

## Thornbury

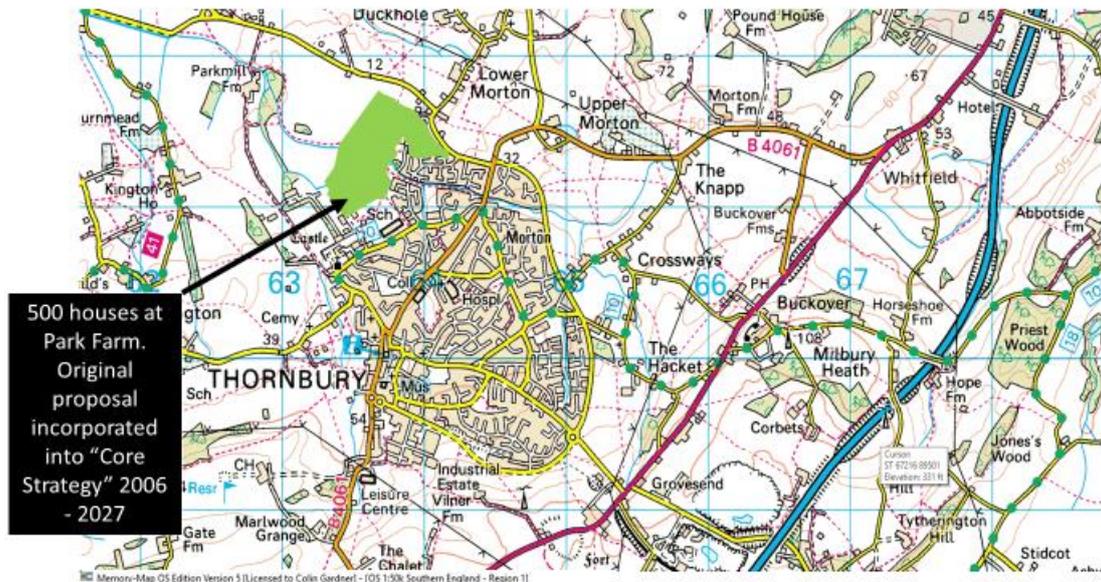
**The JSP fails the test of soundness because it fails to provide the right amount of housing in a sustainable way**

Thornbury has and continues to grow at a rate that outstrips its ability to manage in terms of infrastructure. This will continue according to the JSP, even though we have long ago surpassed the development in the Core Strategy that was supposed to take us to 2027. The town is afflicted by speculative development and applications creating an elongation of the town away from its centre and no action has been taken to deal with the consequences of this influx on services such as GP capacity, or on roads, public transport and town centre parking capacity. Yet another large speculative development, of 370 houses by Bovis, that would engulf the hamlet of Upper Morton, is subject to appeal and, if approved, will make the crisis even worse.

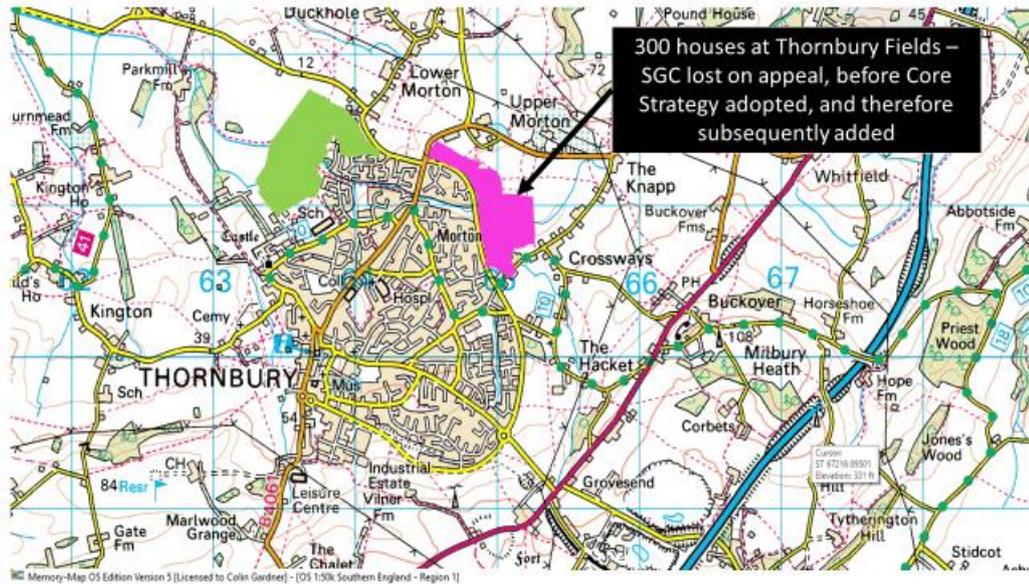
Two areas reserved for employment in the Core Strategy are now being converted to houses, whilst the JSP now proposes a new greenfield site for employment purposes which, we think, will most likely simply end up being yet more houses.

Policy 7.11 proposes a further 500 houses around the town's north and eastern edge. In order to understand why this has an unsustainable impact on the town's infrastructure and its ability to absorb this level of housing growth in the timeframe proposed, it is necessary to understand the context of recent development in Thornbury:

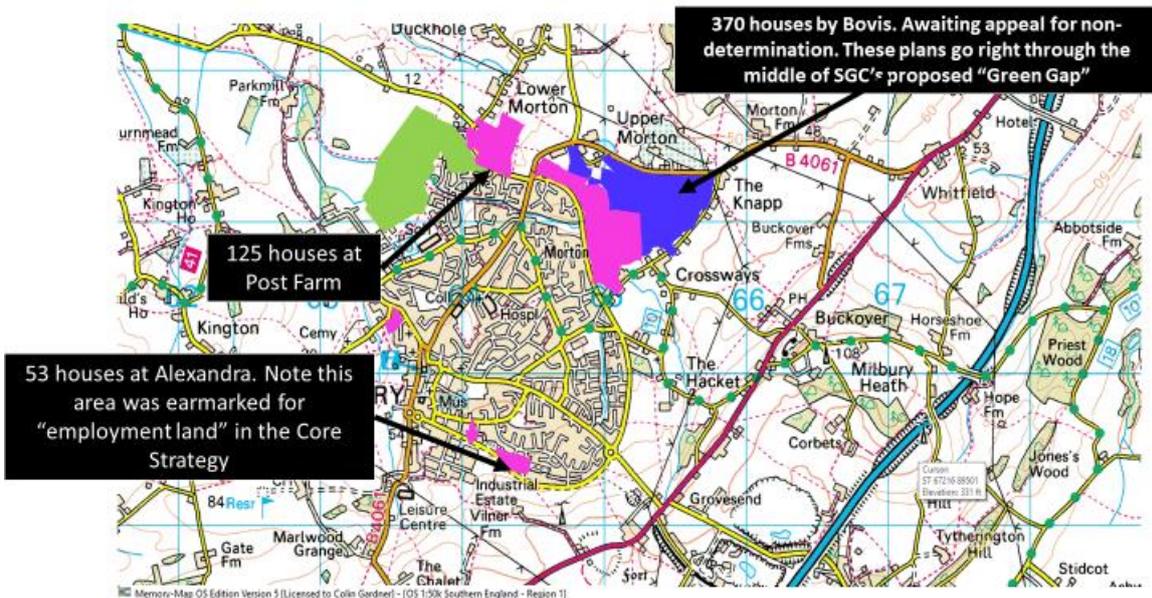
1. The Core Strategy was supposed to run from 2006 to 2027, and originally included only one strategic site for Thornbury. That was Park Farm with 500 houses, and the intention was in part to try to balance the shape of the town by locating the development to the west:



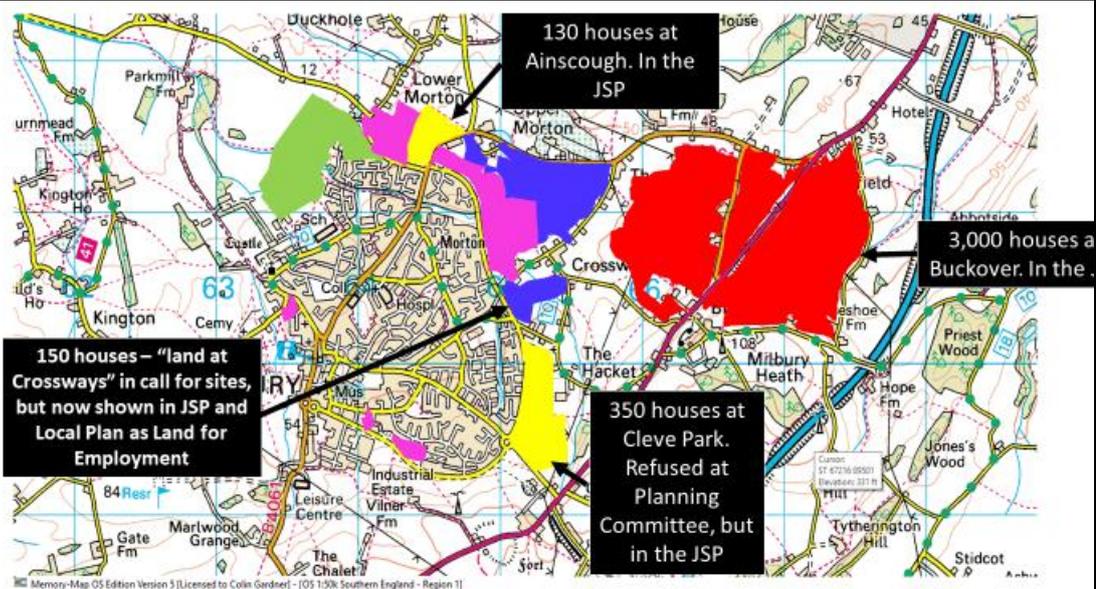
2. The proposal for 300 houses at Thornbury Fields then came along before the Core Strategy had been adopted. Although this was originally rejected, it was subsequently lost on appeal. This took the original Core Strategy officially to 800 houses:



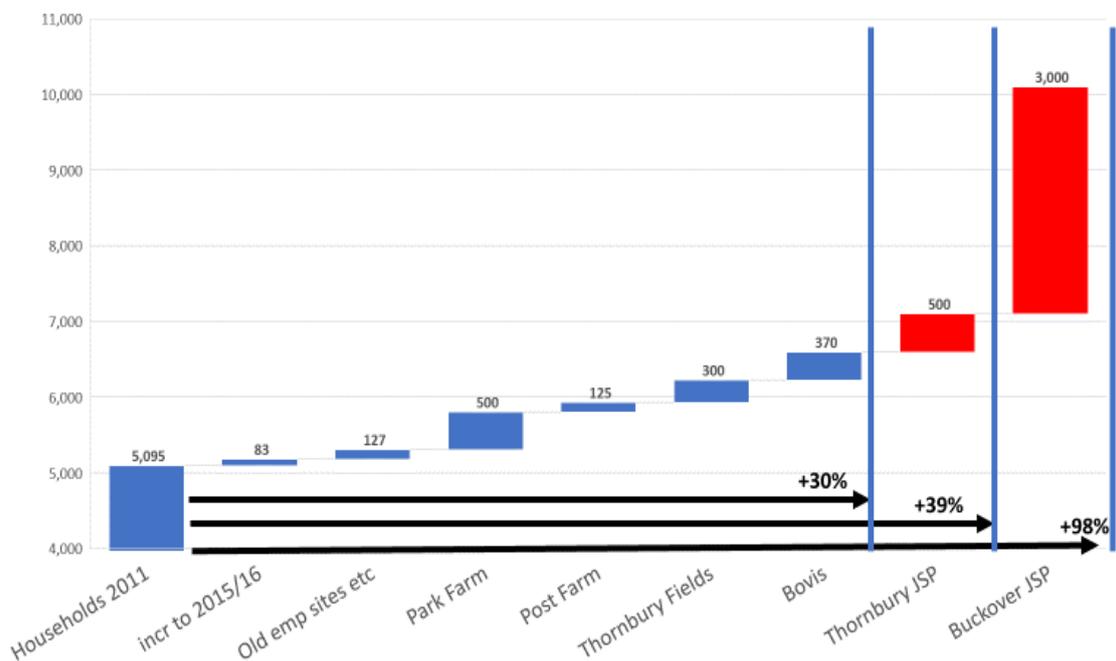
3. Further housing was approved on the former Alexandra Workwear site and the former Council Offices – in both cases this land was designated for employment. On top of this came 125 houses at Post Farm, former police station, Nat West carpark and, potentially, the Bovis application for 370 houses, which is currently under appeal for non-determination. Note that **these houses are neither in the Core Strategy nor the JSP**:



4. 4. Now we have the JSP itself with a further 500 houses on two sites (one of which has already been refused by the Planning Committee but subject to appeal), plus new Greenfield land earmarked as land for employment and, of course, Buckover: (the 350 at Cleve Park should also say '+70 bed nursing home').



In the short period since 2015/2016 Thornbury is faced with the prospect of housing growth of 30%, excluding that which is in the JSP, followed by the JSP itself which will mean the number of households will have doubled:



This rate of growth is unsustainable. The character of the town is changing irreversibly, and transport and services cannot cope.

We believe the measure of patients per GP is a good bell-weather of strain on a town's infrastructure because it is a service that everyone needs and can be measured objectively over time and against other locations. In South Gloucestershire's Infrastructure Delivery Plan, published in March 2014, the report notes that the standard capacity within NHS South Gloucestershire is 1,700 patients per GP, and further notes that this is above the national average of 1,520. The table

in Appendix 6 of that report then shows the number of patients per GP in each practice, and the results for Thornbury are extracted from the table, giving a total of 11.95 FTE GPs and an average of 1,796 patients per GP:

	No. GPs (full time equiv.)	List size	Patients per GP
Thornbury Health Centre - Burney	6.25	9884	1581
St Mary Street Surgery	3.03	6749	2227
Thornbury Health Centre - Male	2.67	4825	1807
Total Thornbury	<u>11.95</u>	<u>21458</u>	<u>1796</u>

Moving forward to 2017, TRAPP'D requested equivalent data from NHS England, who supplied statistics as at January 2017, showing the number of FTE GPs has actually decreased to 10.11, we understand because of the difficulty in recruiting and retaining GPs, with several now working part time. As a consequence, the number of patients per GP has risen to 2,090, and this is with only about 316 of the houses listed above now completed:

	No. GPs (full time equiv)	List size	Patients per GP
Dr.Foubister & Partners	4.00	8,764	2,191
Dr.Male & Partners (now Streamside surgery)	3.07	5,071	1,652
St.Mary St. Surgery	3.04	7,292	2,399
	<u>10.11</u>	<u>21,127</u>	<u>2,090</u>

Throughout the period of rapid growth there has been almost no development in roads and public transport, or any other services that make up the town's infrastructure. The Local Authority's attitude is that because they can list essential services in Thornbury, regardless of capacity constraint, the town must be sustainable, and is therefore conveniently earmarked for growth.

This unsupportive attitude continues into Policy 7.11 with a measly statement on transport that "*Development will also make financial contributions towards local and strategic transportation schemes, including potentially: Metrobus Extension to Thornbury ....*". This is South Gloucestershire's standard boiler plate for placing the onus entirely on the contribution from the Developer, without making any commitment to actually improving the transport links (we especially note the devious use of the word "potentially" in this phrase) which, by definition, means that funding is achieved after the houses are built out. There is no mention of other infrastructure services at all.

With an additional 500 houses at the front end of the JSP we believe there is no chance that this will be an end to further speculative development during the period of the JSP. Thornbury *may* have further capability for growth within the time period of the JSP, but it is unsound to pursue further development in this town until current developments have been built out and absorbed within the community, and vital infrastructure has had a chance to catch up with the house build.

Any further development should be sensitive to the need to avoid a worsening of the imbalance of the distended shape of Thornbury away from the Town Centre. The best way to address this is for any target development to be back-end loaded within the plan period, and to allow the Neighbourhood Planning process then to guide the specific sites to be identified.

**Q4. Please set out what modification(s) you consider necessary to make the Joint Spatial Plan legally compliant or sound, having regard to the matter you have identified at Q3 above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at Examination.) You will need to say why this change will make the Joint Spatial Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible:**

Policy 7.11 should be deleted or entirely re-written. We have called for a thorough review of the Green Belt, and this should include Thornbury and similar towns that have been afflicted by urban sprawl in a manner that could not have been envisaged in the 1950s when the original Green Belt was put in place. To a degree the JSP recognises this need by proposing a “strategic green gap” which we welcome, albeit in this case it is a self-serving mechanism for the Local Authority to argue that Buckover is not **merely an extension of Thornbury**. However, the residents of Thornbury and the surrounding hamlets, would also argue that in practical terms, what is proposed is a totally inadequate gap and the local roads between the two would become rat runs.

Our preference would be for no additional housing to be specified in the JSP, but to explicitly recognise that Thornbury has **already** been the subject of strategic development, which is ongoing at the time of writing, and that the town needs investment in infrastructure and time to absorb the current influx. That is not to say that we are against housing growth per se; we acknowledge that 2036 is a long time away, and it is not unreasonable to suggest that more small scale housing could be absorbed within that timeframe, provided we have the infrastructure to deal with it. A Neighbourhood Plan is currently at an early stage of development, and the best way to deal with any additional housing is to give that plan the maximum flexibility to choose the location, quantum and timing.

In the event this argument is not accepted, we ask that any additional housing be back-end loaded in the JSP, with an explicit requirement that Thornbury is given a minimum of ten years to absorb the current additions and to put the necessary infrastructure in place. The real danger for Thornbury is that history is repeated as we saw in the Core Strategy, with permission given for the additional 500 houses before the ink is dry on the JSP, with further speculative development forging on as if a Spatial Plan hadn’t existed.

In either event, there needs to be a far more explicit and committed statement about transport and infrastructure development for the town. We call for policy 7.11 to include a wide-ranging review of the capacity of infrastructure and transport needs in the town, including the impact of building underway or outline permission given, and for a commitment for necessary improvements to be put in place before each further tranche of housing. Policy 7.11 should also state that subsequent development should be sensitive to the need to avoid a worsening of the imbalance of the distended shape of the Town away from the Town Centre.

Since the Metro bus is already under development we call for this to be extended to Thornbury in the light of development already under way or permitted (i.e. a clear commitment, without any “potentially” or “perhaps”), and we also ask that a feasibility study should be committed regarding re-opening the rail station.