

# JLTP4 Draft: Comments from Tickenham Road Action Group

Please find below comments submitted in response to JLTP4.

## Introduction

The publication of the draft JLTP4 in early February 2019 has caused significant levels of concern and unease in Tickenham village.

Consequently, but instigated during the period of time for comments on the JSP WED007 (Transport Topic Paper) and WED008 (Emerging Findings Transport Report) in early January, an action group has rapidly formed; the Tickenham Road Action Group (known as TRAG). TRAG, with 150+ sign-ups, has a steering group, terms of reference and has been formally adopted and recognised within the village, by the parish council, by North Somerset Council, by Dr Liam Fox MP and by other stakeholders including the village primary school.

The comments in this response to JLTP4 are submitted by TRAG.

The overriding summary is that whilst the objectives and outcomes of JLTP4 clearly and for good reason benefit many across the WECA/JSP geographical area, if JLTP4 is unchanged from its current draft their impact will deliver the polar opposite to Tickenham; poor accessibility, a negative impact on quality of life/ health/ environment, create a worse place and most notably make for a very unsafe B3130 road through the narrow village settlement.

With this in mind TRAG fully endorses North Somerset Council (NSC) commitment, stated at a meeting between NSC/Tickenham Parish Council and Tickenham residents (held 4 March 2019 at Castlewood, Clevedon), to effect that NSC will not accept future finalisation of a JTLTP which does not have the direct strategic link between Nailsea and M5 J20 clearly stated as the preferred option / future primary traffic route, and in doing so removing the idea of W4 link road and funnelling future and increased traffic through B3130 and Tickenham village.

## Context

Within the JLTP4 Summary Document there are various key statements made, extracts of which are: "The main challenges can be summarised as:

- travel demand is growing and there is an increased need to improve walking, cycling and public transport
- parts of the road (and rail) networks are under strain
- transport continues to impact on safety, security, air quality, public health and public realm

"Vision, objectives and outcomes: *(selection of statements from JLTP4)*

- improve accessibility
- address poor air quality
- contribute to better health, wellbeing, safety
- create better places

There are also many benefits claimed in JLTP4 documents on topics such as developing resilience of road network, seeing reduction in road casualties, that road safety for transport users is improved, that a high-quality transport network will result.

TRAG is of view that **JLTP4 as presented in written draft has failed to consider, at all, the impact of its plans on Tickenham village and that JLTP4 (as drafted) will fail Tickenham on every single outcome**. The B3130 and Tickenham village is simply not able to safely and effectively accommodate

current traffic flow stemming from the JSP and its regional development plans. Based on our findings and opinions we have to conclude that the JLTP4 consultant / authors and approvers behind its draft possess little or no detailed knowledge of Tickenham and the B3130.

Notably in comparison with the previous JLTP(3) this concern has been borne by the plan to build W4 and other link roads in order to channel all Nailsea and Bristol bound traffic (industrial and residential) leaving the M5 J20 through Tickenham village (thus along a secondary B road, the B3130). And vice-versa to channel all traffic heading in the other direction through the same route.

JLTP3 promoted as its preferred / baseline option a direct link between the west end of Nailsea and M5 J20, which is entirely sensible and would, if things were reversed such that it become the preferred option again, mitigate almost every reservation TRAG has with JLTP4.

JLTP4 simply recognises a direct route between Nailsea and the M5 J20 as a 'long term potential link', with no surety about it - TRAG would like that reversed so to see it again as the confirmed preferred solution – and are pleased to hear that NSC will require this as a progressive change from the current JLTP4 draft.

## **Strategic Solution**

TRAG agrees that there is a need to improve road access in the region to accommodate the existing and future traffic demands of Nailsea, Backwell, Clevedon and Bristol Airport and supports a strategic solution based on a direct link from the M5 J20 to Nailsea.

A new direct link (specifically designed in itself for HGV/multi-modal use) would provide the all-important missing route from the end of the Long Ashton bypass (A370) via Nailsea and direct on from there to Junction 20, M5. This would:

- Support the growth of MetroBus; improve links to the rail stations and new safe cycle routes.
- Enable direct access for emergency vehicles (blue lights) to/from the M5
- Alleviate existing congestion on B roads in local North Somerset towns and villages that were never designed to accommodate current volumes of traffic.
- Deliver the much-needed infrastructure that links Bristol and the area in the northern part of North Somerset with the M5.
- Promote inward investment to sustain and encourage economic growth, particularly new homes and jobs.

Such a more joined up approach takes the opportunity to secure the infrastructure that the Backwell, Nailsea and Clevedon area need to support and sustain the level of development proposed in the NSC Local Plan 2036 and beyond.

## **Key Concerns with JLTP4**

TRAG held a strongly attended public meeting during February, as well as met North Somerset Council on 4 March, and from that has set out the following list of key points of concern. There are topics and aspects within it which TRAG intends to explore in greater detail in the future. **TRAG intends to further contribute to opportunities in the JLTP finalisation and decision making process (e.g. at Local Plan stage) well before it transitions into detailed planning - as it will (presumably) be too late at that point to alter the JLTP.**

**Key Concern 1: Suitability of B3130;** the road through Tickenham is classified as a B road. Current NSC Highways Development Design Guide (Dec 2015) require all new strategic, main and secondary

distributor roads to be a minimum 7.3m width. Some brief checks (TRAG will be doing a more detailed survey) on the B3130 in Tickenham village settlement finds that, at its narrowest, it is marginally less than 6m 'kerb to kerb' and that only in a very few places does it actually widen beyond c.6.5m. With narrow and in some sections non-existent pavements, with at some locations residential properties/buildings and curtilage butting almost adjoining the kerb, it is not practical for the road to be suitably widened as part of the JLTP4 project. By its own design rules NSC therefore has it as significantly under the safe and required width. Relevant to also note that UK safe highways advice allows 3m width 'mirror to mirror' for both HGVs and buses – both of which regularly use the B3130. There are, increasingly, 6 axle HGVs traversing the B3130, these vehicles have a max gross weight of 44 tonnes and signs of their damage to infrastructure are continual. TRAG has logged numerous examples of anecdotal evidence surrounding unsuitability of the B3130 and its inherent risks and threat to road safety of all.

Also factor in Bristol Airport plans for 100% growth in the next decade (J20 is the nearest M5 exit point to it), or additional short-term raised traffic levels resulting from when the M5 is closed in either or both directions between J19 and J20, and there is further compounding of the unsuitability of JLTP4.

All of this renders the road unsafe and unsuitable not only for the future but, as demonstrated currently, now results in gridlock given circumstances such as an incident or accident, rubbish/recycle collections, trailer or agricultural vehicles, cyclists, unloading etc. This also causes a threat for blue lights to pass swiftly through to Clevedon and the M5 (including from the fire and ambulance centres in Nailsea).

We also draw attention to the JLTP4, p58, Fig 11.1, which indicates the B3130 will become an "Improved Road". It is not clear to TRAG what this means but as generally relayed across these comments it does not seem (other than minor surface and street furniture improvements) how the B3130 has the width, capacity and general capability to become what could be stated as a (sufficiently) "Improved Road".

**Key Concern 2: Capacity of B3130;** strongly linked to the B3130 suitability issue is its capacity. Traffic counts over recent years (and we have requested NSC help for an update in 2019) suggest that it is running close to capacity as of now. A consultant traffic management report in 2015 for another development elsewhere in Tickenham predicted that, based only on existing and known/confirmed housing growth in the intervening period, it would hit 100% capacity by 2020. Based on its own traffic modelling efforts TRAG also contests and regards as misleading the publicised Tickenham traffic volumes that have been indicated as resulting from implementation of the full JSP. TRAG is forming its own predictions based on accepted modelling techniques and initial findings continue to confirm that the B3130 road capacity will be exceeded. We have obtained figures from the Department for Transport indicating that in 2017 the road was nearing capacity and that the extra volume of traffic to be anticipated from 3,000 more homes would tip it well over limits. This is without taking into consideration any further traffic, HGV or otherwise, from the 10.5 hectares of employment land.

TRAG is also concerned that the interconnection of the proposed link roads in current JLTP4 will provide vehicles from a much wider geographical area (well beyond Nailsea) with a route choice allowing/encouraging them direct access to/from the M5 J20 via Tickenham. This effect will further heighten future traffic flow through Tickenham.

**Key Concern 3: Impact on Tickenham Primary School;** the village primary school (with its car parking area on premises only sufficient for staff) requires all children to walk c.100-200 yards from

designated drop off and collection locations further along the B3130. With narrow sections of pavement and no protective railings/ barrier (and no space to install such) there is a constant danger for children and their parents - this will only compound under JLTP4. Further add in relevant considerations such as worsening air quality / pollution from emissions (a current issue of national concern to young children in particular).

**Key Concern 4: Safe and increased cycling;** an objective of JLTP4 is to increase the quantity and quality of cycle routes, this is laudable and TRAG greatly supports this as we represent a rural community. However in consideration of the concerns of the B3130 set out above it will just not be possible to provide safe/safer cycling between Clevedon and Nailsea. There is no scope for adding in a cycle lane to the B3130 through the village. This means that into the future cyclists will have to (unsafely) use the same carriageway as increasing levels of HGVs, buses and vehicles in general. This is not what JLTP4 should be looking for. The obvious solution is a cycle lane within the previous JLTP3 proposed Nailsea-Clevedon link road. Relevant to note too that for the B3130 sections without pavement, pedestrians currently walk on the carriageway. Given its rural location on occasions horses also traverse the B3130.

**Key Concern 5: Damage to the environment;** within the village boundary and also in local areas in which the proposed JLTP4 W4 link road will sit there are environmental, historical and scientific factors that greatly concern TRAG. In brief detail they include:

- Tickenham Church; the W4 route will harm the dramatic visual impact of St Quiricus and Julietta - a Grade 1 listed building.
- Tickenham Court Farm; the W4 route will reverse a range of positive environmental works undertaken by the landowner (e.g. a traditional orchard plantation).
- Roman Villa; the W4 route will cut through the archeological site of a roman villa.
- Land Yeo and its 14th century embankments; the W4 route will pass close to Land Yeo and its leat ducts - believed constructed by Augustinian Monks for Tickenham mill.
- Endangered Bat species; the W4 route appears to interfere with the commuting route of the endangered Greater Horseshoe Bat and is a foraging area for Annex II (European Habitats Directive) species and designated by European Wildlife Law as a Special Area of Conservation.
- Other protected species; the W4 route will interfere with the European Otter and Kingfisher.
- Impact to SSSI; the wider JLTP4 proposals (and any routes on the Tickenham, Nailsea and Kenn Moors) are likely to have a significant impact on designated Sites of Special Scientific Interest (SSSIs) - both during construction and resulting from permanent water run-off thereon. With changing water levels impacting on birds and wildlife habitats.
- Impact to Constructed wetland; the W4 route will cross an area of constructed wetland which is an existing project funded by NSC in partnership with other stakeholders. There would appear to be a conflict of interest between NSC interests in this project and then supporting JLTP4/JSP proposals to construct roads and develop housing across the same wetland area.

**Key Concern 6: JLTP4 Appendix 3 'Strategic Environmental Assessment' (SEA) draft;** this (WECA issued) document has been reviewed by TRAG and our concerns on aspects of its content are consistent with those set out above in response to the main JLTP4 draft. TRAG would therefore have liked to submit a copy of these comments to the transport team at WECA. This is invited within the SEA however the closing date for submitting comments was back in February 2019. It seems unreasonable that the comments deadline on the SEA was not synchronised to the 20 March 2019

deadline for comments on JLTP4. In any case TRAG will lodge a copy of these JLTP4 comments with WECA and the SEA team.

## Conclusion

As set out above it is clear that TRAG can not accept JLTP4 as drafted. With respect to its impact on Tickenham, JLTP4 has not considered detail, is ill-thought and fails to deliver in every respect the JSP benefits that it is seeking overall across the wider WECA.

To progress with the current JLTP4 does not make any economic sense and would be a waste of scarce funding, time and resource - which should be diverted immediately to a (Nailsea to M5 J20) strategic link road to alleviate the current traffic issues and more fully meet the demands of future growth.

TRAG is of view that WECA and the JSP must revert to the JLTP3 proposal of the direct Nailsea to M5 J20 link. That would tick every box spanning an efficient network and connectivity across North Somerset, provide the proper catalyst for improved and predictable public transport, alleviate congestion and help underpin overall success of the JSP. It is encouraging that NSC concur with TRAG on this.

TRAG would like to retain an ongoing connection with and ability to consider, review and input developments to the JLTP as it moves forward from now.

**Dated: 8 March 2019**

**Signed by the TRAG Steering Group:**

Bruce Campbell (Chair) 

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