**NORTH SOMERSET LOCAL PLAN 2038: PREFERRED OPTIONS CONSULTATION DRAFT**

**REPRESENTATIONS ON BEHALF OF BACKWELL RESIDENTS ASSOCIATION**

**Strategic Priorities (page 6)**

Backwell Residents Association (BRA) is a voluntary organization with over 400 households and 700 paid-up members, whose aim is to support and protect the character and vitality of the village now and into the future. We support and approve of much of the content of the draft Plan. However, our response to the draft plan concentrates predominantly on the potential effects on Backwell village itself.

Backwell Residents Association (BRA) broadly supports the Local Plan’s strategic priorities, in particular to locate new development close to places with a wide range of services, facilities and job opportunities. It is noted that these priorities include reducing car use and delivering strategic transport infrastructure where it is necessary to support new development and enable sustainable travel options.

We welcome the recognition that these two priorities are not mutually exclusive and that whilst all steps must be taken to reduce car usage, if new development is located where infrastructure is inadequate to meet its needs, it will remain necessary to deliver new road infrastructure both to accommodate additional car journeys generated by the developments and provide additional public transport corridors.

The Local Plan must be ambitious in its approach to reducing car usage, by setting a specific target for reducing the use of private cars by the end of the plan period; the current priority to reduce car use by an unspecified amount does not go far enough to tackle the climate emergency.

**SP3 Spatial Strategy**

In the context of the climate emergency the proposed spatial strategy is inadequate and fails to achieve a radical reduction in carbon emissions. The spatial strategy gives priority to “locating new residential and mixed-use developments in or close to urban areas where there is an existing or proposed wide range of facilities, services and jobs, and there are opportunities to encourage active travel, particularly at locations which are currently, or have the potential to be, well served by public transport”. This rather generic strategy fails to acknowledge the significantly greater opportunities to deliver highly sustainable new neighbourhoods at Weston-Super-Mare and Bristol.

As a first priority, the spatial strategy should direct growth to these locations, including ambitious proposals for exceptionally sustainable new neighbourhoods, supported by enhancements in public transport, including mass transit. This approach is supported by the Sustainability Appraisal (SA) accompanying the earlier “Choices” consultation on the Local Plan 2038.

As set out within our representations to the Choices consultation, the urban focus strategy out-performed all other development strategies when set against the SA objectives and provided the potential to deliver high quality, sustainable infrastructure including Mass Transit; improved access to healthcare, education and other facilities, job opportunities and delivery of decentralised energy generation. Weston-Super-Mare and the edge of Bristol should be placed at the front and centre of this spatial strategy to accommodate strategic scale development which could support mass transit, energy generation and walkable neighbourhoods and provide housing in areas of greatest housing need within the District.

As drafted the spatial strategy serves to direct unsustainable levels of growth to Nailsea and Backwell. At the time of reporting the draft spatial strategy to the Council’s Executive on 28 April 2021, it was envisaged that Backwell and Yatton would jointly accommodating around 1,000 new homes. However, the Preferred Options serve to direct a 1,511 new homes to these settlements, of which 1,120 are located at Backwell. This represents a hugely significant and unsustainable level of growth for Backwell to accommodate, equivalent to the construction of around 75 homes per annum throughout the 15 year life of the plan and a subsequent 60% increase in the village’s population. This would have a significant effect on the community of Backwell, in terms of the urbanisation of the area, its significant and rapid growth to a scale commensurate with a town, the loss of substantial accessible green space, the introduction of substantial new road infrastructure and the consequential adverse impacts of such extensive development on the visual appearance, character and rural qualities of the village and its setting and the associated wellbeing of its residents. For these reasons, BRA objects to the draft spatial strategy and its implications for the district’s future planned growth.

**Policy SP6: Villages**

BRA supports the provisions of Policy SP6 which serve to control the scale and form of development at the Villages. The policy defines villages as those settlements (beyond the four main towns) which are defined by settlement boundaries on the Proposals Map. The Proposals Map makes no distinction between Backwell, Yatton and the other rural villages in this regard. Accordingly, it follows that Policy SP6 applies to Backwell and Yatton.

BRA welcomes the policy requirements to ensure that new development:

* results in a form, design and scale of development which is high quality, respects and enhances the local character, contributes to placemaking and the reinforcement of local distinctiveness, and can be readily assimilated into the village;
* includes housing of a size, type, tenure and range of housing reflecting local community needs;
* will not cause significant adverse impacts on local services and infrastructure, including cumulative impacts;
* maximises opportunities to reduce the need to travel and connects to local facilities by high quality walking and cycling infrastructure, with good public transport connections for longer trips; and
* complements the defined local centres and contributes to their vitality and viability.

Beyond the settlement boundary the policy serves to strictly control new residential development at villages. BRA supports this approach.

Policy SP6 fails to draw a distinction between the sustainability of Backwell and other settlements to justify the scale of growth through the draft plan. No evidence has been provided through the supporting documentation to demonstrate that the village’s proximity to Nailsea and the train station is sufficient to justify such a hugely significant uplift in planned housing growth at Backwell when compared with other villages in the District; particularly given the poor condition of the existing station and the limited potential for expansion.

Whilst it is acknowledged that some growth beyond the settlement boundary of Backwell may need to be planned through allocation(s), such proposals must continue to comply with the above criteria and maintain Backwell’s local distinctiveness and identity as a village. A level of growth broadly equivalent to growth levels delivered through the adopted Local Plan and Neighbourhood Plan would be compatible with these criteria. Proposals which would prejudice the village’s identity and result in Backwell becoming a dormitory town with reliance on Bristol for the majority of employment, must be avoided. In BRA’s opinion, proposals for 1,100 new homes at Backwell over a 15 year period and the associated infrastructure and possible employment are unjustified and would have a significant and harmful impact on Backwell, its distinctive character and sense of place. Proposals for substantial new infrastructure would damage the tranquil rural setting of the village and no evidence has been provided through this draft plan to demonstrate that such infrastructure would deliver any benefits to the village by fully mitigating the impacts of new development on Backwell. Accordingly, the proposed strategy for Backwell is incompatible with policy SP6 and the scale of development should be reduced significantly.

**SP7 Green Belt**

BRA objects strongly to the proposed policy SP7, in particular the proposed removal of land from the Green Belt at East Backwell and the limited extent of land proposed for removal from the Green Belt at Yanley Lane.

As set out within our representations to the “Choices” consultation, land should only be removed from the Green Belt through the Local Plan process where there is evidence of exceptional circumstances, as defined by the NPPF, paragraph 141. The LPA must be able to demonstrate that it has examined all reasonable alternative options before land is removed from the Green Belt.

In this regard, the Spatial Strategy and Capacity paper (February 2022) acknowledges that 22 non Green Belt sites at Weston-Super-Mare (west of M5) covering 180 hectares, with potential capacity for around 1,705 dwellings have been discounted from further consideration due to partial inclusion within Flood Zone 3A. However, on the basis that insufficient land is available outside flood zone 1 and Green Belt, full consideration should be given to sites in flood zones 2 and 3a through the application of the sequential test, in accordance with the NPPF, to ensure all reasonable alternatives to Green Belt development have been fully explored before exceptional circumstances can be established for the release of Green Belt. This approach should apply to all sites within or adjoining settlements with settlement boundaries and not limited to Weston-Super-Mare, to ensure all sites where the flood risk can be effectively mitigated, contribute towards the housing provision before Green Belt land is considered for development.

In addition, there is no evidence that NSC has undertaken a full asset management review to identify and include land within its ownership for consideration. BRA understands that the Council’s offices at Castlewood, Clevedon are due to be sold by the Council and could offer a suitable location for residential development, thereby contributing towards the urban capacity of the main towns. Further opportunities for redevelopment may exist through a review of NSC’s landownership which could reduce the need for development on greenfield land. These opportunities must be fully explored through the Local Plan.

As drafted, the evidence underpinning the Preferred Options fails to demonstrate that all reasonable alternatives have been explored, contrary to paragraph 141 of the NPPF.

Notwithstanding the above, BRA acknowledges that given the scale of the housing requirement, established by the Government’s Standard Methodology, there remains a strong likelihood that land will need to be removed from the Green Belt in order to meet the housing need in full.

Under these circumstances, the NPPF requires LPAs to take account of the need to achieve sustainable patterns of development, including the impact of channelling development to locations beyond the outer Green Belt boundary.

NSC should take a strategic, long-term approach to redefining the Green Belt to the south-west of Bristol, to ensure a comprehensive, co-ordinated approach is taken to the development of this area to contribute significantly towards North Somerset’s housing needs over this plan period and potentially beyond. NSC should adopt a broader, holistic approach towards achieving sustainable development, recognising the role it plays and must continue to play as a rural District towards the UK’s food security and the sustainability of the supply chain, reducing the UK’s reliance on food imports and the carbon footprint of associated transport emissions.

Proposed allocations at Nailsea and Backwell would result in the permanent loss of large swathes of best and most versatile land, the majority Grade 1 at Backwell (See Nailsea and Backwell Broad Locations Template, page 7). The Sustainability Appraisal acknowledges that development of this land would have a significant negative effect which cannot be mitigated. The permanent loss of high quality arable farmland must be afforded substantial weight through the sustainability appraisal in order to ensure a wholly sustainable strategy for the future development of North Somerset.

The Preferred Options proposals to limit the removal of land from the green belt to Yanley Lane only, is short-sighted.

The Edge of Bristol Broad Location Template paper identifies limited primary constraints within the broad location; with such constraints affecting small areas on the periphery only. Although NSC suggests that the triangular area of land north of the railway line plays an important Green Belt role and lies within Flood Zone 2. However, land south of the A370 offers a relatively unconstrained location for residential development, subject to appropriate design to address the landscape sensitivity within the area. Comprehensive development of the area would offer the opportunity to create an attractive new entrance into Bristol and safeguard green corridors along the A370 to maintain the separate identity of Long Ashton and a distinct transition into the rural landscape of North Somerset. In addition, an enlarged development area, extending towards the A370 would enable the developers to bring forward their proposals for a new railway station on the existing line, providing services to Bristol and Weston-Super-Mare, thereby enhancing the site’s sustainable transport infrastructure.

Based on proposals submitted by the promoting developers to the Joint Spatial Strategy in 2015, the comprehensive development of land at The Vale could deliver around 4,500 dwellings and employment, together with community facilities and schools.

The Sustainability Appraisal accompanying the Local Plan Preferred Options highlights the considerable benefits of development at South West Bristol. The proposed location has the potential to deliver significant positive outcomes in respect of:

* Accessibility to a range of jobs without a car;
* Locating development where there is demand for new employment;
* Access to facilities and enhanced community cohesion;
* Decentralised energy generation;
* Minimising flooding; and
* Reducing the need to travel by car.

Overall, the location offers an exceptionally sustainable location for major development when compared with other locations.

The Preferred Options identify exceptional circumstances for removal of land from the Green Belt to accommodate 5,334 dwellings. However, despite the findings of the Sustainability Appraisal and the known capacity of The Vale, the Local Plan has only removed sufficient land from the Green Belt to accommodate 2,500 dwellings.

We object to this limited approach to the removal of land from the Green Belt at what is the most sustainable location within the District. An extensive area within the Broad Location is capable of delivering a comprehensive development for 4,500 dwellings. An allocation of this scale could be sufficient to meet the outstanding local housing needs over the plan period, following further examination of all reasonable alternative sites in non-Green Belt locations (see above) and would align with an ambitious spatial strategy capable of contributing positively towards carbon neutrality by 2030, including a meaningful reduction in our transport emissions.

The findings of the SA indicate that South West Bristol offers the best location to deliver new housing which can access employment opportunities without a car and can reduce reliance on the private car for all other journeys. Within the context of North Somerset’s Climate Emergency Strategic Action Plan and the critical need to reduce emissions through transport, the capacity of this most sustainable location should be fully exploited through this Local Plan for delivery by 2038.

In addition, further consideration should be given to other locations in close proximity to the Bristol urban area, including Easton-in-Gordano and Pill, which will benefit from rail services through the reopened Pill Station as part of the Metrowest proposals.

Policy SP7 also proposes the removal of land from the Green Belt at East Backwell. BRA expresses its strongest objections to this proposed change to the Green Belt.

Exceptional circumstances place the emphasis on identifying highly sustainable locations which are well served by public transport and cause least harm to the Green Belt. It is for these reasons that BRA supports the principle of releasing land from the Green Belt at SW Bristol where the moderate harm to the Green Belt (Green Belt Review Part 1, January 2022) is outweighed by the substantial benefits of the sustainable location.

The removal of Land East of Backwell is equally regarded as causing moderate harm to the Green Belt; therefore of comparable significance to SW Bristol in respect of the function it plays as part of the Green Belt. However, the relative sustainability of East Backwell compared with SW Bristol is markedly lower and would involve the substantial loss of Grade 1 agricultural land. Accordingly, the sustainability credentials of the development location and proposals do not outweigh the harm associated with the loss of the Green Belt and best and most versatile agricultural land.

The Sustainability Appraisal’s assessment of land East of Backwell (Table 5.1) records positive impacts against only 5 or 6 SA criteria (depending on the land parcel assessed) compared with neutral or negative impacts against the remaining 9 or 10 criteria. It is noteworthy that site HE2062 performs better than HE202012, particularly in respect of SA1.1 and SA1.2 (accessibility to jobs without access to a car and locating development where there is demand for new employment). There is no apparent reason for the differentiation between these neighbouring sites. On the basis of limited employment opportunities available within Backwell and the limited demand for new employment in this location, the lower score should be recorded against both sites.

Policy SP7 states that land released from the Green Belt will be required to meet exceptional sustainability standards and compensate for the loss of Green Belt. It states that these requirements will be set out in the detailed allocations and planning guidance. However, the associated policy LP3 fails to define any exceptional standards of sustainability to compensate for the loss of Green Belt. Indeed, the policy does not distinguish between the requirements applying to non-green belt sites in Nailsea and Backwell and those applying to East Backwell. Accordingly, it is evident that there are no exceptional sustainability standards set through this policy to compensate for the loss of Green Belt.

BRA supports the proposed extension of Green Belt between Nailsea and Backwell. The proposed extension to the Green Belt would perform well against the tests for Green Belt, as set out within the NPPF. In particular,

* To prevent neighbouring settlements from merging into one another;
* Safeguard the countryside from encroachment;
* Assist in the reuse of urban land.

The relatively narrow gap between Nailsea and Backwell is under threat from the expansion of Nailsea to the south and Backwell to the west. The extension of the existing Green Belt to the west of Station Road is welcomed to maintain the separate identity of the Nailsea and Backwell and the setting to the Backwell Lake. The creation of new Green Belt secures the long-term openness of this area and remove threat of further development. It also provides an opportunity to enhance the existing area through new green infrastructure, pedestrian and cycle connections, biodiversity gains and new tree planting to enhance wellbeing and healthy living. However, due to existing physical constraints affecting this land, the development potential of large areas of the proposed Green Belt is already limited. For these reasons, the scale of the benefit which can be attributed to the creation of new Green Belt between Backwell and Nailsea does not outweigh the harm associated with the loss of Green Belt and the development of land at East Backwell.

**Policy SP10: Transport**

BRA supports the policy approach established through Policy SP10 in respect of the hierarchy of transport schemes which will be considered to support new developments. We support the recognition that new roads are appropriate where such proposals support active travel and public transport, benefits community connectivity, public realm or provides safety improvements or is required to support economic development.

However, the primary objective of this Local Plan’s spatial strategy should be to reduce car use by locating development where it can readily access employment and other facilities without the need to use the private car. As set out elsewhere within our representations, Weston-Super-Mare and South West Bristol should be the primary focus for new residential development given the high levels of employment and facilities which would be accessible to new residents and offer a genuine opportunity to reduce car usage.

**Policy LP2: Yanley Lane**

BRA supports the principle of allocation of land at Yanley Lane. However, for the reasons set out in respect of SP7: Green Belt, objection is raised to the extent of the allocated land and the proposed site capacity. The Council should adopt a bolder stance towards the release of Green Belt land on the edge of the Bristol conurbation on the basis that it represents the most sustainable location within North Somerset and has the potential to deliver significant housing, employment and community facilities.

Based on proposals submitted by the promoting developers to the Joint Spatial Plan in 2015, an extended allocation of the area known as The Vale, (SHLAA reference: HE20110) could deliver 4,500 new homes. Conversely, the allocation of Yanley Lane as defined by Policy LP2 represents a relatively isolated parcel of land with limited connectivity to the existing Bristol urban area. The enlargement of this allocation to encompass the entire area of The Vale would enable development to function as a cohesive urban extension to Bristol, with multiple opportunities for connectivity into existing and proposed transport infrastructure, including a provision of a new train station on the existing line between Bristol Temple Meads.

In this regard we support reference to the provision of mass transit passing through the site. A coordinated approach must be taken through this Local Plan’s spatial strategy to ensure new development is located to benefit from the proposed mass transit route to ensure its viability and achieve real change in respect of the new residents’ travel habits.

For these reasons full consideration must be given to South West Bristol’s contribution towards North Somerset’s housing needs and the key role it could play in reducing transport emissions and achieving carbon neutrality by 2030 and net zero target by 2050.

**Policy LP3: Nailsea and Backwell**

BRA supports and welcomes the policy requirement for a strategic and coordinated approach to mitigation of development at Nailsea and Backwell. BRA has consistently lobbied for a holistic planned approach towards the delivery of new development at Backwell and Nailsea to ensure adequate infrastructure, particularly transport infrastructure, is planned and delivered in a timely manner to support the phased delivery of new housing.

NSC acknowledges through the Stage 4 and 5 Transport Assessment that Backwell crossroads are a heavily congested, physically constrained junction (Table 3-9). There is no further potential to relieve pressure on the crossroads without the delivery of new road infrastructure. Recent planning applications for new housing at Backwell and Nailsea will, where granted, place additional pressure on the existing infrastructure, without any meaningful mitigation.

BRA acknowledges that Backwell and Nailsea will need to play a role in meeting some of the identified housing need through the Local Plan period to 2038. However, the scale of development which may be considered acceptable will be largely dependent on the nature and scale of infrastructure required to mitigate the associated impacts of development and the feasibility and deliverability of such infrastructure. Crucially, the Local Plan must demonstrate that proposed infrastructure is sufficient to mitigate the impacts of development with 100% of the funding sources identified and allocated to ensure delivery of any new road infrastructure, ahead of the new housing and employment development.

The Preferred Options fail to include any details of the proposed infrastructure which it recognises will be critical to the planned growth of Nailsea and Backwell. The Stage 4 and 5 Transport Assessment outlines four potential options for a rail crossing, namely:

* Overbridge or underline bridge at East Backwell;
* Underline bridge at West Backwell;
* Active travel route connections underneath railway line (east and west Backwell)

However, with scant information available, no assessment can be made of the suitability of these infrastructure options or their capacity to mitigate the traffic generated by new development. Moreover, in the absence of full details of the proposed infrastructure, the plan fails to demonstrate that a strategic and co-ordinated approach to development and infrastructure is achievable at Nailsea and Backwell.

The Stage 4 and 5 Transport Assessment does confirm the following:

* Provision of active travel rail crossings alone is unlikely to be sufficient to relieve congestion on Station Road and the A370 crossroads;
* An overbridge at East Backwell would be visually intrusive and harmful to the Green Belt with a bridge height of around 12 metres. It would generate the highest carbon emissions through construction of all options;
* All options are beset by flooding and drainage issues which require further investigation.

It is therefore evident that substantial additional work is required to establish the technical feasibility, cost, viability and deliverability of the available rail crossing options and support the residential development proposals under Policy LP3. The evidence supporting the draft plan is wholly inadequate in this regard and it is disappointing that the Council proposes strategic levels of growth reliant on mitigating infrastructure without evidence of its deliverability.

In addition, further transport assessments are required to establish the extent of infrastructure which would be necessary to mitigate the impact of the proposed developments.

In the absence of further detailed investigations, insufficient confidence can be given to the deliverability of new housing at Nailsea and Backwell without giving rise to substantial unmitigated harm. Accordingly, the proposals would be ineffective and therefore unsound.

Whilst BRA supports the policy requirement for development proposals to support the delivery of a package of measures, including those designed to alleviate traffic impacts on Station Road and at the Backwell crossroads, it is not sufficient to refer to the “likely” provision of a strategic rail crossing, subject to further feasibility review and environmental assessment post adoption of the Local Plan. Further feasibility review and environmental assessment must be completed ahead of the Pre-Submission draft of the Local Plan to enable firm proposals for a multi-modal route to be identified through this policy.

BRA supports in principle the policy requirement to improve active travel routes within and between Nailsea and Backwell, to improve bus priority and frequency and to enhance existing facilities at the Nailsea and Backwell Station. However, BRA highlights the physical constraints which limit the potential to improve the existing station, in particular to achieve disabled access, which limit the station’s accessibility to the population as a whole. The Proposals Map includes the allocation of land to the east of the station for expansion purposes, however this land lies within private ownership and relies upon a willing landowner to dispose of the site for this purpose. It is understood that NSC do not propose to utilise compulsory purchase powers to secure land and will therefore be reliant on the willing sale of land from private individuals to enable delivery of a transport hub at Nailsea and Backwell Station, which form a crucial component of both its transport and spatial strategies.

BRA supports the principle of extending the existing segregated cycle route known as Festival Way. However, it questions the practical deliverability of such proposals. Policy LP3 refers to the route running on an east-west axis from Festival Way to Chelvey Road, presumably along the northern boundary of the railway line.

The proposed route would require the full co-operation and agreement of all private landowners adjoining the railway line to the use of their land for this purpose. The alignment of the route would unavoidably conflict with the private access road to Moorside Farm. Therefore whilst the aspirations are laudable, it is questionable whether an extension to Festival Way is deliverable.

BRA expresses concern regarding the reference to East Backwell as a mixed-use site with potential to deliver employment. Planning permission granted for employment uses at Coles Quarry in Backwell has failed to generate any meaningful demand for employment units with the majority of the site left undeveloped. Previous iterations of the Local Plan had allocated land at Coppice Place, Moor Lane for employment. Despite allocation for around 30 years, no proposals for employment use came forward and the site was reallocated for housing in the latest Adopted Site Allocations Plan. The Local Plan fails to demonstrate any change in circumstances which would warrant the allocation of additional employment land in Backwell and has not established any exceptional circumstances to justify the release of land from the Green Belt to meet its employment land requirements. Moreover, in the absence of established employment development in Backwell, proposals for new residential development should not be regarded as performing well in terms of their proximity to areas of high employment demand.

For the reasons set out in response to Policy SP7 (Green Belt), there are no exceptional circumstances to justify the removal of land east of Backwell from the Green Belt. In the absence of such circumstances the delivery of a road bridge to the east of Backwell in isolation is put into further question.

The stage 4 and 5 Transport assessment acknowledge that options for a rail crossing to the West of Backwell are more severely constrained than east Backwell and unlikely to be capable of delivering a rail crossing. Even if this was possible, its location to the west of the Backwell crossroads would not mitigate traffic movements through the crossroads to the same degree as a crossing at East Backwell. Therefore its contribution towards the spatial strategy for Nailsea and Backwell would be considerably more limited. The existing residential streets to the east of the proposed allocation site are narrow and unsuitable to accommodate the additional traffic arising from new development. It would therefore be necessary for any proposed allocation to be served by a separate vehicular access off the A370 and to allow only pedestrian and cycle connections through to existing facilities in Backwell.

Development to the west of Backwell would also result in the loss of Grade 1 agricultural land and for the reasons set out in our representations to Policy SP7 the significant negative effect identified through the SA should be afforded substantial weight in the context of achieving a wholly sustainable strategy for the growth of North Somerset. Careful consideration must also be given to the site’s proximity to the North Somerset and Mendip Special Area of Conservation for Greater and Lesser Horseshoe Bats including the Juvenile Sustenance Zone and the important role of the land as foraging habitat to sustain the population of bats at Brockley Hall Stables.

The proposed allocation of land for 600 homes West of Backwell, with accompanying infrastructure (including a possible link to Station Road, north of the railway line) would have a significant urbanising impact on this part of the village, removing large swathes of highly important bat habitat, in particular grazed pasture and hedgerows which bats rely upon to feed and commute. The introduction of lighting, particularly along major new road infrastructure would also have a harmful effect on the bat population and the long term viability of this important SSSI and SAC.

BRA expresses its serious concerns regarding the vehicular accessibility of land west of Backwell. Although the site is physically connected to existing roads within the built up area of Backwell, namely Rushmoor Lane, Rodney Road and Moor Lane. None of these roads are suitable for accommodating additional traffic from the proposed allocation; the roads are narrow and/or already face congestion at peak times and have limited opportunities to improve capacity without harm to the local character of the established residential area. For these reasons, BRA would strongly resist any proposals for land West of Backwell to be served by vehicular accesses off existing residential roads.

BRA supports the policy provisions for new primary, secondary and special educational facilities within Nailsea and Backwell to support planned growth, enhanced leisure and sports facilities and environmental enhancements. Further details of these proposals must be provided through the Pre-Submission version of the Plan.

Policy LP3 fails to address the impact of the proposed growth on the existing waste management facilities, in particular the recycling centre on Dark Lane, Churchtown, Backwell. NSC acknowledges that the location of the recycling centre is sub-optimal, particularly given its proximity to the Backwell Junior School and the shared point of access via Dark Lane. The Leader of North Somerset Council, Don Davies’ letter of 17 May 2021, recognised that “the current location of Backwell recycling centre is less than ideal. Finding an alternative site is a task best approached through the Local Plan process." Accordingly, this Local Plan must include the allocation of land to enable the relocation of the recycling centre to a suitable location which would enable safe vehicular access and the future expansion of facilities to serve the enlarged population.

Policy LP3 should also take account of the impact of planned growth at Bristol Airport upon Nailsea and Backwell. In particular, the increasing pressure on the rural lanes between the airport and A370 which will inevitably arise as a result of the permitted expansion to 12 million passengers.

**Summary**

BRA acknowledges that Backwell has a role to play in meeting North Somerset’s housing requirement over the period to 2038. However, the scale of development proposed for Backwell through Policy LP3 is entirely contrary to Policy SP6 (Villages) and disproportionate to the scale and population of the village and its existing infrastructure and service provision. The proposed allocation of land to deliver 1,100 dwellings and potential employment land, including the removal of land from the Green Belt, proposals for substantial new road infrastructure with 12 metre elevation over the railway line, would have a severely damaging effect on Backwell’s character, appearance and identity.

The substantial and rapid pace of growth would change Backwell from a rural village to dormitory town within the space of 15 years. The loss of large swathes of agricultural land would result in:

a) the loss of high quality Grade 1 agricultural land;

b) substantial harm to the village’s rural setting;

c) loss of Green Belt;

d) significant urbanisation through dense outward expansion.

The draft plan has failed to provided sufficient evidence and detailed proposals to demonstrate how the traffic generated by proposed housing and employment land at Backwell and Nailsea would be mitigated. Most importantly, the plan fails to establish that a strategic and co-ordinated approach to the development of Nailsea and Backwell would be achieved. The evidence base supporting the draft Plan is insufficient, failing to provide any confidence that the necessary infrastructure is deliverable and viable in a timely manner without significant harm to the local area and its environment.

The draft plan has failed to demonstrate that exceptional circumstances justify the release of land East of Backwell from the Green Belt or to establish any exceptional qualities of sustainability which would outweigh the harm to the Green Belt of its development.

In the absence of robust evidence, BRA expresses its serious concern and objection to the proposed scale and location of planned developed at Backwell. In BRA’s opinion, the scale of development planned for Backwell should be substantially reduced in accordance with the objectives of Policy SP6 to a rate of growth broadly equivalent to that achieved through the Adopted Local Plan and Backwell Neighbourhood Plan.

In the interests of localism, NSC should proactively engage with local stakeholders, including BRA to seek to agree a suitable development strategy for Nailsea and Backwell which would take account of the known constraints, respect the identity and character of both settlements and ensure delivery of infrastructure in a sensitive and timely manner. BRA is open to working with NSC and other stakeholders to seek to identify a sustainable strategy for the local area, to form the Publication draft Plan.

**Policy LP8 Green Belt**

Please refer to our representations in response to Policy SP7.

**Policy DP42 Affordable Housing**

BRA supports the policy terms of Policy DP42. However, the policy should clarify that new affordable housing will be made available to people on the local housing needs register, to ensure the housing serves to meet the needs of local people in housing need. Although the principle of delivering additional affordable housing through the proposed increase in the percentage of affordable housing is to be welcomed, concern is raised that this will draw funds away from other critical infrastructure which must be delivered to achieve sustainable developments.