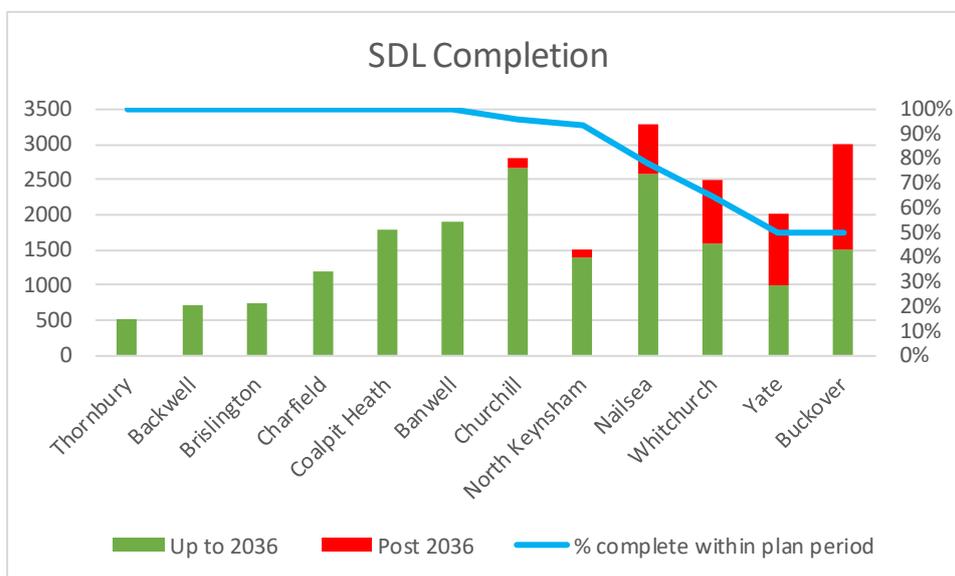


## Buckover Garden Village

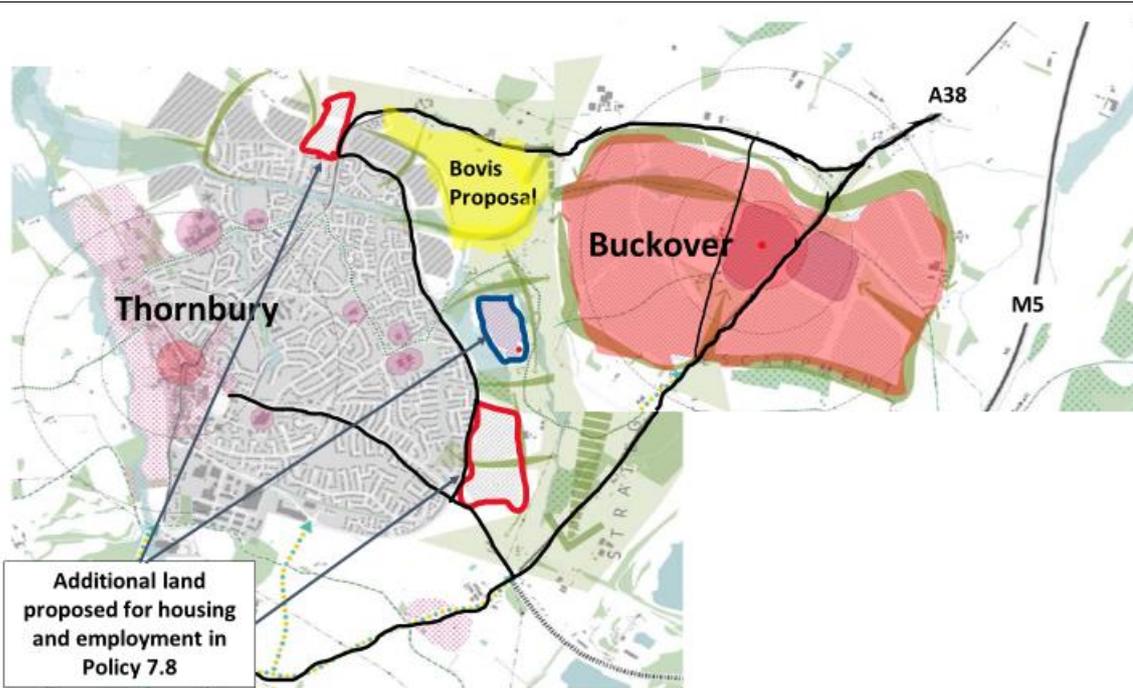
**The JSP fails the test of soundness because Policy 7.8 (Buckover Garden Village) cannot be delivered within the timeframe of the JSP due to the unsuitability of the specific site selected, and does not meet the Government criteria for Garden Villages. There are other far more suitable locations for such a development that have not been considered in the JSP.**

The Buckover proposal is a 3,000 house development that WEJA is beginning to realise will be extremely difficult to deliver. In the second phase of consultation (Towards the Emerging Spatial Strategy Document – November 2016) there was assumed to be 2,200 dwellings built within the timescale (page 19). In the final consultation, published less than one year later, that amount has dropped by 32% to 1,500 with the first houses developed in 2027. This is a clear admission that the proposal is struggling. The chart below shows the build out assumptions for each Strategic Development Location (SDL) pre and post 2036, with Buckover a clear laggard:



In addition, our understanding is that the agreement between the landowner and proposed developer at Buckover is a joint venture with both parties being involved in the development. From experience in such complicated arrangements timeframes for completions are extremely long and do not produce the expected annual housing numbers. Large scale developments are hindered by only having one builder on site at any one time and can easily get tired especially if they lack the necessary infrastructure. We do not believe this will deliver 250 houses in one year, as is conveniently inserted into the last year of the plan. Furthermore, the slow build-up means that for up to a decade it will be relying on Thornbury for provision of all services such as GPs.

There is a pretence in the JSP that Thornbury and Buckover are two separate strategic developments. This is a complete nonsense not only from the fact of the reliance that Buckover will place on Thornbury for its services, but just from the proximity of the Buckover development. Local roads, not designed even for current levels of traffic, will become rat runs. In the chart below we have matched, combined and annotated the concept diagrams for strategies 7.8 and 7.11, as presented in the JSP WEJA report on 30th October 2017 in order to remove any doubts that Buckover and Thornbury should be treated as one development:



There are further fundamental problems with the site selected, not least of which is the fact that the busy A38 runs straight the middle of it. This is the designated relief road for the M5, fast and busy at the best of times, and at a standstill when there are problems on the M5 (which can be simply down to heavy holiday traffic on a Friday and Saturday in the Summer):



The Transport Officers in South Gloucestershire council know that transport is a major issue for this proposal. We attach below an e-mail from a freedom of information request obtain in 2016 from the Head of Transport and Strategic Projects:

See "Emma Blackham" pdf attached.

This e-mail was sent to the most senior planners in South Gloucestershire Council in the process for the first unsuccessful bid for Government funding for this proposal, and we draw your attention to two sections. The first is bullet 4 where Ms Blackham states *"The A38 is still of concern. The submission shows this going straight through the middle of the development .... This is the strategic alternative to the M5 motorway and during busy times this is an extremely busy route with holiday traffic often backed through this area and beyond"*. She goes on to say *"I think on transport grounds alone I would struggle to be supportive....."* and then, most damning of all

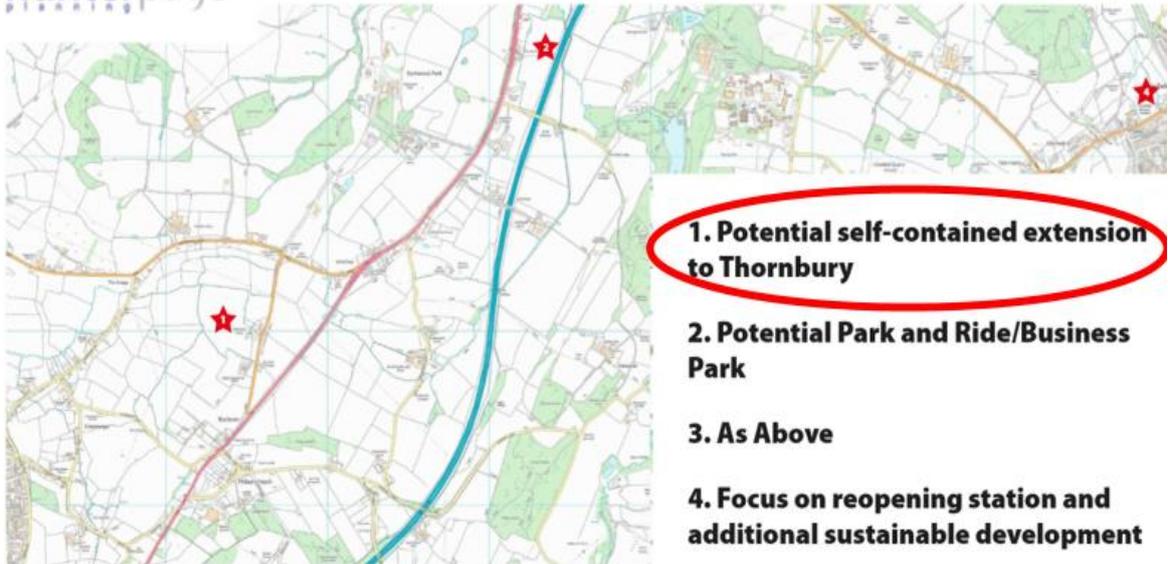
*“..... I wouldn't pursue this on transport grounds alone. But this could be 'fudged' for the presentational purposes .... If other factors make this attractive to the council”.*

The JSP also acknowledges this is a problem, but Policy 7.8 simply states *“Consideration will also be required to ensure the A38 can continue to act as an effective relief road to the M5 without detriment to the new resident's health and wellbeing”*. This is simply not good enough. Having been twice rejected for Government funding for this project, the Local Authority is desperate to gain some respectability for Buckover that would come with its inclusion with the JSP, even though they don't know how to fix one of its biggest shortcomings. In effect they want to be given a free hand to be their own judge and jury of a satisfactory solution to this problem; they should not be allowed to get away with this, particularly in the light of Ms Blackham's comment about 'fudging' the transport issues.

We would further comment on transport issues in policy 7.8 as follows:

- A rail station is proposed for Charfield, which is a welcome development for that town, but is unlikely to be much benefit for commuters from Buckover as they would be travelling 5 miles in what for most people would be the wrong direction (vs 10 miles to Bristol Parkway)
- The Metrobus concept is unproven. Only 6% use public transport to commute in South Gloucestershire, and we have data that shows this figure is even lower in and around Thornbury. There is no research or comment published about the anticipated proportion of commuters that will leave their cars behind and use this service to get to work. In addition, we are sceptical about the feasibility of developing this service along the A38 as far as Buckover, without significant permanent contraction in its ability to handle large volumes of other road vehicles, given the ribbon development all along this road. We find this unacceptable given that the Metrobus seems to be the only real mitigation mechanism for the additional commuting volume that this development will lead to.

In reality, Buckover is not a “Garden Village”, but two massive housing estates adjoining Thornbury and separated by the busy A38. The developer / landowner gave the game away on this in their initial submission to the JSP consultation in January 2016 when their map described the proposal as a *“potential self-contained **extension to Thornbury**”*:



We are therefore not surprised that Buckover twice failed the Government tests on Garden Villages, as set out in the Department for Local Government and Communities guideline “*Locally-Led Garden Villages, Towns and Cities*” published in March 2016. The requirement for a “Garden Village” is that must be genuine - not just use the label “garden” as a marketing tool, and the eligibility criteria includes the following important points that it must:

- *Be a freestanding settlement* – **Reality**: it will simply coalesce with Thornbury
- *Meet local Housing need* – **Reality**: this is designed to make up a shortfall in the wider WEJA region (in a different HMA). Local housing needs have already been exceeded by the excessive developments in progress and approved
- *Demonstrate it has local political support* – **Reality**: it is opposed by Falfield Parish Councillors, Thornbury Town Councillors, District Councillors, the local MP and the Metro-Mayor who pledged his opposition in his electoral manifesto
- *Be able to demonstrate strong local commitment and support* – **Reality**: we have seen almost no local support, as demonstrated by the survey conducted by our MP, Luke Hall, and reported in the town’s local newspaper, the Thornbury Gazette on 27<sup>th</sup> March 2017:

27th March 2017

## Thousands of residents oppose Buckover Garden Village in MP survey

**AN OVERWHELMING majority of residents in Thornbury and Alveston are opposed to the proposed 3,000-home Buckover Garden Village, a survey has shown.**

The survey, which was conducted by Thornbury and Yate MP Luke Hall, has revealed that 92 per cent of participants are opposed to the plans put forward by the Tortworth Estate.

A copy of the development survey, which was sent to every household in the town and village, saw around 3,000 responses to the series of speculative applications that have been put forward for Thornbury in recent months.

Mr Hall said: "It is really important that I firstly thank the thousands of residents in Thornbury and Alveston for taking the time to provide their feedback to my survey. It's important to me as our MP to ensure that we are being heard and it has been hugely helpful in helping me keep up the fight for our community.

"On these proposals our communities' feelings could not be clearer. There is no support for the 3,000 development a stone's throw away from our town and I will be doing everything within my powers to make sure we are heard"

The West of England's Joint Spatial Plan (JSP) which includes housing targets up to 2036, has allocated in its latest draft for 2,200 of the new homes destined for South Gloucestershire to go to the garden village.

Thornbury already faces around 1,900 new homes, with both approved and prospective developments on the north and east of the town.

At a public meeting organised by residents action group TRAPP'D (Thornbury Residents Against Poorly Planned Development) at the Armstrong Hall last November, Mr Hall cast doubt on the future of the scheme, after announcing that the Government had decided that the scheme had not met the criteria required to gain the Government support to progress the application.

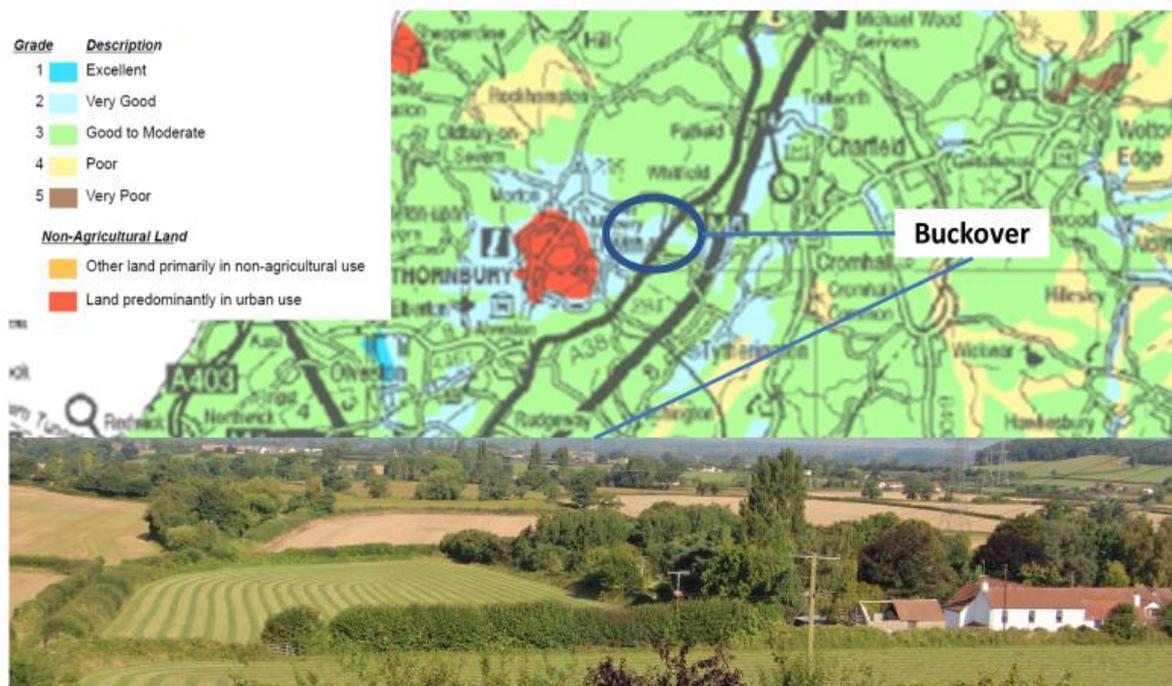
Unsurprisingly, the Buckover proposal was twice rejected for a Government support package because it simply does not meet the criteria to be a "Garden Village".

By ignoring the overwhelming level of opposition to BGV from local residents and political representatives, WEJA is ignoring the first core principle in para 17 that states a Plan should "*be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area*". WEJA is further ignoring the 5<sup>th</sup>, 6<sup>th</sup> and 7<sup>th</sup> core principles, including the need to:

- *Recognis[e] the intrinsic character and beauty of the countryside*
- *support the transition to a low carbon future in a changing climate*
- *contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value*

The development proposal at Buckover also fails the NPPF in para 34 which states that *“Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised”*.

The green space around Thornbury is much valued by local residents and visitors alike and, in our view, is outstandingly beautiful, being criss-crossed with public footpaths popular with hikers and dog-walkers. Much of this green space around the town is Best Most Versatile (BMV) grade 2 land which, as the map below shows, is now a rare commodity in the region:



The NPPF para 112 states that *“Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.”*

In our earlier comments in relation to *“Spatial Strategy flaw in creating satellite developments”* we have drawn attention to the problems of pollution created by additional commuter traffic, and Policy 7.8 is a particular culprit of this, bringing danger to health for both existing residents and those that would settle in this development.

Finally, we repeat our earlier comments that there are clear, preferable alternatives available to this development. In particular, we have seen compelling evidence of a comparison between the Woodlands Golf club option and Buckover that illustrates the extent of the environmental damage represented by the choice of opting for Buckover, two of the headlines being:

- Woodlands has a high concentration of jobs within easy walking and cycling distance (2km): approx. 4,833 jobs close to Woodlands vs only 66 within 2km of Buckover
- An assessment of greenhouse gas emissions has shown that every day Buckover Garden would generate an additional 2.5 tonnes of CO2 when compared to Woodlands

**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:**

**We strongly believe that Policy 7.8 should be deleted as being unsound and unachievable.**

Failing that, the area for development should be shrunk to at least avoid all BMV land and create a far more realistic and significant green gap with Thornbury than is contained in the current proposal. Better still, move the location north of the M5 junction, still within Tortworth land, onto the alternative "Tortworth Garden Village" location proposed by local architects, but ignored by Tortworth and the Local Authority.

In addition, Policy 7.8 should be re-written to contain clear and unequivocal language about the prerequisites to development in terms of mitigating the impact on transport and infrastructure. This should include:

- a clear statement on what commitment to infrastructure would be put in place ahead of any development
- what impact the transport mitigation would have on the additional commuter traffic
- How the Metrobus will overcome the problem of ribbon development on the A38 without permanently impacting its capacity for other road users
- what actual solution is proposed for the A38 problem