

I am instructed to make this statement on behalf of Thornbury Residents Against Poorly Planned Development (TRAPP'D).

### 1. Introduction and Summary

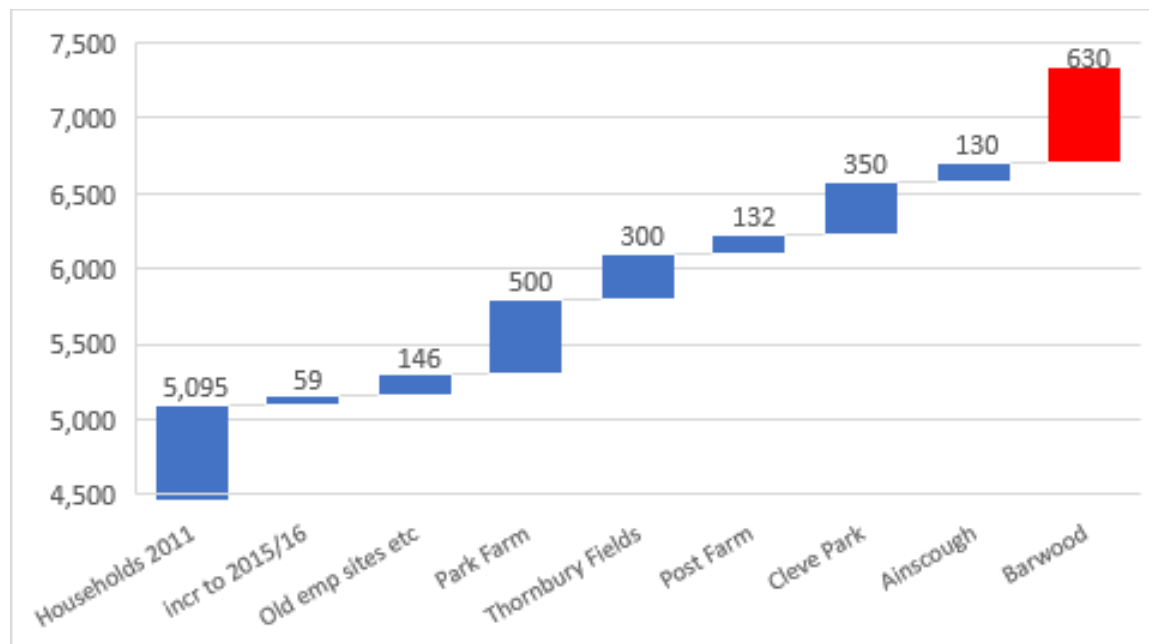
Reasons for refusing this application are so overwhelming it is difficult to know where to start. With South Glos now able to demonstrate a land supply well in excess of the 5-year threshold, this application has literally nothing going for it, and the timing of the planning decision to coincide almost exactly with the Examination in Public of the JSP represents the most blatant instance of an attempt at predetermination we can imagine.

On the negative impacts, Planning Officers and the Planning Committee need look no further than the eloquent public objections, including those of Thornbury Town Council, to simply feel the outrage that Thornbury has been inundated with speculative applications without any redress to infrastructure or public services of any kind.

The widespread extent of the feeling of “enough is enough” by the residents of Thornbury is also reflected in the recent e-petition which calls for both a reversal of the Council’s policy on supporting Buckover and a review of the green belt around the town to put in place protection against precisely this sort of speculative development. There are now almost 450 signatures on this petition, despite having been launched only a little over two weeks ago, and we confidently predict that this will soon be the most popular petition on the South Glos website.

### 2. The quantum of recent approvals threatens to overwhelm Thornbury

New housing approvals since 2011 have now reached 1,617 prior to this application, representing a 31% increase in the size of the town. If we add this application it would take us to 2,247 new houses, representing a 43% increase:



These figures exclude Bovis which, at the time of writing, is awaiting the outcome of an appeal. If Bovis is included on top of Barwood then we will have seen an increase in the size of the town by more than 50%.

It is worth reflecting that of the 1,617 already granted approval, as at March 2018 only 538 (33%) had been completed. Therefore, any strain that Thornbury is already feeling on its infrastructure and services is only the tip of the iceberg.

### **3. It is outside the boundary of both the existing and draft forthcoming Local Plans**

This is a speculative development which is outside the development boundary as defined in the South Gloucestershire Core Strategy and the emerging Joint Spatial Plan (JSP) or Local Plan. This site was proposed in the "Call for Sites" during the consultation phase of the JSP and was rejected during that process.

### **4. Predetermination**

It is expected that the Examination in Public for the JSP will take place in May 2019. The draft JSP policy 7.11 starts with a first bullet point that "*a maximum of 500 dwellings ... be developed within the plan period [2036]*". Planning permission to reach that number has now unfortunately been granted with Cleve Park and Ainscough. TRAPP'D has fully participated in the JSP consultation stages and has submitted a comprehensive objection to the premise in Policy 7.11 that Thornbury should be designated as a Strategic Development Location, and therefore the planning system has already failed us by depriving us of our democratic opportunity to make our case.

This application alone represents additional housing significantly in excess of the "*maximum of 500*". If it was granted approval, we would find ourselves facing 220% of the number of houses planned in the JSP before our case has even been heard. If Bovis also wins their appeal that would take us to a factor of 3.

Our democratic opportunity to make our case to the Examiners of the JSP must not be allowed to be further undermined by this proposal.

### **5. Inappropriate location**

Access from the site to the town centre and other facilities is very poor, with an unacceptable walking distance of 1200m, so that access to the town centre and other facilities is too far to walk for the vast majority of inhabitants for most of the time. Cycling is also not attractive because of the few very busy roads available. As with walking, at many times of the year the weather can be cold, wet and windy so it is more convenient to use the private car. Buses are hardly used in the Thornbury area.

This would be yet another location sustainable only by the use of the private car, and yet astonishingly in their Statement of Community Engagement (November 2018), the developers proposal to deal with the growing problem of lack of town centre parking is to provide none at all on the grounds that "*The provision of additional car parking within the town centre could adversely encourage people to drive rather than travelling by foot, cycle or using public transport*" (page 15).

Our view is that parking in the town is already problematic and would get even worse. The local roads, such as The Plain, are potential congestion spots. Other rural roads are equally unsuitable but are becoming rat runs at peak times, causing danger on these minor roads.

In addition, the inhabitants would be so far out of Thornbury so as to feel isolated (as already observed in the new current developments).

## **6. Congestion impact**

The developers Statement of Community Engagement also reviews the impact of congestion on the A38 on page 14 stating that *“the proposals will have a negligible impact”*. This does the classic trick of looking at the development in splendid isolation. In contrast, the Scoping Report at 3.4.35 states that *“it is considered that likely significant cumulative effects [from the developments around Thornbury] are anticipated .... relating to Traffic and Transport, Socio-Economic and Air-Quality”*. This speaks the truth of the matter, as witnessed by residents; it is the cumulative impact that counts, and there is real concern particularly in relation to congestion getting in and out of Thornbury, on the A38 and on access to the M5 at Junction 14.

The ensuing traffic would be accompanied by pollution which is already at limits in Bristol, and even Thornbury would be in danger of excessive pollution levels.

We note that Highways England recommend that planning permission should not be granted for at least another three months (report dated 5<sup>th</sup> February 2019) pending further assessment of traffic impacts.

The Highways England report further comments on road safety as follows *“it has to be accepted however, that a worsening of traffic conditions at M5 J14 would result in an increase in the risk of vehicle collisions due, for example, to increased mainline queuing. It is therefore imperative that the impacts of the development on the traffic conditions at M5 J14 are adequately demonstrated”*.

## **7. Impact on Infrastructure and Services**

Many people have commented on the fact that nothing has been done in and around Thornbury to resolve growing problems with Infrastructure and Services to cope with the additional houses. As mentioned previously this perception by residents will be based on only one third of the additional housing having been built. Of particular note is the impact on the following:

- Adding so many new houses to the area, already overloaded with current developments, is out of balance with the decreasing employment situation. Thornbury has lost many hundreds of jobs in recent years, a situation which continues today. New inhabitants can expect long commutes, of the order of 30 to 40 kms per day.
- Parking in the town is already problematic so any benefit to the businesses of the town that might be generated from the new homes will be negated.
- Health services in the town are already under pressure with reported waits of 4-5 weeks to see a GP. Our research shows that the level of patients per GPs are now at a level of 2,434, which contrasts unfavourably with the NHS South Gloucestershire capacity level quoted as 1,700 GPs per patient. The developer suggests that if health service capacity is an issue then this might be resolved by making land available for more GP surgeries. This, however, completely misses the point that it is not additional space that is the problem, it is our inability to encourage enough GPs to work in Thornbury, and moreover to work full-time.

## **8. 5-Year Land Supply test**

South Gloucestershire Council can now demonstrate that it has a 5-year land supply as defined in the NPPF. As of December 2018, the Core Strategy is now more than five years old. Therefore, in accordance with the NPPF published in July 2018, the Council has used the new Standard Methodology for calculating the housing supply, which makes reference against the forecast demand published by the ONS, as opposed to a formula that links to the previous Core Strategy.

**At last we have a method of calculation that genuinely reflects the expected level of demand, together with an appropriate buffer at 5%.** It should be of no surprise that this gives a level of easily above the minimum at 6.3 years. Moreover, this figure ignores the supply from Cleve Park as this was subject to an outstanding judicial review in December 2018 when the Early Extract AMR was published. We now know the outcome of that review, which sadly is to allow the Cleve Park development, which in turn was predicated upon the assumption that the entire 350 houses will be built within 5 years. Adding this figure onto the land supply therefore **gives an updated land supply of 6.52 years.**

Finally, we have a sensible measure and it tells us that **there is no shortage of housing in South Gloucestershire.** All of the planning policies of the Core Strategy are therefore up to date and relevant, including that which relates to the development boundary in Thornbury.

The one and only substantive claimed justification for this development has now been eliminated and planning permission should consequently be rejected.