

Nailsea Action Group strongly objects to Gleeson Homes' proposal to build 400 dwellings in south Nailsea. (Planning Application reference: 23/P/1145/OUT)

Nailsea Action Group (N.A.G.) aims to promote and protect Nailsea's rural setting particularly at its interface with the countryside around it. Whilst N.A.G. is not opposed to the necessary building of homes, it is concerned to ensure that these new dwellings are built in the appropriate locations, near to employment and amenities, and do not destroy valuable green space which is an essential resource for current residents and future generations.

N.A.G.'s response to the consultation covers the issues of the strategic gap, the Local Plan, open green space, employment, ecological matters, flooding, transport and access, and cumulative impact.

The strategic gap

Gleeson Homes has stated in various documents within the planning application to North Somerset Council that the Strategic Gap is an outdated concept, without substantiating this rationale. This is patently not so, as North Somerset Council (NSC) supports this concept (NSC policy CS19 which is dedicated to protecting and enhancing the Green Belt and the strategic Gap), and has not publicly renounced the Strategic Gap. The Gleeson Homes' proposals contradict the main aim of the strategic gap, which is to preserve the individual identities of Nailsea and Backwell. The Strategic Gap protects the two communities from urban encroachment and from becoming one continuous sprawl of housing from south Backwell to north Nailsea, also incorporating the various developments in West Nailsea.

Gleeson Homes states that there are precedents for this development in the strategic gap. There is one: Woodstock Homes (14 houses) carved out of a very small wedge of de-allocated strategic gap on its northernmost boundary furthest away from Backwell. If NSC permit the Gleeson Homes development, that in itself will indeed constitute a major 'precedent' to other developers wanting to develop in South Nailsea and in the strategic gap. If, in the future, the Gleeson Homes site presents opportunities for the development of a link road further west, and also east from the junction of the Gleeson Homes' site access point on Station Road, this will open the floodgates to building all along the southern edge of Nailsea. NSC should consider that this planning application constitutes a dangerous major precedent to inappropriate speculative further development.

The Local Plan

On the basis of prematurity (via the National Planning Policy Framework (NPPF) paragraphs 49-50) if nothing else, this application should not be considered until the draft 2023 -2038 Local Plan has passed through its various stages and has been approved by NSC. The Local Plan will contain many matters relevant to this application, such as road links to the A370, the final building numbers for Nailsea / Backwell, and in particular, what constitutes green belt in South Nailsea.

With reference to the Local Plan, National Highways is clear when it states "The Local Plan 2038 is yet to be adopted...(we) will need to be satisfied that the site can come forward without impacting on the delivery of the wider Local Plan. Where the development would result in a severe congestion or unacceptable safety impact, the applicant should be required to deliver mitigation which adequately accommodates its impact, in addition to growth within the Local Plan."

Open green space

Nailsea has already lost much of its green space. At least three green areas (The Uplands, Parish Brook off Engine Lane, and Netherton Grange off Netherton Wood Lane and Youngwood Lane) much used by residents for recreation, are currently being developed for housing. Local residents treasure the South Nailsea green space, and have resisted its development since at least 1988, when Costains put forward initial proposals for residential development in planning application no. 3929/88. Nailsea was deemed not suitable for construction then, and, especially with the flood situation getting worse and the road infrastructure not significantly improved since the 1970s, it is no more suitable for construction now. If open green spaces are said to be the 'lungs of a town', then, in the light of all the other developments, Nailsea will slowly suffocate. The Gleeson Homes site is the last significant piece of publicly available green open space now in south and south-west Nailsea.

Employment

None of the developments currently under way in Nailsea include any local employment options (as expected in NPPF Paragraph 81). Gleeson Homes' application is no different. The implication, therefore, is that many new residents will travel to employment locations in Bristol and other towns. This will impact on traffic congestion, and pollution and air quality, and increase the unsustainability and overall carbon footprint of this application significantly. NSC should note these shortcomings, and declare that this application is not environmentally appropriate, particularly where public transport is of a very poor quality and cannot be relied on. Housing development plans should be specifically employment led. This one is not.

The ecology

The area has a diverse range of flora and fauna which will be seriously disturbed, disrupted and destroyed by the development. Insects which form the base of a long and important food chain, will disappear, affecting those species which rely on them as a food source such as birds, small mammals and bats.

The bats will be significantly affected, but the application papers conclude that the impact would not be serious especially as nearby alternative sites have been identified as mitigation. The main location for one of these, however, is just by another developing site, and another is some way east of the site, up to a mile or more away by Backwell Bow. Evidence such as that presented in a recent study of bat migration by Exeter University suggests that bats take some time, unsurprisingly, to re-locate from one foraging site to another along newly made bat corridors, during which time the potential for loss of life is higher than otherwise. A local ecologist has assessed that the proposed transport corridors for the bats by Gleeson Homes are totally inadequate.

The site is judged as delivering well below the required biodiversity gain of 10%. (Report of Lucy White Planning Ltd., 2 August 2023.)

Flooding

Water regularly collects all over the site during the winter, and, when the river bursts its banks (the last occasion very recently), this is of course more pronounced. The fields are water meadows, and water ponds there substantially especially in the winter. The added run-off from a hillside of buildings will make flooding a certainty.

Flooding was one of the reasons that the coal mines in this area closed years ago. There is no convincing evidence put forward as to how the swales and SuDS will cope effectively with water from roofs and hardstandings especially in the event of prolonged and heavy rainfall.

The developer's documents suggest that this is not a significant risk to the new built environment and are very selective in respect to the flood risk, only detailing matters from the Environmental Assessment which were beneficial to the application. Yet some flood maps suggest that even parts of Phase 1 border such risk areas. Experience in the last ten years has demonstrated that forecasts have been wildly out, and this is more likely as climate change speeds up – probably way beyond anything imagined by the calculators of such risks.

It would appear that the Environment Agency is reserving judgement so far on the matter, and there is no mention of the possible impact of the development on the flow of the River Kenn and on the Blind Yeo into which it flows, the last significant improvements to which were made in 1949. There has literally been much water under the bridge since then with extensive building all around, and probably more than is forecast to come.

North Somerset Council Flood Risk Management Team objects to the application, appearing to doubt the proof of Gleeson Homes' statements. It states "the proposed development increases flood depths by 100mm (approximately four inches) and flood depths in Backwell Lake would also increase due to the proposals. This is likely to have an impact on the wider surface water drainage system that is connected to Backwell Lake. The LLFA (Lead Local Flood Authority) disagrees with the statement that the assessed fluvial flood risk is 'very low'."

Furthermore the Somerset Drainage Boards Consortium, which is responsible for maintenance of the river Kenn which passes through the proposed site has said it objects to the proposed development because it needs more information about the surface water drainage system to assess the flood risk resulting from the development.

Gleeson Homes has not yet undertaken an assessment of flooding via a sequential test and its flood model has not yet been approved by the Environment Agency, so the run-off cannot be properly calculated and the swales deemed sufficient. All the flooding bodies are raising objections especially with regard to the land immediately south of the site up to the railway, thereby threatening the properties in Station Close.

The houses in Station Close could be particularly vulnerable and the site's access road potentially impassable. One resident there has submitted a very lengthy, detailed, photographically illustrated and closely argued objection to the proposals which may be read on the NSC planning application website as part of the public comments.

Access and traffic

Access in and out of Nailsea as a whole is already challenging, with every route subject to significant physical constraints. Mitigation suggested by Gleesons, such as a new road from the entrance roundabout taking traffic east towards Bristol, is very unlikely to take place soon, if ever. On the evidence gathered by the Tickenham Road Action Group, the B3130 is a very well used main road to the M5 from Nailsea via The Causeway, or through the hamlet of West End and Nailsea Wal, and it is already very congested with these roads already heavily over-used

The single entry and exit point to and from a 400 house site on to a new roundabout so close to other junctions, will exacerbate traffic congestion at that point, at the traffic light controlled single-track-working bridge under the railway, and at the traffic light controlled crossroads on the A370 in Backwell.

It is not only at rush hours and at both ends of the school day that Station Road is busy which is bad enough. Those who regularly travel on it whether as pedestrians, cyclists, motorists or bus passengers, are often significantly delayed at the railway bridge and at the Backwell crossing to Dark Lane on the A370.

The now abandoned Joint Spatial Plan declared that this crossing was unmitigatable. That was without knowledge of all but one of the currently planned housing developments in the area. The current developers' proposed mitigation for the junction as drawn looks ineffective.

No algorithm is needed to understand that, with the proposed access onto Station Road via a substantial roundabout so close to the railway bridge, the railway car park, the Backwell Lake entrance and Station Close, the vehicle movements associated with 400 homes using this single entrance to, and exit from, the site, especially at rush hours and at the beginning and end of the school day, will make a currently challenging situation impossible. There are also significant pinch points at the top of Station Road where it is joined to Trendlewood Way and Queens Road at a staggered junction.

The view of National Highways is that there was insufficient information on the cumulative effect of all the nearby new developments, and the site itself requires a lot of roadway. There is no certainty that it can accommodate the site's traffic efficiently.

It is to be hoped that NSC Highways will strongly object to the planning application on the grounds of access, and make it clear that it would not accept subsequently suggested additional access points for vehicles made from the north of the site into Sedgemoor Close, nor east to Youngwood Lane.

There is no other proposed access to this site, but emergency vehicle access is mooted through Youngwood Lane and a cycle path along the bridlepath linking with Sedgemoor Close. Some parts of the site are beyond recommended walking distances to the railway station and there is no connection with bus routes.

It is true that other parts of the site are relatively close to the railway station and to bus stops, but residents soon learn that the bus service cannot be relied on to pick up and deliver passengers to, for example, timed appointments in hospital, or starting work promptly etc.. The 2021 census data shows that 66% of Nailsea's workers who commute daily, work out of town. Only 1.03% commute by train and 1.07% commute by bus.

National Highways' interest in this application is due to the scale of potential growth in this area, the cumulative transport impacts, and the absence of an agreed up-to-date strategy for mitigation. Its planning response is very categorical in saying that this application should be rejected for at least 6 months whilst the applicant provides more relevant traffic data. It also implies that acceptance should await the adoption of Local Plan as this will provide a consolidated traffic picture to include all planning applications, and current developments, stating: "The Local Plan 2039 is yet to be adopted...(we) will need to be satisfied that the site can come forward without impacting on the delivery of the wider Local Plan. Where the development would result in a severe congestion or unacceptable safety impact, the applicant will be required to deliver mitigation which adequately accommodates its impact, in addition to growth within the Local Plan."

The traffic figures quoted in the Gleeson application were not considered to be 'credible' by a local resident who conducted his own on the spot research.

He said: "The computer models used in the transport assessment indicate that, currently, the queues at Backwell traffic lights always clear during the rush hour.

On the basis of this, he predicted traffic queues and bottlenecks at Backwell crossroads and Station Road, currently the main commuter route to Bristol out of Nailsea.

His detailed survey should be read as an Annex at the end of this document.

The cumulative impact

The additional traffic that will be generated by the albeit smaller local developments in The Uplands (53), The Perrings (14), the larger St Modwen site (200) to the west of Parish Brook, the much larger Taylor Wimpey build of 450 dwellings, the slightly more distant but significant north Nailsea building proposal (450), and those in Backwell such as that off Rodney Road is not properly considered by the planning permission applicants.

The close proximities of The Uplands site (53), The Perrings site (14), the St Modwen proposal (200), Parish Brook (171), and Netherton Grange (450) impact significantly on the loss of open green space in the south-west corner of Nailsea, boxing in the current inhabitants and leaving them very limited recreational space.

The Gleeson Homes' site is the last large piece of open countryside easily accessible to the population in south Nailsea, and is very widely enjoyed as such. No development should take place if it so significantly reduces the well-being of those – human and animal, flora and fauna - already there. NSC policy DP35 asserts that new housing should not have an unacceptable adverse impact on the landscape character of the district, and should respect the tranquillity of the area. This development does not do that.

In the light of that, Gleeson Homes' claim that harm is limited and localised, and has been mitigated, is unsupportable.

The proposers of the development loftily assert that "The south of Nailsea is clearly an area the council [NSC] considers suitable for significant development, and in the absence of a five year supply, is somewhere an early approval to assist in remedying the five year shortfall would be appropriate." The issue of the five-year supply was particularly controversial for North Somerset as it was raised twice from the original figures. For Gleeson Homes to imply that it wishes "to assist in remedying the five-year shortfall" is specious.

North Somerset has suggested that this area could accommodate up to 600 dwellings. Might the areas on the current Gleesons plan that are not filled by houses simply be building plots in waiting? For the developer to claim that the district will benefit from the areas of open space in the development is, again, specious in the light of the magnificent open space that is already here without Gleesons.

The cumulative effect could be significantly reduced if the plan included prospects for local employment which is not mentioned at all. It is well known that new developments should be employment-led. This one is not.

Conclusion

This application is neither sound nor sustainable. Notwithstanding that it is for outline permission, it is clear that the applicants have not considered the issues sufficiently thoroughly or carefully to warrant approval. They have been selective in the evidence they present, and have not responded to or ignored in many instances material in reports from various agencies that demonstrate the unsuitability of their application, possibly on the assumption that the fact NCS does not have a fully supported continuing five year supply of land for housing, means that they have a carte blanche to approval.

It is N.A.G.'s considered view that this inappropriate application should be rejected by NSC. This very important consultation should not be treated as just a box-ticking exercise. NSC need to treat this as a genuinely consultative procedure, and should take on board the many concerns expressed in the reports of official bodies and consultees, and the overwhelming negative responses of local residents to this application.

ANNEX

Carried out and written up by a local resident, a detailed survey of traffic queues and bottlenecks at Backwell crossroads and Station Road, currently the main commuter route to Bristol out of Nailsea.

SUMMARY OF HIS COMMENT

1. This evidenced objection to planning application No 23/P/1145/OUT calls for the application to be refused.
2. In the planning application Gleeson seeks outline planning permission with all matters reserved except means of access to a site off Station Road, for residential development of up to 400 dwellings.
3. The current reality of congestion at the Backwell crossroads is reflected in North Somerset Council documents, the daily experience of local people and recent observations, by a N.A.G. member in July, of the morning rush hour queues reported below.
4. In the planning application's transport assessment (TA), observed traffic flows are processed to predict the current queue characteristics of delay and length. Those predictions fail to reflect the current reality of congestion at Backwell. That failure shows that the applicant didn't bother to validate the TA results by observing the real life queues. Consequently, that failure also renders the process's predictions non-credible for all other scenarios covered in the TA.
5. The TA assesses that, if all of Nailsea's residential development sites in the draft local plan were built out without the relief road, delays at Backwell crossroads' traffic lights would be little more than five minutes. The inadequacy of that result is highlighted by the July observations of longer queue delays in Station Road and on the A370. This further undermines the credibility of the queue results in the TA.
6. A further inadequacy of the TA is that analysis of medium term cumulative effects with other developments in Nailsea is incomplete. The TA goes some way to consider cumulative effects but only includes of one of the five sites that are currently under construction. The TA should be considering the cumulative effect of completion of all five sites, which will contribute a total of about 1,100.

7. It is these adverse observations on the TA's credibility that are one of our main reasons for asking for the application be refused.

SUMMARY OF OBJECTIONS

8. The process used for the traffic assessment gives results that are not credible. Without a credible transport assessment, the application should not be permitted
9. In any re-application or TA amendment the following should be included:
 - a) A process that includes validation against observed rush hour queues at significant local junctions
 - b) In the assessment of the cumulative effect on traffic queues, all residential development sites in Nailsea with current permission should be included
 - c) To give an understanding of the likely accuracy of the queue results in the TA, a statement should be included of the statistical nature and confidence limits on the queue results

KNOWN CONGESTION AT BACKWELL CROSSROADS

10. In the Stage 4 and 5 Transport Assessment (March 2022) for North Somerset Local Plan there are many references to the congestion at Backwell crossroads. The effect on that congestion is a prominent consideration in the traffic case for quite a few of the schemes considered in that assessment.
11. In recent decades, the queue delays at Backwell crossroads have been notorious among local residents over quite a large area. This notoriety was in evidence at the Extraordinary Nailsea Town Council meeting on Tuesday 25th July to discuss this application at which there was standing room only. There was the biggest public attendance of any of the Town Council's meetings of recent times with extended public participation. The suggestions in the TA that Backwell crossroads are not congested were met by guffaws of derision showing that local people find the TA's queue results laughable.

THE PLANING APPLICATION'S TRAFFIC ASSESSMENT

12. A traffic survey is reported in the TA the results of which were processed through a number of software packages to generate Degree of Saturation (DoS %), Mean Maximum Queue length (MMQ) and queue Delay at a number of junctions with a number of scenarios.
13. The results for the current situation at Backwell crossroads are reported in TA table 8.4
14. Two future scenarios are also reported in table 8.4. The "Without development" scenario includes the effect of the 450 homes currently under construction at Youngwood Lane. The "With development" scenario adds the 400 homes proposed by the planning application. For both of these scenarios, the figures in the traffic survey were increased to allow for traffic growth expected by 2028.
15. For all three of the cases reported in table 8.4, paragraph 8.1.8 states "Modelling shows that queues clear on all arms in every cycle"
16. The TA also included "Test 1" scenarios, which assess traffic queues with all of Nailsea's residential development sites in the draft local plan built out (2,100 new homes) without the relief road. The

results for these scenarios, appear in TA table 8.8. With the current crossroads layout, the delays at Backwell crossroads' traffic lights are assessed, in seconds, to be:

Station Road	278
A370 eastbound	249
Dark Lane	320
A370 westbound	279

OBSERVATIONS OF RUSH HOUR QUEUES AT BACKWELL CROSSROADS

17. Traffic queues in Station Road are notorious at several times of day including the end of the school day as well as rush hour. The notoriety of the frequency of these traffic queues causes many Nailsea residents to avoid the crossroads by taking alternative, longer routes. As the queue results in the TA are so far from this reality, a N.A.G. member decided to carry out some observations of rush hour queues at Backwell crossroads to get a more quantitative feel for how unrealistic the TA queue results are. As the TA incorrectly states that, currently during the rush hour, queues clear in all arms in every cycle, the objective was limited to showing that that is not the case
18. The observations were made on 18th July between 7:51 and 8:36 and 19th July between 8:01 and 8:54.
19. Two methods of observation were used, standing and riding. Standing at the railings on the west corner of Dark Lane provided good visibility of the A370 eastbound and Station Road queues and also provided a very convenient starting point for the riding observation. The only disadvantage with that location was that the colour changes of the Station Road lights could not be seen but the changes were apparent from the movement of traffic. While standing, the following were recorded a) the times of all Station Road traffic light changes and b) whether that queue cleared or how many vehicles remained when the queue stopped. If the residual queue was too long to count, observation switched to the following riding method, which was also used to assess the A370 eastbound queue. For this, the observer cycled as it is more nimble and, if a bike can keep up with the traffic, there's definitely a queue. The observer joined the back of the queue, noted the time and then stayed behind the same car all the way to the traffic lights, noting the time whenever the queue stopped and the time on arrival at the lights. This gave the time in queue (queue delay).
20. Times were recorded in minutes of the hour as that is sufficiently accurate to show that the TA results are substantial underestimates. There are several delays of 4 minutes or above and one of 7 minutes.
21. In summary, only 38% of the recorded queues cleared, all clearances were in Station Road. While the A370 eastbound queue was being observed, it never cleared.

COMMENTS ON THE TRAFFIC ASSESSMENT

22. The TA concludes that, currently, all of the queues at Backwell traffic lights always clear during the rush hour. This is very different to the observations, made in July, that a) the A370 eastbound queue never cleared and b) 6 out of the 14 queues observed in Station Road weren't cleared in a single traffic light cycle. This leads us to believe that the queue study process used for the TA doesn't produce credible results.
23. The TA study process also gave queue delays that are not credible. The "2028 'Sensitivity Test 1 with development – without mitigation'" scenario considers completion of all of the draft local plan's residential development sites in Nailsea with Backwell crossroads unmodified and no relief

road. That's an additional 2,100 homes for Nailsea. The queue delays given for this scenario were 4 to 5 minutes. In the July observations however, 25% of the times in queue were 4 minutes or more with a maximum queue delay of 7 minutes. This suggests that the current situation is worse than the TA predicts with 2,100 more homes in Nailsea.

24. In the timescale that Gleasons proposals would be built out, the five sites currently under construction around Nailsea would also be built out, a total of about 1,100 homes. The TA goes some way to consider the cumulative effect but only includes Taylor Wimpey's development (16/P/1677/OT2) at Youngwood Lane and omits the developments currently underway at Engine Lane (17/P/1250/F), Clifton Homes's development at Youngwood Lane (20/P/0861/FUL), the Uplands (20/P/2000/R3) and Trendlewood Way (18/P/5234/OUT). The TA should be considering the cumulative effect of completion of all five sites.
25. The yawning gap between the TA's description of the current queues and the July observations shows that the applicant did not bother to validate their process by simple observation of the rush hour queues. That failure not only led to a waste of time and effort for the applicant but has also wasted the time and effort of Council officers because there will be more work to consider what to do about these shortcomings and then to progress the consequent action. As council tax payers N.A.G.'s members object to such waste of officers' time.
26. No indication is given in the TA of the statistical nature of the Degree of Saturation and Delays i.e. are they means, modes, maximum or typical? What distribution are they (normal, Poisson or other)? Nor is any indication given of their confidence limits nor the statistics of Maximum Mean Queue. The absence of that sort of statistical information makes it difficult for readers to assess how observed queue delays are likely to be distributed around the delays given in the TA.

[End of local resident's comment.]