Backwell SDL nearby.
 - x. No overall public transport improvement scheme for the North Somerset SDLs, including Nailsea and Backwell, has been identified or modelled at this stage. Therefore, neither the potential mode share or mode shift from car use, nor the optimum mitigation package can be established without heavy reliance on highway infrastructure.
 - xi. This does not provide enough certainty at this stage that the schemes can be delivered sustainably and in any event Nailsea and Backwell SDL are reliant on large and challenging infrastructure components. There would be significant problems for Backwell if ultimately the schemes could not be delivered.
 - xii. The timescales and ability to deliver mitigation measures are questionable. There are significant challenges getting the funding for the major elements of the schemes, the planning process won't be straightforward and there are clearly technical challenges to overcome.

3 EMERGING FINDINGS TRANSPORT REPORT

3.1 Summary of Transport Report

- 3.1.1 The report presents the key findings of a series of technical studies commissioned by the WoE authorities to examine the issues and develop interventions associated with the JSP proposals. It states the technical studies are primarily used to help inform the Local Plan preparation, but will also help provide background information to JSP.
- 3.1.2 The studies are based on corridors servicing the JSP growth proposals. The A370 corridor study considers the SDLs at Nailsea and Backwell.
- 3.1.3 The supplementary studies should provide key information of direct relevance to the JSP Examination, for example on the relationship between infrastructure within Bristol and SDLs on key corridors. Given that the supplementary studies are intended to provide supplementary evidence in support the JSP, the reports should all be submitted to the examination. The absence of this material is highly unsatisfactory.
- 3.1.4 A summary of findings does not qualify as evidence. An independent observer should be able to examine the technical work to test this and the conclusions. This is not possible with the partial presentation of material, which is unsatisfactory.

3.2 Chapter 5: D. Nailsea and Backwell

Case for Intervention

- 3.2.1 The report notes the demand for vehicle journeys will increase along A370 and other local roads, plus M5 J19 and J20.
- 3.2.2 Table 5.1 identifies the clear transport challenges already faced at Nailsea and Backwell. These are summarised as:
- the poor standard of highway around Nailsea and in Backwell;
 - the volume of traffic through villages such as Backwell is disruptive for residents;
 - the existing infrastructure has inadequate capacity to support identified need for housing growth; and
 - the resilience of the network is inadequate.

3.2.3 Table 5.1 also identifies the transport objectives for Nailsea and Backwell. These are summarised as:

- providing sufficient capacity for both highway and sustainable modes to alleviate existing congestion and enable JSP sites to be delivered;
- improve local sustainable transport connections;
- improve journey times and journey time reliability on the local road network; and
- maintain the safety, strategic nature and operational integrity of the Strategic Road Network.

3.2.4 There is a clear need to solve existing problems as well as problems created by SDLs, but there is no distinction drawn within the testing or mitigation measures proposed. There is insufficient evidence to conclude the solutions will solve existing problems in Backwell and there is concern more problems will be created on the A370 at Farleigh and Flax Bourton east of the new link road as well as exacerbating capacity issues at the A370 crossroads.

Options considered

3.2.5 Table 5.2 shows all the options considered for the transport package at Nailsea and Backwell and which were taken forward and which were not taken forward, with a brief explanation of the rationale for the selected options.

3.2.6 However, there is insufficient clarity or evidence provided in respect of the alternatives and the decision-making process. It is necessary to see the full picture and details of each of the schemes and the benefits and dis-benefits of each provided to be able to understand the reasons why the selected options were chosen.

3.2.7 There are some schemes that are being taken forward that are not fully reflected in the proposed programme diagram. For instance the new link to bypass the Stone-edge-Batch junction and a link to bypass Portbury are not shown on the diagram only an indicative marker.

3.2.8 Option W9 that was rejected could provide wider transport benefits, but the option is not directly related to the SDLs in the chosen locations. This highlights the lack of clarity and transparency in the decision-making process and insufficient assessment of the mitigation required for existing and future traffic impacts.

3.2.9 The SDL site selection could have identified locations where minimal transport / highway interventions would be required, away from congestion hotspots where significant mitigation is required.

- 3.2.10 Option E5 relating to improvement to existing highways and junctions, such as Backwell crossroads, Station Road and the A370 through Backwell, Farleigh and Flax Bourton was rejected on the grounds that it would not mitigate the impact of SDL-related traffic at key identified congestion locations, such as Station Road railway bridge and Backwell crossroads. This confirms that there are significant congestion problems in and around Backwell and no solution exists to improve the existing available capacity at the crossroads.
- 3.2.11 Option E3 is to be taken forward which incorporates a new road link from Station Road to the A370 east of Backwell, traffic management on the A370, potential closure of Station Road, improvements for pedestrians and cyclists and bus priority at the Backwell traffic signals.
- 3.2.12 Options S1, S2, S3 a new highway link from Nailsea SDL south to A370 west of Backwell is not considered to be deliverable in construction terms and would still require traffic from Nailsea SDL bound for Bristol to pass through the congested Backwell crossroads. Further evidence is required on why this was rejected in deliverability terms and if this cannot be delivered, how can the link to the east of Backwell also crossing the railway line, still be regarded as deliverable. The current transport programme has Backwell SDL traffic still passing through the congested Backwell crossroads and no evidence to confirm it can be accommodated.

Proposed Programme

- 3.2.13 Table 5.3 identifies the shortlisted schemes which have been combined into four packages to enable phased delivery.
- 3.2.14 The mitigation schemes are referred to as the Nailsea Package in the Transport Topic Paper and the majority of measures relate to the Nailsea SDL located to the South West of Nailsea, with limited benefit to, or mitigation for, Backwell SDL. There is an absence of measures that will directly mitigate the impact from the Backwell SDL on the congestion problems in Backwell.
- 3.2.15 There is a reliance on an overall reduction in car travel in the area and trips diverting away from the crossroads. However, this strategy has not been proven.
- 3.2.16 The new highway link in Package 1 to the east of Backwell does not alleviate traffic from the villages of Farleigh and Flax Bourton. There is reference to traffic management on the A370 through these villages to manage increased traffic flow and to benefit residents and pedestrians, but no clear description of what this would be or how successful it could be.

- 3.2.17 Package 1 also suggests exploring the closure of Station Road beneath the railway bridge, allowing changes to the signal timing at Backwell crossroads to gain more capacity and benefit A370 traffic. There would be a heavy reliance on the closure of Station Road to reduce traffic at Backwell crossroads, but it is not clear if any traffic modelling has been carried out that supports this option. It is worth recognising that local traffic would continue to use Station Road to access housing and services, including Backwell Secondary School and therefore the traffic lights would need to continue to provide an opportunity for traffic to access the A370 from Station Road, as existing. There would be limited opportunity to vary the traffic light signals as a result of the closure of Station Road as a through route.
- 3.2.18 The closure will be a dis-benefit to existing residents of Backwell who would have to make a longer journey should they need to drive to Nailsea and further north. There are a proportion of trips that are made between Nailsea and Backwell School that would have to route on the new link road creating a longer journey. There is a risk more journeys could transfer to unsuitable roads to travel between Backwell and Nailsea such as Backwell Common and Chelvey Road. We understand that this was the case during August 2018 when Station Road was closed for road works.
- 3.2.19 It is not clear how the closure of Station Road will work with the enhancements to the railway station and the increased capacity of the car park, as drivers to the car park from the south and west of the station will have to make longer journeys via the new link road east of Backwell and still travel through the Backwell crossroads to access the public transport services into Bristol.
- 3.2.20 It suggests Metrobus complementary services could make use of improved signal timings at Backwell crossroads, but no modelling evidence has been presented. There is also no evidence that the road is of suitable standard to accommodate a metrobus service whilst retaining access for local use. Frequent bus movements in and out of Station Road, in addition to the pedestrian crossings at the junction and traffic to / from Dark Lane, will still need to be accommodated.
- 3.2.21 The only other improvements to the bus infrastructure is on the Long Ashton bypass, with nothing proposed within Farleigh or Flax Bourton. The standard of the new A370 link road and whether dedicated bus lanes will be provided is not clear. The ability for the transport package to create a significant shift to public transport use is questionable and not evidenced. It has not been demonstrated that the public transport strategy will offer any meaningful mitigation to the traffic from Backwell SDL.

Delivery of Programme

- 3.2.22 Table 5.8 identifies the delivery case of the programme and confirms there are significant technical challenges to deliver package 1 and significant potential issues from likely public acceptancy.
- 3.2.23 The report suggests the major challenge is getting public support for new highway links and the requirement for a new bridge structure to cross the railway line.
- 3.2.24 This highlights that the decision-making process has not been clear and transparent, with alternative growth proposals relying on more cost-effective and less technically and publicly challenging solutions fully explored.

3.3 Conclusions on Emerging Findings Transport Report

- 3.3.1 The following key information and conclusions can be drawn from the Emerging Findings Transport Report:
 - i. Additional technical studies underway, but further detail needs to be presented on the traffic modelling and mitigation strategy and why options have been discounted, to provide transparency and clarity.
 - ii. There is a need to solve existing problems as well as problems created by SDLs, but there is no distinction within the testing or mitigation measures proposed.
 - iii. Concern problems will be created on the A370 at Farleigh and Flax Bourton east of the new link road, with a significant increase in traffic.
 - iv. There is a critical reliance on large-scale mitigation and therefore a need to be certain these can be delivered and will be effective. Detailed evidence of the alternative options considered and clear reasoning for their exclusion is necessary.
 - v. There has been no consideration of alternative SDL locations or interventions. Less intrusive or less expensive transport / highway interventions could potentially be provided for alternatives. The SDL for Backwell is integrated with the Nailsea SDL with no flexibility in either SDL considered.
 - vi. Insufficient clarity or evidence in the alternative mitigation options and the decision-making process.
 - vii. Insufficient evidence to conclude that Backwell SDL traffic can be accommodated at the Backwell crossroads.

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- viii. The current transport programme discounted the link west of Backwell and therefore Backwell SDL traffic would have to travel through the congested Backwell crossroads, yet no certainty has been provided that this can be accommodated without significant adverse impacts upon the transport network.
 - ix. There is no detail of the nature of the construction challenges which led to the link road west of Backwell being discounted and why these challenges would not equally apply to the A370 link road east of Backwell.
 - x. Other highway solutions around Nailsea were put forward as offering good benefits to the town, but were not directly related to the SDLs proposed. However, should the relocation of the SDLs or distribution of houses be reconsidered, the transport package could be more effective, cheaper or deliverable. This could affect Backwell.
 - xi. There is an absence of evidence that measures could mitigate the impact of the Backwell SDL on the congestion problems in Backwell.
 - xii. The closure of Station Road to through traffic will be explored as part of Package 1, but there is no clear indication at this stage on how this will affect traffic movements and associated benefits. This is an important link to the station and Backwell School. It is uncertain if consideration has been given to the impact of Station Road remaining open on traffic flows and local junction performance.
 - xiii. The public transport improvements have been scaled back and no certainty has been provided that those can come forward. The potential mode share or mode shift from car use, or the optimum mitigation package has not been proven.

4 CONCLUSIONS

- 4.1.1 PEP has prepared representations on behalf of Backwell Parish Council, Backwell Residents' Association and Backwell Resistance in respect of:
- WED007 Transport Topic Paper 8 (Update); and
 - WED008 Emerging Findings Transport Report.
- 4.1.2 PEP has highlighted that these reports do not provide any substantial new evidence or clarification on the SDL site selection in transport terms, compared to other potential locations for the SDL.
- 4.1.3 The reports refer to new technical studies being undertaken, but limited detail has been provided and more information is required on the traffic modelling and mitigation strategy and why options have been discounted, to provide transparency and clarity. The decision-making process has not been clearly explained.
- 4.1.4 The approach to the JSP has been to assess Nailsea and Backwell SDLs together. This is flawed as there is no clear evidence of the impact from either SDL or the measures required to mitigate the traffic from each of these locations.
- 4.1.5 There is no clarification or modelling evidence provided as to the mitigation measures required to resolve existing problems, before the JSP proposals.
- 4.1.6 From the latest assessments, there is concern that the traffic modelling is not representing traffic patterns in and around Backwell with the addition of the SDLs and with or without mitigation.
- 4.1.7 Traffic associated with the Backwell SDL is now reliant on access via the A370, whereas in the previous version of the strategy it would have been able to use a new link road between the A370 and Nailsea, which would have allowed some development traffic to avoid the Backwell crossroads.
- 4.1.8 The additional vehicles from the Backwell SDL would therefore create further queuing and delay to a junction identified as an existing congestion hotspot. There is insufficient evidence provided to confirm that this problem can be adequately addressed. Reliance is placed on other trips diverting away from the centre of Backwell on the A370 link to the east of Backwell, or trips switching to public transport. However, there is no clear indication from the modelling that this will happen or be effective.
- 4.1.9 There is insufficient information to provide reasonable certainty that the A370 link east of Backwell can be delivered.

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- 4.1.10 The public transport interventions have been scaled back with no new sustainable transport corridor on the A370 link to Nailsea now proposed.
 - 4.1.11 The traffic modelling shows increases in traffic on A370 through Farleigh and Flax Bourton. There are limited options to improve public transport priority through these villages and the traffic management / road improvement proposals have not been clearly demonstrated at this stage. The current public transport strategy only has bus priority at Long Ashton bypass with some improvements to the railway station. Therefore, the potential mode share or mode shift from car use, or the optimum mitigation package cannot be proven without heavy reliance on highway infrastructure.
 - 4.1.12 The submitted documents do not explore in any detail other options for highway and public transport options around Backwell or Nailsea that could be an alternative to the focus on the A370 corridor, such as the B3128 or B3130, which have regular bus services. This should be provided to understand if alternative SDL locations were fully considered which could provide less intrusive or less expensive transport / highway interventions.
 - 4.1.13 There is insufficient evidence presented to date that demonstrates deliverability of the transport programme for Nailsea and Backwell and therefore no certainty that the traffic impact from the Backwell SDL can be effectively accommodated.
 - 4.1.14 Overall, there is a lack of robust transport analysis and evidence justifying the measures included in the SDL transport strategy and for selecting Backwell as a preferred location for a SDL.