

Regulation 19 Consultation

Backwell Parish Council & Backwell Residents Association – Transport

1. INTRODUCTION

1.1.1 Neil Brant Consulting (NBC) has been appointed by Backwell Parish Council (BPC), supported by Backwell Residents Association (BRA), to provide advice on matters of highways and transportation concerning the village.

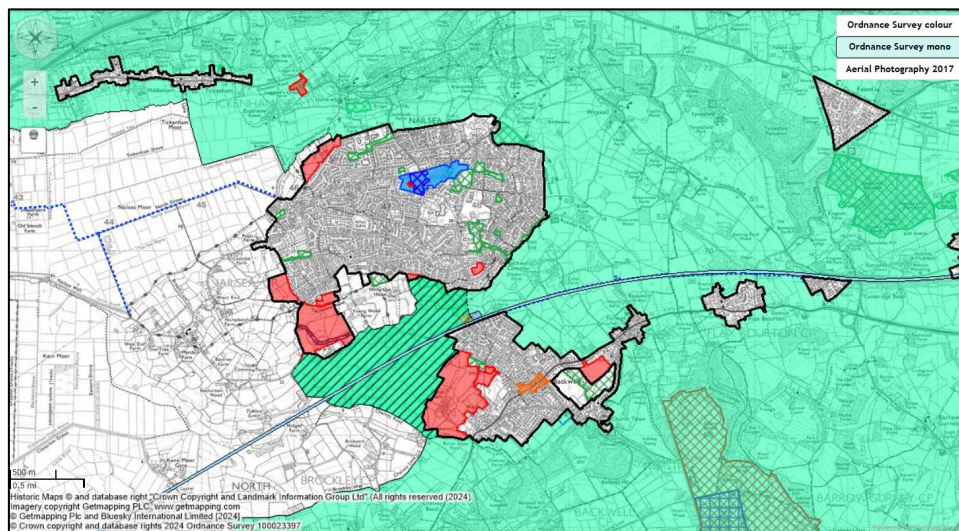
1.2 Scope and Purpose

1.2.1 These representations are made in respect of matters of highways and transportation to the draft allocated sites at Backwell and other sites across the planning authority area, as set out in the Settlement Plan¹, Site Selection Report² and Transport Review³ prepared and submitted for consultation by North Somerset Council as part of the Regulation 19 consultation on the emerging North Somerset Local Plan (NSLP).

1.3 Site Locations

1.3.1 With regards to the sites referenced in these Representations, **Figure 1-1** over the page is an extract from the on-line Policies Map of the Backwell and Nailsea area and sets out the site locations referenced at Schedule 1 of the NSLP.

Figure 1-1: Backwell & Nailsea Policies Map



¹ North Somerset Council, North Somerset Local Plan 2039 Pre-Submission Plan (Regulation 19) (NSC, October 2023)

² North Somerset Council, Pre-Submission North Somerset Local Plan Sustainability Appraisal (NSC, November 2023)

³ AECOM, North Somerset Local Plan, Stage 7 Interim Transport Assessment (NSC, November 2023)

1.3.2 The Settlement Plan proposes a total of 705 dwellings within the village of Backwell and 1,406 dwellings total across the wider Backwell and Nailsea area, including extant consented developments.

Representation Content

1.3.3 These representations provide a review of the Draft NSLP Site Allocations and Policies in respect of the proposed transport strategy, infrastructure and residual effects relevant to Backwell. The remainder of this note is structured as follows:

- Section 2 – sets out a review of the Sustainability Appraisal’s application of transport related Objectives to sites at Backwell;
- Section 3 – considers the transport related aspects of Policies and their relationship to Backwell;
- Section 4 – sets out a review of the interim transport assessment and implications on consideration of transport matters at Backwell.

2 SUSTAINABILITY APPRAISAL

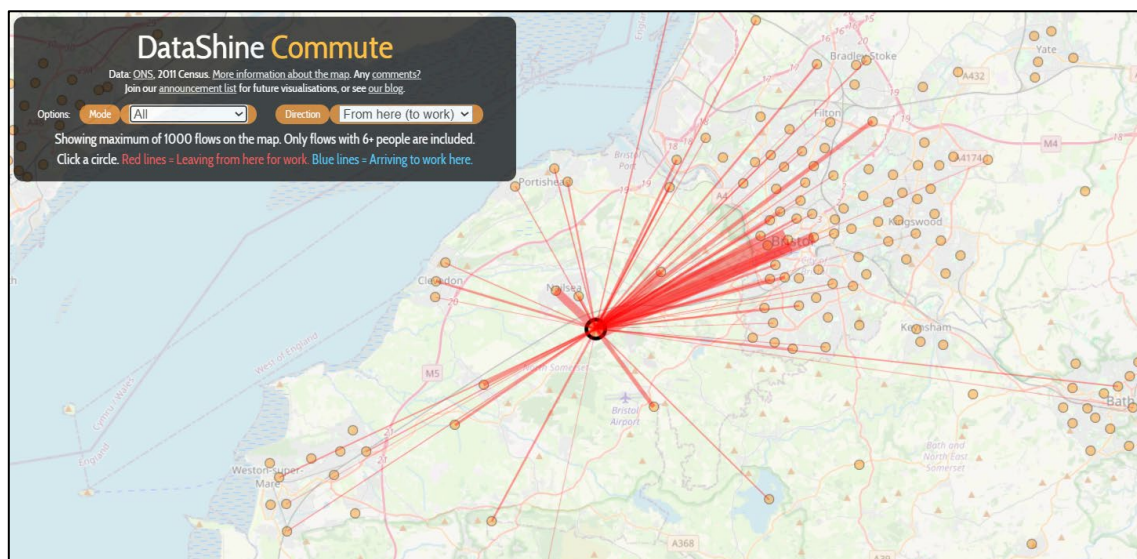
2.1 Objective 1.1

Ensure a range of job opportunities are easily accessible without having to use a car.

2.1.1 In respect of travel to work, the 2021 census only provides a picture of behaviour at a time restricted movement and changed working patterns. Therefore, whilst dated, the 2011 census provides a more representative understanding of normal travel to work behaviour.

2.1.2 In respect of the relationship of Backwell to employment areas, the 2011 census data identifies that there is only a small proportion of self-containment within the village (8%) and a further 6% travelling to Nailsea. 17% of travel occurs elsewhere within North Somerset, and significantly 33% occurs to Bristol and 6% to within South Gloucestershire. Reference has been made to this data via the DataShine software⁴ and an extract provided below at **Figure 2-1** illustrating the spatial relationship of current residents of Backwell and their employment locations.

Figure 2-1: Travel to Work Census Data



2.1.3 In terms of the taking up of sustainable modes of travel from Backwell to employment areas, the 2011 census data shows that 1.4% occurs by cycle, 1.5% by public bus, 2.8% by rail and 3.7% by walking, a total of 9.4% occurring by sustainable modes. The remaining 90%+ occurs by car and thereby demonstrating that there is a clear and significant reliance on use of a car to travel to work from the village, reflecting the nature of its accessibility.

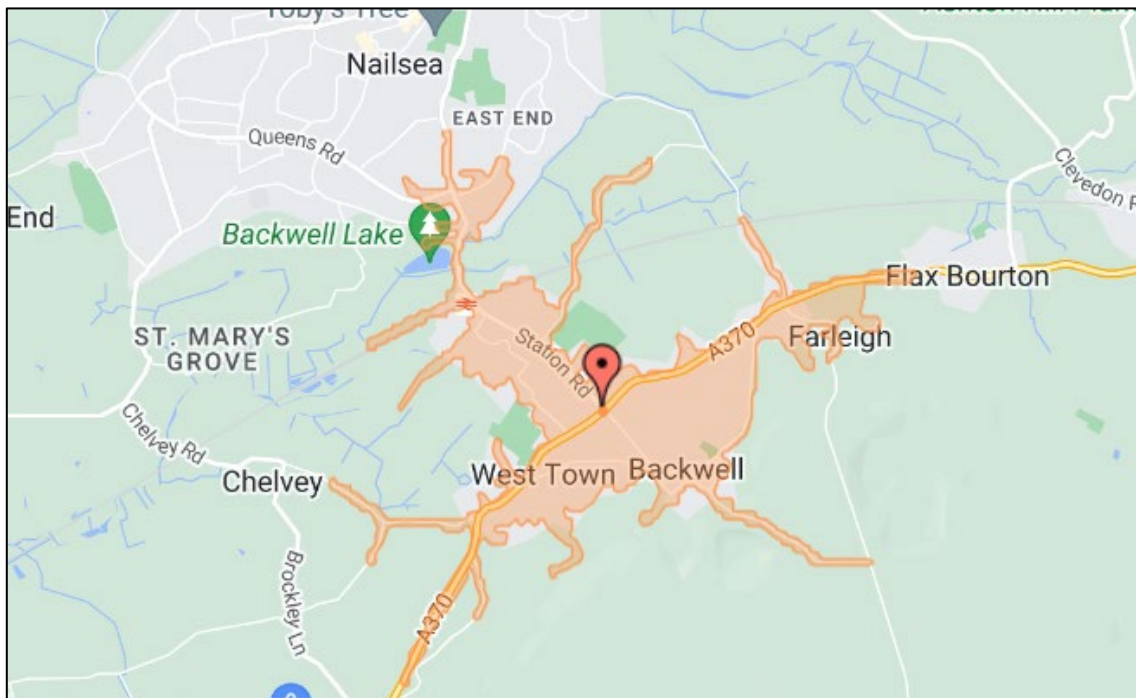
⁴ DataShine, *Interactive mapping for large, open demographic data sets*, *Journal of Maps* (Oliver O'Brien & James Cheshire, 2016)

2.1.4 The document, Guidelines for Providing for Journeys on Foot⁵, suggests that the preferred maximum walking distance for commuting journeys is 2km and that approximately 80% of walk journeys in urban areas are less than 1.6km (1 mile). Manual for Streets (MfS)⁶ states:

“Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes’ (up to 800m) walking distance of residential areas which residents may access comfortably on foot. However, this is not an upper limit and PPS13 states that walking offers the greatest potential to replace short car trips, particularly those under 2km.”

2.1.5 The 2,000m (25 minutes) walk isochrones^{Error! Bookmark not defined.} from the centre of Backwell (crossroads) is illustrated in **Figure 2-2** below. It is evident that only Backwell, with just 8% of self-containment of employment, and a small part of Nailsea, are accessible within a reasonable walking distance/time. Therefore, the village cannot be considered to be well located to enable walking to c90% of employment areas.

Figure 2-2: 2,000m Walk Isochrone from Backwell



2.1.6 The publication Cycle Audit and Cycle Review⁷ suggests that journeys of up to 8km (a 30-minute cycle time) are considered to be a comfortable distance for a reasonably fit person. A study published in Local Transport Today⁸ (LTT) established that the distance up to which people would ordinarily cycle as being the 85th percentile (85thile) and concluded that for the purposes of development planning, residential areas should be considered in the context of their 85thile catchment of 7,250m of employment and everyday amenities

⁵ Institution of Highways & Transportation, *Guidelines for Providing for Journeys on Foot* (IHT, 2000)

⁶ Department for Transport, *Manual for Streets* (TSO, 2007)

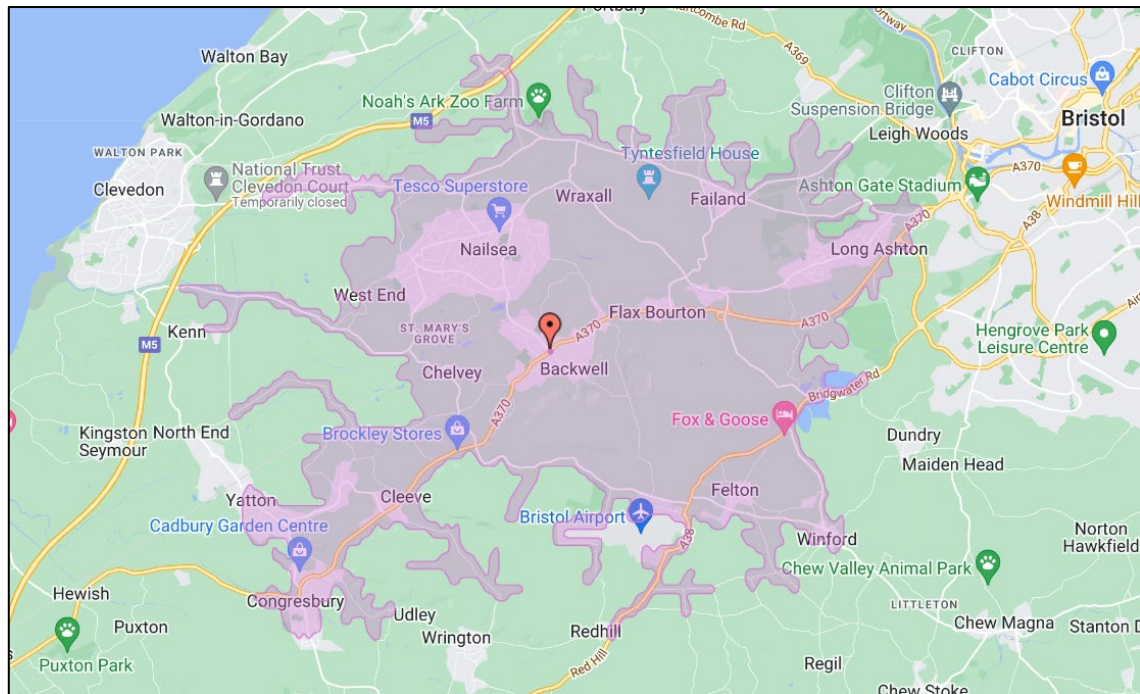
⁷ Institution of Highways & Transportation, *Cycle Audit and Cycle Review* (IHT, 1998)

⁸ Local Transport Today: *WYG: How Far Do People Walk* (LTT, 13-26th October 2017)

and facilities.

The 8,000m (30 minutes) cycle isochrones^{Error! Bookmark not defined.} from the centre of Backwell (crossroads) is illustrated in **Figure 2-3** below. It is evident that the main employment areas of Bristol, S.Glos, Clevedon and WsM are significantly beyond the 85th percentile cycle distance of Backwell and therefore the village cannot be considered to be well located to enable cycle travel to the majority, c83%, of employment areas.

Figure 2-3: 8,000m Cycle Isochrone from Backwell



- 2.1.7 Potential for growth in public bus use is limited, with the X9 Nailsea – Backwell service constrained to use of a single decked bus because of the clearance height of the rail bridge. The X1 WsM – Bristol service is proposed to increase by 1 service per hour, an increase of c100 passengers per hour, accommodating all towns and villages within the full A370 corridor length, and reflecting a mode shift away from car in the order of tenths of one percent and not of a level that will materially reduce car travel at Backwell.
- 2.1.8 The Sustainability Appraisal (SA) at para. C.67 identifies a 249% growth in rail usage at Nailsea & Backwell station between 2020 and 2022. The reliance upon this figure to suggest that rail travel is healthily growing from Backwell is spurious and misleading, as the figure largely represents the return to work after Covid, as opposed to an underlying significant increases in rail use.
- 2.1.9 Pre-Covid, in the period April 2019 to March 2020, 519,574 total entry and exits were estimated⁹ at Nailsea & Backwell station. In the most recent period, April 2022 to March 2023, i.e. post-Covid, the total entry and exits were estimated at 414,450, 80% of the pre-Covid level. Therefore, in real terms there has been no underlying growth in rail passenger use from Nailsea & Backwell station, other than a progressive recovery in passenger numbers post Covid.

⁹ Office of Road & Rail: [Estimates of station usage | ORR Data Portal](#)

- 2.1.10 In real terms, increased passenger numbers and reduced car use, growth in rail and bus services will be modest over the plan period and see for only a small scale improvement on sustainable travel from Backwell that will translate in to only a proportionately small number of car trips being removed from the network.
- 2.1.11 As a consequence of the low level of self-containment of employment within Backwell, poor spatial relationship to employment areas, and low level of sustainable travel use, it would seem appropriate that the SA should have applied the 'Negative Effect (-/--) scoring to residential allocations at Backwell. However, the SA scores Backwell at (+) in regards of Objective 1.1, which is only 1 level lower than Weston-super-Mare.
- 2.1.12 In summary and conclusion of the SA scoring of Objective 1.1 for sites at Backwell, BPC and BRA contest that sites have been scored too high given the poor level of opportunity for those sites to achieve the necessary level of sustainable travel to areas of employment, and limited village amenities and facilities.

2.2 Objective 1.4

Promote development which requires a deliverable level of high-quality and sustainable infrastructure.

- 2.2.1 The *Transport Position Statements*¹⁰ acknowledge that the Backwell crossroads is a known capacity constraint on the A370, to the detriment of bus services, and is a 'limiting factor' on the cumulative level of development that should be allocated at Backwell and Nailsea.
- 2.2.2 The Reg18 draft NSLP proposed to mitigate the impacts of planned development at Backwell and Nailsea by construction of a relief road, but this has been removed from the Reg19 pre-submission Local Plan.
- 2.2.3 The Infrastructure Delivery Plan¹¹ (IDP) at scheme reference TR24, states that in respect of the Bus Service Improvement Plan (BSIP)¹² at the Backwell crossroads:

As per Policy DP17 in Local Plan. This package of schemes are not required to deliver specific development sites but are strategic transport improvements that are necessary to facilitate development and transport strategy across the development area.

- 2.2.4 As such, it is deemed to be necessary to deliver improvements in the level of service of public transport and is not a scheme to mitigate the residual traffic impacts of development. This position is established in the NSC sensitivity modelling¹³ of the BSIP scheme where, with the inclusion of Grove Farm at Backwell, the performance of the Backwell crossroads worsens by a degree of 448%, from -4.8% PRC to -33.3% PRC. The resulting delay and congestion on the A370 is modelled by NSC as being a queue length of c620m eastbound in the AM peak, compared to a projected 'Do Minimum' (BSIP scheme only) queue length of c120m. Whilst the BSIP scheme proposes a bus lane on the eastern arm of the junction, it is evident that the significant

¹⁰ North Somerset Council & AECOM, *Nailsea and Backwell Transport Position Statement* (NSC, September & October 2023)

¹¹ North Somerset Council, *North Somerset Local Plan 2039 Infrastructure Delivery Plan* (NSC, November 2023)

¹² <https://www.westofengland-ca.gov.uk/what-we-do/transport/bus-service-improvement-plan/>

¹³ North Somerset Council, *Backwell Crossroads Modelling Assessment* (NSC, undated)

queue occurs on the western arm, and therefore buses would have no means to bypass this queue and would be delayed no less than all other vehicles.

2.2.5 It is apparent that any benefit afforded to the reliability of public transport by the BSIP scheme would be more than eroded by the impact of traffic from Grove Farm, effectively rendering the publicly funded BSIP scheme pointless, and that the residual traffic impact could be considered to be Severe.

2.2.6 There is no alternative scheme proposed identified in the IDP at Backwell to mitigate traffic impact of proposed development. Therefore, Objective 1.4 is not met as no high-quality and sustainable infrastructure is proposed to avert a severe traffic impact.

2.2.7 In summary and conclusion of Objective 1.4, BPC and BRA contest that the draft allocation of Grove Farm at Backwell will not deliver high-quality and sustainable infrastructure necessary to avoid severe residual traffic impacts.

2.3 Objective 3.3:

Reduce the need to travel by car to minimise environmental impacts of unsustainable forms of travel, including transport related carbon emissions and air pollution. Ensure good access to infrastructure that promotes travel by active modes (walking and cycling)

2.3.1 It has been established in regard to the representations made to Objective 1.1 and 1.4 above that Backwell is not well located to enable travel by sustainable means.

2.3.2 Other than travel associated with commuting and business accounting for c16% of travel, c30% occurs for personal business, c22% leisure and recreation, 20% shopping, and 12% education. Backwell is identified as being a village and has limited facilities and amenities to meet with local needs, and not of a level that could contain a reasonable level of travel covering personal travel, recreation and shopping.

2.3.3 Regardless of the provision of improved or new active travel routes, Backwell's distance from key trip destinations will be the greatest barrier to active travel take-up occurring and development will remain predominantly reliant upon car use.

2.3.4 In the absence of an identified mitigation scheme for the Backwell crossroads, the residual traffic impact of the proposed allocation at Grove Farm will be severe, will negatively impact upon public transport reliability, and will likely see a knock-on effect of reduced bus patronage as a consequence of the westbound delays in the morning period.

2.3.5 In summary and conclusion of Objective 3.3, BPC and BRA contest that development sites at Backwell will result in unsustainable development predominantly reliant upon car use, with associated environmental impacts and unintended knock-on impacts to wider public transport patronage.

3 DRAFT PLAN POLICIES

3.1 Policy SP1: Sustainable Development

- 3.1.1 The allocation of major residential development at Backwell does not accord with the SP1 policy objectives. As set out in these representations, residential development at Backwell will result in reliance on car travel to the extent of c90%+ of travel to work. Walk and cycle catchments do not encompass key travel destinations and therefore opportunities for active travel will be constrained from achieving any level of growth and mode shift away from car use that is of a material level to offset any meaningful level of car reliance at Backwell. This is coupled with the absence of the necessary amenities and facilities within the village requiring travel unnecessarily further afield, and which will be predominantly reliant upon car travel.
- 3.1.2 The inevitable effects of this will be an increase in carbon reliant transport contributing to increased climate change and negatively impacting upon net zero objectives, at all levels.
- 3.1.3 These representations set out the scale of adverse impact on the community at Backwell, as assessed by the NSC BSIP modelling, as being unequivocally severe, and with no proposals within the IDP for mitigation.

3.2 Policy SP2: Climate Change

- 3.2.1 The Plan does not propose mitigation of the severe adverse traffic impact of development at Backwell, and therefore the residual impacts of a 448% worsening of the Backwell crossroads junction performance as a result of the development of Grove Farm (515 dwellings) would remain unmitigated. Prospects for mitigation through mode shift away from car use are very limited, given the spatial location of Backwell beyond walking and cycling distance of key trip destinations and only small levels of growth achievable through public transport.
- 3.2.2 The residual traffic impact of development at Backwell would be severe and permanent, negatively impacting upon net zero objectives and climate change.

3.3 Policy SP3: Spatial Strategy

- 3.3.1 There is a clear and obvious disconnect in the spatial strategy of the Plan in that it seeks to distribute development across the authority area, so as to spread the burden, as opposed to locating it where the need to travel will be least. The NPPF¹⁴ [para 104] sets out the considerations that should be made in plan making:

Transport issues should be considered from the earliest stages of plan-making and development proposals,

- 3.3.2 However, a transport assessment informing the draft allocations for development, and infrastructure delivery necessary to support and enable those developments to come forward without severe adverse effects has not been produced and is not anticipated until later in 2024. Therefore, the spatial strategy for development within the plan has been based on assumptions and ignorance of transport consequences.

¹⁴ National Planning Policy Framework (DCLG, September 2023)

3.3.3 At para 105 the NPPF confirms that significant development should be focused on locations which are or can be made sustainable:

The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

3.3.4 This general position is acknowledged and commented upon in the Council's Strategic Transport Policy response of September 2023¹⁰, where it states that development closer to the main trip destinations and significant areas of employment, at Yanley is the *transport sustainable* approach, as opposed to development at Backwell:

Notwithstanding this, Strategic Transport Policy considers that a strategic allocation at Yanley, delivered in the right way, presents an opportunity to deliver housing needs in a transport sustainable way without excessive growth in the Nailsea and Backwell area. If Green Belt release is to be progressed it should be considered holistically and that development at Yanley should be part of the consideration.

3.3.5 It is evident that significant residential development at Backwell does not meet the NPPF test of being well located to minimise the need for travel given that it is not within walking and cycling distance of key areas of employment, public transport use and growth is proportionately small, and the resulting reliance upon car use is 90%+.

3.4 Policy SP4: Placemaking

3.4.1 As presented in these representations, Backwell is not well located to encourage active travel with few travel destinations being located within reasonable walking and cycling distances. Therefore, distance will be the greatest barrier to encouraging active travel regardless of the provision of supporting infrastructure.

3.5 Policy SP6: Villages and rural areas

3.5.1 The NSC BSIP modelling of the Backwell crossroads establishes that a severe adverse traffic impact will occur, and be unmitigated, as a consequence of significant residential development within the village. This would be contrary to the stated policy objective to not cause significant adverse impacts.

3.5.2 Development at Backwell, out of scale of any established community need, would significantly increase the need to travel, as opposed to locations closer to areas of employment, amenities and facilities, and will therefore result in car reliant and unsustainable development contrary, and at the polar opposite, to the policy objective of maximising opportunities to reduce travel through development.

3.6 Policy SP10: Transport

3.6.1 The allocation of major residential development at Backwell would not minimise the carbon impact of travel, in contrast to locations in closer proximity to key travel destinations. It would result in reliance on car travel to the extent of c90%+. Walk and cycle catchments do not cover key travel destinations and therefore opportunities for active travel will be constrained from achieving any significant level of growth

and mode shift away from car. The absence of many amenities and facilities within the village, thereby requiring significant levels of travel unnecessarily further afield, would be predominantly reliant upon car use.

3.6.2 Regardless of the delivery of active travel infrastructure, the majority of key trip destinations fall beyond reasonable walking and cycling distances from Backwell.

3.6.3 The potential for increased public transport patronage is limited, and of a scale that would not significantly reduce the reliance upon the car, thereby remaining unsustainable development with c90%+ car use.

3.6.4 Mitigation of the residual severe impact of residential development at Backwell is not proposed, and therefore its affects would be permanent, and worsening over time.

3.7 Policy DP14: Highway safety, traffic and provision of infrastructure associated with development

3.7.1 Significant residential development at Backwell would result in an unmitigated severe traffic impact at the A370 Backwell crossroads resulting in increased congestion and delay, and a reduction in junction performance of 448%. As the impact is not proposed to be mitigated, its effects on the community, all road users and bus services would be permanent and increase over time.

3.7.2 The severe degree of the residual and unmitigated impact upon Backwell is such that BPC and BRA considers the Plan to be unsound. The Plan has not been prepared with due regard to the transport implications of development; a transport assessment has not been undertaken to inform the plan making process and will only follow as a retrospective contribution. Therefore, the allocation of development and infrastructure delivery is unevidenced from a transport perspective.

3.8 Policy DP15: Active and sustainable transport

3.8.1 Significant residential development at Backwell would not be located so as to minimise the need to travel nor maximise the opportunities for active travel. Regardless of the delivery of active travel infrastructure, distance to the majority of key trip destinations will be the greatest barrier to meaningful levels of increased active travel use at Backwell.

3.9 Policy DP16: Active travel routes

3.9.1 As stated in response to Policy DP15 and elsewhere in these representations, regardless of the delivery of active travel infrastructure, distance to the majority of key trip destinations will be the greatest barrier to meaningful levels of increased active travel use at Backwell.

3.10 Policy DP17: Public transport accessibility

3.10.1 Whilst development of Grove Farm at Backwell would potentially be located within proximity of a frequent bus service, the residual and unmitigated impacts of traffic, eradicates the junction capacity benefit of the Backwell crossroads BSIP proposals, and worsens by a degree of 448%, from -4.8% PRC to -33.3% PRC junction performance. The resulting delay and congestion on the A370 is modelled by NSC as being a queue

length of c620m eastbound in the AM peak, compared to a projected 'Do Minimum' (BSIP scheme only) queue of c120m, with no bus lane on the western arm bypassing this queue. It is evident that bus services would be very severely impacted by this severe traffic impact and potentially existing patronage levels would be negatively impacted, as opposed to grown.

3.11 Policy DP18: Travel plans

3.11.1 Regardless of the delivery of mode shift initiatives through a travel plan, the location of significant residential development at Backwell, coupled with limited local amenities and facilities, will temper the effectiveness of those initiatives and see only very limited levels of mode shift, to a degree that does not change the reliance upon car travel.

3.12 Policy DP63: Infrastructure delivery and developer contributions

3.12.1 As set out previously in these representations, proposals to mitigate the impacts of planned development at Backwell and Nailsea by construction of a relief road have been removed from the Reg19 pre-submission NSLP. The IDP at scheme reference TR24, states that the BSIP crossroads improvements at Backwell are not intended to deliver or mitigate specific development and are strategic in nature.

3.12.2 There is no alternative or additional infrastructure scheme proposed in the IDP at Backwell to mitigate traffic impact of proposed development in the village. Options for mitigation of congestion at the Backwell crossroads have been thoroughly reviewed and exhaustively considered through the Reg18 submission, and thereby the prospect of a developer lead solution seems highly unlikely and improbable. Therefore, the residual severe traffic impact will be permanent and unmitigated.

4 TRANSPORT ASSESSMENT

- 4.1.1 A transport assessment has not been undertaken as part of the plan making process and will only follow as a retrospective contribution to the process, in spring 2024. Therefore, the allocation of development and infrastructure delivery is unevidenced from a transport perspective.
- 4.1.2 An interim transport assessment³ has been submitted in evidence for the consultation of the Regulation 19 pre-submission draft plan. In effect the interim assessment serves to only set out a framework approach to addressing the transport implications of the plan proposals and is in many respects generic in nature and not tailored to the needs and implications of specific proposals of the plan.
- 4.1.3 In respect of Backwell, the interim assessment acknowledges and sets out the evolution of transport infrastructure from the Reg18 stage to that within the Reg19 consultation. It confirms that the BSIP proposals for the Backwell crossroads do not form part of a strategy or mitigate any specific development proposals and are a committed scheme.
- 4.1.4 Infrastructure proposals in mitigation of significant development at Backwell are not identified or proposed within the interim assessment and there is a full reliance upon a level of mode shift away from car use to avoid a severe adverse impact occurring. Given the scale of the mode shift that would be required to avoid a severe traffic impact, full reliance upon a shift strategy is considered to be unwise and fundamentally unrealistic.
- 4.1.5 No spatial analysis of travel has been undertaken in the interim assessment, so no evidence on the ability of residents of new residential development at Backwell to travel by sustainable means, given the village's limited amenities and facilities and distance beyond reasonable walking and cycling thresholds to key trip destinations, is provided and thereby the reliance upon a sustainable transport strategy achieving mode shift is uninformed and un-tested.
- 4.1.6 Similarly, the residual traffic impacts of car travel on the Backwell crossroads are not assessed and no form of computational analysis provided. No assessment of the scale of mode shift required to avoid a severe traffic impact at the Backwell crossroads has been undertaken, and therefore the feasibility to achieve such change in travel behaviour is not determined.
- 4.1.7 In summary and conclusion, the spatial strategy for development within the plan has been based on assumptions, and ignorance of the transport consequences, and therefore absent of a credible mitigation strategy and is considered to be unsound.