Land West of Park Farm, Thornbury

(APP/P011999/W/21/3288019)

Response Note to Late Representations (March 2022)

This note contains responses from Mr Matthews of Savills and Mr Thorne of Stantec to the late representations submitted to the above appeal by Mr Gardner of Trapp'd and Mr Woosnam.

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Late representations have been received in relation to the above appeal from Mr Woosnam and the organisation Trapp'd. Many of the points raised in these representations are covered already in the Mr Matthews Proof of Evidence and supporting appendices. Where these matters have not been addressed previously, a summary response is provided in this note to assist the Inspector.

Mr Thorne has also produced a response note which addresses the points raised in relation to accessibility and air quality.

Whether Thornbury is a sustainable location for development

a. The Thornbury Data and Access Profile (CD1.5) demonstrates that Thornbury has a wide range of community, health, retail & food facilities; access to major employers; education facilities; and, superfast broadband.

b. Thornbury has been recognised by the authority as a sustainable location for development and strategic allocations have been made at the town through the Core Strategy and then the (subsequently withdrawn) JSP. This was acknowledged by the Inspector in the Cleve Park appeal (see paragraph 15 of CD3.1).

c. The latest evidence on the housing to employment ratio is provided in the Local Plan Phase 1 Issues & Options Consultation Document (November 2020). Page 46 contains a table which, based on Census data, outlines the ratio of jobs to workers. The table (which has been copied below), demonstrates that Thornbury has a job ratio of 1.0, i.e. one job per resident – greater than the East Fringe (of Bristol), the Rural Areas, the other major market town of Yate & Chipping Sodbury and the average for the authority area.

Policy Area	Resident workers within area	'Jobs' within area	Ratio Jobs per worker
East Fringe	53,800	24,000	0.4
North Fringe	32,600	57,700	1.8
Rural Area	24,900	15,600	0.6
Severnside	1,900	2,400	1.2
Thornbury	5,900	5,900	1.0
Yate & Chipping Sodbury	18,300	13,200	0.7
South Gloucestershire	137,400	118,800	0.9

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d. The development will deliver supporting infrastructure in the form of the primary school and community hub. There is capacity in other existing infrastructure to accommodate growth.

Health Services

a. The lack of healthcare provision does not feature as a reason for refusal of planning permission and there is no indication of a shortfall in GP provision in the officers report to committee.

b. No objection to the application has been raised by the health providers or the PCT.

c. An updated review of the capacity within local GP practices indicates that there is sufficient capacity to accommodate the additional population.

Education

a. Land for a 210 place primary school is proposed on site. The primary school has capacity to accommodate the vast majority of the projected needs arising from the development – 214 primary school age children (based on the Council's ratio of 36 primary school age children per 100 dwellings).

b. A financial contribution of £4,207,899 is proposed within the draft UU for the construction of the primary school based on the Department for Education cost calculator of £18,537 per additional primary pupil place.

c. There are two secondary schools – Castle School and Marlwood School – within the 3 mile catchment shown on Thornbury Data & Access Profile (CD1.5). There is significant capacity within these schools to accommodate the number of secondary school age pupils arising from the development.

d. Subject to the provision of land and the financial contribution for the provision of a primary school on site there is no objection to the development from the Education Authority.

e. The alternative pupil product ratio presented in Mr Woosnam's evidence is based on exclusively on the unrefined output of a limited survey of properties at a point in time. As such it assumes that:

    - 100% of properties are permanently occupied;
    - all school age pupils will attend LEA funded schools contrary to the application of the 'uptake factor' set out in the School Capacity Survey Forecast Guidance; and
    - all pupils will change school as a result of moving into a new property.

    The calculation of a pupil product ratio requires a more forensic analysis than a simple survey of new residents moving into a development.

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Late representations have been received in relation to the above appeal from Mr Woosnam and the organisation Trapp'd. Many of the points raised in these representations are covered already in Mr Matthews' Proof of Evidence and supporting appendices. Where these matters have not been addressed previously, a summary response is provided in this note to assist the Inspector.

Mr Matthews' has also produced a response note which addresses the points raised in relation to the sustainability of Thornbury as a location for development, health services and education.

Sustainability / Accessibility

Mr Woosnam sets out his measured actual walking distances to local facilities and amenities from both the centre of the built development and the far point of the built development. For comparison, this has been combined with the actual walking measurements set out by both Stantec and South Gloucestershire Council (SGC) (as reported in the Statement of Common Ground) within the table at **Appendix A** of this Note.

It should be noted that Mr Woosnam's assumption on the methodology of both Stantec and SGC's measurements is incorrect. Both Stantec and SGC have measured actual walking distances from the nearest and furthest residential area of the development.

Stantec's methodology traces the exact route along footways, footpaths and across formal crossings, using the British National Grid coordinate system in GIS to provide very accurate results.

By way of example, **Figure 1** presents the GIS analysis output for the distance (1,910m) from the nearest residential area to the town centre, along the route identified in Figure 3.3 of Mr Thorne's Transport Statement to the Inquiry.

As set out in the Statement of Common Ground with SGC, whilst there are some minor differences in the measured distances to key facilities between those measured by the Appellant and SGC, these are not significant.

The distances measured by Mr Woosnam are greater in all instances, and it has not been possible to check this methodology and reported results. However, it should be noted that Google works off a projected coordinate system called WGS84. This is a global grid and is measured in degrees not metres. The measurements are then converted to metres using a transformation (to take account of the fact the earth is not flat) and should be used with caution because of the risk of discrepancy (stretched measurements).

The actual distances as set out by Stantec should therefore be considered as the most accurate by the Inspector.

Mr Woosnam disagrees with SGC's informed conclusion, as the Local Highway Authority, that the proposal is complaint with Policy PSP11.

However, Mr Woosnam's conclusion is drawn wholly from a comparison of measured appropriate walking and cycling distances to that set out within the PSP (page 36). This does not take account of the Policy as a whole. In particular, the Policy states:

"*Development proposals which generate a demand for travel, will be acceptable where: …*

3. residential development proposal(s) are located on:

> *i. safe, useable walking and, or cycling routes, that are an appropriate distance to key services and facilities*
>
> *and then*
>
> *ii. where some key services and facilities are not accessible by walking and cycling, are located on safe, useable walking routes, that are an appropriate distance to a suitable bus stop facility, served by an appropriate public transport service(s), which connects to destination(s) containing the remaining key services and facilities."*

In addition, Para's 5.18 to 5.23 of the PSP establish the decision making process of the Authority in determining whether a development proposal's accessibility conforms with Policy PSP11, as reported within the Transport Assessment in support of the outline planning application.

In addition, Mr Woosnam's conclusions ignore the distances people actually walk and cycle, irrespective of guidance distance thresholds, as set out in the Transport Statement of Common Ground with SGC.

With regards to national Policy, the NPPF is clear that "*opportunities to promote walking, cycling and public transport use are identified and pursued*" (Para 104d), and that "*significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes*." (Para 105). In considering development proposals, the NPPF states that it should be ensured that "*appropriate opportunities to promote sustainable modes can be – or have been – taken up, given the type of development and its location.*" (Para 110a).

Finally, Mr Woosnam's conclusions overlook the fact that the planning application includes land for a Primary School (Use Class D1), up to 700m2 for a Retail and Community Hub (Use Classes A1, A2, D1), the facilitation and promotion of sustainable modes through the Travel Plan, the benefits to all road users through the highway improvements proposed and the significant benefits for public transport provision within this area of Thornbury.

Predicted Traffic Generation

Mr Woosnam states that "*This proposal, in addition to the other current approvals and applications places a severe 'Cumulative Impact' on the existing Thornbury infrastructure*." With regards to transport impacts, this is addressed within the Transport Assessment and the Transport Statement of Common Ground with SGC.

The predicted traffic generation, assignment, and assessment of impacts of the proposed development is set out within the submitted Updated Transport Assessment (January 2020), based on industry recognised data sources, methodology and assessment tools. This included use of a SGC traffic survey of a local new-build development. The assessment, having been comprehensively scoped with both Authorities, and resulting mitigation requirements, are agreed with SGC and National Highways, as the Local and Strategic Highway Authorities.

Section 4.2 of Mr Thorne's Transport Statement to the Inquiry, and the Transport Statement of Common Ground with SGC also refer to this point.

Mr Woosnam concludes that *"without any meaningful additional local employment or considerable further public transport infrastructure; it is clear that the new residents will be almost entirely reliant upon extensive use of the private motorcar."*

Mr Matthews' Proof of Evidence and Response Note to Late Representations (March 2022) deals with the sustainability of Thornbury as a settlement to accommodate development.

It is relevant here to note that commuting makes up only a small proportion of all trips. Table NTS0403 sets out the average number of trips by trip purpose.

Department for Transport statistics
National Travel Survey

Table NTS0403

Select table from dropdown list (or scroll down to view static tables):
Average number of trips (trip rates) per person per year by trip purpose: England, from 1995/97 (including short walks)

	Average number of trips (trip rates) per person per year by trip purpose: England, from 1995/97 (including short walks)																			
Purpose	**1995/97**	**1998/00**	**2002**	**2003**	**2004**	**2005**	**2006**	**2007**	**2008**	**2009**	**2010**	**2011**	**2012**	**2013**	**2014**	**2015**	**2016**	**2017**	**2018**	**2019**
Commuting	176	174	164	166	170	162	162	164	158	147	150	148	147	146	148	144	144	144	144	140
Business	38	37	36	34	35	38	35	34	31	30	29	28	30	30	32	31	33	27	30	28
Education	67	70	65	72	70	69	65	65	64	65	62	61	66	66	65	65	64	67	66	68
Escort education	50	52	47	52	51	52	47	47	46	48	52	50	56	51	53	50	54	54	60	58
Shopping	238	228	222	215	214	212	225	191	202	196	197	194	191	184	178	182	183	189	188	181
Other escort	85	84	105	96	93	96	98	87	97	93	92	93	88	87	86	84	84	87	89	83
Personal business	111	106	118	110	109	112	109	100	106	106	101	95	96	91	95	91	89	96	92	88
Visiting friends at private home	145	138	125	122	121	125	121	112	110	111	102	105	103	96	92	89	90	88	84	82
Visiting friends elsewhere	47	50	50	49	46	50	52	50	48	49	48	46	45	45	47	48	50	49	53	48
Entertainment / public activity	40	38	49	47	51	52	51	49	44	44	47	48	52	51	52	52	56	54	60	59
Sport: participate	23	25	19	20	19	17	16	18	20	20	18	17	15	14	13	13	14	14	14	13
Holiday: base	11	11	11	11	11	12	11	11	11	12	12	11	10	10	9	12	9	12	12	13
Day trip	21	18	23	24	24	28	27	28	29	28	28	30	27	28	29	28	29	35	33	32
Other including just walk	43	41	41	41	41	45	47	41	46	47	45	46	46	44	42	47	56	58	62	61
All purposes	1,094	1,073	1,074	1,060	1,054	1,070	1,067	998	1,014	997	982	972	971	943	942	934	954	975	986	953
Unweighted sample size:																				
individuals	19,621	18,739	14,369	16,685	16,487	16,956	16,648	16,858	16,360	17,299	16,553	15,730	16,670	16,192	16,491	15,525	15,840	14,541	14,150	14,356
trips ('000s)	398	371	279	318	314	324	317	303	295	312	292	273	291	274	280	259	276	256	256	250

For ease of reference, this data has been converted into percentage of trips by purpose, with Commuting highlighted in orange below. Commuting accounts for only 15% of all trips (2019: 140/953).

Average number of trips (trip rates) per person per year by trip purpose: England, from 1995/97
Including short walks Percentages of All Purposes

	Trips per person per year (including short walks) - Percentage by Purpose																			
Purpose	**1995/9**	**1998/0**	**2002**	**2003**	**2004**	**2005**	**2006**	**2007**	**2008**	**2009**	**2010**	**2011**	**2012**	**2013**	**2014**	**2015**	**2016**	**2017**	**2018**	**2019**
Commuting	16	16	15	16	16	15	15	16	16	15	15	15	15	15	16	15	15	15	15	15
Business	3	3	3	3	3	4	3	3	3	3	3	3	3	3	3	3	3	3	3	3
Education	6	7	6	7	7	6	6	7	6	6	6	6	7	7	7	7	7	7	7	7
Escort education	5	5	4	5	5	5	4	5	5	5	5	5	6	5	6	5	6	6	6	6
Shopping	22	21	21	20	20	20	21	19	20	20	20	20	20	20	19	19	19	19	19	19
Other escort	8	8	10	9	9	9	9	9	10	9	9	10	9	9	9	9	9	9	9	9
Personal business	10	10	11	10	10	11	10	10	10	11	10	10	10	10	10	10	9	10	9	9
Visiting friends at private home	13	13	12	11	11	12	11	11	11	11	10	11	11	10	10	9	9	9	9	9
Visiting friends elsewhere	4	5	5	5	4	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5
Entertainment / public activity	4	4	5	4	5	5	5	5	4	4	5	5	5	5	6	6	6	6	6	6
Sport: participate	2	2	2	2	2	2	2	2	2	2	2	2	2	1	1	1	1	1	1	1
Holiday: base	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
Day trip	2	2	2	2	2	3	3	3	3	3	3	3	3	3	3	3	3	4	3	3
Other including just walk	4	4	4	4	4	4	4	4	5	5	5	5	5	5	5	5	6	6	6	6
All purposes	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100	100
Unweighted sample size:																				
individuals																				
trips ('000s)																				

With regards to further public transport infrastructure, Mr Thorne's Transport Statement to the Inquiry already sets out the significant benefits of the development in terms of facilitating a high quality, commercially viable bus service to not only the proposed development, but to the adjoining Park Farm development and local area also. In addition, Mr Thorne's Statement also sets out the proposed public transport improvements currently being consulted by SGC along the A38 corridor, to support public transport (as well as walking and cycling) use along the A38 as a means of reducing the need to travel by private car.

Air Pollution

Mr Woosnam's Appendix 6 sets out his assessment on commuting patterns and predicted CO2 emissions, as well as oxides of nitrogen (NOx) and particulates PM2.5 and PM10 from a housing survey undertaken by TRAPP'D.

Air Quality, including fine particulate matter, was considered in detail in Chapter 11 of the Environmental Statement. In summary, this concluded that:

1. The Project Site is not located within an AQMA, the closest AQMA is approximately 12 km from the site.
2. With the standard conditioned mitigation (Construction Environmental Management Plan) in place, the construction impacts are judged as Not Significant.
3. There are no predicted exceedances of the Nitrogen Dioxide (NO2), or fine particulate matter (PM10 and PM2.5) air quality strategy objectives at any of the existing receptor locations in close proximity to the site and no exceedance is expected at the Park Farm development.
4. No long-term or short-term NO2 objectives are predicted to be exceeded at the Project Site. The site is considered to be suitable for the proposed residential development.
5. Overall, it is concluded that there are no air quality constraints to the Proposed Development.

No concerns have been raised by Officers and there is no reason for refusal on this matter.

APPENDIX A

Comparison of Walking Distances

Comparison of Walking Distances

Measurements in metres		Stantec Measurements[1]		SGC Measurements[2]		Mr Woosnam Measurements[3]	
Key services and facilities (PSP11)	Appropriate "crow fly" walking and cycling distances (PSP11)	Actual Distance from nearest residential area	Actual Distance from furthest residential area	Actual Distance from nearest residential area	Actual Distance from furthest residential area	Actual Distance from centre of built development	Actual Distance from furthest built development
		(actual distances shown, PSP11 comparable crow fly distances are shorter)					
Retail (comparison) shops and services and/or Market towns and Town Centres (CS14 of Core Strategy) Edge of town centre (Co-Op) (Weekly) Superstore or supermarket (Day to Day) Smaller food (convenience) shops ***Potential on-site provision**	1,200 metres	1,910 (24 min walk, 6 min cycle)	2,680 (34 min walk, 8 min cycle)	1,940	2,740	2,712	3,122
Local health services Thornbury Health Centre ***Potential on-site provision**	800 metres	1,485 (19 min walk, 5 min cycle)	2,250 (28 min walk, 7 min cycle)	1,565	2,365	2,376	2,786
Pharmacy Eastland Road ***Potential on-site provision**	800 metres	1,670 (21 min walk, 5 min cycle)	2,440 (31 min walk, 8 min cycle)	1,740	2,545	2,284	2,694
Community Centre The Chantry ***Potential on-site provision**	800 metres	1,865 (23 min walk, 6 min cycle)	2,635 (33 min walk, 8 min cycle)	1,870	2,670	2,936 (Likely to be another Centre)	3,346 (Likely to be another Centre)
Post office The Co-Op ***Potential on-site provision**	800 metres	1,910 (24 min walk, 6 min cycle)	2,680 (34 min walk, 8 min cycle)	1,940	2,740	2,490	2,900
Public House The Anchor	800 metres	1,443 (18 min walk, 5 min cycle)	2,215 (28 min walk, 7 min cycle)	1,550	2,350	2,040	2,450

Measurements in metres		Stantec Measurements[1]		SGC Measurements[2]		Mr Woosnam Measurements[3]	
Key services and facilities (PSP11)	Appropriate "crow fly" walking and cycling distances (PSP11)	Actual Distance from nearest residential area	Actual Distance from furthest residential area	Actual Distance from nearest residential area	Actual Distance from furthest residential area	Actual Distance from centre of built development	Actual Distance from furthest built development
		(actual distances shown, PSP11 comparable crow fly distances are shorter)					
Secondary school The Castle Secondary School	3 miles (4,828 metres)	1,141 (14 min walk, 4 min cycle)	1,910 (24 min walk, 6 min cycle)	1,370	1,990	1,771	2,180
Primary school Manorbrook Primary school ***New Primary School Proposed on Site**	2 miles (3,219 metres)	1,012 (13 min walk, 3 min cycle)	1,780 (22 min walk, 6 min cycle)	1,190	1,810	1,761	2,171
Major employers. Designated Town Centres and Safeguarded Employment Areas (CS12 of Core Strategy) Thornbury Town Centre Thornbury Industrial Estate	2,000 metres	1,910 (24 min walk, 6 min cycle) 2,820 (35 min walk, 9 min cycle)	2,680 (34 min walk, 8 min cycle) 3,590 (45 min walk, 11 min cycle)	1,970	2,740	2,712	3,122

Notes:
1. Stantec Measurements as set out in Neil Thorne's Transport Statement to Appeal Inquiry.
2. SGC Measurements taken from SGC Committee Report.
3. Mr Woosnam Measurements taken from Mr Woosnam's Appendix 7.