

## **Examination of The West of England Joint Spatial Plan**

### **Statement of Tickenham Road Action Group (“TRAG”) on Matter 6.3:**

**Is there robust evidence to demonstrate that, having regard to mitigation measures, the development envisaged in the JSP would not give rise to severe transport-related problems?**

#### **1. Introduction**

1.1 Tickenham is a village on the B3130 road linking Nailsea to the South and Clevedon to the West. The publication of the Joint Spatial Plan, together with the related Joint Local Transport Plan 4, has caused significant levels of concern in the Village.

1.2 Tickenham Road Action Group was formed after a public meeting at which residents expressed concerns about the plans proposed in JSP WED007 and WED008 in early January 2019. The Group has over 160 sign-ups, a steering group and terms of reference adopted by the Village. It is recognised by the Village and the Parish Council and has received messages of support from Councillor Nigel Ashton, then Leader of North Somerset Council, Dr Liam Fox MP and other stakeholders including the local primary school.

1.3 The concerns centred, almost entirely, on the proposal in JSP 3 and related JLTP 4 to build a road or roads linking the proposed developments at Nailsea and Backwell with the B3130 in Tickenham and then to J20 of the M5 to the West and Bristol to the East, This changed an earlier proposal in JLTP 3 to build a direct link from Nailsea to J20.

1.4 The overriding summary is that, whilst the objectives and outcomes of the JSP benefit many across the WECA/JSP geographical area, if JSP 3 and the related JLTP 4 are unchanged from their present draft their impact will deliver the opposite to Tickenham and other users of the B3130 generally, namely:

- 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 this narrow village settlement.

It will, therefore, have a detrimental effect, not only on the residents of Tickenham but on motorists, cyclists and everyone using the road including those accessing the local primary school.

1.5 We, therefore, fully endorse the statement of the then Leader of North Somerset Council made at a public meeting in March 2019, that the Council would not ‘sign off’ any plan which did not include the link referred to in JSP 3 as the preferred option and primary transport route thereby removing the need for any links through Tickenham. A return to the original proposal would remove almost all TRAG’s objections to JSP 3.

1.6 The plan as envisaged in JSP 3 and JLTP 4 fails to consider at all the impact on Tickenham Village . It will also fail the strategic test of providing sustainable transport links to the proposed development at Nailsea and Backwell envisaged in Sections WED 004 and 008 of JSP 3. The latest proposals simply refer to the direct link as a “long term potential link’ with no certainty that it would happen. TRAG would wish to see that reversed and the direct link adopted as the primary and only choice.

1.7 TRAG acknowledges the need for improved transport links to accommodate the proposed development. A new direct link designed to take all types of traffic, including HGVs, would provide the all-important missing route from the end of the Long Ashton by-pass (A 370) via Backwell and Nailsea and the proposed extension of the transport hub directly on to the M 5 at J 20. This would:

- Support the growth of MetroBus, improve the routes to railway stations and provide new safe cycle routes
- Enable direct access for emergency vehicles to/from the M5
- Alleviate existing congestion on B roads in local North Somerset towns and villages that were never designed to accommodate current traffic levels by volume or weight, let alone those which would be generated by the proposed Nailsea/Backwell development or the proposed growth of Bristol Airport.
- Deliver the much-needed infrastructure that links Bristol with the northern part of North Somerset and the M5.
- Promote inward investment to sustain and encourage investment and economic growth, particularly jobs and housing.

1.8 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 envisaged in the NSC Local Plan for 2036 and beyond.

## **2. Key Concerns with JSP 3**

TRAG expresses the following key concerns demonstrated by residents at various public meetings following the publication of JSP 3:

### **2.1. Suitability of B3130**

2.1.1 The road through Tickenham is classified as a 'B' road. Current NSC Highways Development Design Guide (Dec 2015) require all new, strategic and secondary distributor roads to be a minimum 7.3 metres wide. Our research on the B3130 in Tickenham finds that, at its narrowest, it is marginally less than 6 metres 'kerb to kerb' and only in a few places does it actually widen beyond 6.5 metres. With narrow, and in some places no, pavements and residential properties, and buildings and curtilages abutting onto or adjoining the kerb it is not practicable for the road to be suitably widened. By North Somerset Council's own design rules, therefore, the road is under the required and safe width. We refer to JLTP 4, Figure 11.1 at page 58 which indicates that the B3130 will become an 'improved road' but it is difficult to see how, given these factors, it would be possible to 'improve it' to the extent required to carry the existing and additional traffic anticipated by the development and natural growth

2.1.2. Further, advice on UK safe highways allows 3 metres width from mirror to mirror for both HGVs and buses, both of which regularly use the B3130. An increasing number of 6-axle HGVs with a maximum gross weight of 44 tonnes use the B3130. Signs of the damage they do to the infrastructure are continual. TRAG has logged numerous examples of anecdotal evidence of unsuitability of the B3130 for this type of vehicle, resulting in a safety-risk for all users.

2.1.3 Predicted traffic flows over and above JSP 3/JLTP 4 should also take into account:

- a) Bristol Airport plans for 100% growth in the next decade (J20 is the nearest M5 exit point to it)
- b) additional short-term increase in traffic levels when the M5 is closed in either or both directions between J19 and J20.
- c) anticipated increases in traffic flow even without the impact of JSP 3 (See Appendix 1)
- d) road and other works requiring traffic control which are common along the B3130
- e) Delays caused by recycling collection and other commercial vehicles, trailer or agricultural vehicles and cyclists.

- f) The B3130 is used by public transport travelling to and from Bristol. This regularly results in long tailbacks. Even if there were lay-bys at the bus stops there would still be delays because of the narrowness of the road but the situation is made even worse by the fact there are no lay-bys nor is there the space for any to be constructed.

2.1.4 The existing factors already result in gridlock along the B3130 and, with the anticipated factors at a) and c) above, the road will become unsafe and unsuitable, even without the very significant increase that will be a consequence of JSP3 and JLTP 4. One of many results will be serious delays to the emergency vehicles based in Nailsea where all three services are based. They currently use the B3130 through Tickenham to access the M5 at J20.

2.1.5 Document SD 16B Joint Transport Study Final Report October 2017 at page 6 says: “The growing economy has meant an increase in the volume of travel resulting in congestion, delays and accessibility challenges. There is a risk that these problems could reduce the productivity and competitiveness of the region and constrain further growth.” It is clear from the details in this section and in 2.2 that the construction of W4 and W5 would serve only to exacerbate these problems. On the other hand, the construction of a direct link would address them.

2.1.6. In 2015 an application was made to build 41 new dwellings and 900 square metres of office space on a site in Tickenham. In their recommendations dated 10 February 2016 the Highways & Transport Department of North Somerset Council recommended refusal because any pedestrians or cyclists leaving the site would “be put into direct conflict (with) vehicles on the B3130.....This is an unacceptable risk.” Whilst we recognise that this refers to use of a specific site we would argue that it gives an insight to the general danger to pedestrians and cyclists using this road; a danger which would be significantly increased were JSP 3 and JLTP 4 to be implemented in their present form.

## 2.2 Capacity of B3130

2.2.1 Strongly linked to the suitability of the B3130 for the purpose envisaged in JSP 3 and JLTP 4 is its capacity.

2.2.2 There is attached at Appendix 1 a report prepared by TRAG based on traffic counts taken from a TRACSIS survey in September 2017 and by North Somerset Council in February 2019. This report shows that, at certain peak times, the B3130 is already near capacity without taking into account any of the factors mentioned at a)-f) in 2.1 above. Also, the two counts show an increase of 15% in traffic flow through the Village between the two dates. This increase over less than two years contrasts with the increase anticipated between 2013-2026 in document SD 16B Joint Transport Study Final Report October 2017 of 16% and both figures should be considered in the light of the anticipated growth in trips by road due to population growth of 26%.

2.2.3. Another survey carried out in 2015 for a proposed housing development predicted that based only on existing and known/confirmed housing growth in the intervening period, the road would hit 100% capacity by 2020. This appears to be borne out by the counts referred to in the Appendix.

2.2.4 Based on recognised traffic modelling TRAG also contests and regards as misleading the Tickenham traffic volumes that are anticipated in the event of JSP being implemented. We refer to paragraphs 7.1 and 7.2 of the Appendix to show that the anticipated traffic flow along the B3130 from the housing development envisaged by JSP 3 will very significantly exceed the figures anticipated.

This is without taking into account any further traffic, HGV or otherwise, from the 10.5 hectares of employment land also envisaged in the Plan.

2.2.5 TRAG is also concerned that the interconnection of the proposed link roads will provide vehicles from a much wider geographical area well beyond Nailsea with a choice of routes allowing or encouraging them direct access to and from the M5 J20 via Tickenham. This effect will further heighten future traffic flow through Tickenham. The impact of these journeys is shown in paragraph 7.3 of the appendix and the overall impact shown in paragraph 7.4.

Again, Document SD 16B acknowledges the problem. At 5.4 on page 52 it says: "There are also significant problems with traffic delays on key routes including.....through Tickenham.....It will also be necessary to consider how to address the impacts of travel from Nailsea to the North and West. Traffic currently uses roads through....Tickenham ....which will increase with new development at Nailsea and Backwell. A package of measures will be developed to address these impacts, with options to address the pinch point at Stone Edge Batch (B3128/3130 junction), measures to manage impacts in Tickenham and improved connections to Clevedon and M5 Junction 20."

Far from 'addressing' these issues, the proposals in JSP 3 and JLTP 4 significantly exacerbate them. They are also in breach of Policy 6 which refers to "sustainable and active travel choices".

The direct link originally proposed from Nailsea to the M5 would, on the other hand, solve them and be in accordance with this policy.

### **2.3. Impact on Tickenham Primary School**

2.3.1 The Primary school, situated in the middle of the Village has a car parking area on its premises sufficient only for staff. All the children and accompanying adults are, therefore, required to walk c.100-200 yards from designated drop off and collection locations further along the B3130. They then have to walk along narrow sections of pavement with no protective railings/ barrier (or space to install such). So there is a constant danger for children and the accompanying adults which will significantly increase should the proposals in the Plan be implemented. Further considerations such as worsening air quality / pollution from emissions which are issues of national concern to young children in particular, should also be taken into account.

2.3.2 Also the School occasionally hires a coach to take the children on trips. This can only park in the adjacent road which results in further gridlock.

### **2.4 Safe and increased cycling**

2.4.1 A stated objective of JSP 3 and JLTP4 is to increase the quantity and quality of cycle routes. TRAG greatly supports this as we represent a rural community.

2.4.2 However, this laudable objective is completely at odds with what the consequences of the proposals will be. The factors outlined in paragraphs 2.1 - 2.3 above will make it impossible to provide safe cycling in the Tickenham, Clevedon and Nailsea areas.

2.4.3 The B3130 through Tickenham is a popular cycling route but there is no scope for adding in a cycle lane to the B3130 through the village. This means that in the future cyclists will have to (unsafely) use the same carriageway as increasing levels of HGVs, buses and other vehicles. TRAG, therefore, submits that, far from resulting in increased safe cycling, the Plan will see a reduction of cycling because the B3130 will simply not be safe for cyclists. This is not what JLTP4 should be looking for.

2.4.4 The obvious solution is a cycle lane within the previous JLTP3 proposed Nailsea-Clevedon link road.

2.4.5 It is relevant to note too that for the B3130 sections without pavement, pedestrians currently walk on the carriageway. Given its rural location on occasions horses and their riders also use the B3130.

## **2.5. Damage to the environment.**

Document SD 16 B and the JSP Publication Document refer to the need to protect the environment. Specifically, Policy 5 seeks to “ensure the protection and enhancement of the national, built and historic environment.” TRAG feels strongly that the proposals for W4 and W5 have the contrary effect for the following reasons:

- 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 along the Land Yeo River
- Impact to SSSI; the wider JSP 3 and 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 between NSC interests in this project and those supporting JLTP4/JSP proposals to construct roads and develop housing across the same wetland area.

The direct link would avoid this environmental damage.

### **3. Conclusion**

The proposal of a link road or roads from Nailsea to Tickenham is contrary to Policies 5 and 6 of the JSP and exacerbates many of the concerns expressed in the JSP and accompanying documents including sustainability, environmental, safety and damage to the economy.

The direct link from Nailsea to the M5 at Clevedon would address all these concerns and should be re-instated as the preferred and only choice.