

## **THORBURY NEIGHBOURHOOD PLAN – TRAPP’D RESPONSE**

Neighbourhood Plan survey: <https://www.surveymonkey.co.uk/r/DraftTNP>

<b>Topic</b>	<b>TRAPP’D View on whether draft proposal meets the objective</b>	<b>Draft Plan Chapter</b>	<b>Policy numbers</b>
Vision & Objectives	Yes		
Identity & Coherent Development	Mainly	5	1 & 2
Housing	Mainly	6	3 to 9
Town Centre & Economy	Yes	7	10 to 13
Services & Facilities	Yes	8	14 to 16
Sustainable Development & Connectivity	Mainly	9	17 to 19
Travel, Transport & Parking	Yes	10	20 to 23
Overall	Yes		

### **Vision & Objectives – TRAPP’D Response:**

Generally very supportive, but would like to see a strengthening of the first objective to state that green open spaces are highly valued and in need of protection, and that it is vital to maintain strategic green gaps to prevent surrounding hamlets being merged with the town.

These are points that are picked up in subsequent chapters, but merit specific mention at the outset.

### **Policy 1 – Rural Character and Landscape Setting**

Strongly agree with the sentiment in Policy 1 about preventing the coalescence of Thornbury with surrounding hamlets, but would go further by extending Policy 1, or adding a new Policy 1a, establishing the need for strategic green gaps in the case of new major developments (over 50 dwellings) around the north and east of the town. Propose that the larger the proposed development the greater the need for, and extent of, the required green gap which should be measured from the proposed built area within any such development to the nearest existing or planned approved housing. Propose that the green gap should be not less than 25% of the diameter of the proposed built area at its widest point.

*Note that Thornbury Residents Against Poorly Planned Development (TRAPP’D) submitted an e-Petition requesting a Green Belt Review to South Gloucestershire Council (SGC) in August 2019. Following a meeting with Senior Strategic Planning Managers on 30th July 2019, TRAPP’D was informed that SGC had commissioned an independent Review following which interested parties would be involved, but no subsequent response has been forthcoming.*

### **Policy 2 – Neighbourhood Development Frameworks**

Strongly agree with the points in Policy 2 about infrastructure being delivered in a timely manner – i.e. much of it in advance of the houses themselves. If anything, this sentiment should be strengthened given the past track record of failure to provide any meaningful infrastructure from recent developments. Also worth mentioning that access to GP appointments is becoming increasingly difficult as a result of the combination of new housing without any commensurate increase in health service provision, and the trend for GPs to increasingly work part time.

### **Policy 3 – High-quality Design**

Much more emphasis to be placed on issues such as maximum ridge heights, precise location of higher buildings, building materials, e.g. roofing tiles, and finishes so that we don’t end up with eyesores like the overpowering 2½ storey buildings.

New houses should not be allowed to overpower existing properties and Planners should take heed of the need for reasonable separation distances, particularly where the new developments have overlooking windows. Developers must not be allowed to use every inch of land when existing residents’ properties and residents are significantly affected.

There are also too many ‘barrack blocks’ amongst the affordable housing which display very little architectural merit.

Impose a minimum road width of 7.25m on all new developments to ensure adequate access for service vehicles. SGC Transport Development Officers appear to be stuck in the immediate post-war syndrome of believing that 6m is an adequate width!

All footpaths and pavements within developments should be a minimum of 2.5m wide. It has become obvious that with the increasing population of under 5s on the new developments that there is insufficient room for two buggies to pass safely, particularly when toddlers, bikes, scooters, dogs etc are involved. If we want to encourage walking and cycling, we need to provide sufficient and safe pedestrian access.

#### **Policy 4 – Design Review**

A Design Review Panel should include at least 1 resident who has local knowledge and experience in this field.

#### **Policy 5 – Sustainable Design and Construction**

More emphasis is required on the inadvisability of allowing development on land located in Floodzones 2 and 3 given the impact this has on adjacent properties. Suggest the need for a new policy 5a relating to avoidance of future-proofed floodzones. Against a background of climate change and a record level of rainfall this winter and the fact that Thornbury forms a natural bowl, residents are deeply concerned that by paving over open fields, the risk of flooding in surrounding areas is substantially increased. It is not sufficient for new developments to simply claim mitigation via installation of drainage schemes. The Environment Agency publishes map showing floodzone areas, but these represent a once in so many year flood risk based on historic data only. It is therefore proposed to future-proof the floodzones by requiring that any future development site which contains Floodzone 2 or 3 areas may not pave over any area within, say, 10 metres of those floodzones.

#### **Policy 6 – Energy Efficiency**

No additional comments.

#### **Policy 7 – Renewable Energy**

Suggest the need for a new policy 7a relating to sustainability:

New Policy 7a – Impact on Climate Change through increased commuter traffic

The task for South Gloucestershire is to become carbon neutral by 2030, and there are a number of policies in Chapter 6 to ensure high standards of energy efficient new houses, but the negative impact of additional commuter traffic by private vehicle is often overlooked. Thornbury provides a desirable location for people to live, but not the employment commensurate with the level of earnings necessary to afford the housing provided. The distance from such employment locations and lack of suitable public transport gives Thornbury a very low public transport share of commuter journeys at around 2%. It is not up to the Neighbourhood Plan to determine spatial locations within the overall region, but we can require any proposed new developments to provide an independent assessment of the annual commuter CO<sup>2</sup> cost of the proposal by assessing the likely commuter range for the houses proposed and modal quotient that would do so by private vehicle. It would then be for the Local Authority or Inspector to judge the climate change affordability of the development in the context of the overall progress being made towards the target of carbon neutrality.

#### **Policy 8 – Mixed Development**

Emphasise that the 'mix' of dwelling types should be sensitively placed throughout a development rather than all of the affordable and social housing being 'lumped' around site perimeters.

#### **Policy 9 – Brownfield and Infill Sites**

No additional comments.

#### **Policy 10 – Town Centre Design Principles**

No additional comments.

#### **Policy 11 – Preserving Historic Identity**

No additional comments, although see Policy 3.

### **Policy 12 – Town Centre Vitality**

No additional comments.

### **Policy 13 – Provision of Office and Light Industrial Units**

These should not generally be located within existing or new housing developments.

### **Policy 14 – Phasing of Community Infrastructure with Housing Development**

More emphasis needs to be placed on the provision of essential infrastructure to support housing development and inevitable population growth at a much earlier stage in the planning process. As a result of the limitations of the Section 106 Agreement contributions pertaining to individual developments, the highways improvements are woefully inadequate and will require more substantial funding to alleviate the resultant traffic congestion – see comments under Policy 20.

### **Policy 15 – Leisure Opportunities for Young People**

Whilst appreciating that walking, cycling and public transport are being prioritised under Policy 2, could Mundy Playing Fields be made more accessible to the private car? Currently access via Kington Lane and Castle Court Car Park are the only viable options.

### **Policy 16 – Community Facilities**

No additional comments.

### **Policy 17 – Planning for Green Infrastructure, Biodiversity and Food Production**

We must ensure that the environment is not irreversibly damaged by development. Whilst we are always reading the mitigation measures being taken to protect wildlife, it is patently obvious that the numbers of species are rapidly decreasing. Genuine and enforceable protection needs to be added for hedgehogs, badgers and foxes etc. It is futile to put in mitigation strategies for wildlife if these are going to be flouted by developers. Possible solution would be to require a conservation consultative group to be set up for large developments for the duration of the project, with representation including local residents.

### **Policy 18 – Creating Connections through Streamside Walks**

It is essential that ‘temporarily’ suspended public footpaths and rights of way are returned to full access once developments are completed.

### **Policy 19 – Local Green Space**

There are additional ‘green space’ locations in and around Thornbury that are equally deserving of special mention and it is therefore proposed that four further parcels of land should be identified as Local Green Spaces under Policy 19:

- 1) The fields to the east of Clay Lane (bordered by Clay Lane, The Hackett, the A38 and Whitewall Lane) are highly valued by ramblers, dog walkers and runners using the PROWs that criss-cross these fields. This land has thus far not been subject to planning permission requests and provides a critical bulwark against the coalescence of development granted permission at Cleve Park and existing housing along Morton Way, along with potential proposed development at Crossways Lane and Buckover.
- 2) Cleve Wood and Crossways Wood adjacent to the Cleve Park development were given the status of significant green infrastructure many years ago, they are much valued woodlands appreciated by all of the residents in Hackett Lane as well as a lot of walkers from Thornbury. They are Ancient Woodlands and are very significant wildlife havens; we have bats, 3 different species of wild deer, badgers, owls, buzzards and plenty more besides living in them.
- 3) Land South of Gloucester Road which was the subject of a refusal of the planning application at Appeal, in large part due to the impact on the setting of nearby heritage assets. It also importantly provides a buffer against coalescence of development along Morton Way, and proposed developments at Crossways and Buckover, as well as the hamlet of Upper Morton.

- 4) The green space between Phase 2 and 3 of the Thornbury Fields development forming the banks either side of the Pickedmoor Lane Rhine

### **Policy 20 – Highway Impact**

See comments under Policy 14. As a result of SGC's rigid adherence to historic data, there appears to be little acknowledgement of the undeniable fact that the volumes of traffic using particular junctions are way above what they are planning for. Therefore, contributions are currently falling well short of the costs required to make meaningful improvements to the existing highways infrastructure in order to accommodate the growing population and car use.

Developers should be required to reimburse the cost of repairs to roads, pavements, walkways, footpaths and verges damaged by the high volume of heavy construction traffic during the development phase. This issue should be covered as a Condition in the Reserved Matters Application as costs cannot be quantified for a Section 106 contribution in the Outline Planning Application.

### **Policy 21 – Walking and Cycling**

No additional comments.

### **Policy 22 – Safeguarding Former Railway Line**

Whilst we agree that the route of this line should be safeguarded, there is little merit in its potential for future use as a rail link unless a second line and station/transport hub could be located beyond Tytherington.

### **Policy 23 – Town Centre Parking**

The town centre parking requirement is critical to preserving the economic strength of the Town Centre.

### **Overall – TRAPP'D Response:**

Overall, this is a well thought out and professionally presented piece of work that should give some help to preserve the best of Thornbury whilst helping to ensure that adequate and appropriate housing and infrastructure is provided to allow families to remain in the area. However, there are several areas that need to be strengthened particularly under chapters 5, 6 and 9.

### **Additional Points**

1. The new population estimates described in Chapter 3 and referenced in Appendix E points <sup>3</sup> and <sup>4</sup> are considerably below the figures obtained by TRAPP'D in our house to house survey on Park Farm and Thornbury Fields in December 2018. Our population figures would indicate a 40% population increase (above Census 2011) by 2026 to a level of approximately 17,000 for Thornbury alone, assuming that all currently approved developments are built out. Our age demographic figures show that 44% of the new population will be in the 25-44 age group and 13% in the 45-64 age group, which will have a disproportionate effect on the working population figures and growth of the younger age group demographic.