

**Transport Review of App No  
20/P/1847 for up to 65 Houses on  
Land West of Rodney Road,  
Backwell**

**Highway and Traffic Issues**

**23 September 2020**

**For and on behalf of  
Backwell Residents Association**



**Project Ref: 2020/563**

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**Contents**

**1 Introduction.....1**

**2 Scope of Report.....1**

**3 Planning Application and Relevant Policy .....2**

**4 Review of Submitted Transport Assessment.....7**

**5 Summary and Conclusion .....24**

**Figures**

**Figure 1 Possible Road Link Considered in the 2036 Local Plan.....5**

## **1 Introduction**

- 1.1 My name is Paul Lacey BSc CEng DipTE MICE FCIHT. I am a Chartered Engineer holding a Bachelor of Science Degree in Civil Engineering and a Diploma in Transportation Engineering from the Institution of Highways and Transportation. I am a member of the Institution of Civil Engineers and a Fellow of the Chartered Institute of Highways and Transportation.
- 1.2 I have 47 years experience in highway, traffic and transportation engineering in both Local Government and private practice. I have been a Director of LvW Hghways Ltd for the past ten years and was previously employed by Peter Brett Associates LLP Consulting Engineers, where I was a Senior Associate.
- 1.3 My report has been commissioned by Backwell Residents Association who object to the development of 65 houses on land to the west of Rodney Road in Backwell. The site is contained within the north-east corner of a 700 house possible strategic site which was considered within the 2019 West of England Joint Spatial Plan (JSP).
- 1.4 The initial hearings in 2019 resulted in the two Inspectors having serious concerns about the 'soundness' of the plan. This has led to the JSP being withdrawn and the Council agreeing to this situation in April 2020.

## **2 Scope of Report**

- 2.1 LvW Highways Ltd were appointed by Backwell Residents Association to review the transport and access arrangements for the development of land served from Rodney Road for 65 houses. Reference has been made to local policy documents, to the submitted Transport Assessment prepared by Stantec, to comments made by local residents and to a site visit undertaken by LvW Highways.
- 2.2 Based on the review it was concluded that it is unlikely that sufficient improvements will be possible to the existing Rodney Road, Embercourt Drive, Westfield Road and Moorfield Road to provide a safe and suitable access to serve the site. The report also concludes that the development of the site is premature and should be considered as part of the emerging 2038 Local Plan and taking account of the Joint Local Transport Plan 4 which was approved in March 2020.

### 3 Planning Application and Relevant Policy

- 3.1 An outline planning application No 20/P/1847 was submitted on 8 August 2020 with all matters reserved except for access. This was submitted to North Somerset Council for the residential development of up to 65 dwellings including drainage infrastructure and landscaping.
- 3.2 This application is in advance of the preparation of a new Local Plan for the period up to 2038 which is programmed for completion by 2022 and would then be considered by the Secretary of State.

#### ***Core Strategy of the 2026 Adopted Local Plan***

- 3.3 The present adopted Core Strategy within the plan to 2026 was adopted in January 2017 and refers to Backwell in Policy CS32 for Service Villages. This policy was not referred to in the submitted Transport Assessment (TA).
- 3.4 Policy CS32 has the following relevant sections.

*CS32: Service villages*

*New development within or adjoining the settlement boundaries of the Service Villages of Backwell, Banwell, Churchill, Congresbury, Easton in Gordano/Pill, Long Ashton, Winscombe, Wrington and Yatton which enhances the overall sustainability of the settlement will be supported where:*

- It will not cause significant adverse impacts on services and infrastructure and the local infrastructure is sufficient to accommodate the demands of the development*
- It does not result in significant adverse cumulative impacts (such as highway impacts) likely to arise from existing and proposed development within the wider area;*
- The location of development maximises opportunities to reduce the need to travel and encourages active travel modes and public transport; and*
- It demonstrates safe and attractive pedestrian routes to facilities within the settlement within reasonable walking distance.*
- Sites outside the settlement boundaries in excess of about 25 dwellings must be brought forward as allocations through Local Plans or Neighbourhood Plans.***

- 3.5 The proposals for 65 houses are therefore contrary to the final criterion on the basis they exceed the threshold for planning applications.

- 3.6 Policy CS10 is mentioned in the submitted Transport Assessment (TA) and includes the following relevant extracts:

*Transport schemes should:*

- enhance the facilities for pedestrians, including those with reduced mobility, and other users such as cyclists;*
- deliver better local bus, rail and rapid transit services in partnership with operators;*

- *develop innovative and adaptable approaches to public transport in the rural areas of the district;*
- *improve road and personal safety and environmental conditions;*
- *reduce the adverse environmental impacts of transport and contribute towards carbon reduction;*
- *mitigate against increased traffic congestion;*

3.7 The submitted TA fails to mention the list of highway proposals in Policy CS10 that would assist the development of the allocated sites. In relation to Nailsea and Backwell the only relevant proposal is:

13) *Extended car parking facilities at Nailsea/Backwell rail station with improved pedestrian access.*

3.8 The improvement of station parking is unlikely to have any significant impact on the traffic effects of the proposed housing development and will have little impact on the surrounding access roads of Rodney Road, Embercourt Drive, Westfield Road and Moorfield Road.

### ***Joint Local Transport Plan 4(JLTP4)***

3.9 The proposed 65 houses are contained within the Taylor Wimpey proposal for 700 houses (south-west of Backwell) which require substantial highway improvements as listed in the approved Joint Local Transport Plan 4 approved in March 2020. The submissions to the Joint Spatial Plan hearings confirmed that these items of infrastructure would only come forward if the associated developments were brought forward through new Local Plans.

3.10 **Backwell Residents Association wish to make clear that they objected at the time to the proposals in the 2036 Local Plan and the Joint Spatial Plan for the development of 700 houses on land to the south-west of Backwell, together with the associated A370 link road to the station. BRA also objected, and continues to object, to the 2018 Taylor Wimpey proposals for the development of the Grove farm site which adjoins the subject site.**

3.11 Page 180 of JLTP4 lists the following improvements in relation to Nailsea and Backwell.

- *Nailsea sustainable travel, rail station and local network improvements. Enhanced bus services, including options for improved connections to Bristol via the Long Ashton Park & Ride and metrobus M2 service, explore improved interchange at Nailsea & Backwell rail station.*
- ***Nailsea – Backwell A370. New link road from Nailsea to A370 including crossing of the rail line, providing improved access to potential development locations.***
- *Clevedon-Nailsea-Bristol transport corridor improvements Investigate improved multimodal connections between M5 Junction 19 and Nailsea & Backwell, and along the Clevedon-Nailsea-Bristol corridor including bus priority and other public transport improvements.*

- 3.12 The second (bold) item concerning a new link road from Nailsea to the A370 east of Flax Bourton was also mentioned in the North Somerset New Local Plan 2036 Issues and Options consultation that took place in 2018.

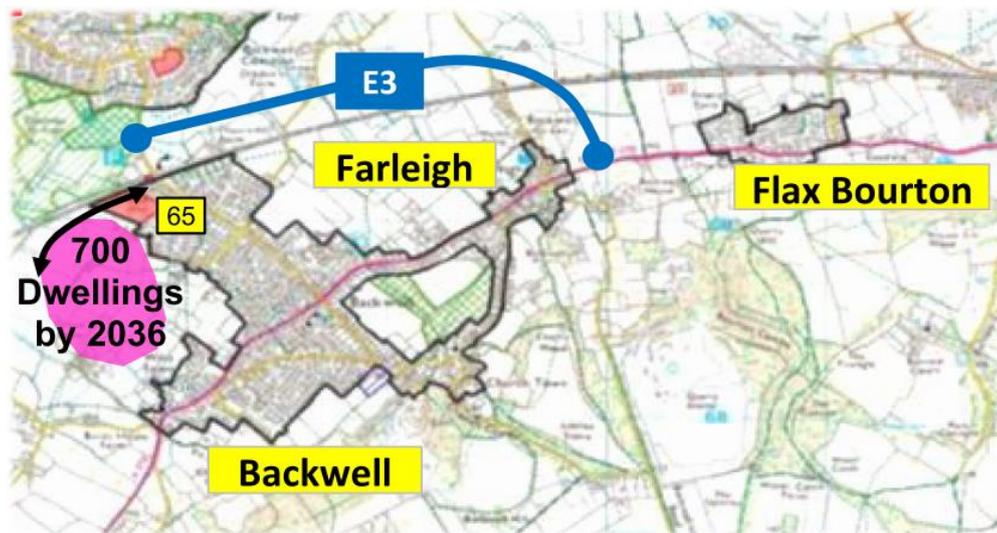
### **Consultation for 2036 Emerging Local Plan**

- 3.13 During 2018 the Council was consulting on the 2036 emerging Local Plan which at that time was intended to conform with the Joint Spatial Plan which has now been withdrawn.

- 3.14 The design principles in the evolving masterplan for 700 houses in Backwell sought to achieve the following outcomes:

- *Development to be well-related into the existing village.*
- ***New Station Road – A370 link to be delivered in advance of development commencing coupled with modifications to Station Road.***
- *Design to safeguard and enhance existing heritage assets including the rural setting of West Town Conservation Area and nearby listed buildings. Key plots and hedgerows to be retained to safeguard the open setting.*
- *The setting of Grove Farm including views from the main elevation should be protected and the form of development in the immediate vicinity of the complex should respect its historic nature.*
- *Design and materials applied to new buildings surrounding Grove Farm should reference the historic palette and styles with a lower density to create a historic core to the development.*
- *Retention of historic hedgerows will help preserve the character of the area, and the reinstatement of historic orchards within the new development should be investigated. These are shown indicatively on the concept diagram.*
- *Historic field names should be considered for application within the new development to contribute to the historic value of the site.*
- *Development form and layout to developed taking into account views to and from Chelvey to the northwest of the development.*
- *Strategic ecological habitat mitigation to be delivered including onsite features and links to wider strategic mitigation.*
- *Surface water will be managed effectively including potential for on or near site attenuation, and using a catchment based approach to managing water.*
- *Green infrastructure will feature as a key element of the development linking through and surrounding development and offering a soft transition to surrounding countryside on the western side. This will be interconnected and multifunctional having ecological, recreational, and environmental benefits.*
- *Cycle and pedestrian links will be made into Backwell from the new development providing access to the station. New and improved routes will also be located to facilitate views to surrounding landmarks including St Bridgets Church in Chelvey.*
- ***Station Road will be improved with a new access to the A370 helping to address congestion at Backwell Crossroads.***
- *A new primary school will form a focal point within the development located to offer safe and convenient walking routes to surrounding development.*

- 3.15 This list confirmed that the Council considered that a new link road was required connecting Station Road close to the rail station car park to the A370 just east of Farleigh. This would provide some relief to the A370 crossroads as traffic between Bristol and Nailsea would utilise the new road. Traffic to residential areas of Backwell close to the rail line could also use this route. **As mentioned in para 3.10 BRA are opposed to both the 700 house development and the proposed mitigation of the A370 Link Road.**
- 3.16 A plan of the proposed road is shown in **Figure 1** below



**Figure 1 Possible Road Link Considered in the 2036 Local Plan**

- 3.17 The description of the various measures required to deal with the Strategic Development Locations (which include the Backwell 700 houses) were as follows:

*Nailsea & Backwell railway station as a transport hub with cycle & pedestrian links from the strategic development locations [shown by the black arrows] and MetroBus services from the station to join the existing MetroBus infrastructure at Long Ashton Park & Ride [E6]. The first phase also proposes a new highway link from the railway station to the A370 near Farleigh [E3]. This link offers congestion relief to Backwell Crossroads.*

- 3.18 Within the consultation response provided by DLP Planning for Taylor Wimpey the following comments were made:

*2.5 TW are generally supportive of this proposed vision and the majority of the design principles set out for the Backwell SDL. However, they do question the rationale and justification of the second design principle whereby the Council require the delivery of the new Station Road to A370 link [E3] in advance of development commencing, coupled with modifications to Station Road. Transport Assessment modelling to support the pending planning application is indicating that there is sufficient capacity within Backwell crossroads (with minor highway improvements) to facilitate the additional transport movements generated by the entire Backwell SDL. At the very least TW would contend that there will be capacity to enable several phases of the Backwell SDL to come forward prior to the delivery of the proposed.*

- 3.19 The bold section confirms that Taylor Wimpey consider that the whole of the 700 house development could be accommodated on the existing highway network without the construction of a new link road between the station and the A370. As the 2036 Local Plan process has stopped the need for this road and the suitability of the site to accommodate 700 houses has not been tested through the appropriate Local Plan process.
- 3.20 It would appear that Taylor Wimpey are now trying to 'test the water' by applying for the first section of the 700 house development prior to the appropriate test for the whole site within the emerging 2038 Local Plan.

## 4 Review of Submitted Transport Assessment

- 4.1 The report prepared by Stantec is dated 2020 and is reviewed below starting at Section 3.

### *Section 3 - Existing Transport Conditions*

- 4.2 A plan is shown in Fig 3.1 which indicates the location of the site but does not mention that this is part of the larger plan for 700 houses which was presented at a Public Exhibition in November 2017. The 65 house site is in the north east corner of the larger plan for 700 houses.

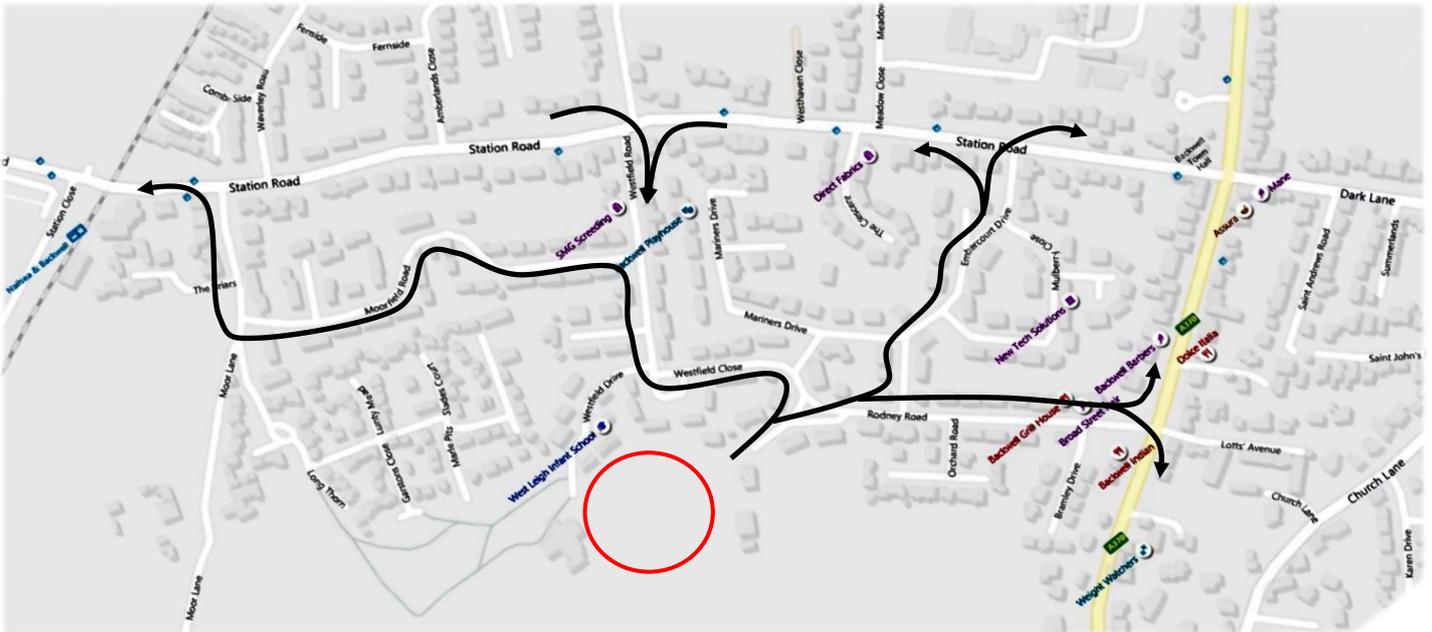


**Revised Figure 3.1 showing extent of 700 house development**

- 4.3 A description of the local highway network is provided which provides a fair description of Rodney Road but gives only a brief mention of the other routes to the site via Embercourt Drive, Westfield Road, Moorfield Road and Moor Lane. These are the only roads available for traffic generated by the site and are all between 4.8 and 5m in width with bendy alignments and substantial amounts of on-street parking.
- 4.4 The site itself is immediately adjacent to a Scout Hut, one of the the main entrances to the park, the Rainbow Preschool, the Judo Club and the Backwell Football Club. The west side of the site is adjacent to West Leigh Infants School. At various times of the day and during the evening activities take place which cause-drop off and pick-up to occur by parents. Cars are often parked along the full length of the cul-de-sac road leading to the site and will inevitably lead to additional congestion and conflict with pedestrians when the development is complete.

4.5 The safety of all existing users of the local roads is of great concern to the members of the Backwell Residents Association who consider that the roads cannot accommodate the additional vehicles and pedestrian movements that will be generated by the development. Their concerns relate to the narrow width of the local roads, the restriction in vehicle movement caused by on-street parking and the conflict between vehicles and pedestrian movements.

4.6 A plan of the roads that would be affected by the development is shown below:



4.7 In order to give a visual view of the various roads the following paragraphs provide typical photos of the routes to the site.

**Rodney Road**



**1 Looking north on A370 at junction with Rodney Road**

The white vehicle turning right is on the wrong side of Rodney Road. At all times of the day some northbound traffic on the A370 turns left and uses Rodney Road and Embercourt Drive when travelling to Nailsea. This avoids queuing traffic at the Station Road signals.



**2 Looking north on A370 just north of Rodney Road**

The crossing is regularly used in order to find a safe pedestrian route through the significant queuing that occurs on the A370.



### **3 Looking into Rodney Road from the A370**

Shops are present on both sides of the road with angled parking next to the Spar, a small car park on the right and an in-line layby for the shops on the right. The road is subject to a 7.5 tonne weight limit.



### **4 Shops on right in Rodney Road**

Parking space can often become congested with vehicles manoeuvring in and out of spaces.



### **5 View showing on-street parking beyond the shops**

The road is 4.8m at this point leaving a width of just under 3m when passing parked cars. The parking restricts two-way movement along Rodney Road and can lead to driver frustration.



### **6 View close to junction with Embercourt Drive**

Shows conflict with approaching car passing a parked vehicle.



### **7 Access to site via junction on left or at further junction on bend**

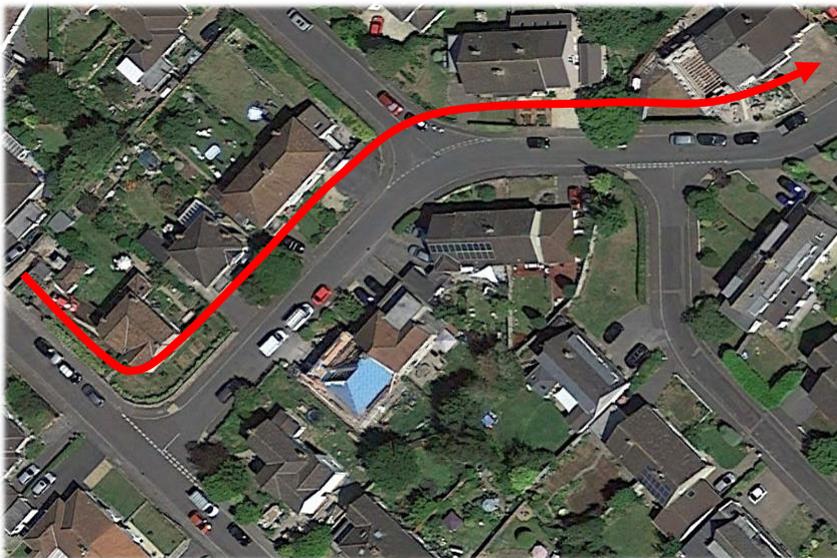
An unconventional double junction is shown.



**8 On-street parking associated with the Junior Football Club at 10.30am on a Sunday**

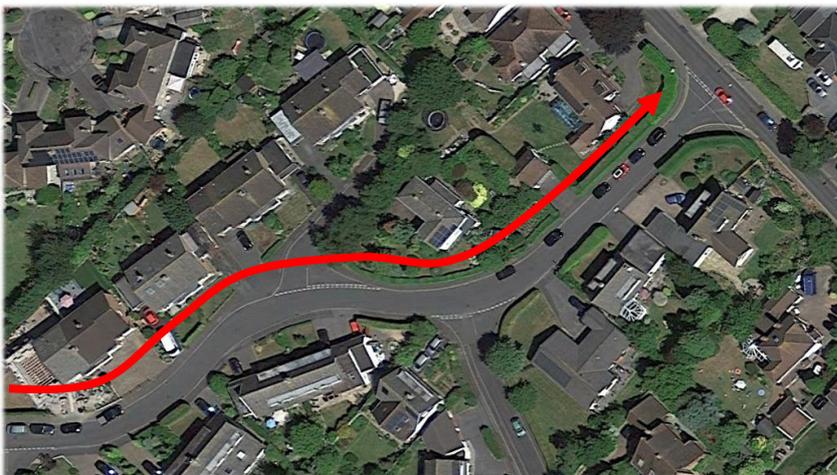
*The various sports uses, Scout Hut and Pre School result in serious on-street parking at various times. This would restrict the access to the development to a 3m single track road.*

**Embercourt Road**



**1 Southern end showing junction with Rodney Road**

Indicates bendy nature of 5m width road with typical levels of on-street parking.



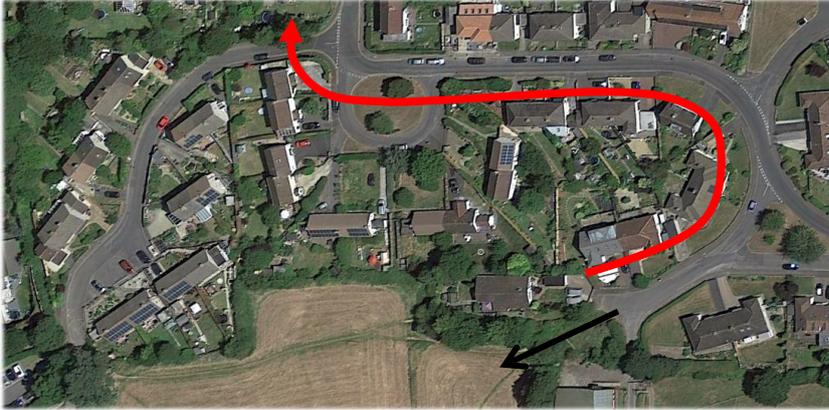
**2 Northern end showing junction with Station Road**

Indicates continuing bendy nature of 5m width road with typical levels of on-street parking.

4.8 As mentioned previously Rodney Road and Embercourt Road are used as a 'rat-run' for traffic travelling between Nailsea and the A370 to the south. This occurs when queuing traffic is present on Station Road and the A370 and often takes place outside

of the conventional peak periods. Traffic uses the route in both directions. In the morning peak period Rodney Road is subject to the greatest volume of pedestrian traffic to the Infants, Primary and Secondary schools in Backwell and will be adversely affected by additional development traffic.

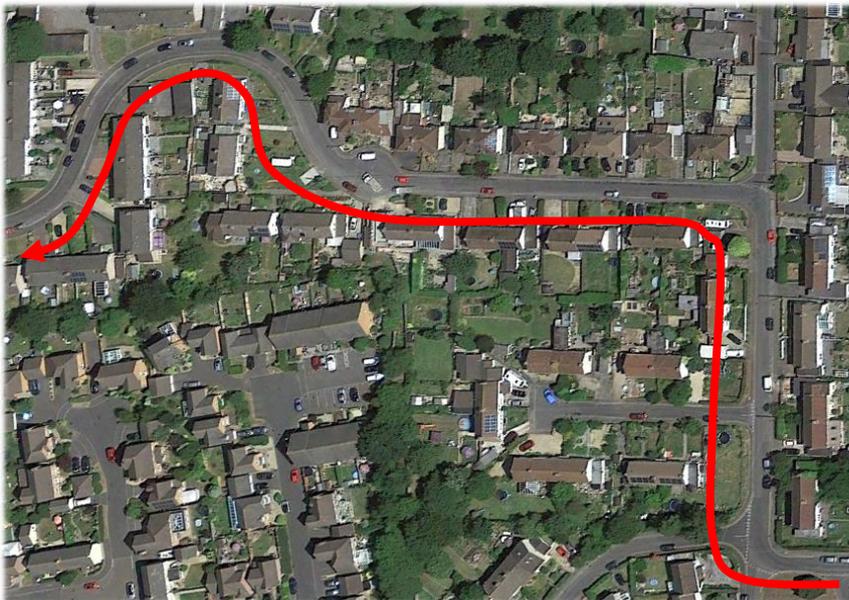
***Westfield Drive, Westfield Close and Rodney Road***



**1 Development Access shown by Arrow**

Trips to Nailsea will travel by Westfield Close with development traffic turning left at the junction with Rodney Road. View shows on-street parking on the 5m wide roads. The West Leigh School is shown in the bottom left of the photo.

***Westfield Road***



**1 Westfield Road**

The section of Westfield Road with the loop has significant on-street parking.



### **2 View showing on-street parking on Westfield Road**

The road is 5m at this point leaving a width of just under 3m when passing parked cars. The bend and parked vehicles seriously affects forward visibility.

### **Moorfield Road and Moor Lane**



### **1 Moorfield Road and Moor Lane**

The road widens to 5.5m at the mid-point of the loop and continues at 5.5m in width on Moor Lane. On-street parking is still evident on both roads. The rail station is shown in the top left on Station Road and results in rail users parking along these roads to avoid parking charges in the station car park.

The 65 house development in the left corner is another Wimpey development being constructed on Moor Lane and adding traffic to the Moor Lane/Station Road junction.

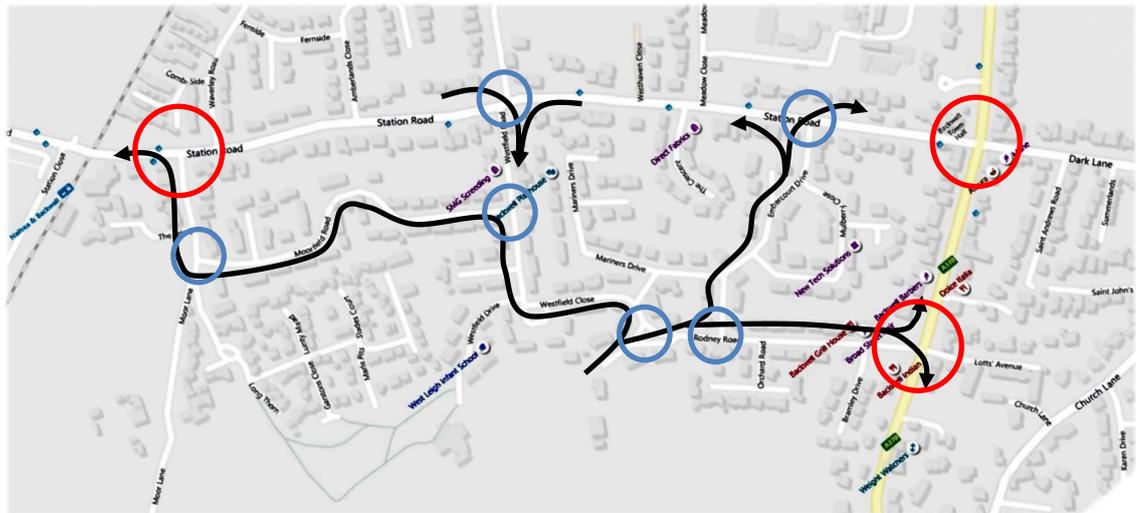
- 4.9 The views provide a better impression of the inadequacy of the surrounding local roads, the majority of which are 5m in width with residents and rail users parking on-street. In addition parents cause significant additional on-street parking demand when children are dropped-off and picked-up after the numerous activities that take place on and adjacent to the Recreation Ground.

### **Section 3.4 - Existing Traffic Flows and Vehicle Speeds**

- 4.10 Traffic surveys were commissioned on weekdays in July 2017 but the actual dates of the surveys were not shown. It is assumed that these surveys were carried out in order to test the effects of the 700 houses that were being promoted by Taylor Wimpey at that time. The following junctions were surveyed.

1. A370/Station Road/Dark Lane– signalised crossroad junction
2. Station Road/Moor Lane – 3 arm priority junction
3. A370/Rodney Road/Lotts Avenue– 3 arm priority junction + access to Lotts Avenue
4. A370/Chelvey Road – 3 arm priority junction
5. A370/Brockley Lane/ Brockley Combe Road – signalised crossroad junction.

- 4.11 The first three junctions are relevant to the Rodney Road application and the last two to the assessment of the 700 houses. The plan below shows the surveyed junctions in red and other junctions in blue which should have been surveyed in order to determine the impact of the development traffic on the complex local road network.
- 4.12 With the significant on-street parking problems close to the development access it is also considered essential that on-street surveys of parking demand are undertaken when the various events take place at and adjacent to the Recreation Ground.
- 4.13 It is considered that additional junction surveys and on-street parking surveys close to the site and along Rodney Road should be requested by the highway authority and an Addendum provided to the Transport Assessment addressing the local traffic issues close to the site. The highway authority cannot determine the full traffic impact of the development in the absence of this additional data.



Sites in blue were not included in the Transport Assessment

- 4.14 Reference to guidance on the production of Transport Assessments is now limited but was available in a document produced by the Department for Transport in 2007 titled ‘Guidance on Transport Assessment’. This indicated that:

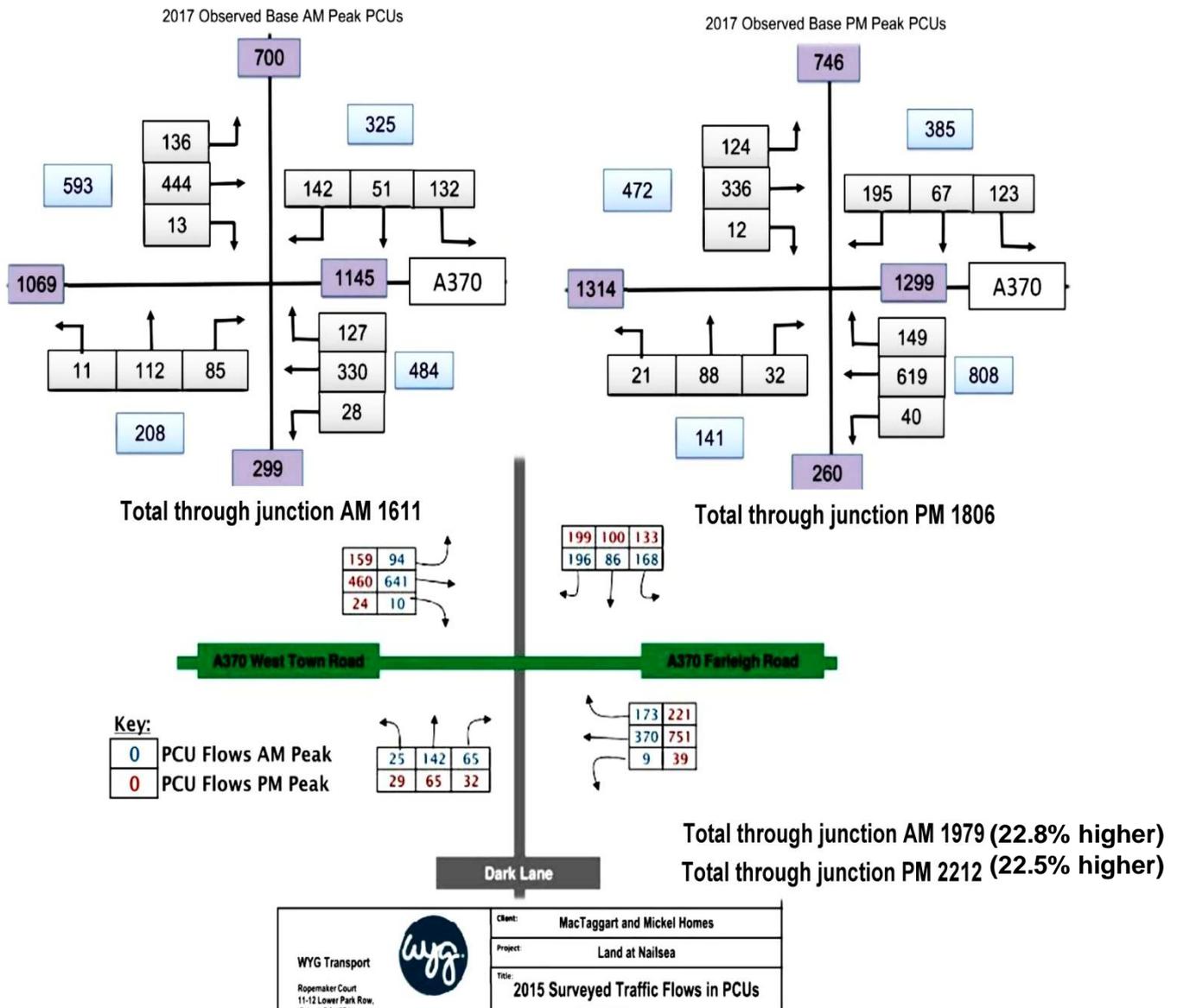
*The traffic data should reflect the normal traffic flow conditions on the transport network (e.g. non-school holiday periods, typical weather conditions etc.) in the vicinity of the site, and should be valid for the intended purposes. It should also take account of holiday periods in tourist areas, where peaks could occur in periods that might normally be considered non-neutral. **The recommended periods for data collection are spring and autumn, which include the neutral months of April, May, June, September and October.***

- 4.15 The surveys undertaken in July are outside of the recommended months and could easily have resulted in lower flows on the A370. During July many school children will

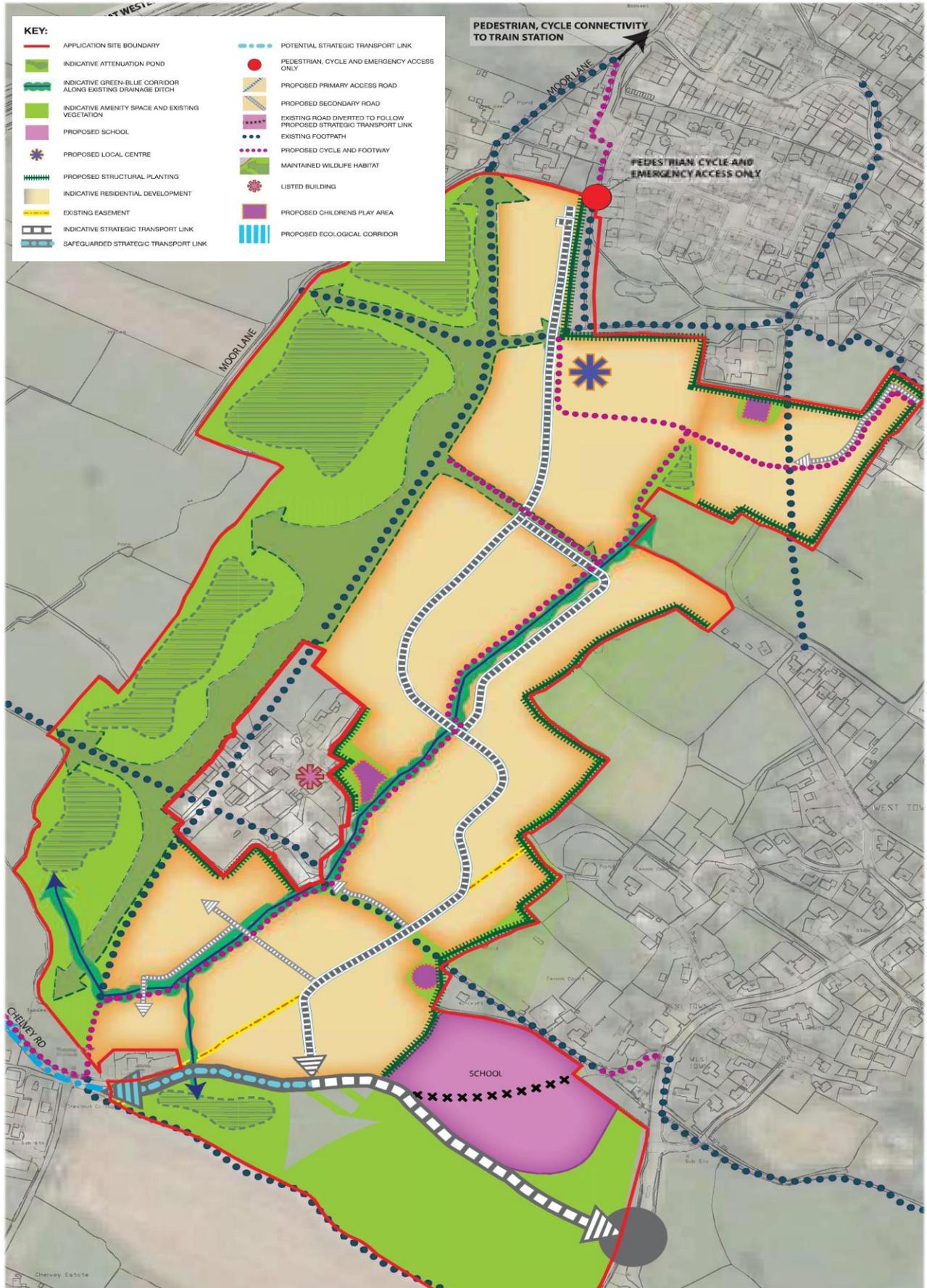
have completed their exam periods and may not be at school, colleges will have closed for the summer and some staff based in Bristol will be on holiday.

- 4.16 A previous Transport Assessment was prepared by WYG Consultants for a site on the south west side of Nailsea. This report also looked at the capacity issues at the A370 Station Road signals and undertook traffic surveys on the 30 June 2015 in the morning and evening peak periods. The morning peak was between 0745 and 0845 and the evening from 1700 to 1800 hours. As the Stantec Transport Assessment used data from July it might be assumed that the counts would be similar. This is not the case however as can be seen from the traffic diagram of the junction on the next page.
- 4.17 In terms of total traffic flows through the junction the older 2015 WYG traffic counts were 22.8% higher in the am peak and 22.5% higher in the evening peak when compared with the Stantec 2017 surveys. For the north-eastbound A370 flows approaching the traffic signals the 2015 WYG counts were 25.6% higher in the am peak and 36.2% higher in the pm peak when compared to the Stantec counts.
- 4.18 The latter movements represent the traffic that regularly queues past the Rodney Road junction and indicates that the Stantec predicted future traffic flows for the Station Road and Rodney Road junctions could be between 25% to 36% low in the north-eastbound direction. The Stantec detailed analysis of junction capacity is likely to show unrealistic results and substantially underestimate the impact of future traffic growth and the impact of development traffic.

**Stantec Traffic Flows compared to WYG Survey**



- 4.19 It is considered essential that additional capacity analysis is undertaken using the data from the WYG report. This should take account of the 700 house development which has a new access planned to the south of Backwell. These tests would confirm whether the Strategic Site can be accommodated. If it is shown that the impact on the Station Road junction is excessive it will indicate that the first 65 house corner of the larger site should be refused planning permission.
- 4.20 The suggested masterplan for the larger site (shown below) indicated that the proposed access to the 65 house development onto Rodney Road would be a Secondary route where future control would be possible if a Primary Access is available to the south of the village. If the Primary route is delayed or is omitted all together there will be no scope for reducing traffic flow onto Rodney Road.



### Sections 3.5 and 3.6

- 4.21 Sections 3.5 and 3.6 of the Transport Assessment describe the 'Local Facilities and Amenities' and the 'Site Accessibility by Non-Car Modes'. It is accepted that the descriptions confirm that the majority of facilities in the village are within an 800 metre walk distance of the site. This could encourage walking but also results in some parents using their cars to transport children to the three schools and to leisure facilities even if these are within a walking distance of 800m.
- 4.22 The residents are particularly concerned about the additional conflict between development traffic and pedestrian movement and have made considerable numbers of objections.

### Residents Points of Objection

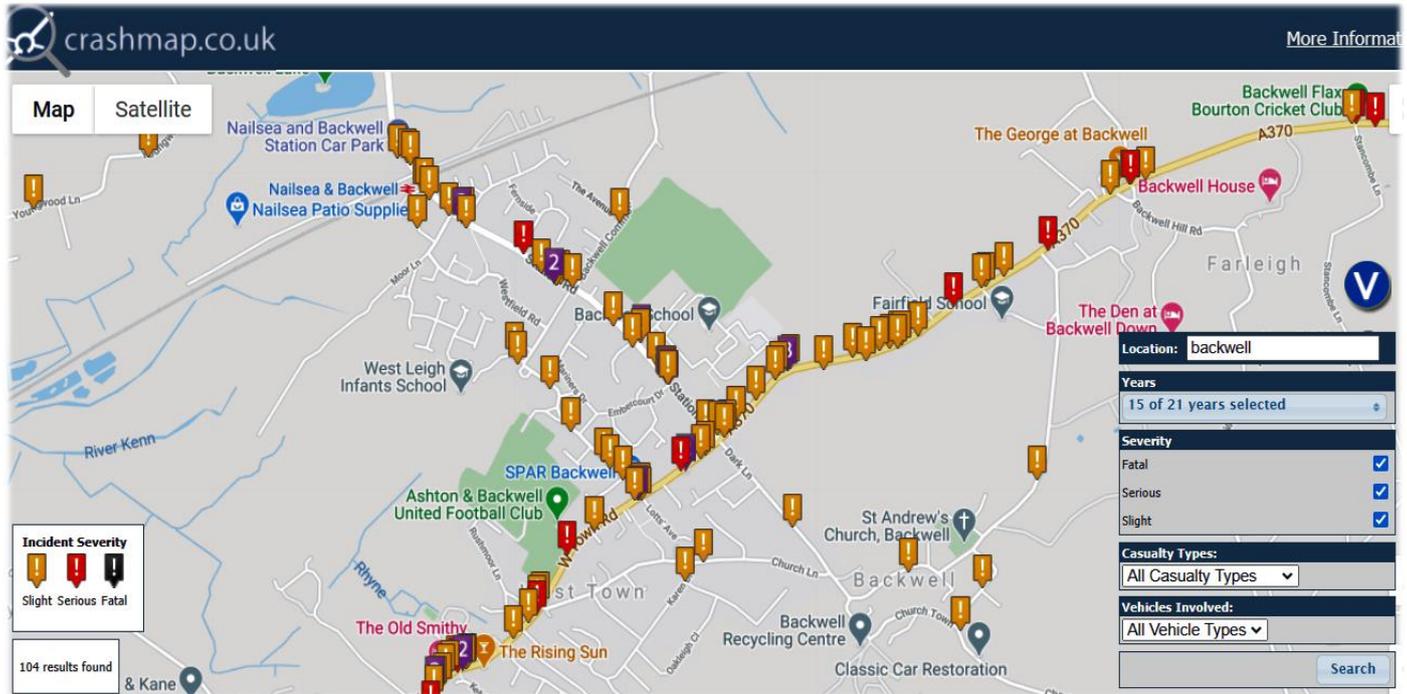
- 4.23 As the residents have a local view of the potential problems it is considered that the main points are important and are therefore summarised below:
- *"The proposed access road into this development would go through a narrow gap between the Scout Hut and a residential property, sharing this limited gap with an important footpath, used by many residents, including schoolchildren. It is a busy corner due to heavy use of the Scout Hut and many other facilities on the adjacent Playing Fields.*
  - *The A370 has claimed 1 child's life whilst crossing to attend the junior school. This development will increase risks.*
  - *The crossings on the A370 benefit pedestrians but cause traffic build up - there has been many minor accidents caused by traffic exiting Rodney Road.*
  - *Some of the parking in Rodney Road for the shops is dangerous as vehicles have to reverse into traffic flow.*
  - *There is a large pedestrian footfall in this area of children, some unaccompanied, walking to and from these various clubs. It is also a popular route taken by parents walking their children to Westleigh Infant School. In my opinion this is not a safe place to put a busy access road.*
  - *As well as the narrow unsuitable access road, traffic will exit onto Rodney Road. Rodney Road is a narrow largely residential road where houses have limited parking space and on street parking is common. This means driving along Rodney Road is already difficult with cars having to zig zag around and stopping behind parked vehicles at all times of the day as two cars can rarely pass side by side.*
  - *The route beyond Rodney Road is out onto the already heavily congested A370 although more likely cars will be cutting through to Station Road via Embercourt Drive or Westfield Close all of which are as unsuitable as Rodney Road to take additional traffic.*
  - *Margins for error have been reduced by wider modern vehicles. There has been a huge increase in parcel delivery by large vans. Junctions to the wider road network are T-junctions onto the A370 or Station Road; are very busy at peak times and for much of the day.*
  - *Large construction lorries would go on the kerb causing damage and danger for people, mothers and children possibly with push chairs etc walking on them on the way to school. The road is subject to a 7.5 tonne weight limit which would be exceeded by vehicles delivering materials and concrete to the site.*

- *Taylor Wimpey are currently building houses on Coppice Place and the noise nuisance with their use of Pile Drivers is a very serious concern. They are affecting residents health and well being.*
- *This site is well used by residents, children and dog walkers alike. It is a popular cut through for parents and children using Rainbows Pre-School and West Leigh Infants, as well as the playing fields in the recreation area and the Tennis Club.*
- *The access road to the playing fields is single track and currently vehicles have to wait on Rodney Road for traffic exiting the car park to pass. This can take several minutes due to the length of the access road and pedestrians in the way. Currently, residents and visitors park on Rodney Road so during this time the road is blocked. This is not a problem at the moment as the road is a cul de sac but will be an issue if the development goes ahead.*
- *Whilst parking restrictions could be introduced, they are the subject of a separate TRO consultation process so the developer cannot rely on their introduction. Therefore, since the development has not addressed this issue in its layout it should be refused.*
- *Backwell is already grid locked at school times and many parents do not walk and drive to keep their children safe.*
- *The site would result in a potentially hazardous increase in traffic in existing, surrounding roads, particularly Embercourt Drive which is already used as a 'rat run', also being quite narrow, winding and with a fair number of parked cars.*
- *There are also five junctions which, although they are marked with 'give way' lines, are often driven through with insufficient regard to the need to take care and give way. Owing to parked cars, drivers approaching these junctions are often on the wrong side of the road.*
- *There is pedestrian traffic, particularly with small children on their way to school and playgroup, which adds to the difficulties when cars are trying to find gaps to allow others to come in the opposite direction.*
- *The road is so busy North Somerset Council implemented a traffic and pedestrian calming measure with signage on Rodney Road to aid social distancing during Covid 19. It is a necessary footpath/pavement walking route for parents and pupils attending Westleigh Infant School and Rainbows pre-school, as well as many young visitors to the Scout Hut, Football club other recreational facilities.*
- *This site is situated next to the playing fields which supports many village activities for all ages, tennis, bowls, football, skate boarding, judo, a youth club and over 400 children in the uniformed organisations using the scout hut every week."*

4.24 It is clear that considerable thought has been put into the objections by residents. They are not based on proforma objections and are based on local knowledge which needs to be seriously considered by the highway and planning authority in coming to a decision.

**Section 3.7 - Accident Data**

4.25 In order to show a visual view of the accident history the CrashMap program has been used to investigate the injury accidents over the past fifteen years. The diagram shows accidents between 2004 and 2018.



4.26 By looking at a longer period of time than used in the Transport Assessment it is easier to see the roads which have significant numbers of accidents. The roads with high numbers are the A370, Station Road and Rodney Road. As most residential access roads have no injury accidents it is clear that the accidents along Rodney Road confirm the views of residents that a safety issue exists.

**Section 5.4 - Vehicular Access Strategy**

**Site Access**

4.27 Although access is to be determined as a detailed consideration there appears to be only one plan 46669/5501/001 at the end of volume 1 of the Transport Assessment. This is shown superimposed onto an OS map extract below and indicates an area of the existing road circled in red where works are likely to be required but are not shown. Comments from the highway authority are not yet available in the planning documents but should seek additional details before a decision can be made.



- 4.28 The view of the end of the cul-de-sac is shown in the photo with the access to the Scouts and sports facilities on the left, grass area ahead where the new access is proposed and an existing access to a bungalow on the right. A footpath connection to the Infants School is present between the bungalow and the grass area. The proposed plan appears to have incorporated this footpath but will require pedestrians to cross the new access road at the mid-point of the bend into the site. This will result in vehicle/pedestrian conflict which does not exist at present.

**Section 5.6 - Improvements to Rodney Road**

- 4.29 This section refers to the various activities that take place close to the site entrance and the pressures that result in terms of on-street parking associated with drop-off and pick-up. The report suggests that:

*“The proposed development will not impact on these short periods of increased vehicular activity on Rodney Road since the development is adjacent to the school and Playing Fields and will deliver direct walking connection to these two*

*destinations, therefore not creating any additional vehicular demand associated with the use of these facilities.”*

- 4.30 These comments ignore the fact that additional development traffic will be accessing and leaving the site at the same times that activities (in the various clubs) are taking place. This additional traffic will be in conflict with parents trying to drop-off and pick-up children and could result in dangers to children walking along and across the road to get to the Recreation Ground access.
- 4.31 The report then suggests that an area of land within the ownership of NSC next to the infants school could be used as a parking area for both the school and for drop-off and pick-up. It is understood that this land has been reserved for the possible expansion of the school and as far as is known the Council have no plans for using the land as suggested by the developer.
- 4.32 It is also suggested that:
- “The developer would offer to consider a highway improvement scheme on Rodney Road with the aim to reduce the impact of traffic and traffic speeds on this road as well as improve facilities for pedestrians. The identification of such a scheme would be done through working collaboratively with NSC and the Parish Council so that any solution meets the requirements of the local community and address their concerns.”*
- 4.33 If this proposal is serious it is essential that a scheme is developed before a decision is made on the planning application. As mentioned in the application form all items are reserved with the exception of access which should be considered in detail. This should include the whole of Rodney Road rather than just the connection to Rodney road shown in para. 4.27. If an acceptable scheme can be agreed further negotiations would be needed to determine the financial contribution that would be made to the Council by the applicant. If the Taylor Wimpey financial offer is too low there can be no guarantee that the Council will be able to finance the remainder and in this case the impact of the traffic on Rodney Road would not be mitigated.

### **Section 5.8 - Construction Traffic Management Plan**

- 4.34 The report suggests that a CTMP will be developed after the grant of outline permission as a planning condition. One of the suggested topics is the *“Routing of delivery vehicles in and out of the site”*. It is assumed that construction traffic would have to use Rodney Road but there is no analysis of whether this is feasible and what effect it could have on the shops and residents who front the road.
- 4.35 As the impact on the residents and users of Rodney Road will be significant, with nearly all deliveries being made by vehicles in excess of the 7.5 tonnes weight limit, the details of the plan should be determined as part of the application rather than as a condition after outline permission has been approved.

### **Section 6.5 - Vehicle Trip Generation**

- 4.36 Vehicle trip rates have been calculated using person movement rates from TRICS data and mode split data for different journey purposes. This method has produced lower

rates than used by WS Atkins in the modelling of development options across the Greater Bristol area for the Joint Transport Study.

- 4.37 If the slightly higher rates of WS Atkins are used the number of trips is predicted as shown in the table below:

Table 6.7: Total Vehicle Trips – 65 Dwellings

	AM Peak Hour			PM Peak Hour		
	Arrival	Departure	Total	Arrival	Departure	Total
<b>Stantec Vehicle Trips</b>	6	19	25	17	11	28
<b>WS Atkins Rates</b>	10	24	33	21	13	34

- 4.38 Trip generation predictions are not a pure science and obviously can be variable from one site to another. As ‘worst case’ tests are often preferred by highway authorities it is suggested that future traffic predictions and capacity tests should use the higher rates. They will also fully test the possible impacts of the development on the local access roads before the traffic gets to the main road network.

### **Section 7.2 - Assessment Years and Traffic Growth**

- 4.39 It is often considered that a forecast year should be five years after the submission of the application which would indicate that 2025 would be appropriate. The Transport Assessment has used 2024 which is unlikely to alter the conclusions of the capacity tests.
- 4.40 The most significant concern is that the base survey in July 2017 has underestimated existing traffic flows that occur in the spring and autumn months of April, May, June and September and October. This concern was raised in para. 4.17 and 4.18 which indicated that traffic flows observed through the Station Road traffic signals were 22% higher in counts undertaken by WYG Consultants in June 2015. The capacity tests at the signals should be re-run using the WYG counts.

### **Section 7.7 - Junction Capacity Assessment**

- 4.41 The results of the capacity tests confirm that the Station Road signals will become severely overcapacity based on normal levels of traffic growth and regardless of the proposed development. With the higher base traffic flows counted in the WYG Transport Assessment this situation will be even worse and likely to result in very long queues north-eastbound towards Bristol in the morning peak and away from Bristol in the evening. Queuing traffic is also frequent at other times of days particularly during the mid afternoon period when children are leaving school.
- 4.42 Whilst 65 houses would only have a small additional effect, it is evident that the transport infrastructure does not have the capacity to accommodate additional development without significant improvements which needs to be addressed through the development plan process.

4.43 This completes the review of the Transport Assessment and confirms that additional information is required from Stantec before a decision could be made on the application. Four major issues need to be addressed:

- *The validity of using traffic survey data in July 2017 which appear to show traffic levels considerably lower at the Station Road signals than observed by WYG Consultants in June 2015.*
- *The need to undertake new junction counts (shown in blue in para 4.13) and on-street parking surveys on Rodney Road.*
- *The need to consider the highway improvements that can be made to the local roads of Rodney Road, Embercourt Drive, Westfield Road and Moorfield Road to mitigate the adverse effects of the development traffic. These roads need to be considered before a planning permission can be given where highway access is to be considered in detail.*
- *The requirement to consider Construction Access at the outline stage rather than as a planning condition after approval.*

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## 5 Summary and Conclusion

- 5.1 LvW Highways Ltd have been asked to undertake an independent review of the transport and access arrangements for the development of land served from Rodney Road in Backwell.
- 5.2 Investigation of the emerging policy documents indicates that Taylor Wimpey were preparing to submit an outline application in 2017/2018 for a Strategic Development of 700 houses to the south of Backwell. This was being considered by NSC as part of the 2036 Local Plan process. For this development to be acceptable the Council considered that a New Link road would be required from Nailsea to A370 including a crossing of the rail line, providing improved access to potential development locations. This was intended to remove some traffic from the Station Road/A370 traffic signals which cause serious traffic queues during the peak periods.
- 5.3 As a number of access points are possible to the larger 700 house development it is considered essential that the site is considered as a whole rather than on a piecemeal basis. This should be undertaken as part of the 2038 Local Plan process.
- 5.4 **Backwell Residents Association wish to make clear that they objected at the time to the proposals in the 2036 Local Plan and the Joint Spatial Plan for the development of 700 houses on land to the south-west of Backwell, together with the associated A370 link road to the station. BRA also objected, and continues to object, to the 2018 Taylor Wimpey proposals for the development of the Grove farm site which adjoins the subject site.**
- 5.5 A review of the Transport Assessment prepared by Stantec for the 65 house development first looked at the description of the local roads such as Rodney Road that will provide the access routes to the site. This did not describe the local roads in detail and this report has provided photos which clearly indicate the limitations resulting from roads 5m in width with considerable numbers of on-street parked cars and vans.
- 5.6 The site itself is immediately adjacent to a Scout Hut, one of the main entrances to the park, the Rainbow Preschool, the Judo Club and the Backwell Football Club. The west side of the site is adjacent to West Leigh Infants School. At various times of the day and during the evening activities take place which cause drop-off and pick-up to occur by parents. Cars are often parked along the full length of the cul-de-sac road leading to the site and will inevitably lead to additional congestion and conflict with pedestrians when the development is complete.
- 5.7 A review of the traffic survey data collected for the Transport Assessment indicates that the flows at the Station Road/A370 junction could be low due to the surveys being undertaken in July. A comparison with data available in a WYG Consultants report indicates that counts in June 2015 were approximately 22% higher than those used by Stantec which were observed in July 2017. The surveys also failed to count numerous local junctions as indicated in a diagram in para.4.13 and failed to observe on-street parking demands on Rodney Road close to the Recreation Ground entrance.
- 5.8 In relation to the local roads a selection of comments made by local residents give a good description of the problems that already occur related to drop-off and pick-up of children close to the proposed access next to the access to the Recreation Ground. It is clear that considerable thought has been put into the objections by residents.

They are not based on proforma objections and are based on local knowledge which needs to be seriously considered by the highway and planning authority in coming to a decision.

- 5.9 The developer has offered to look at a highway improvement scheme on Rodney Road to mitigate the effects of development traffic. The application seeks to get permission in detail for the highway access and this should not be determined before this Rodney Road improvement scheme is designed. It will also be important to ensure that any scheme is achievable as the developer is only offering a proportion of the estimated costs. If the Council have insufficient funds then the scheme is unlikely to be constructed and the necessary mitigation will not occur.
- 5.10 The final sections of the Transport Assessment describe the prediction of future traffic flows in 2024 and the assessment of capacity at the Station Road junction. Despite the flows being lower than observed in the WYG Consultants report it is predicted that the junction will be over capacity in 2024 based on the growth of the existing traffic. As traffic survey data collected in July 2017 appears to be low the capacity analysis should be repeated using the higher traffic flows observed in the 2015 surveys undertaken by WYG Consultants.
- 5.11 Whilst 65 houses would only have a small additional effect on the operation of the junction, it is evident that the transport infrastructure does not have the capacity to accommodate additional development without significant improvements which needs to be addressed through the development plan process.

### **Conclusion**

- 5.12 Based on the review it is considered unlikely that sufficient improvements will be possible to the existing Rodney Road, Embercourt Drive, Westfield Road and Moorfield Road to provide a safe and suitable access to serve the site and to allow for construction traffic. The report also concludes that the development of the site is premature and should be considered as part of the emerging 2038 Local Plan.