

# Land West of Park Farm Appeal – TRAPP'D Representation

PINS Appeal reference: APP/P0119/W/21/3288019

SGC Planning reference: PT18/6450/O

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## 1. Introduction and Summary

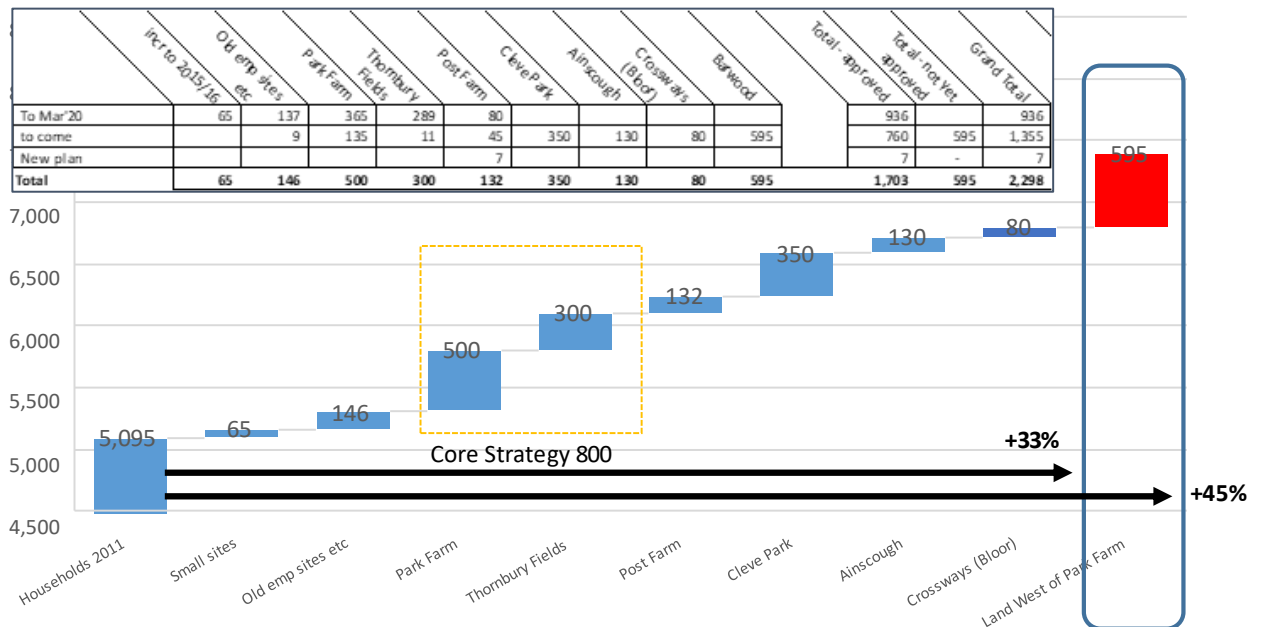
Thornbury has seen more than 1,700 mostly speculative houses given planning permission in recent years and, with almost no supporting infrastructure, the widespread feeling of residents is one of “enough is enough”. With South Gloucestershire comfortably able to demonstrate a five-year land supply and consultation now under way for a new Local Plan, there is no justification for undercutting the considered plan-making process by allowing yet another speculative development.

As if that were not enough grounds for refusal, it is common ground that almost 70% of this application comprises Best Most Versatile Land, becoming increasingly rare in the West of England, and will have a negative impact on the town’s most significant heritage asset, the Grade 1 listed Thornbury Castle, amongst others.

## 2. The quantum of recent approvals threatens to overwhelm Thornbury

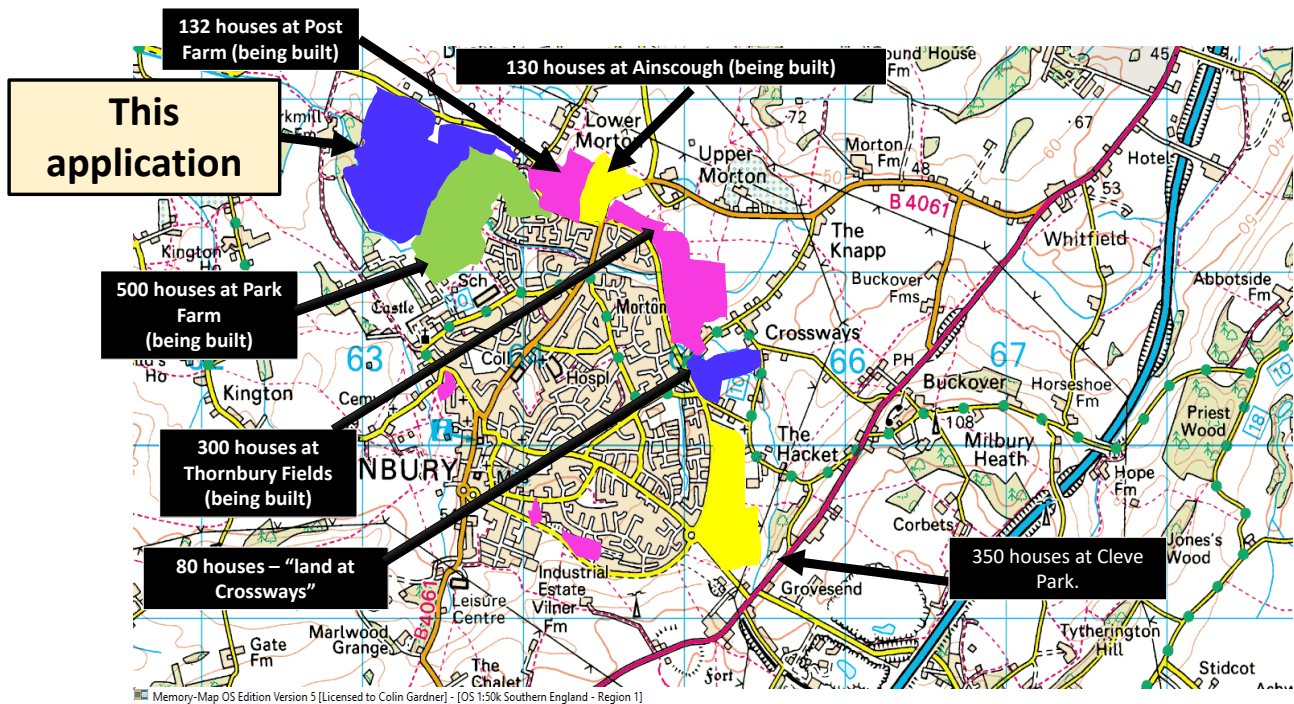
New housing approvals since 2011 have now reached 1,703 prior to this application, representing a 33% increase in the size of the town. If we add this application, it will take us to 2,298 new houses, representing a 45% increase:

**Housing growth in Thornbury – to date**

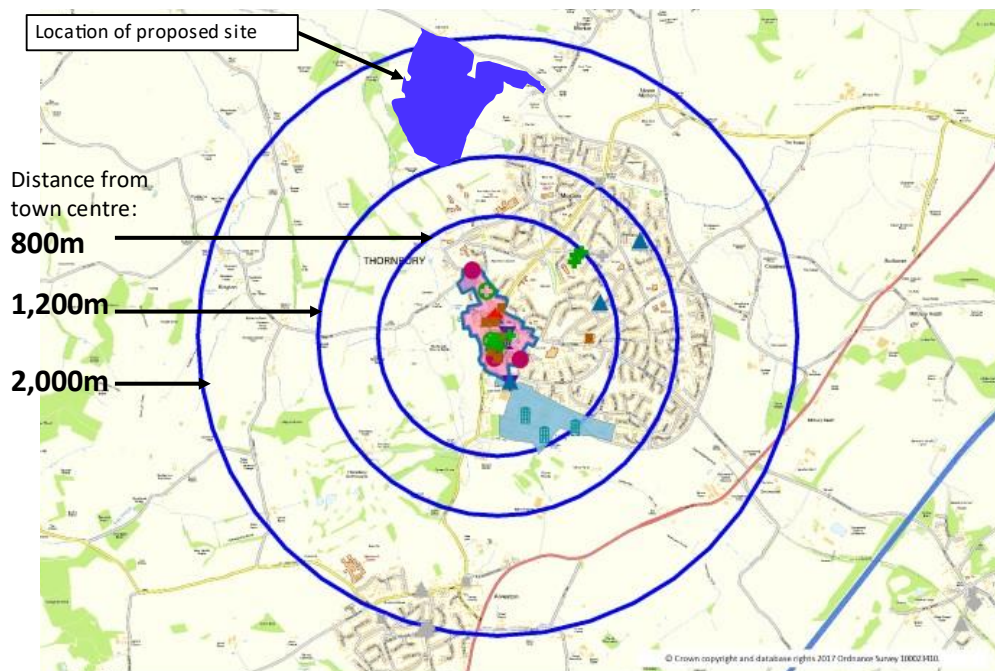


Within this overall growth only 800 houses were part of a Local Plan, and within that 300 were added on appeal before the Core Strategy was adopted. This is essentially why almost no infrastructure has been added as part of this rapid growth.

The developments follow a pattern of growth around a north-eastern diagonal which represents the boundary of the Greenbelt, and this has created an urban bulge, forcing the town's centre of gravity away towards J14 of the M5:



Bear in mind that the town's high street is on the south-western fringe, the mode of development is more resembling that of a seaside town:



The practical upshot is that this application would extend the car-based outer fringe, causing further problems for town centre parking and congestion within the town and beyond. Our frustration is that from the initial approval within the 1,200m to 2,000m ring above, the argument was erroneously accepted that the development was within acceptable walking distance to the town's services, and now, even though the

evidence from around two thirds of these new estates occupied is that new residents rarely or never walk into town, the planning logic is stuck in a self-perpetuating fallacy that if site A was judged to be within walking distance, then the same must be true for site B and so on.

Given such a large increase in the size of the town in such a short period, accompanied by almost no infrastructure improvements, it should come as no surprise that access to services such as health services has become a major issue. Prior to the pandemic it had become increasingly difficult to obtain a non-emergency doctor's appointment with waits of four to six weeks being commonplace.

**3. It is a speculative development outside the boundary of the Core Strategy and the draft Neighbourhood Plan, and predetermines the new emerging Local Plan**

This is a speculative development which is outside the development boundary as defined in the South Gloucestershire Core Strategy. The Thornbury Neighbourhood Plan (TNP) is designed to comply with the Core Strategy, as updated to reflect speculative development approvals given after the adoption of the Core Strategy. The Joint Spatial Plan (JSP) was the intended update of the Core Strategy and was rejected by Inspectors during the Examination in Public and therefore has no direct relevance to this application. However, it is a measure of the quantum of recent speculative approvals in Thornbury that they are equivalent to the entirety of the proposed further developments incorporated into the JSP for the town that was supposed to take us up to 2036.

The inquiry will be aware that the TNP has now been through the Independent Examination stage and will be subject to a referendum on 31st March – i.e. whilst this inquiry is taking place. Residents will be voting for or against this Plan, as currently described, and we feel strongly that it is in the interest of trust in local planning democracy for residents to believe that what is being described to them is what they are being asked to vote for. If residents should vote for this Plan and then be told a few weeks later that the proposals they have voted for will not be implemented because their wishes have been trumped by an inquiry, then it will be seen to undermine the Government's policy on encouraging Neighbourhood Plans and destroy any remaining faith in local planning democracy.

Furthermore, it is our understanding that should the TNP be approved in the referendum then immediately para 14 of the NPPF should be engaged which would change the basis on which this application should be judged, most notably that the housing delivery test threshold is effectively reduced to three years.

Finally, West of England's Spatial Development Strategy (SDS) and South Gloucestershire's new Local Plan is at various stages of consultation and we believe that this application should not be allowed to predetermine the outcome of those plans. It is our view that the cumulative effect of speculative development around the town means that it is especially important to enforce the principle that any future development should be on a planned basis only.

**4. It will result in further congestion on key commuter routes and undermines the potential for the regional SDS / new Local Plan to select development locations that contribute towards the binding aim of net zero carbon status by 2030**

We accept that for the purpose of this inquiry it is a matter of common ground that agreement has been reached with Highways England for a specific investment in J14 of the M5 if this application is allowed, but the point here is that the congestion problem caused by the private car is much more widespread than that of one junction of the M5.

High volumes of traffic commuting from Thornbury to the north fringe and Bristol result in congestion on the A38, and the equivalent journey time by bus can be up to 83 minutes long. It is therefore not surprising that bus services travel largely empty, even before the pandemic, backed up by the 2011 census that shows a mere 1.7% modal share of transport to work by bus. What this tells us is that bus services may be vitally important for those that need them but are completely irrelevant in dealing with congestion emanating from developments in and around Thornbury. High levels of commuting by car are a particular feature of our area and a significant contributor to the carbon footprint. Further development around Thornbury will make this worse and will not be offset to any measurable extent by offering bus subsidies.

Congestion on the A38 is becoming a serious problem and by 2018 road traffic accounted for one third of CO<sup>2</sup> emissions in South Gloucestershire, up from one fifth in 2005. That brings us to the question of how to achieve carbon neutrality, which is a mandatory requirement for all Authorities in the West of England, by 2030.

Both the SDS and the Local Plan state that achievement of this aim will be a central theme. TRAPP'D has lobbied hard for the strategic sites selection process to incorporate a mandatory requirement for an assessment of each potential location's carbon footprint from a transport point of view, and to that end we held a fruitful meeting with the Metro Mayor, Dan Norris, on 8th February 2022. At the time of writing we cannot know whether our plea to include this important assessment criteria has been heeded, but we can say two things in relation to this application; first, as a location the transport carbon footprint is about as high as it would be possible to get given the distance from places of work and exceptionally high prevalence of the private car, and; second, if this appeal is allowed it will deprive the SDS / Local Plan from considering whether a better choice of location from a carbon footprint is possible.

**5. South Gloucestershire's margin over the 5-year land supply threshold is even greater when the small sites assumption is correctly factored in**

South Gloucestershire Council has prepared a housing trajectory as at December 2021 showing a five year deliverable supply at 8,724 units, giving an overall land supply equivalent to 6.14 years. We understand that this is inevitably a matter of dispute between the appellant and the Council, given that with such a comfortable land supply the tilted balance would not apply and, in the light of the common ground about this site being speculative, on BMV land and with some degree of harm to heritage assets, there would be no basis for the appeal.

We are not qualified to add anything to the arguments about the housing delivery on specific sites but notice that the allowance for small sites (under 10 units) is significantly understated at 210 units per annum, despite the fact that the Council's AMR states that "*Monitoring of past completions of small sites reveals an annual average of 253 units since the start of the SGC Core Strategy period*". It goes on to say that 210 has been used as a "conservative" assumption. The NPPF, however, does not say that the assumption should be "conservative", but "realistic", stating in para 69 "*Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends*".

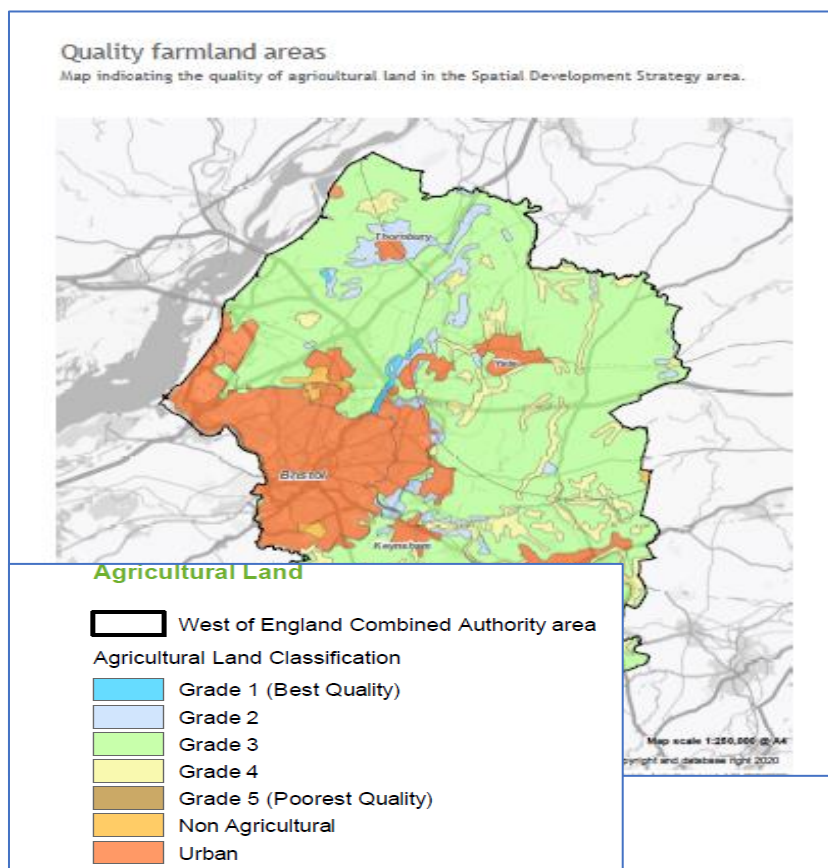
Using an assumption of 253 units the land supply equivalent would increase from 6.14 years to 6.69 years.



**6. The location of the proposal will have a negative impact on the town's most important heritage asset and will consume some of the increasingly scarce BMV land**

We fully endorse the Council's case that great weight should be attached to the harm to the Grade I listed Thornbury Castle and St. Mary's Church and the Grade II listed Sheiling School and Thornbury Conservation Area. Undoubtedly this will be the subject of great scrutiny during the inquiry, so the only thing we would like to add is that Thornbury Castle itself is an iconic symbol for the town and maintaining the setting and character of the surrounding area of the Castle is seen by residents as being of crucial importance to maintaining its aura.

It is also common ground that the proposal will result in the loss of 14.4ha Grade 2 agricultural land and 10.3ha of Grade 3A agricultural land, equating to 69% of the application site. We would like to add that the feeling of a gradual whittling away of best agricultural land through speculative development is keenly felt within the town, and would draw the inquiry's attention to the scarcity of the highest grades of agricultural land in our region:



**7. Conclusion**

In our view the Council's case for not allowing this development is exceptionally strong on pure planning grounds. However, we also hope the inquiry will view this case, in the context that we have tried to set; of a town under siege from speculative development with all the commensurate problems that such rapid, unplanned growth presents in terms of the cumulative impact on services and congestion.

We strongly urge the inquiry to allow residents to participate in shaping the future of our town through participation in the planning process, be it the SDS, the Local Plan or TNP, rather than be determined by legal arguments presented by landowners.