North Somerset

Personal Details:

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Comment text:

Related subject: North Nailsea

Thank you for considering my views that the area north of Nailsea should be in Nailsea not Wraxall. You've stated that this wasn't considered as there was no planning application in. I think that is about to change imminently. Also the area is in the Local Plan now submitted with the inspectorate, so I think the situation has changed. I would therefore ask if the issue could be reconsidered.
https://lva.co.uk/projects/greenfield/north-of-nailsea-somerset/
Outline application (Ref: 24/P/1586/OU2)

Attached Documents:

- land-north-of-nailsea-he20136.pdf

Planning Reference: 24/P/1586/OU2

Applicant: Nailsea Holdings LVA LLP

Location: Land North of Southfield Road Trading Estate Clevedon Road Nailsea

The following points are made with reference to the planning application detailed above. In summary, I object to the proposed development due to the detrimental effect upon the green belt and the environment in general, together with the unsustainable nature of the proposal.

1. Loss of green belt
    - The proposed area of development focusses on a wide swathe of land between Wraxall and the Nailsea/Tickenham border. This land is recognised green belt and deserves protection in recognition of the multiple benefits the land brings to the local communities and the preservation of the demarcation between Wraxhall, Nailsea and Tickenham. Without this separation the area will degenerate into an urban sprawl, lacking green space and any form of planned infrastructure to support the increase in traffic and demands for essential local facilities. The proposed application looks no further than the immediate development, neglecting the day-to-day needs and functionality required by residents and visitors to the area and is fundamentally flawed in this respect.

2. Threat to local environment and business
    - The proposed development will have a detrimental impact on the immediate area, by taking away a huge area of open land which is greatly valued by both the local and neighbouring communities as a wildlife refuge, a quiet, green open and safe space for adults and children which is comforting and promotes wellbeing. The Fishing Lakes immediately to the north of the development will be adversely affected by the encroaching construction due to loss of passing wildlife which is an important part of the visitor attraction for those fishing and many others who visit the facility for the relaxing, outdoor natural space. The pollution resulting from the construction of the new development and its in-use life is likely to damage the ecology of the environment and may well cause the thriving Fishing Lake business to fail because of water course pollution to the fishing and breeding lakes which also harbour a wide variety of insects and mammals. The proposed development plan does not consider the risk of contamination of local springs which should be safeguarded and their continued flow paths given consideration.

3. Loss of wildlife corridor
    - Wildlife depends on this green corridor which runs almost uninterrupted between the north of Long Ashton to Clevedon and beyond into the Somerset Levels, for safe passage between habitat and secluded breeding grounds. The proposed development will destroy this natural movement corridor and will deprive wildlife of the safe movement they depend upon for survival. This will be a tragic, irreversible and unnecessary situation because alternative solutions to the destruction of this natural and precious facility are available.

4. Land north of Greenfield Crescent / Sports Field
    - The fields forming the green belt in this area act as a natural sponge, attenuating the flow of water to the Land Yeo, which is a narrow river that collects storm water run-off from the surrounding areas which are largely marshland, within a designated flood plain, and which are waterlogged for the majority of autumn and winter. The Land Yeo in the area directly north of the proposed development is narrow, no longer maintained, heavily overgrown in parts and is regularly in flood. The river, adjacent to the B3130 at the western end of the proposed development breaches in heavy rain and flows across the B3130 close to Jacklands Bridge because the river cannot contain the storm water run-off. The proposed development will obviate the attenuation function provided by the fields, replacing them

with hard surfaces, paths, and roads and driveways, overloading the capacity of the Land Yeo that cannot currently cope with heavy rainstorms. The numerous, small attenuation facilities proposed throughout the development within ground that is saturated for eight out of twelve months, is woefully inadequate to prevent flooding of local businesses, roads and private property. There is no indication in the planning proposal as to how storm water from the new road network will be directed. This is a critical matter because the existing sewerage network becomes surcharged in periods of heavy rain causing the drain covers in the B3130 to rise by around eight inches in the centre of the south bound carriageway into Nailsea, on occasion closing the lane and creating an extreme hazard for all road users.

5. Light pollution
    - There is no reference in the development proposal to limit the negative effects caused by the significant levels of artificial light that will result from the sports pitches, community hub and care home, all of which need high light levels, together with private dwellings and street lighting in an area that is currently uninhabited green belt with very low artificial light levels during dark hours. It is widely accepted that artificial outdoor light disrupts the natural patterns of wildlife (birds, pollinators, and mammals), obscures views of the night sky and generally reduces human wellbeing. There are references in the application to a variety of wildlife that will be adversely affected by artificial light, for example, Horseshoe Bats that thrive in the area. The proposed development will have a long-term, irreversible and damaging consequences across the immediate construction area and will adversely affect the environment, wildlife and residents of the surrounding area.

6. Danger to wildlife
    - The proposed development will restrict the land available for existing and future wildlife. Some will undoubtedly be forced away forever as their environment is destroyed. Some larger mammals may attempt to remain in a reduced habitat, forcing them into contact with the negative aspects of the proposed development such as new roads, increased vehicle movements due to the circa 700 vehicles that will result from the 380 additional homes. The consequence is a permanent, damaging impact upon a vast variety of birds, mammals, insects and reptiles that have used these facilities for hundreds of years and whose future, should this development proceed, is undoubtedly elimination.

7. Pollution
    - The green belt area, subject of this planning application, is a completely natural area comprising marsh and wetlands, with grassland for grazing and agricultural use. There is nothing to generate any pollution to the land other than the occasional agricultural vehicle being used. The proposed development will generate significant levels of pollution resulting in lower air quality due to combustion engines (vehicles, garden equipment), biological contaminants from household outdoor processes, rubber particulate from car tyres, oils and fuels. All of these will drain from the residential development and contaminate the attenuation ponds and the Land Yeo to the detriment of flora, forna and humans. Wastewater / sewage discharge from the proposed development will cause contamination when the main sewerage system is surcharged, access covers are displaced and the contents of the sewerage system flow into the environment, contaminating the roads, footpaths, the green belt to the west of the B3130, and the Land Yeo itself.
    - During the construction period, of around 60 months, the development site, surrounding areas including the Land Yeo, will be contaminated through combustion engines, paints, solvents, chemicals,

construction debris and dirt. Clearing the green belt land cover will result in soil erosion leading to silt-bearing run-off and sediment pollution to the Land Yeo which is already suffering from maintenance neglect and so flow rates are severely restricted in numerous locations along this vital drainage channel.

8. Additional infrastructure and benefits to the community
    - The development proposals offer a minimal contribution to the local community. Improved football pitch/facilities, a care home, a community hub and some play areas are offered but there is no proposal to improve the local transport infrastructure, or provide more significant community facilities such as a swimming pool and indoor sports centre which Nailsea has desired for over 20 years, neither is there any proposal to provide any schooling facilities, GP/dental surgeries, retail or cultural amenities as will be essential to meet the demands of the 700 plus residents.

9. Travel / commuting
    - Nailsea has relatively few significant employers and so the majority of the working population commutes daily. The main vehicle routes from the proposed development to Bristol and Weston super Mare, via the A370, or towards Clevedon and the M5, via Tickenham depend upon the B3130. The B3130 does have capacity for circa 700 additional vehicle movements per day particularly at the two pinch points (east and west of the site) where the road serving the new development connects the B3130.
    - Nailsea and Backwell railway station is a small village station with hardly any amenities, a part time ticket office, relatively little dry waiting space, no toilet facilities and limited car parking. The additional load on these basic facilities will lead to an increase in on-road parking in the Nailsea / Backwell area, overcrowding on the narrow platforms, and frustration with the limited and problematic ticket purchasing/ collection facilities. The planning application has not considered in sufficient detail the day-to-day commuting needs of the new residents.

10. Local road networks (B3130 / B3138)
    - The B3130 between Jacklands Bridge (BS21) and the junction with the B3138 (Tickenham Hill) at Stone Edge Batch is very narrow with no footpaths on either carriageway. Traffic flow is regularly halted for several minutes because two goods vehicles, lorries or buses cannot pass each other over a significant distance, requiring extended careful manoeuvring, or more difficult backing-up, to re-start traffic flows. This scenario is a regular occurrence during the daily rush-hour periods but occurs sporadically throughout the day depending upon vehicle types and timing of movements. The additional log jams and tail backs that will result from the increased vehicular traffic stemming from the proposed development will cause delays to commuters, school buses and emergency services, reduce air quality, increase general pollution and noise. Traffic jams and stationery vehicles consume vast amounts of energy needlessly, and the resulting carbon footprint cannot possibly be justified based on an increased number of residential dwellings in an area that has inadequate supporting infrastructure.
    - The new link road through the proposed development will be used as a shortcut for traffic from the east and west ends of the estate to avoid the traffic lights in Nailsea. This means that the traffic flow through the proposed residential area will be significant, effectively becoming a Nailsea by-pass, introducing noise and pollution into another location which is currently quiet, unspoilt green belt pasture and marshland.

11. Flooding and dangers to life and property
    - The storm water run-off from the land to the north of the proposed development is accommodated by the Land Yeo from the east of the proposed development, close to Wraxhall and to the west of the development at Jacklands bridge and beyond through Tickenham and Clevedon. The river cannot cope with periods of heavy rainfall throughout the year. This is particularly so since the Environment Agency decided that seasonal vegetation will not be removed, nor will dredging be continued as has been completed in previous years. The new development, as confirmed in the planning application, will cause more intense run-off volumes within a shorter space of time. This will lead to more regular flooding of the Land Yeo, more regular breaching, and overflows to the B3130 at Jacklands Bridge, across the narrow pedestrian footpath, generating hazards to road users due to raised ironworks. There is a genuine threat to public safety in terms of road users and pedestrians resulting from the proposed development. The attenuation provisions proposed to deal with storm water include a number of attenuation ponds, between 1.4 and 2.3m in depth. These are located throughout the development site, some close to designated child play areas.
    - The management and maintenance of the attenuation facilities and the land drainage system including cleaning, de silting and de-vegetation, together with the management, repair and replacement of multiple water butts and maintenance of the landscape represents a huge financial burden to North Somerset Council and local taxpayers, on an ongoing, endless basis.
    - The result of high-water levels in the Land Yeo will be experienced throughout its lower-level catchment area, detrimentally affecting businesses and residential accommodation between Watercress Farm, Wraxhall House all the way to Clevedon. There is no recognition as to the damage that will be caused in this respect by the proposed development.
    - Chapter 10 of the Environmental Statement – Flood Risk and Drainage notes at Table 10.2 that there is a high risk of flooding affecting residents downstream, Tickenham, Nailsea and Kenn Moors SSSI. The mitigation methodologies proposed, that are not certain of success, incur a huge ongoing maintenance and operational commitment.
    - The use of water butts is non-viable because most water butts remain full in the autumn and winter when heavy rainfall and flooding is most likely. Over time, water butts fall into disrepair undermining the proposed mitigation strategy completely. The reliance on water butts is a completely unreasonable proposal given the enormous operational, maintenance, repair and replacement obligations that accompany such a solution. This is neither a practical nor sustainable means of limiting flooding.
    - The planning application presents a major risk to North Somerset Council because failure to operate, manage and maintain the complete storm water attenuation and drainage infrastructure could easily result in accident and injury.

12. Economic restraints
    - The Land Yeo used to be maintained on a regular basis by a combination of the Environment Agency and the Lead Local Flood Authority, whereby vegetation was removed, and dredging carried out to ensure the river was free flowing. In addition, the spillway adjacent the B3130 at Jacklands Bridge was regularly inspected, maintained and operated to prevent overtopping or breaching of the Yeo at this location. The maintenance of the Land Yeo and spillway no longer takes place, resulting in more frequent overtopping and flooding of the surrounding areas. There is no reference in the application as to how the maintenance of the Land Yeo, the spillway, or the proposed attenuation ponds will be achieved and by whom. Neither is there any indication as to who is responsible for these works and the significant costs arising. These activities will need to be undertaken at a regular frequency due to the

additional load imposed on the storm water drainage function through the Land Yeo. Presumably the additional costs will fall to North Somerset Council and or the Environment Agency. These maintenance activities, outside of the proposed development site, will involve cleaning, removing vegetation, desilting and dredging to address the consequences of the proposed construction.

13. Other options
    - There are alternative brownfield sites in Nailsea in the Blackfriars's Road area and the Coates Industrial Estate, where the redevelopment of outmoded areas would be viable and where infrastructure such as roads and utility services already exist. Such redevelopment would benefit the community because it would be a better use of existing built-up areas, without the need to destroy green belt and damage the local environment in a permanent manner.

14. Loss of wellbeing
    - It is recognised by many learned organisations, for example the National Institute of Health, that green open spaces are beneficial in terms of mental health and wellbeing. Individuals have less mental distress, less anxiety and depression when living in areas with more green space compared with less greenspace. Health and access to green spaces are closely linked and so to remove a widely appreciated and extensively used area of green belt to provide residential accommodation in an area with limited local employment and where brownfield areas are available for positive redevelopment would be an irreversible and damaging mistake.
15. Footpaths
    - Whilst the development plans indicate improvements to footpaths within the boundaries of the application, no consideration is given to the footpaths outside of the designated access points. For example, the access point indicated to the northwest corner of the site, has no designated external path. Access is direct onto the B3130, with no pavement and a narrow-unmade track used by adults and children making their way into, or from Nailsea. To suggest that this is a suitable means for pedestrian and cyclists to gain entry to, or from, the new development, given the increased traffic flow on the B3130 and lack of suitable pavements is unacceptable and will highly likely result in accidents and injuries, particularly in winter as no road lighting is present on this section of 40 MPH road. The existing situation is hazardous enough and introducing additional foot traffic into this area without improvements to the wider infrastructure, such as proper footpaths, cycle tracks, street lighting and a reduced road speed limit would be extremely dangerous.

16. Construction traffic
    - The construction programme is noted as 4 to 5 years. The impact on the local environment and disruption caused by the construction process over this time will cause prolonged disruption, congestion and inconvenience to residents, businesses and school transport. The application documentation (Chapter 6 of the Environmental Statement) firstly notes that the effect of construction traffic over the 4-5 years is difficult to predict, it then follows with a comparison to a site in Cambridge, that is not of a similar size, suggests that 58 HGV's per day will be active and concludes that the effect of construction traffic on the community will be negligible. The conclusion is dependant of a number of predictions and conclusions which may or may not be realised. The paper does not present a balanced view by detailing the less optimistic and more realistic scenarios that are likely to result.

17. School traffic
    - There are several schools and key school transport routes near the proposed development. There is no reference in the application documents to the impact that will be caused to children walking to / from school past the construction site works, or of the likely delays to school buses, taxis and car share / rota schemes. This would seem to be a major shortfall in the application submission.

18. Emergency vehicle response times
    - The fire, police and ambulance facilities are co-located in Nailsea at the junction of the B3130 and Pound Lane. This area is on the immediate western boundary of the proposed development site. The new development when complete will generate a substantial volume of vehicle movements, to and from the area, via the B3130 at the east and west junctions. It is probable that over 700 vehicle movements per day will result from the 381 residential properties plus other facilities.
    - This increased vehicular activity will cause delays and tailbacks because the road infrastructure cannot accommodate existing traffic flows at busy times, particularly at specific pinch points.
    - The construction period of around five years will cause similar traffic disruption due the number of HGVs and general construction traffic needing access to the site.
    - As a result, both short and long term, the ability of the emergency services to deploy quickly from their current location will be severely compromised because they depend upon the B3130 to reach the A370, Tickenham, Bristol, Bristol Airport and the M5 motorway.
    - There is no assessment provided to demonstrate the likely delay to emergency vehicles reaching an incident and the resulting implications to life, property and affected persons, due to traffic congestion caused as a direct result of the proposed development.

19. The Causeway (west Nailsea to Tickenham passing Tickenham Church)
    - A narrow route exists between the west of Nailsea and the B3130 at Tickenham (passing by Tickenham Church). This route is often used as a shortcut by motorists to avoid the regularly congested B3130 at the Stone Edge Batch (B3130/B3128) junction.
    - Emergency vehicles occasionally use this route for expediency on route to Tickenham, Clevedon and or the M5 motorway.
    - The Causeway is also used to move livestock between pastures which can interrupt traffic flow for between 15 and 20 minutes.
    - Should this development progress, this Causeway shortcut is likely to become a more favoured route for motorists trying to avoid the B3130 and the B3128 pinch points.
    - This will lead to more tailbacks, increased accident risk, increased delays to emergency vehicle response times and saturation of the road network in the southwest of Nailsea towards Backwell, which already has a major limiting traffic flow interrupter due to the bridge at Nailsea and Backwell railway station. Overall, the proposed development will result in regular peak hour traffic gridlock across Tickenham, Nailsea and Backwell.

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Photographs and brief commentaries

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<tr><td>1. Flooding in immediate area of proposed development resulted in lane closure on the B3130.</td><td>2. The B3130 was closed because of raised ironworks causing danger.</td><td></td></tr>
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<tr><td>4. Environment Agency monitor the Land Yeo because it cannot cope with heavy rain and floods the B3130 and pedestrian footway.</td><td>5. The left circle indicates the point at which the Land Yeo breaches across the pathway, the other circle shows one of two local ironwork installations in the B3130.</td><td></td></tr>
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<tr><td>7. View of the two ironwork covers that rise by c200mm with heavy rain.</td><td>8. A = Yeo breaching point, B & C are the storm drain covers. The only footpath to Nailsea from north of the proposed development site is in the foreground.</td><td></td></tr>
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<tr><td>10. High risk area for pedestrians between path and Land Yeo, particularly when in flood (full to top).</td><td>11. Risk to life when Land Yeo is full as footpath is underwater and flooding B3130. Higher risk in dark autumn / winter when flooding occurrences increase.</td><td></td></tr>
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<tr><td>13. The proposed development with an increased rate of stormwater runoff will exacerbate an already precarious situation with a high risk of personal injury. Proposed pedestrian entry to the new development is on the left of the bend in the road ahead.</td><td>14. The Jacklands Bridge is frequently surcharged due to excessive vegetation and inadequate dimensions to cope with even short periods of heavy rain. The proposed development will make matters much worse due to the increased run off velocity.</td><td></td></tr>
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<tr><td>16. Heavy vegetation in Land Yeo due to a ‘no-maintenance’ approach.</td><td>17. Heavily overgrown Land Yeo immediately north of development site which is insufficient to cope with increased storm water flows.</td><td></td></tr>
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19. Spill-over culvert no longer maintained or operated to minimise risk of Land Yeo breaching.	20. B3130 at Stone Edge Batch, is too narrow to allow two lorries/ busses to pass causing regular traffic queues towards Nailsea and Tickenham, beyond B3128 turn.	
		
22. B3130 at narrow section cannot accommodate existing traffic flow without frequent traffic jams and incidents.	23. There are brownfield sites, some in the immediate area of the proposed development. that offer alternative opportunities without destroying recognised green belt land.	

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17. Brownfield opportunities in close proximity to the proposed development site (Coates Estate).	18. Other brownfield locations in Nailsea (Blackfriars Road).	

End.