

TRAPP'D response to New Local Plan phase 3 consultation – Feb. 2024

Section 2: Council priorities and Local Plan objectives

We are in broad agreement with the Council's objectives. In particular, Objective 2a will be the most helpful guide when selecting development locations, being concerned about locating new homes in places where employment, key services and facilities are easily accessed by means other than the private vehicle, in combination with Objective 6, which is concerned with deliverability. We think this latter objective is vital to avoid some of the pitfalls that previous attempts at plan-making have fallen into, particularly in terms of wishful thinking on infrastructure requirements that are outside of the Council's control. To that end, we believe that Objectives 6a or 6b should be strengthened to refer to the point that the infrastructure concerned should either be clearly already sufficient for the scale of development proposed, or within the gift of the Council and developer to make it so.

Section 3b: Planning for a strong economy and jobs

No comment

Section 3c: Planning for town centres

We have no issue regarding the town centre boundary proposals.

Section 3d: Planning for infrastructure

Although comment on this section is primarily requested from developers and infrastructure providers, we note that within the NHS practice topic paper, Severnvaile is ranked as the highest priority Primary Care Network (PCN) for investment in South Gloucestershire due to the poor condition of Thornbury Health Centre, and the fact that two of the practices in Thornbury are in the top 10% of practices in Bath, North Somerset and South Gloucestershire in need of more space.

As residents this is hardly news, but as housing campaigners we find this infuriating; throughout all of the recent housing appeals we have had zero engagement from our PCN and, despite residents deserved concerns about extensive waiting times, the capacity and investment issues in healthcare have not featured at all in the consideration for these new developments. We would like to hear an explanation from the PCN as to why they have failed to engage in the decision-making process that has led to a 50% increase in the size of the town, which is clearly something that our local health provision has no plan to cope with.

We are also deeply concerned to learn that the ambition for a new health centre is no longer feasible due to the impact of inflation. Aside from the obvious alarm this will raise, particularly given the fact that Thornbury still has c.1,000 houses to be built out from existing permissions, this case raises wider salutary lessons for wishful thinking about presumed infrastructure development to match housing increases.

Section 4: Urban areas and market towns

We have no objection in principle to any brownfield development that respects its surroundings in terms of design, and the density factors specified for relevant urban locations. Site TH001 is the existing Thornbury Health Centre which comes with additional unused buildings and land. In this case the development needs to be linked with a solution to the development of the Health Centre.

We have no comment on the 2 urban allocations elsewhere in South Gloucestershire with options for different uses.

Section 5: Towards an emerging preferred strategy

TRAPP'D view A: Summary – the Preferred Strategy is fairer, more likely to be deliverable, and is consistent with compulsory carbon neutrality targets

We agree with the Council's Preferred Strategy to distribute the Authority's housing need in a more proportionate and widely distributed manner than previous attempts and puts deliverability at its core by avoiding the wishful thinking of WECA's Joint Transport Strategy. In our view the strategy to go for a larger number of smaller sites improves the deliverability of the Plan and helps the Council to securely maximise housing delivery in the early years of the Plan.

In our response, we show why it would be both unfair and unsound to leapfrog the Greenbelt and rely on major new developments in the north of the Authority, either to implement one of the alternative "lenses", or to satisfy a significant quantum of Bristol's housing shortfall.

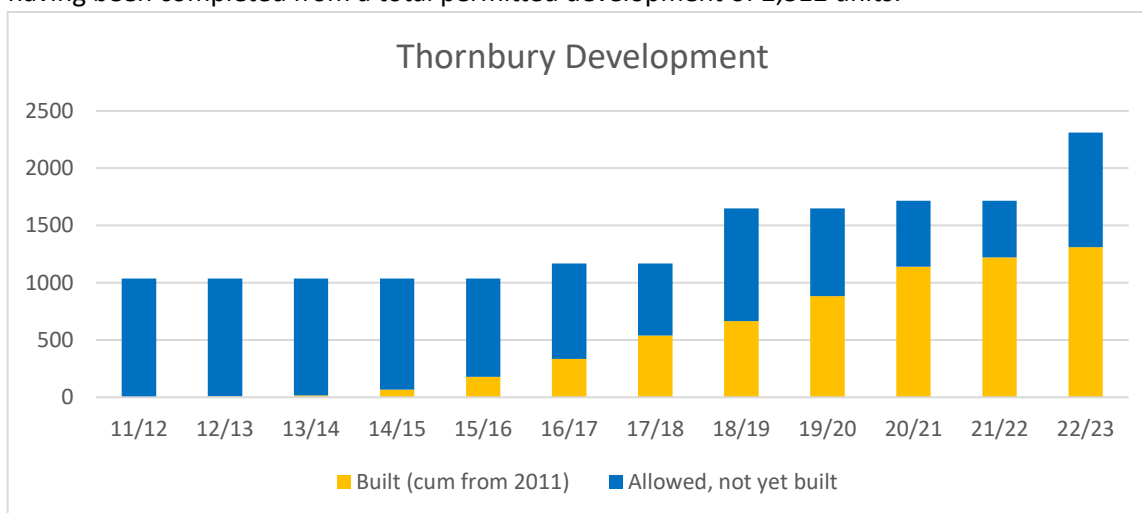
In section 6a we deal with the carbon neutrality target and our assertion that both the "No Greenbelt Loss" and "Transport Corridor" lenses will cause the Council to fail in its requirement to achieve carbon neutrality by 2030 by generating large scale trans-greenbelt commutes.

Fundamental to our case that Thornbury is in need of an extended break from further greenfield development is the extraordinary recent growth in housing. A key driver of this growth is an unintended consequence of the Greenbelt, the boundary for which runs through the middle of the town, creating a frontier to the north and east that has become a prime target for speculative development, as can be seen in our map later in this section. As we will demonstrate in section 6a, an alternative policy of avoiding the Greenbelt brings about disastrous consequences and, therefore, we have no qualms about preferring to develop more suitable land that happens to be within the Greenbelt, as discussed more fully in section 6b.

The next sub sections will outline the recent planning history, followed by an analysis of Thornbury's contribution to the increase in housing stock over two cycles compared to the rest of the authority, and finally our comments in relation to the specific sites proposed in the Preferred Strategy.

TRAPP'D view B: Recent growth in Thornbury amounts to an increase in the size of the town by almost 50%

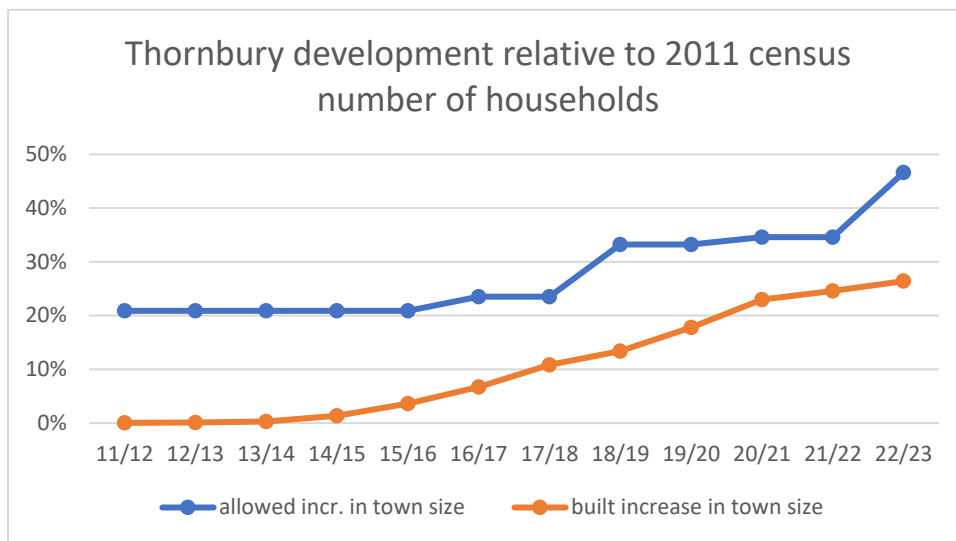
Since 2011 Thornbury has experienced an overwhelming surge in greenfield development with 1,310 units having been completed from a total permitted development of 2,312 units:



One of the most striking features of this development is that **in 2011 permitted developments waiting to be built amounted to slightly over 1,000 units, but with more and more speculative greenfield developments being granted permission, by March 2023 we still had more than 1,000 to be built out.**

In October 2017 the Joint Spatial Plan (JSP) phase 2 consultation was published, listing 12 Strategic Development Locations (SDLs) including Thornbury with 500 units. The JSP was subsequently (and correctly) rejected by Inspectors during the Examination in Public, largely because the SDLs were nothing more than a random list of WECA's preferred locations, rather than a development **strategy**. However, **the remarkable fact for Thornbury is that since the publication of a proposed target of 500 units, permission has actually been granted for 1,144 units – a multiple of 2.3 times the quantum proposed in that plan!**

The chart below shows that the allowed developments would amount to an almost 50% increase in the size of the town since the 2011 census (5k houses):



The chart also illustrates the lag between outline permission and completed houses at 155 per annum over the last 8 years, with each year adding another 3% onto the size of the town. Of the existing permissions 43% are as yet unbuilt, which means that we are nowhere near the full strain on infrastructure, congestion, and services that these new developments will inevitably bring.

The neighbouring villages of Falfield and Tytherington have seen a similar but even more recent influx, with Falfield, for example, experiencing a whopping 117% increase in the village size compared to 2020. These villages rely in part on services from Thornbury, these developments thereby having a further knock-on effect on services.

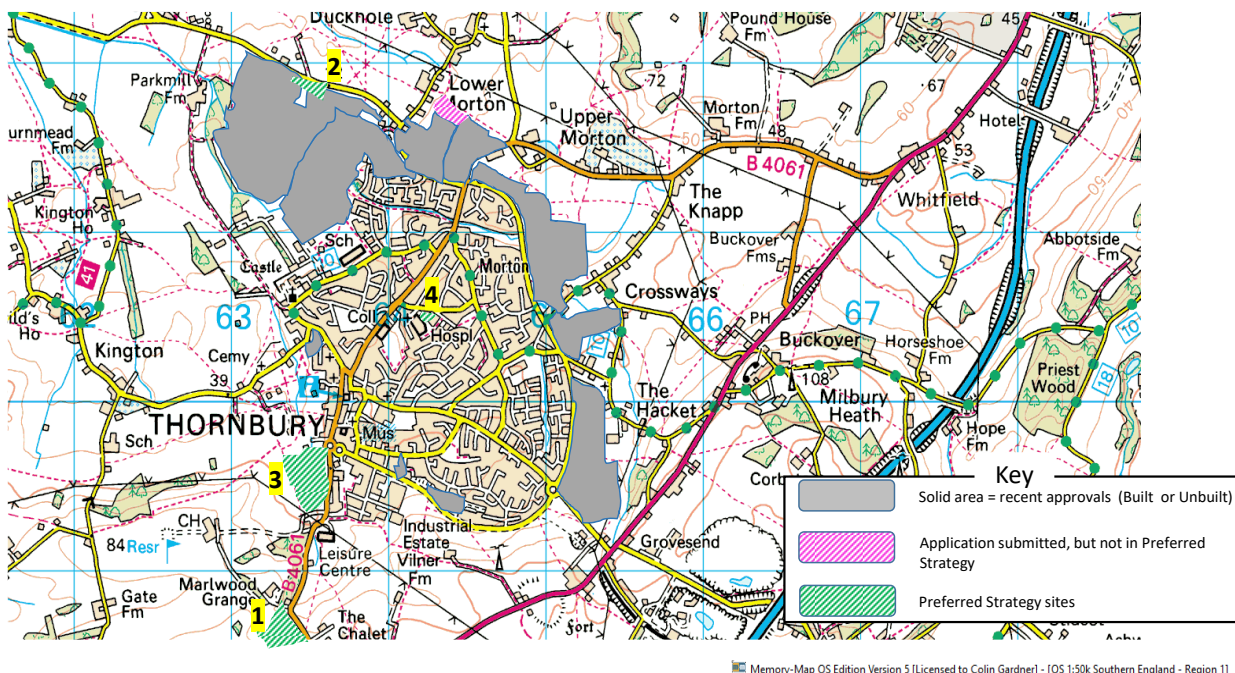
Notwithstanding the fact that we are only just a little more than halfway through building our existing permitted developments, residents are feeling the impact of the strain on road congestion, occasional lack of parking, lack of primary school places, difficulty in registering with dental surgeries and, most of all, obtaining routine doctors' appointments. We have heard the argument that this situation is normal, resulting from the trend for early GP retirements and increased part time working. However, **this argument is false**; scarcity of GP appointments is not a binary matter which all towns either have or don't have, it is a problem that becomes more acute by degree and, in our case, we have the issue on *both* the supply side (lack of GP hours) *and* the demand side (increase in the number of patients). See also Section 3d on the critical issues facing health services in Thornbury.

The conclusion is that Thornbury is running hard to stand still with more than 1,300 houses completed over the last 12 years, and yet remains in the position of 1,000+ permitted houses not yet built - more than double the proposal put forward in the failed JSP. Development represents a 50% increase in the size of the town in a very short period without any infrastructure support, leading to severe pressure for key services, exacerbated by a similar story in surrounding villages that rely on services from Thornbury. **Our town is in desperate need of a break from further greenfield development in the New Local Plan to enable build out of the existing sites, address the infrastructure shortfall and assimilate all the changes.**

TRAPP'D view C: The Preferred Strategy recognises that Thornbury needs an extended period to absorb the already permitted development. It is a matter of both fairness and practicality in terms of matching development with infrastructure that we view the contribution of each area over the period of two planning cycles

The Preferred Strategy includes 130 houses from new developments in and around Thornbury, mainly on new greenfield sites. However, it would be incorrect to conclude that the 130 new units is the only

contribution that Thornbury makes to South Gloucestershire’s housing need in the next planning period, as there are 785 houses in Thornbury to be built out during the plan period, representing almost 10% of the Authority's 8,080 existing permitted developments, shown in grey in the map below, alongside the proposed site allocation in the Preferred Strategy:



We fully agree that that the concept of “every town and village has a role to play” is the principle that enables the Council to meet its housing need in a more widely distributed manner and, whilst we accept that 115 new houses on greenfield sites is a modest addition compared to recent experience, we believe the right way to look at a town’s contribution to housing growth should be over the period of two planning cycles:

		Preferred Strategy	
	Prior 15 years	Plan Period	30 years total
Already approved	1,535	785	2,320
Local Plan scenario		130	130
Total		915	2,450
Increase in housing stock			49.4%

Comparing Thornbury with the rest of the region through this perspective shows that Thornbury contributes 2,450 houses, representing a 50% increase, compared to the rest of the Authority which will have seen a much lower increase of 34%:

	2011 Census No. H'holds	15 years to		30 years Total	Increase Percent
		March '25	March '40		
Thornbury	4,960	1,535	915	2,450	49.4%
Rest of South Glos	113,141	19,295	19,573	38,868	34.4%
South Glos	118,101	20,830	20,488	41,318	35.0%

With this perspective the logic is flawed to say that Thornbury must make a further contribution, and that the 115 houses on new greenfield sites should be removed, unless there is some new compelling benefit for the town.

TRAPP'D view D: The selection of new greenfield sites for Thornbury should only be included if there is some compelling new benefit to the town

To be clear, if we were offered a period of respite from new greenfield development on the condition that we had to accept a modest addition of 115 new houses then we would be inclined to agree that it would be an acceptable price to pay. However, we have as yet heard no argument in support of the 3 sites in question, except the suggestion that it represents a token contribution under the principle of “*every town and village has a contribution to make*” and, as we have shown, this argument is flawed when viewed from the longer term perspective of the contribution made by Thornbury. Moreover, all the arguments that the Council appears to accept for not concentrating development in the north of the authority also applies to the 3 sites in the Preferred Strategy for Thornbury, but just on a smaller scale.

Some site specific comments are given in the next section but, in general we would make the point that in light of the fact that TRAPP'D and the Council appear to be in agreement that Thornbury needs an extended pause from greenfield development, then there has to be some compelling exceptional benefit to the town, over and beyond the usual Infrastructure Levy. This may include, say, a significant contribution towards the regeneration of the Armstrong Hall.

The comments above apply to greenfield sites only. We do not object to brownfield locations in principle, provided the design features and densities are appropriate, and we note that no allocation has been included for the Castle School 6th form site in Gloucester Road which was identified in the Neighbourhood Plan. In the event that this site becomes added at the Regulation 19 stage then, in our view, it should replace an equivalent quantity of greenfield development around Thornbury.

TRAPP'D view E: EPS Thor3 – Land west of B4061 (40 houses)

Our general point about the need for a contribution over and above the Infrastructure Levy applies.

Furthermore, we have had specific feedback from members with concerns about this site:

- That it will erode one of the best and last remaining views in Thornbury over to Wales and the Severn Estuary,
- That the allotments are over 500 years old, being a significant part of Thornbury's history. Dagg's has now set up a link with Thornbury food bank, offering surplus produce to residents who use the Food Bank,
- That it will reduce the mental health benefits of the amenity used by hundreds of Thornbury residents, because it will destroy the open space and views from the allotments, as well as the peaceful nature of the location,
- That it could affect the biodiversity of the allotments and the wildlife in this area.

TRAPP'D view F: EPS Thor2 – Land west of Park Farm (15 houses)

We reserve our comments on the merits or otherwise of the site until we have seen any specific points from residents. However, our general point about the need for a contribution over and above the Infrastructure Levy applies.

In addition, in this case we struggle to understand why this site has been preferred, being amidst one of the areas that has seen the most development over the last decade. We specifically object to the idea of ‘infill’ between other sites as being a valid criterion for acceptance.

TRAPP'D view G: EPS Thor1 – Land off Alveston Hill (60 houses)

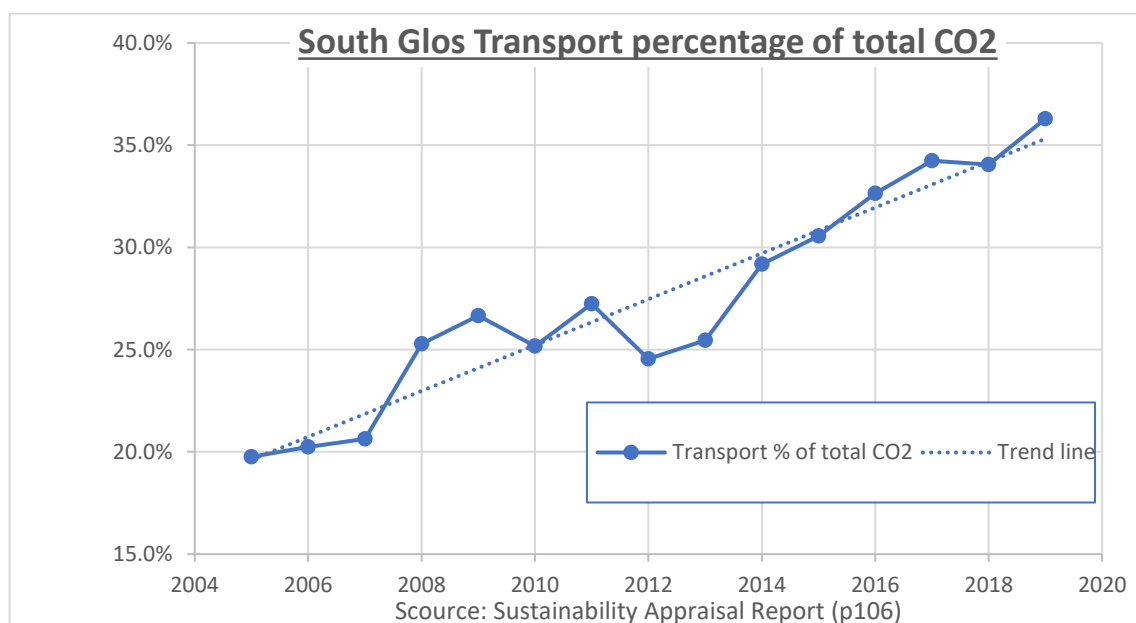
We reserve our comments on the merits or otherwise of the site until we have seen any specific points from residents. However, our general point about the need for a contribution over and above the Infrastructure Levy applies.

Section 6a: Strategy Lens 1: No Green Belt Loss

This is the lens that requires large scale trans-Greenbelt commutes by basing the bulk of the new greenfield sites in the north of the authority. We agree with the Council that the ‘challenges’ listed in 6a22 would render this option unsustainable and our comments are split into 3 parts; failure to respond to the climate change challenge, failure to provide a deliverable strategy and the disastrous impact on Thornbury.

TRAPP'D view A: This strategy lens would lead to failure of the Council's legal obligation for carbon neutrality by 2030

Arguably the single most influential decision that a Local Authority can make towards reducing carbon emissions is the juxtaposition of where people will live, work, and spend their leisure time, plus the means of getting from place to place. South Glos is committed to a legal obligation to achieve carbon neutrality by 2030, which will only be achieved if it can stabilise and then reduce the growth in transport emissions:



The reason for this trend is that Domestic and Industrial emissions continue to fall whilst those from Transport remain static or rise slightly. South Glos, with its commitment to carbon neutrality, cannot afford to ignore this problem, which means the worst thing a spatial strategy could do is to build new or extended settlements beyond the Greenbelt, resulting in increased traffic on the network back into Bristol.

This point is highlighted by a survey which TRAPP'D conducted in 2018 in the new Thornbury estates in which one of the key findings was that c.60% of the new residents had relocated from Bristol and the same proportion then commute back into Bristol by car every day.

If leap-frogging the Greenbelt for development locations is generally inconsistent with a carbon neutral mission, then building in Thornbury is particularly detrimental, having a very low modal share of travel to work by bus, as revealed in the 2011 census at just 1.7%. The especially high modal share of the private car in Thornbury was also noted in the Atkins report commissioned by SGC in 2019 entitled "A38 Thornbury Corridor Strategic Transport Schemes".

Thornbury is particularly poorly served by public transport, and this has worsened recently with the cancellation of the T2 and 622 (Yate) services. The only service towards Bristol is now the T1, which runs more or less directly into the centre of Bristol, missing out the most useful commuting destinations into Bristol Parkway, the A38 beyond Aztec West and Cribbs Causeway.

Whilst the bus service is invaluable for a small number of people who have no other option, it will never be a method of mass transit from Thornbury, with even the T1 service remaining substantially underused. For a bus to make any headway into the modal share from Thornbury it would need to have three attributes:

- Destinations directly to where people need to go (i.e. not simply Bristol city centre)
- Fast service
- Frequent service (say, every 15 minutes so that if you miss one it doesn't matter too much)

These are clearly conflicting aims that will never be achieved from Thornbury as a destination. For the same reasons a train service from Charfield will never fulfil the role of mass transportation from Thornbury and, even if it did, it would put further traffic pressure on J14 of the M5.

A good illustration of the inaccessibility of Thornbury by public transport was aired in a recent BBC radio programme, [My name is Sam](#), about a young man with a progressive disablement who fears being forced to move to Thornbury.

TRAPP'D view B: Development on massive greenfield sites, such as an extended version of Buckover, would render the Plan undeliverable on two counts; the first being the ability to even start the project (reliant on wishful thinking on infrastructure decisions and funding which are beyond the Council's control), and the second being highly optimistic build-out rates, which have proved notoriously fickle

The proposed site at Buckover would straddle the sclerotic A38, which is the designated relief road for the M5, that frequently results in queuing traffic:



Even more seriously, the whole concept of Buckover is reliant on the assumption of plenty of spare capacity on J14, which is simply not the case. This fundamental flaw was pointed out in the above-mentioned Atkins report, which stated that in order to permit Buckover, and other sites proposed in the JSP, then J14 would require an upgrade to a full interchange, which means a second bridge over the M5. This issue has been fundamental in upending [Stroud's Examination in Public](#) in which [National Highways confirmed](#) that additional capacity would be required at J14. This point is also confirmed by the [Inspector's findings](#) (para 6), who additionally warned that the cost is likely to be significantly more than Stroud had estimated (para 12) and that it usually takes many years to secure funding (para 13). In terms of the cost, the Atkins report estimated this in 2019 at £76m, but this was before the runaway levels of construction inflation and, to give a better feel for the likely outcome, we have [Gloucestershire county council's estimate](#) for the neighbouring Junction 12 at £350-400m (see item 5).

In our view, not only would it be an outrageous use of public funds to spend hundreds of £ millions to subsidise developer's infrastructure requirements but, even setting the funding issue aside, we see that National Highways (formerly Highways England), which operates on a five-year planning cycle, has no provision for an upgrade of J14 in its next cycle ("Road Period 3", 2025 to 2030). The earliest *possible* start date for such a project would therefore be 2031, with completion in 2032. However, the key point is that whilst we know for certain that no upgrade could be started during this decade, there is no way to be sure that it would take place during the entire period of the New Local Plan, which also means that we have no

way of knowing the scale of the final cost of the project. **This fact would fundamentally undermine the deliverability of any New Local Plan that included Buckover, or indeed any other significant further development that would impinge on the capacity of J14.**

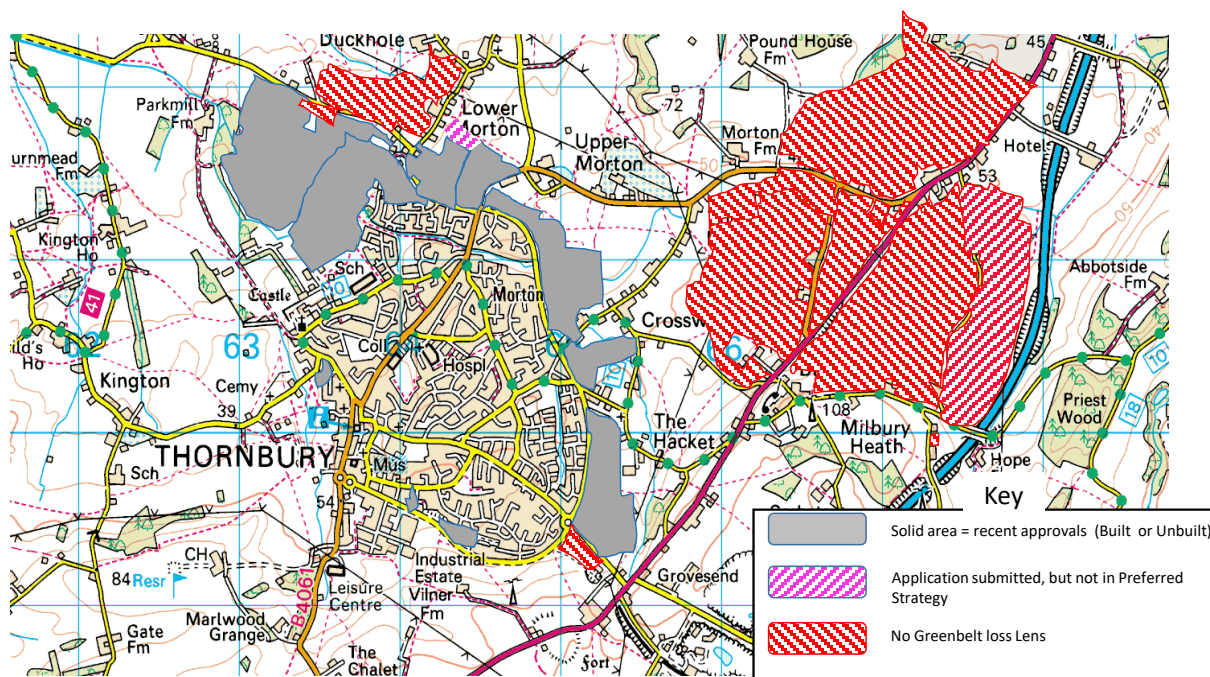
In terms of build-out rates, we note that the Buckover conglomeration comprising five sites makes an unrealistic assumption that the combined build-out rate would be in line with the sum of the individual sites, despite it being effectively a single project. We also know from past experience that the largest sites are the ones that are most susceptible to slower than planned build-out, if not for reasons of project complexity and resource availability, then for the fact that the real determinant of build-out rates is the market willingness to buy without requiring a price drop. On that score the lead developer, St Modwen, has an unenviable track record; in particular we refer to the “Coed Darcy” development near Port Talbot, a 4,000 house development started 20 years ago with no more than a handful built to date and none of the promised infrastructure.

It seems obvious to us that this ‘lens’ would have a vanishingly small chance of being found sound during the Examination in Public. Even if by some leap of the imagination we suppose it did, the result would be a continual failure to achieve the proposed build-out rates and a Plan that would be out of date from inception.

TRAPP'D view C: The impact on Thornbury would be disastrous

At the outset we want to register our objection to the way that Buckover is characterised in the consultation as a separate geographical area of consideration from Thornbury, perpetuating the myth attempted in the failed JSP to treat these two locations as separate Strategic Development Locations (SDLs). **They are not.** Buckover straddles the parishes of Thornbury and Falfield and is a narrow field’s width away from the latest developments in Thornbury itself. It was originally marketed as an extension of Thornbury, and that is also the reality in terms of service provision.

Our map below shows the impact of a combined 5 sites amounting to an additional 4,600 houses at Buckover, plus yet more development north of the town, effectively extending Thornbury all the way to the M5:



Memory-Map OS Edition Version 5 [Licensed to Colin Gardner] - [OS 1:50K Southern England - Region 1

The overall impact on Thornbury, including the years prior to the start of this Plan, would be an astonishing 7,200 houses, representing a 144% increase in the size of the town.

No Greenbelt Loss Lens				
	Prior 15 years	Plan Period	Later Years	Total (inc prior 15 yrs)
Already approved	1,535	785		2,320
Local Plan scenario		2588	2250	4838
Total		3,373	2,250	7,158
		5,623		
Increase in housing stock				144.3%

The impact on services and infrastructure would be unthinkable – we have already seen deep concern over the health care provision, with no certainty as to how the Plan will deal with the existing 1,000 units still to be built, let alone the 5,000 or so still to come in this scenario.

[Section 6b: Strategy Lens 2: Urban edge](#)

This lens requires a substantial quantity of development in Greenbelt, but other than that it seems to be the most logical strategy from our point of view – as described in 6b.6 it has the huge advantage of putting people closer to where they will work and spend their leisure time, affording an opportunity to develop genuinely practical public transport / cycling / walking alternatives to the private motor vehicle.

As we would attest, Greenbelt does not necessarily equate to the most visually valued, environmentally important or agriculturally valuable land and, in many cases, building here could remove the need to build on land that does meet one or more of those criteria, but that happens to be located further afield from Bristol. The question is rightly posed, therefore, as to whether the function of the Greenbelt – to stop the city expanding to swallow up surrounding settlements - can largely be retained within this scenario. Our view looking at the evidence here is that it can.

We are somewhat surprised by the comment that some of the options under this scenario maybe associated with flood risk – assuming that this refers to the risk of the Severn bursting its banks, rather than being simply on low lying marshy natural floodplains – given the recent and ongoing investment in flood protection in the area and the absolute commitment to protect key facilities such as the Severn rail tunnel and the large industrial assets located nearby.

We also question whether the urban or brownfield options have been fully explored to make the most of achieving housing densities appropriate to urban living.

We think the point made at 6b.10 is an important one, namely that this option has the potential to support more homes than the minimum required for South Gloucestershire’s needs. It therefore seems to us that in the unfortunate event that South Gloucestershire is forced to take some of Bristol’s unmet need, then these are the ideal locations to be explored, not least because the source of such demand would be from people who wish to live and work in the city, so it makes sense to provide nearby homes, rather than forcing a trans-Greenbelt commute.

We have no comment about the merits of the specific sites proposed under this scenario.

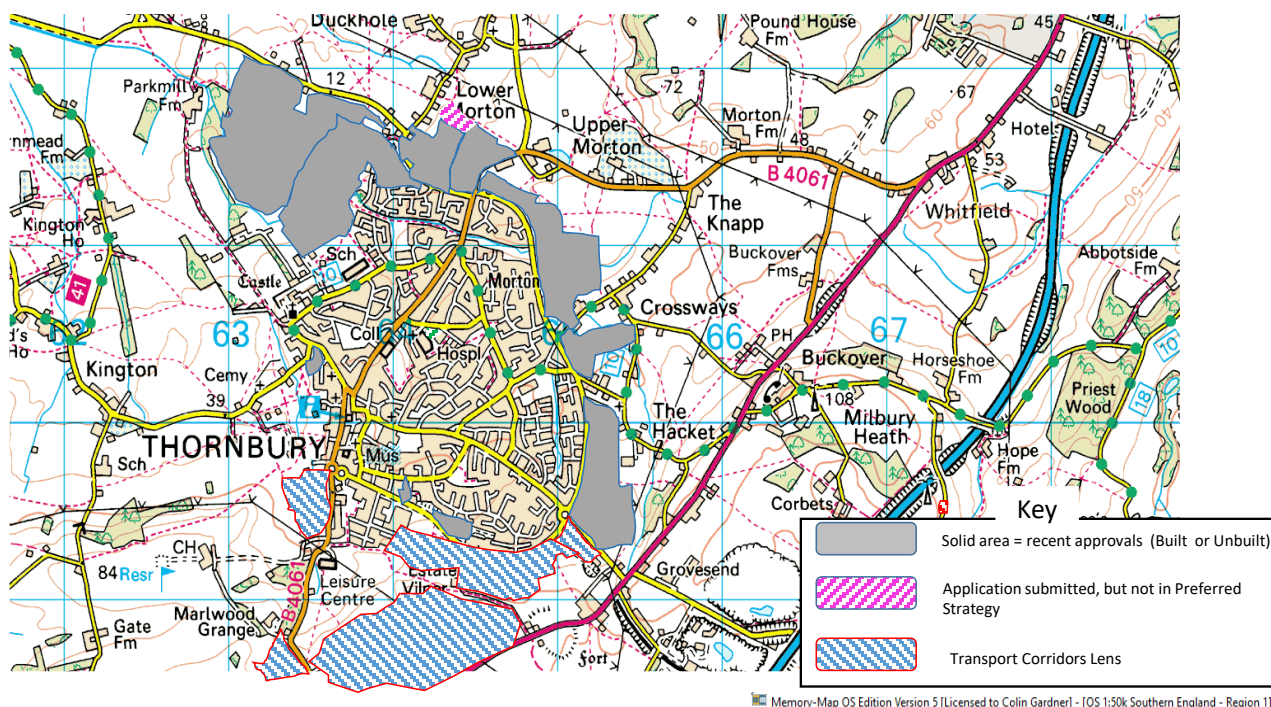
[Section 6c: Strategy Lens 3: Transport corridors and hubs](#)

The problem with this lens is that it contains most of the downsides seen in the “No Greenbelt loss” lens, but just to a lesser extent – the best that could be said about it is that it is less bad than lens 1. The direct impact on Thornbury would be to add 835 houses on top of the 785 already permitted and planned to be built within the Local Plan period. When added to the recently built houses and those that will continue to be built prior to the start period we would see a 64% increase in the size of the town, compared with a 34% increase in the rest of the Authority within the same timescale:

Transport Corridor Lens

	Prior 15 years	Plan Period	30 years total
Already approved	1,535	785	2,320
Local Plan scenario		835	835
Total		1,620	3,155
Increase in housing stock			63.6%

On our map this scenario would see development concentrated around the south of the town on the A38:



We refer back to the comments and photograph of the A38 under section 6aB above, as well as the presumed need for improvements to Junction 14 of the M5.

[Section 7: Planning for traveller communities](#)

No comment.

[Section 8: Planning for renewable energy](#)

Regarding solar energy, we are strongly in favour of the policy of avoiding Best Most Versatile land (grades 1, 2 and 3) as this is in far shorter supply than land available for solar energy generation.

Regarding wind energy, we agree with the concept of safeguarding areas that are considered most suitable for wind energy generation, so that other types of planning consent within the 'windshadow' do not prejudice any future decision.

We note the proposed safeguard area located between Oldbury and Rockhampton, and the fact that this does not necessarily mean that an application for a large wind turbine on this site will come forward. However, at this stage we reserve our comments on the site location until we have had some more feedback locally. This is undoubtedly a difficult issue; the need for additional renewable energy is not in doubt but, on a very local scale, the impact of a large wind turbine could be devastating. It would seem that community led and supported schemes would be the best way forward.

[Section 9: Planning for minerals extraction](#)

No comment.

[Section 10: Planning for strategic green infrastructure](#)

We support the principle of the Strategic Green Infrastructure Network, and we welcome the addition of Key Strategic Viewpoints and Visually Important Hillside.

We agree with the boundaries shown and also welcome the Key Strategic Viewpoint from Whitewall Lane at Buckover, which aligns with point 5 of the 'key views and panoramas' designated in the Neighbourhood Plan, as shown below:



5. View from A38 over Severn Ridge taken between Whitewall Lane and the White Horse Pub

[Section 11: Policy framework and draft policies](#)

We understand that the question of updating Local Plan Policies will be considered during the Reg 19 consultation, including CS32 for Thornbury. However, we assume it is helpful to make our view clear at this stage that we are very keen to see an updated version of CS32 in a manner that makes it unambiguous to any future Council Administration, Planning Committee or Inspector at an Inquiry, that the adopted strategy deliberately intends to allow Thornbury a pause from major new greenfield development in view of the extraordinary level of speculative development allowed in recent years. We are not particular about the format or manner of this policy, so long as the preceding point is recorded unambiguously.

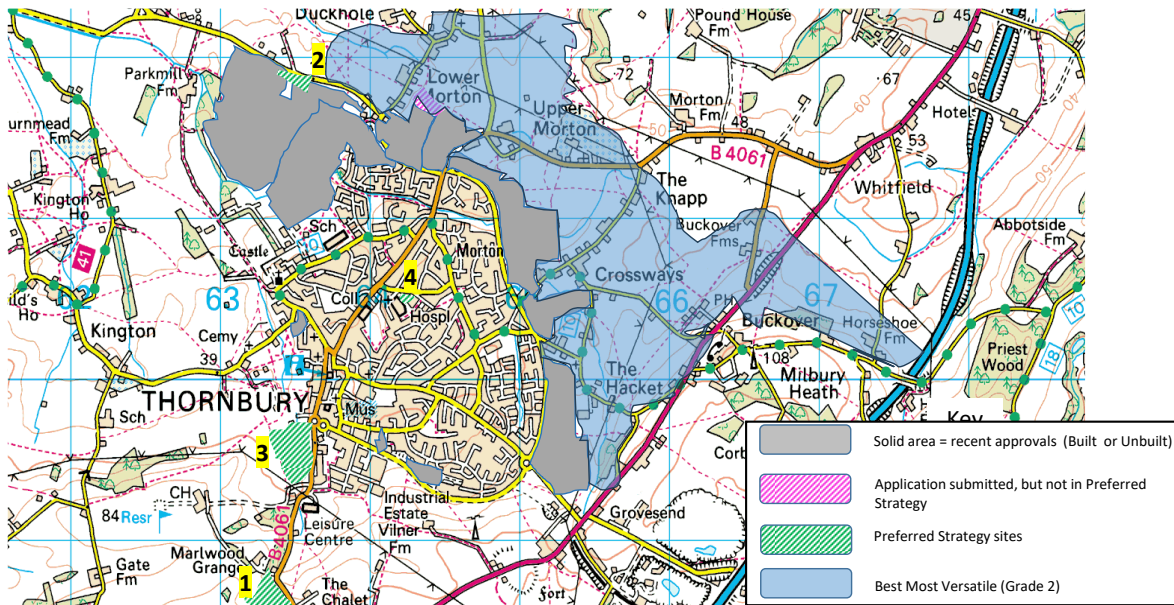
Our need for such a policy statement is grounded in the experience of the last decade, which has seen Thornbury overwhelmed by speculative development, with three quarters of the permitted 2,300 houses being allowed through this route. It is therefore clear that we need stronger protection than can be obtained by merely limiting the number of new houses in the Local Plan.

We acknowledge that the single most important protection is for the Council to have an updated Local Plan in place in a manner that is assured of being delivered as it is possible to be. That is why we agree with the premise underlying the Preferred Strategy that "deliverability" is key, hence the logic of leaning towards many smaller sites rather than 'mega developments', especially ones such as Buckover that rely on infrastructure development beyond the control of the Council.

However, that is not enough. Council administrations change, bringing with them different policies, and the best plan in the world can be blown off course by adverse market conditions, to which big builders' reaction is invariably to slow down build-out rates to protect the value of their investments. The rewards of obtaining planning permission are so large that the Council is inevitably significantly "out-lawyered" at appeals, so we are calling for the Council to give extra protection to address this imbalance.

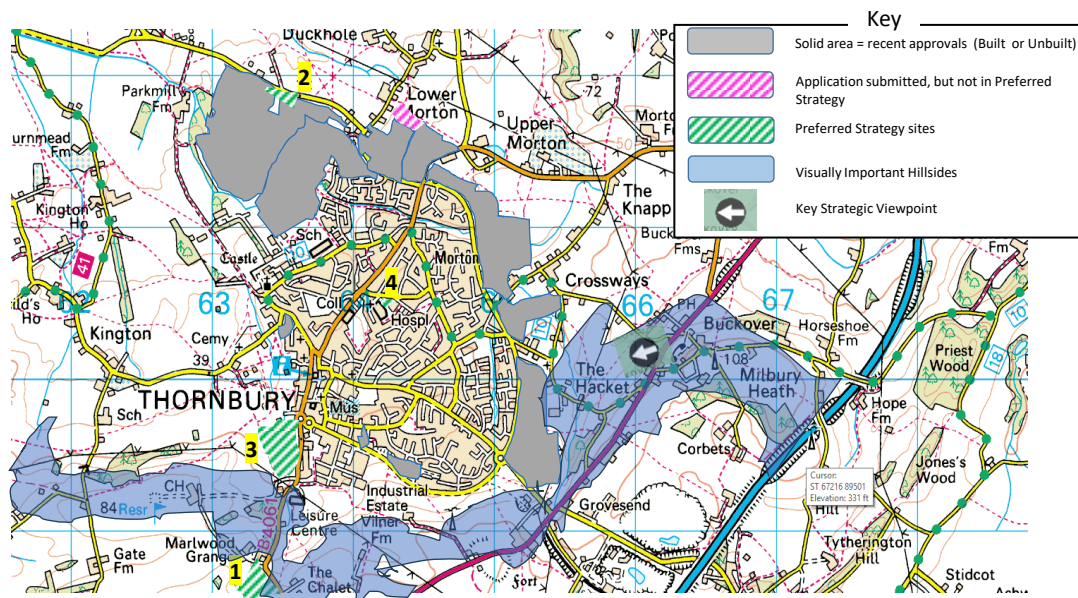
The question then becomes, what form might this protection take? Greenbelt designation is the gold standard, but we are not calling for a re-drawing of the Greenbelt because it would be a complicated process that would delay the plan-making timetable too much.

The next level of protection would be a “strategic green buffer” around the north and east of the town – possibly following the outline of the Best Most Versatile Land (Grade 2) classification, which would chime with para 180 b of the new NPPF on recognising the intrinsic value of best and most versatile agricultural land:



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One level down from this would be to protect the designated Visually Important Hillside and Key Strategic Viewpoints:



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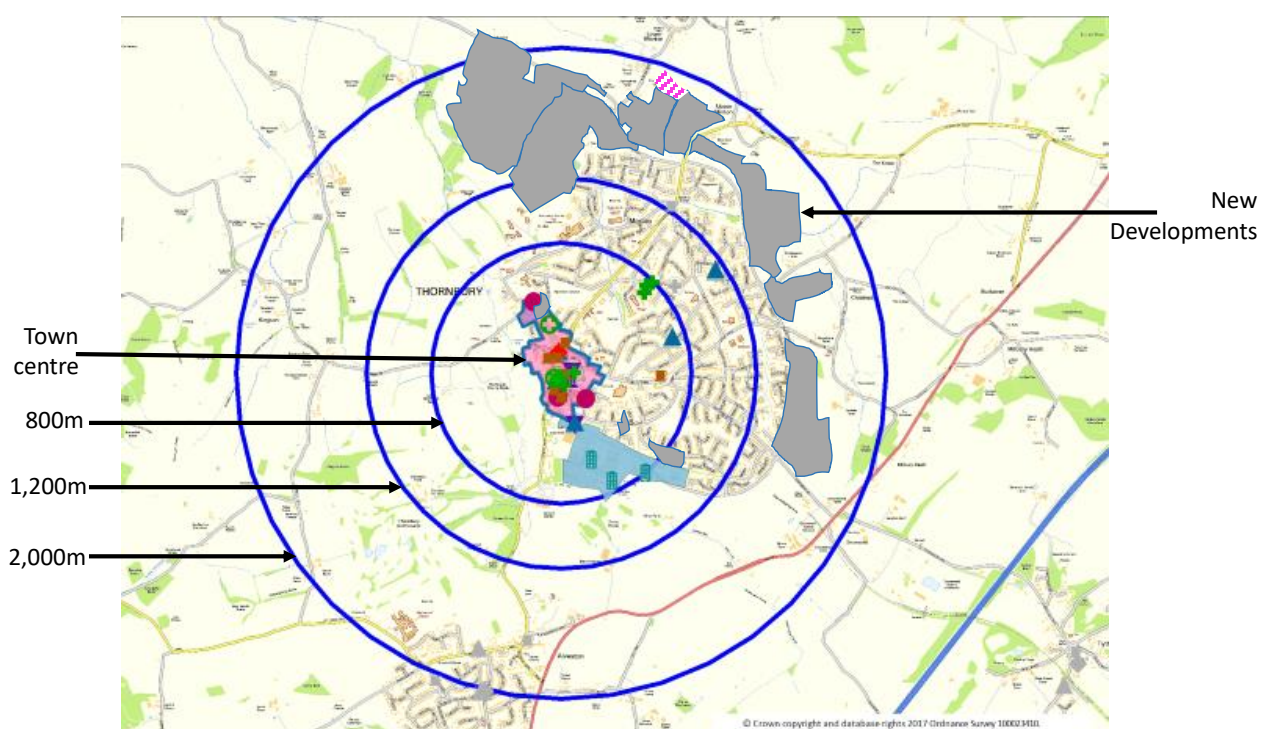
Another way to address the question of needed protection would be to update Thornbury’s Neighbourhood Plan (NP), to recognise the final allocation of land for development within the new Local Plan, and to include a designation of “Local Green Spaces” akin to the area of the map above. The NP currently has no teeth, having been deemed irrelevant during two appeals, and it is hard to see what the point of all that effort and expense was, but that could be remedied if approached in the right way. Suffice it to say that TRAPP’D is keen to work with the Council and other leaders in the town in order to find a solution to protecting our green spaces for at least the period of the Local Plan.

Finally, the least and absolute minimum level of protection would be some form of replacement for CS32 that would facilitate a future defence against speculative applications, be it in a planning committee or an inquiry,

to show clarity of purpose as to why the plan-making process considered and rejected the sites surrounding Thornbury that will become the speculative applications of the future.

Without exception, the speculative applications we have witnessed set the scene of their arguments with reference to some nuance of the old CS32, or the wording of the Sustainability Analysis for Thornbury (produced at the time to support the JSP proposal for an additional 500 houses which, by the way, has since been surpassed with approved speculative applications by a factor of 2.3). In our view it matters to have a policy statement that not only avoids any language that speculative developers can latch onto to support their case, but instead contains absolute clarity that the Local Plan explicitly intends to allow Thornbury time to complete and assimilate recent approvals, recognising:

- The significant contribution of Thornbury to date, unmatched by infrastructure,
- The harm caused by the urban bulge that has led to the town's centre of gravity to drift in an ill-considered manner away from the town centre itself, with new developments already beyond distances that people will usually be prepared to walk:



The map above illustrates the poorly planned lopsided development which makes Thornbury look like a seaside town without the sea. It also demonstrates our view that all of these new developments are car based, even for short trips into the town centre, in direct contradiction to Objective 2a of the Local Plan, to locate new homes where key services can be easily accessed by walking. National guidelines (eg, Chartered Institute of Highways and Transportation, DfT Traffic Advisory leaflet) are centred on 15 minute walking times and suggest that 2km to key services is the maximum distance that people will walk. The concentric circles on the map above are straight-line distances that underestimate the actual walking distance (take Buttercup Road on the Park Farm estate, for instance, which is c.1.5km from the town centre in a straight line, but according to Google maps the shortest walking route is 2.75km and would take 29 minutes to walk), and it is our contention, supported by anecdotal evidence, that every one of these new developments is beyond normal maximum walking distance.

However, Thornbury Fields, the first of the above sites to come to appeal, was incorrectly judged to be within walking distance of the town centre. This error was then perpetuated by subsequent appeals on grounds that if site X was within walking distance, then so must site Y, and so on. We are calling on the Council to debunk this myth by conducting its own survey to demonstrate the reality, and to incorporate these findings into a new version of CS32.

Phase 3 draft planning policies

Firstly, we reiterate our view that a new version of CS32 should indeed be developed, as described in the section above.

Secondly, we support and agree with the need for the carbon neutrality and climate mitigation actions described. In support of that, we think it is long overdue for the Council to insist on enforcing high standards of energy efficiency on all new developments, albeit we feel unqualified to comment on whether the specific measures and standards proposed are at the correct level.

Whilst we agree in principle with the majority of these proposals, we feel that insufficient attention has been given in the Climate Change Mitigation, Adaptation and Resilience section to pluvial (groundwater or stormwater) flooding, as opposed to fluvial (river) or coastal flooding. Our experience in Thornbury over the last decade has been that residents' warnings have gone unheeded about flooding consequences of allowing development on land partly containing flood zones of various categories. This has resulted in flooding of neighbouring houses in contravention to developer's claims that measures such as attenuation ponds will prevent such occurrences. In light of recent evidence of climate change bringing about greater frequency of heavy and persistent storms, planning policies should be far more robust in terms of both avoidance of building in areas that will increase the risk of pluvial flooding, and far stricter about measures that developers need to take to alleviate this risk and the duty of care owed to property owners adjacent to new development.