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# Planning Statement

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Land to the West of Park Farm, Thornbury

Savills on behalf of Barwood Development  
Securities Ltd & the North West Thornbury  
Landowner Consortium

# Planning Statement

Land to the West of Park Farm, Thornbury

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## Contents

1.	<b>Introduction</b>	<b>2</b>
2.	<b>Site, Surroundings and Planning History</b>	<b>6</b>
3.	<b>Pre-application and Public Engagement</b>	<b>9</b>
4.	<b>Development Proposals</b>	<b>14</b>
5.	<b>Planning Policy Context</b>	<b>21</b>
6.	<b>Planning Considerations</b>	<b>44</b>
7.	<b>Planning Benefits</b>	<b>68</b>
8.	<b>Conclusions and Planning Balance</b>	<b>73</b>

# Planning Statement

Land to the West of Park Farm, Thornbury

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## 1. Introduction

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## Introduction

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- 1.1 This Planning Statement has been prepared by Savills on behalf of Barwood Development Securities Ltd and the North West Thornbury Landowner Consortium ('the Applicants') in support of an outline planning application, with all matters except access reserved, for a residential-led development at Pickedmoor, Thornbury.
- 1.2 The development at Pickedmoor represents an exceptional opportunity to deliver a high quality new development as part of the sustainable expansion of Thornbury; providing market housing including a substantial number of affordable homes, a retail/community hub, new open space and an opportunity for new education facilities should these be required.
- 1.3 The Application Site is 35.97 ha in size and is located to the north west of Thornbury, south of Oldbury Lane. Details of the Application Site and Proposed Development are provided in Section 2 and 4 of this Planning Statement, and in the Design & Access Statement (DAS) which accompanies this application submission.
- 1.4 The purpose of this Planning Statement is to assess the proposal against relevant local and national planning policy and guidance and other material considerations, as required by the Planning and Compulsory Purchase Act 2004.

### Site Promotion

- 1.5 The Application Site is being actively promoted by the Applicants within the emerging West of England Joint Spatial Plan (JSP) and the new South Gloucestershire Local Plan 2018-2036 (nLP). It represents an entirely suitable and deliverable site to meet the housing needs of South Gloucestershire and the wider West of England region. This planning application presents the vision for this new neighbourhood, and is supported by a range of technical assessments which confirm the deliverability of the site, and the opportunity it creates to bring forward a sustainable and accessible new neighbourhood.

### Environmental Impact Assessment

- 1.6 The Proposed Development has been the subject of an Environmental Impact Assessment (EIA) Scoping Opinion issued by South Gloucestershire Council (SGC) in May 2018. An Environmental Statement (ES) is therefore submitted with the planning application, with the relevant EIA Regulations for this application the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
- 1.7 The ES includes the following technical chapters:
- Socio-Economics;
  - Traffic and Transport;
  - Water Environment;
  - Air Quality;
  - Noise and Vibration;
  - Ecology;
  - Landscape and Visual;
  - Archaeology and Built Heritage; and
  - Agricultural Land.

### Planning Statement Structure

- 1.8 This Statement comprises 8 sections. Section 2 provides the context to the proposals, including a description of the Application Site and surrounding area, and sets out the relevant planning history. Section 3 sets out the pre-application and public engagement process which has supported the development proposals. Section 4 outlines the details of the proposed development.
- 1.9 Section 5 contains a review of the relevant planning policy context, and Section 6 sets out how the development proposals accord with this policy framework. Section 7 provides an outline of the benefits associated with the proposed development. Finally, Section 8 considers the planning balance.

### Planning Application Documentation

1.10 In addition to this Statement and the ES, the planning application is supported by a number of technical documents and plans. These documents should be considered in conjunction with this Statement in order to provide a comprehensive understanding of the proposed development and the benefits it will deliver.

- Design and Access Statement;
- Affordable Housing Statement;
- Energy Statement;
- Transport Assessment;
- Framework Travel Plan;
- Sustainability Statement;
- Statement of Community Engagement;
- Draft Section 106 Agreement Heads of Terms; and
- Combined Phase 1 and 2 Ground Conditions Assessment.

1.11 The following plans are submitted for approval as part of this planning application:

- Site Boundary Plan (dwg. 9000 Rev H);
- Land Use and Access Parameter Plan (dwg. 9601 Rev F);
- Scale Parameter Plan (dwg. 9602 Rev F);
- Green Infrastructure Parameter Plan (dwg. 9603 Rev H); and
- Concept Site Access Layout (dwg. SK15 Rev A)

1.12 An Illustrative Masterplan (dwg.9410 Rev G) and an Illustrative Landscape Masterplan (dwg.16-10-PL-201 Rev B) have also been prepared to show how the development could be delivered within the proposed parameters; but these plans are submitted for illustrative purpose, and not for approval as part of this planning application.



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## 2. Site, Surroundings and Planning History

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## Site, Surroundings and Planning History

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### Site Location

- 2.1. The Application Site is located to the north-west of Thornbury, bordering the consented development, known as Park Farm, to the east. It is approximately 1.2km from the town centre; which lies southeast of the Application Site. The village of Lower Morton lies approximately 0.5km to the north-east of the site, and the village of Oldbury-on-Severn approximately 1km to the west.
- 2.2. Thornbury is located on the A38 which links Bristol to the south, and Gloucester to the north. The site is approximately 8km north of the urban edge of Bristol and the northern Bristol fringe, and approximately 19km north of Bristol City Centre.
- 2.3. The site is bound by Oldbury Lane to the north, Park Mills Farm and associated buildings to the west and south, and the consented Park Farm development (500~ dwellings) to the east.
- 2.4. There are a number of local facilities within immediate proximity to the Application Site, including a supermarket, local convenience stores, public houses, health centres, various educational facilities and a number of leisure opportunities; alongside employment opportunities. These are located within acceptable walking and cycling distance of the proposed development, as set out in the Transport Assessment (TA), Chapter 6 of the Environmental Statement and the DAS.

### Application Site

- 2.5. The Application Site comprises approximately 35.97ha of land predominately in agricultural use and comprises agricultural fields divided and bordered by areas of hedgerow and woodland.
- 2.6. The land is relatively level, lying at approximately 10m AOD in the west, and sloping gently eastwards to around 15m AOD by the eastern boundary.
- 2.7. The Arboricultural Impact Assessment and Method Statement undertaken for the Application Site identified a number of trees and hedgerows within the site; including four Veteran Trees.



- 2.8. Part of the application area falls within Flood Zones 2 and 3 however no development is proposed within those areas. The Pickedmoor Brook runs through the southern part of the site on a roughly east to west alignment. At the southernmost part is an unnamed watercourse which branches off Pickedmoor Brook and rejoins it 100m downstream of the site. The remainder of the site, where development is proposed, lies within Flood Zone 1.
- 2.9. To the immediate west of the Application Site is Park Mill Covert, which is a Site of Nature Conservation Interest, and part of which is an Ancient Woodland.

### **Planning History**

- 2.10. As set out in the accompanying ES, the Application Site has been subject to a Scoping Request (Application Reference: PT/18/012/SCO); to which SGC provided a Scoping Opinion on the 30 May 2018.
- 2.11. Part of the Application Site falls within the committed Park Farm development; which secured outline planning permission in March 2013 for up to 500 homes, open space and associated works (Application Reference: PT/11/1442/O). The Park Farm site is substantially completed.
- 2.12. The planning approval for Park Farm secured the extension of existing bus services through the committed development, triggered as part of the later stages of the build out, and this is supported by a separate legal undertaking made between the landowners of Park Farm, the developers and SGC to secure the provision of a bus only link through the Park Farm development to Alexandra Way.

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## 3. Pre-application and Public Engagement

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## Pre-application and Public Engagement

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### Public Engagement

- 3.1 The planning application submission is accompanied by a Statement of Community Engagement (SCE) which provides a detailed overview of the public engagement processes which have been undertaken to date in relation to the Application Site.
- 3.2 The Applicant undertook a public exhibition on the 14<sup>th</sup> May 2018, and simultaneously launched a website ([www.pickedmoor-consultation.co.uk](http://www.pickedmoor-consultation.co.uk)) which contained the exhibition material for those persons unable to attend the public exhibition.
- 3.3 Approximately 50 people attended the exhibition, and 14 feedback forms were filled in on the day, and a further 2 comments submitted via email.
- 3.4 The key comments made to this consultation were:
- Concern in regard to the scale of growth occurring within Thornbury;
  - The impact of the development on existing infrastructure; in particular primary and secondary education, health services, and services and utilities;
  - The capacity of the local highway network to support the scale of development proposed;
  - The need for pedestrian and cycle links into the Town Centre and wider services in facilities;
  - The potential impact on off-site flooding downstream of the Pickedmoor Brook;
  - The site should provide a range of housing types, with specific reference made to affordable and retirement accommodation; and
  - A range of open space should be delivered on the site, including children's play, parkland, wildlife corridors, playing fields, allotments and village greens.

### **Town Development Meeting**

- 3.5 On the 29<sup>th</sup> May 2018, a representative from the Applicants attended at a meeting of Thornbury Town Council's Town Development Group.
- 3.6 The discussions at the Town Development Meeting outlined general concerns of the local community in regard to the lack of a strategic plan, and associated infrastructure plan, for Thornbury.
- 3.7 In addition, the following comments were raised:
- In response to discussions on the potential delivery of services and facilities on site, the provision of a primary school, medical centre and small scale retail were suggested;
  - The provision of open space was noted, with a suggestion that 'town square spaces' should be provided, as this is in keeping with the local area. Clarification on the future management of open space was also requested;
  - The impact of the development on local flooding, in particular to land to the west at Oldbury-on-Severn was noted as a concern;
  - The capacity of the local road network was raised as a concern – with particular reference made to the junction at Post Farm (Morton Street-Oldbury Lane-Butt Lane junction), and the future impact of the potential nuclear build at Oldbury Power Station.

### **Thornbury Neighbourhood Plan Group**

- 3.8 The Thornbury Neighbourhood Plan Group has been contacted but no response was received.

### **Pre-Application Discussions**

- 3.9 A pre-application request was submitted to SGC in relation to the Application Site in March 2018, and an initial meeting held with officers on the 3<sup>rd</sup> May 2018. Some formal pre-application comments were received through the EIA Scoping Opinion (see ES Chapter 5), but nothing further has been provided by SGC through the formal pre-application process.

3.10 A number of technical disciplines have discussed the emerging proposals with individual officers at SGC, and these discussions are set out where relevant within the technical disciplines chapters within the accompanying Environmental Statement, and can be summarised below:

- Landscape: the location of viewpoints and the methodology for the landscape and visual assessment was agreed;
- Heritage; the written scheme of archaeological investigation and associated trial trenching were discussed and agreed with officers from SGC, who attended the site during the excavations; and
- Highways: a detailed Transport Assessment Scoping was undertaken, alongside further discussions in regard to the design of the access proposals.

### **Response to Pre-application Discussions and Public Engagement**

3.11 The pre-application discussions alongside the community engagement process, have resulted in a number of key design iterations. The process of design is set out fully in the DAS and Chapter 4 of the ES. In particular reference to the public engagement and pre-application process, the following key changes are noted:

- The ability to deliver a Retail/Community Hub on the site has been included, and the range of Use Classes identified would enable a range of uses to come forward within this hub, including the potential for healthcare uses should a provider come forward;
- The proposals are within a strong parkland setting; with substantive open space provided to the south, linking with the green infrastructure to the east (within the Park Farm development), and providing a new recreational space for Thornbury;
- The Transport Assessment identifies offsite mitigation works at the existing junction at Butt Lane/ Morton Way/ Gloucester Road;
- The drainage proposals for the site, as set out in the Flood Risk Assessment, will result in a betterment, and associated reduction in the risk of flooding of downstream; and

# Planning Statement

Land to the West of Park Farm, Thornbury

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- Whilst not included within the planning application proposals, land for a primary school with early years provision has been identified, see DAS p68, which could be secured if the Education Authority conclude that a need exists for a new primary school in Thornbury.



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## 4. Development Proposals

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## Development Proposals

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### The Vision

4.1. A vision for the site has been developed based upon a thorough understanding of the site characteristics and its context. This vision has steered the development of the application proposals and will help deliver the aspirations for a high quality, sustainable development shared by the Applicants.

4.2. The Vision for the new neighbourhood at Pickedmoor is to :

*“Create a sustainable and healthy neighbourhood that helps to meet the identified local need and growing demand for new homes within the thriving market town of Thornbury. The development will be well integrated within its surroundings through excellent local connections and the provision of new green space for the enjoyment of the whole community. The design will sensitively respect the characteristics of the town to ensure the creation of an attractive, high quality and locally distinctive place to live”.*

### Description of Development

4.3. The application proposals are for outline planning permission with all matters except vehicular access reserved, for:

- Erection of up to 630 dwellings (Use Classes C3);
- Up to 700m<sup>2</sup> for a Retail and Community Hub (Use Classes A1, A2, D1);
- A network of open spaces including parkland, footpaths, allotments, landscaping and areas for informal recreation;
- New roads, a sustainable travel link (including a bus link), parking areas, accesses and paths; and
- The installation of services and drainage infrastructure.



### Plans/ Drawings

4.4. The following plans are submitted for approval as part of this planning application:

- Site Boundary Plan (dwg. 9000 Rev H);
- Land Use and Access Parameter Plan (dwg. 9601 Rev F);
- Scale Parameter Plan (dwg. 9602 Rev F);
- Green Infrastructure Parameter Plan (dwg. 9603 Rev H); and
- Concept Site Access Layout (dwg. SK15 Rev A)

4.5. An Illustrative Masterplan (dwg.9410 Rev G) and an Illustrative Landscape Masterplan (dwg.16-10-PL-201 Rev B) have also been prepared to show how the development could be delivered within the parameters; but these plans are not submitted for approval.

### Housing

4.6. The proposed development seeks permission for up to 630 new homes. The application is submitted in outline and as such, the detailed mix of sizes and types of housing will be determined as part of future detailed phases.

4.7. The proposals include the full policy-compliant level of affordable housing, at 35%, which will deliver up to 220 affordable homes on the Application Site. The mix of these affordable units would be determined at the reserved matters stage, based upon local need, national policy and the delivery of a mixed and balanced new community.

4.8. The housing is delivered across two distinct character areas which respond to the individual characteristics of the Application Site: Pickedmoor Green and Oldbury Edge. The DAS confirms the character and appearance of these areas; setting out the strategy for density, building height and design parameters which future detailed reserved matter applications will be required to comply with.

### Neighbourhood and Retail Hub

4.9. To meet the needs of the new residents in a sustainable manner, the proposals include up to 700sqm of retail and/or community space; within Use Classes A1, A2 and D1. An indicative location is identified on

the Land Use Parameter Plan, and associated Illustrative Masterplan, but this will be confirmed as part of future detailed planning applications.

- 4.10. The inclusion of the D1 Use Class would enable the delivery of a range of community services and facilities, including the potential delivery of a new health centre, which was raised by the local community as part of the consultation process.

### **Access**

- 4.11. The Land Use and Access Parameter Plan shows two proposed points of vehicular access from Oldbury Lane into the Application Site. Preliminary access drawings have been submitted for approval for each of these junctions; which show ghost island priority T-junctions with right turn lanes.
- 4.12. A Sustainable Travel Corridor is provided in the south east corner of the Application Site, and provides a bus-only access into the development, alongside a shared foot/cycleway. This corridor will link the proposed development with the adjacent committed Park Farm scheme, enabling the re-routing of the committed bus service extension through the Application Site. The bus only link is provided at 6.5m width, to enable two-way bus movements, in accordance with a request from SGC. The Sustainable Transport Corridor will provide direct links between the site and a range of key services in the town, and also from the town to the open spaces and community facilities proposed on site, encouraging people to travel on foot, by cycle and by public transport.
- 4.13. The existing PROWs within the site has been retained through design, and will be enhanced through improvements and management as set out in the DAS (section 9.4).
- 4.14. A primary street will form a central spine through the development; linking the two vehicular accesses. The primary street will be designed as a 6.5m-wide carriageway, with a 2m footway, and a 3m shared footway/cycleway located behind a 2m grass verge. The secondary road network will be designed with a design speed of 20 miles per hour, with reduced carriageway widths and cyclists accommodated on carriageway. The detailed internal road network will come forward as part of future reserved matter applications, but will be in accordance with the principles set out in the DAS (section 10.1 and 10.2).



4.15. The detailed reserved matter applications will confirm the levels of cycle and vehicular parking provision; which would comply with the relevant adopted SGC standards at that time.

### Landscaping

4.16. The proposed development includes a substantial green infrastructure network, which responds to existing key features (for example the retention of key trees within proposed open space, the Pickedmoor Brook), and provides new landscape features: for example a new woodland buffer along the north western edge of the Application Site, urban-green corridors within the development parcels, and extensive new parkland to the south with associated planting. The green infrastructure network is designed as multi-functional open space, meeting the recreational needs of the local community; alongside providing ecological, drainage and landscape functions.

4.17. The Green Infrastructure Parameter Plan identifies a number of the proposed green infrastructure proposals, and alongside the elements which are set out in the DAS and Environmental Statement, these will be secured, and its future management confirmed, through the S106 Agreement, and delivered through a Landscape and Ecology Management Plan; secured by planning condition.

### Open Space

4.18. The proposal includes the delivery of a range of informal and formal open space across the Application Site; in addition to the green infrastructure provided within incidental amenity space, communal and private amenity spaces.

4.19. The details in respect to this open space are set out in the DAS which accompanies this application, and shown on the Illustrative Landscape Masterplan. The proposals would deliver the following:

Open Space Typology	Provision (ha)
Allotments	0.30
Informal Recreation	5.19
Children and Young People	0.36
Natural Green Space	12.08

### **Drainage**

- 4.20. The Flood Risk Assessment submitted with this planning application, contained in the Environmental Statement Volume Two, identifies the drainage strategy for the proposed development. This confirms that the surface water will discharge into the Pickedmoor Brook; and in accordance with local policy, the discharge will be limited to the greenfield QBAR runoff rate. A hydro-brake will further restrict discharge from the open attenuation basins provided within the Application Site. This strategy accounts for all events up to the 1 in 100 year storm event plus an additional 40% allowance for climate change. As a result, it will lead to a reduction in runoff rates when compared against the greenfield rate; and within rainfall events over 6 hours in duration, there will be no increase in runoff volume for 48 hours from the start of the rainfall event.
- 4.21. The detailed design of the drainage proposals will come forward as part of reserved matter applications; but will accord with the principles set out in the FRA and DAS, and will deliver the range of ecological enhancements identified within Chapter 12 of the Environmental Statement.

### **Utilities**

- 4.22. A Utilities and Foul Drainage Appraisal Report is included within the Environmental Statement which confirms that connections to existing services and facilities, notably potable water, foul drainage, openreach, electricity and gas can be delivered to the proposed development.

### **Sustainability and Energy**

- 4.23. An Energy Statement is submitted with the planning application which confirms that a fabric-first approach will be taken to minimise carbon emissions, in accordance with the Building Regulations, and that the future detailed design of the development will take account of opportunities to enhance efficiencies through design.

### **Land for Education Facilities**

- 4.24. SGC's published evidence does not demonstrate conclusively whether the need exists for a new primary school within Thornbury. The land for the primary school is not therefore shown on the parameter plans

# Planning Statement

Land to the West of Park Farm, Thornbury

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and it does not form part of the planning application proposals, however, if the need is demonstrated, provision can be made for the transfer of land to the Education Authority for this purpose in the Section 106 Agreement.

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## 5. Planning Policy Context

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## Planning Policy Framework

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- 5.1 This section of the Planning Statement provides details of the national and local planning policies and guidance relevant to the determination of the application proposals.

### Planning Policy Framework

- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to determine planning applications in accordance with the provisions of the Development Plan, unless material considerations indicate otherwise.
- 5.3 When applying this, it is necessary to have regard to the High Court decision *R v Rochdale Metropolitan Borough Council ex parte Milne* [2000]<sup>1</sup>; within which Sullivan J confirmed that a proposal does not have to accord with each and every policy within the Development Plan:

*“...In the light of that decision (City of Edinburgh Council The Secretary of State for Scotland [1997]) I regard as untenable the proposition that if there is a breach of any one policy in the Development Plan the proposed development cannot be said to be ‘in accordance with the plan’. Given the numerous conflicting interests that Development Plans seek to reconcile: the needs for more housing, more employment, more leisure and recreational facilities, for improved transport facilities, the protection of listed buildings and attractive landscapes etc., it would be difficult to find any project of any significance that was wholly in accord with every relevant policy in the Development Plan. Numerous applications would have to be referred to the Secretary of State as a departure from the Development Plan because one or a few minor policies were infringed, even though the proposal accords with the Development Plan considered as a whole. It does not have to accord with each and every policy therein.”*

- 5.4 It is in light of this test put forward by Mr Justice Sullivan that the application proposals need to be considered.
- 5.5 The Development Plan for South Gloucestershire comprises the Core Strategy (adopted 2013), the Policies, Sites and Places Plan (adopted 2017) and the Joint Waste Core Strategy (adopted 2011).

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<sup>1</sup> [2000] EWHC 650 (Admin)

- 5.6 Emerging planning policy is contained within the draft West of England Joint Spatial Plan (JSP) 2016-2036; which is currently at Examination, and the emerging South Gloucestershire Local Plan (nLP) 2018-2036 which was subject to a Regulation 18 consultation in early 2018. The next formal consultation on the nLP is anticipated in summer 2019.
- 5.7 In accordance with paragraph 48 of the National Planning Policy Framework (NPPF, July 2018), weight is afforded to draft policies in light of the advance stage in the adoption process, and their conformity with the policies in the NPPF.
- 5.8 There are a number of material considerations, including the NPPF and Planning Practice Guidance (PPG).
- 5.9 There are a number of guidance documents published by SGC and the West of England which are material considerations. Commentary on these documents is made where appropriate within this Statement, and the wider planning application documentation. The formally adopted SPDs are:
- West of England Joint Local Transport Plan 2011-2026 (agreed 2010);
  - South Gloucestershire Revised Landscape Character Assessment (2014);
  - South Gloucestershire Residential Parking Standards SPD (December 2013);
  - South Gloucestershire Design Checklist SPD (August 2007);
  - South Gloucestershire Waste Collection: Guidance for New Developments SPD (January 2015);
  - South Gloucestershire Renewables SPD (November 2014);
  - South Gloucestershire Affordable Housing and Extra Care Housing SPD (May 2014); as subsequently amended;
  - South Gloucestershire Planning and Noise Specific Guidance Note 1 (March 2015)
- 5.10 In addition, there a number of guidance and technical notes which have been published by SGC, and these are considered where up to date and relevant.

### **South Gloucestershire Core Strategy 2006-2027**

- 5.11 The Core Strategy was adopted in December 2013, and sets the development context for South Gloucestershire up to 2027.



5.12 Policy CS15 (Distribution of Housing) confirmed that a minimum of 28,355 homes would be required over the plan period, 2006-2027, to meet the housing needs of South Gloucestershire. Policy CS5 (Location of Development) identifies Thornbury as a Market Town, and confirms that it is a sustainable location for growth; with the allocation of two strategic development sites at Park Farm and Morton Way (total: 800 dwellings).

5.13 The 'Vision for 2027 and Beyond' sets out that South Gloucestershire will continue to be a great place to live and work; delivering an attractive, accessible and healthier environment within balanced, vibrant and safe communities with ready access to jobs, supporting services and facilities. In particular reference to Thornbury:

*"Thornbury will be a thriving and socially cohesive historic market town with a diverse range of employment opportunities and modern healthcare facilities. The vibrant town centre will provide a range of facilities for the needs of its residents, visitors & workers, as well as its surrounding villages and farming communities. These aims will be supported by an appropriate amount of high quality housing growth which will help to strengthen and develop the town centre, local schools and community facilities and activities. This growth will provide for the needs of young families and the elderly. The town centre will build on its rich historic character and setting and will promote itself as an attraction, a centre for the arts and an exciting place to shop."*

5.14 The two allocations, at Park Farm and Morton Way, were selected due to their location beyond the Conservation Area and Green Belt, and in locations which would enable the developments to be integrated well with the existing fabric of the town and helping to sustainably improve local facilities and service (see Core Strategy paragraph 4.24).

5.15 Policy CS32 (Thornbury) states that development proposals within the Market Town should take account of the vision and priorities for the settlement by:

- Securing better use of Thornbury's network of open spaces, including the Mundy Playing Fields, Streamside Walk, Severn Way Link and Jubilee Way footpaths, through improved signage and legibility and better accessibility for the disabled and the elderly;

# Planning Statement

## Land to the West of Park Farm, Thornbury



- Ensuring that the current character and setting of Thornbury’s open spaces, which contribute strongly to the attractiveness of Thornbury, is maintained and enhanced;
- Providing increased and diversified employment opportunities, particularly within the town centre, through improvements to existing sites, premises and communications infrastructure;
- Supporting opportunities to retain and enhance the arts, cultural and community provision, especially at the Armstrong Hall;
- Conserving and enhancing the special character and significance of Thornbury’s historic assets and their settings in order to support tis attraction as a tourist destination;
- Supporting the provision of Extra Care Housing in Thornbury and the improvement of healthcare facilities through the re-provision of hospital services and a Health Centre to meet the requirements of the local population;
- Promoting the development of high quality housing and associated local infrastructure in accordance with the Strategy for Development and Policy CS33;
- Supporting the continued excellence, viability and quality of all the educational provision and seeking to increase pre-school nursery provision in Thornbury;
- Maximising opportunities for sustainable travel by improving the legibility and publicity of bus routes through the town and enhancing opportunities for walking and cycling to, from and within the town and town centre; and
- Demonstrating through the preparation of appropriate Flood Risk Assessments, surface water management plans and drainage strategies, how flood risk will be managed.

5.16 The following policies are also relevant to the determination of this planning application:

Policy	Policy Summary (Extract Only)
CS1 High Quality Design	<p>Development will only be permitted where the highest possible standards of design and site planning are achieved. Information submitted with an application should be proportionate to the scale, significance and impact of the proposal.</p> <p>Development proposals will be required to demonstrate that:</p> <ul style="list-style-type: none"> <li>• Siting, form, scale, height, massing, detailing, colour and materials are informed by, respect and enhance the character, distinctiveness, and amenity of both the</li> </ul>



Policy	Policy Summary (Extract Only)
	<p>site and its context;</p> <ul style="list-style-type: none"> <li>• Density and overall layout is well integrated with existing adjacent development and connected to the wider network of foot, cycle and public transport links;</li> <li>• Existing features of landscape, nature conservation, heritage or amenity value and public rights of way, are safeguarded and enhanced through incorporation into development;</li> <li>• If of a sufficient scale, the scheme contributes to the vision and objectives of the locality (for example green infrastructure objectives, design guides etc);</li> <li>• Develop new public realm that enables people to gain access safely and conveniently, in particular to serve the needs of pedestrians and cyclists, children/disabled/older persons, and opportunities for social interaction and play;</li> <li>• Ensure soft landscape proposals form integral part of the design, and seek to make a net contribution to tree cover in the locality, prioritise biodiversity objectives and local food cultivation;</li> <li>• Ensure design, orientation and location of buildings, design, landscaping etc. help achieve energy conservation, protection of environmental resources and assist the appropriate siting of renewable energy and/or low carbon energy installations and infrastructure;</li> <li>• Take account of personal safety, security and crime prevention;</li> <li>• Ensure sufficient space provision for recyclable waste materials; and</li> <li>• Take account of the South Gloucestershire Strategic Flood Risk Assessments, and provide, where appropriate, measures to manage flood risk and prepare surface water management plans.</li> </ul>
CS2 Green Infrastructure	<p>Existing and new Green Infrastructure (GI) should be planned, delivered and managed as an integral part of creating sustainable communities and enhancing quality of life, considering the following GI objectives:</p> <ul style="list-style-type: none"> <li>• Realising the potential of Green Infrastructure to assist with mitigation of, and adaption to, climate change;</li> <li>• Delivering high quality multi-functional and connected open spaces (including Green and Blue infrastructure);</li> <li>• Protecting, creating and improving recreational, play, access and local food</li> </ul>

# Planning Statement

Land to the West of Park Farm, Thornbury



Policy	Policy Summary (Extract Only)
	<p>cultivation opportunities;</p> <ul style="list-style-type: none"> <li>Protecting and enhancing species and habitats, and creating new habitats and wildlife linkages between them;</li> <li>Conserving and enhancing landscape character, historical, natural, built and cultural heritage features;</li> <li>Securing ongoing management and maintenance and creation of GI assets.</li> </ul>
CS4 Renewable or Low Carbon District Heat Networks	<p>Only relevant to development proposals over 100 dwellings where wholly or in part greater than 50dph. There are no existing district heat networks in the vicinity.</p>
CS4A Presumption in Favour of Sustainable Development	<p>When considering proposals for sustainable development, SGC will take a positive approach; working proactively with applicants to find solutions so that sustainable development can be approved wherever possible.</p> <p>Where there are no policies relevant to the application, or relevant policies are out of date at the time of making the decision, then the Council will grant permission unless material considerations indicate otherwise. Account will be taken of whether:</p> <ul style="list-style-type: none"> <li>Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits when assessed against the policies of the NPPF, and other policies in the Council's local plan, neighbourhood development plans, supporting supplementary planning documents and any emerging policy as it may be relevant;</li> <li>Specific policies in the National Planning Policy Framework, other policies in the Council's local plan, neighbourhood development plans, and any emerging policies as it may be relevant, indicate that development should be restricted.</li> </ul>
CS6 Infrastructure and Developer Contributions	<p>All new development of a sufficient scale that would add to the overall demand and impact on infrastructure will be required to provide:</p> <ul style="list-style-type: none"> <li>Site specific measures to directly mitigate the impact of development</li> <li>Infrastructure, services and community facilities to mitigate its impacts on existing communities and provide for the needs arising from the development, including financial contributors towards their maintenance where appropriate</li> </ul> <p>Where necessary infrastructure, services and community facilities cannot be provided</p>

Policy	Policy Summary (Extract Only)
	on-site (in kind), financial contributions will be sought and may be pooled to secure the necessary off-site infrastructure investment to mitigate the cumulative impact of developments
CS7 Strategic Transport Infrastructure	Thornbury falls within the area identified as the 'Rural Package' which includes: <ul style="list-style-type: none"> <li>• Extension of the A38 Showcase Bus Corridor to Thornbury;</li> <li>• Extension of the A38 Cycling City route to Thornbury.</li> </ul>
CS8 Improving Accessibility	Priority will be given to providing the users of new development with a range of travel options other than private car. <ul style="list-style-type: none"> <li>• New development proposals which generate significant demand for travel will be more favourable considered the nearer they are located to existing and proposed public transport infrastructure and existing facilities and services. Development which are car dependent or promote unsustainable travel behaviour will not be supported;</li> <li>• All new development proposals of a sufficient scale will be required to contribute financially or in kind to the schemes set out by Policy CS7 and the Infrastructure Delivery Plan, as appropriate, and other physical off-site local transport improvements as may be necessary to make the scheme acceptable;</li> <li>• All new development proposals of a sufficient scale will be encouraged to reduce greenhouse gas emissions, travel demand and support travel by means other than the private car, particular to significant destinations such as educational establishments, hospitals, rail stations, but interchanges and employment areas. This will be achieved through:                             <ul style="list-style-type: none"> <li>➢ the provision of, and integration of walking, cycling and public transport infrastructure into the local network</li> <li>➢ Providing mixed use developments in appropriate locations</li> <li>➢ The active promotion of a Green Travel Plan approved by the Council</li> <li>➢ Contributions to bus services, and other initiatives such as commuter and car clubs and community transport projects, as appropriate;</li> <li>➢ Access to high speed broadband and installation of electrical sockets, storage and sufficient space in dwelling such that allows homeworking</li> <li>➢ Provision of facilitates for charging plug-in or other ultra low emission vehicles</li> </ul> </li> </ul> <p>Vehicular site access should be well integrated and situated so it supports the street</p>

Policy	Policy Summary (Extract Only)
	scene and does not compromise walking, cycling, public transport infrastructure and highway safety.
<p>Policy CS9 Managing the Environment and Heritage</p>	<p>In order to protect and manage South Gloucestershire’s environment and its resources in a sustainable way, new development will be expected to:</p> <ul style="list-style-type: none"> <li>• Ensure that heritage assets are conserved, respected and enhanced in a manner appropriate to their significance;</li> <li>• Conserve and enhance the natural environment, avoiding or minimising impacts on biodiversity and geodiversity;</li> <li>• Conserve and enhance the character, quality, distinctiveness and amenity of the landscape;</li> <li>• Be located away from areas of flood risk;</li> <li>• Reduce and manage the impact of flood risk through location, layout, design, choice of materials and the use of Sustainable Drainage Systems (SuDS);</li> <li>• Protect the quality and quantity of the water environment and its margins;</li> <li>• Utilise natural resources, including minerals, soils and water, in an efficient and sustainable way;</li> <li>• Maximise opportunities for local food cultivation by avoiding the best and most versatile agricultural land;</li> <li>• Protect land, air and aqueous environments, buildings and people from pollution; and</li> <li>• Avoid unstable land unless appropriate mitigation or remediation measures can be taken.</li> </ul>
<p>CS14 Town Centre and Retail</p>	<p>Thornbury is identified as a Market Town; and Policy CS14 seek to protect and enhance the vitality and viability of its Town Centre in recognition of their retail, service and social functions.</p> <p>Any proposals for main town centre uses with a floorspace over 1,000 sq. m. outside of designated town centres will require an impact assessment.</p> <p>Proposals for convenient and accessible local shopping facilities which meet the day to day needs of residents and contribution to social inclusion are supported.</p>
<p>CS16 Housing Density</p>	<p>Housing development is required to make efficient use of land, to conserve resources and maximise amount of housing supplied, particularly in and around town centres and</p>

Policy	Policy Summary (Extract Only)
	<p>other locations where there is a good pedestrian access to frequent public transport services.</p> <p>Density should be informed by the character of the area and contribution to high quality design objectives (Policy CS1); improving the mix of housing in the locality; providing adequate public open space, private outdoor space and semi-private communal open space.</p>
CS17 Housing Diversity	New housing development comprising both market and affordable, must provide a wide variety of housing types and sizes to accommodate a range of different households, families, single persons, older persons and local income households.
CS18 Affordable Housing	Requirement for provision of 35% affordable housing.
CS23 Community Infrastructure and Cultural Activity	<p>New development will be required to provide or contribute towards additional, extended or enhanced community and cultural infrastructure where it would generate a need for such facilities, in accordance with the following sequential criteria:</p> <ul style="list-style-type: none"> <li>• Enhance the quality, role and viability of existing facilities that are within easy walking distance of the new development; and</li> <li>• Provide adaptable multi-use buildings on site in easily accessible locations for pedestrians and cyclists.</li> </ul>
CS24 Green Infrastructure, Sport and Recreation Standards	<p>Where existing green infrastructure is inadequate in terms of providing for the quantity, quality and accessibility of projected needs arising from future occupiers of new development, those occupiers' needs must be met by the new development, together with provision for subsequent management and maintenance.</p> <p>Provision for Green Infrastructure, outdoor space, sport and recreation facilities will be sought according to the following principles:</p> <ul style="list-style-type: none"> <li>• New developments must comply with all the appropriate local standards of provision in terms of quantity, quality and accessibility;</li> <li>• Provision must be delivered on-site, unless it is demonstrated that partial or full off-site provision or enhancement creates a more acceptable proposal; and</li> <li>• The functionality and usability of spaces and facilities must be suitable for their intended purposes.</li> </ul> <p>Appendix 5 sets out SGC's Green Infrastructure, Sport and Recreation Standards:</p>



Policy	Policy Summary (Extract Only)																											
	<table border="1"> <thead> <tr> <th>Category</th> <th>Definition</th> <th>Quantity Standard</th> <th>Accessibility Standard</th> </tr> </thead> <tbody> <tr> <td>Informal Recreational Open Space</td> <td>Includes parks, public gardens, amenity green spaces and green corridors</td> <td>1.4ha/1,000 population</td> <td>12.5min walk / 600 metres</td> </tr> <tr> <td>Natural and Semi-Natural Green Space</td> <td>Areas of green space where the primary purpose is one of wildlife and biodiversity conservation and value</td> <td>1.5ha/1,000 population</td> <td>15min walk/ 720 metres</td> </tr> <tr> <td>Outdoor Sport Facilities</td> <td>Includes all outdoor sports facilities whether naturally or artificially surfaces including playing pitches, bowling greens, full sized MUGAs</td> <td>1.6ha/1,000 population</td> <td>20min walk/ 1,000 metres – playing pitches 22min drive – synthetic pitches, athletics tracks, golf courses</td> </tr> <tr> <td>Provision for children and young people</td> <td>All equipped areas for play, including provision for young people (ie shelters, skate parks)</td> <td>0.25ha/1,000 population</td> <td>10min walk / 480 metres – children play space 15min walk / 720 metres – young people provision</td> </tr> <tr> <td>Allotments</td> <td></td> <td>0.2ha/1,000 population</td> <td>15min walk / 720 metres</td> </tr> </tbody> </table>	Category	Definition	Quantity Standard	Accessibility Standard	Informal Recreational Open Space	Includes parks, public gardens, amenity green spaces and green corridors	1.4ha/1,000 population	12.5min walk / 600 metres	Natural and Semi-Natural Green Space	Areas of green space where the primary purpose is one of wildlife and biodiversity conservation and value	1.5ha/1,000 population	15min walk/ 720 metres	Outdoor Sport Facilities	Includes all outdoor sports facilities whether naturally or artificially surfaces including playing pitches, bowling greens, full sized MUGAs	1.6ha/1,000 population	20min walk/ 1,000 metres – playing pitches 22min drive – synthetic pitches, athletics tracks, golf courses	Provision for children and young people	All equipped areas for play, including provision for young people (ie shelters, skate parks)	0.25ha/1,000 population	10min walk / 480 metres – children play space 15min walk / 720 metres – young people provision	Allotments		0.2ha/1,000 population	15min walk / 720 metres			
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## South Gloucestershire Policies, Sites and Places Plan

5.17 The Policies, Sites and Places Plan was adopted in 2017, and replaced the remaining saved policies of the old Local Plan. The following development management policies from this plan are relevant to the determination of this planning application:

Policy	Policy Summary (Extract Only)
PSP1 Local Distinctiveness	<p>Development proposals will be acceptable here the proposals demonstrate an understanding of, and respond constructively to the buildings and characteristics that make a particularly positive contribution to the distinctiveness of the area/ locality.</p> <p>Innovative architectural responses will be favourably considered, where this would result in a high quality design that would in itself contribute positively to the distinctiveness of a place.</p>
PSP2 Landscape	<p>Development proposals will be acceptable where they conserve and where appropriate enhance the quality, amenity, distinctiveness and special character of the landscape (defined by the Landscape Character Assessment). This includes, but is</p>



Policy	Policy Summary (Extract Only)
	<p>not limited to:</p> <ul style="list-style-type: none"> <li>• landscape attributes which define the inherent character of an area, such as: landscape patterns arising from roads, paths, hedges, waterways and buildings; designed and natural landscapes, which include elements of natural beauty, historical or cultural importance and ecological features;</li> <li>• the tranquillity of a landscape, sense of place and setting;</li> <li>• landscape features, such as trees, hedgerows, woodlands, views, banks, walls, ponds and waterways;</li> <li>• distinctive or characteristic topography and landforms.</li> </ul> <p>Where development proposals would result in harm to the landscape, it must be clearly demonstrated that:</p> <ul style="list-style-type: none"> <li>• the proposal results in benefits that outweigh the harm; and</li> <li>• any harm to the landscape is minimised and mitigated through the form of the development and where reasonable the provision of landscape enhancements.</li> </ul> <p>Landscape Design: Amenity space, hard and soft landscape works and open space provision will be required to be of a high standard of design, appropriate to the use and character of the development and its location; and designed as an integral part of the development, incorporating existing landscape features where appropriate, for the benefit of the development proposal.</p> <p>Landscape Management: Landscape features which contribute to landscape character, quality, amenity or local distinctiveness are to be retained and protected, and along with new landscape features, managed in a manner which ensures their long term health and viability.</p>
PSP3 Trees and Woodland	<p>Development proposals should minimise the loss of existing vegetation on a site that is of importance in terms of ecological, recreational, historical or landscape value.</p> <p>Development proposals which would result in the loss of, or damage (directly or indirectly) to, existing mature or ancient woodland, veteran trees, ancient or species-rich hedgerows will only be acceptable where the need for, and benefits of, the development in that location clearly outweigh the loss or damage.</p>

Policy	Policy Summary (Extract Only)
	<p>Development proposals should, where appropriate include: e protection of trees; and</p> <ul style="list-style-type: none"> <li>• Replacement trees, of an appropriate size and species, where tree loss or damage is essential to allow for development; and</li> <li>• Additional tree planting; and</li> <li>• New planting schemes that retain and integrate healthy, mature trees and hedgerows, and include native species</li> </ul>
<p>Policy PSP6 Onsite renewable and low carbon energy</p>	<p>All development proposals will:</p> <ul style="list-style-type: none"> <li>• Be encouraged to minimise end-user energy requirements over and above those required by the current building regulations through energy reduction and efficiency measures, and in respect of market housing offer micro renewables as an optional extra, and</li> <li>• Be expected to ensure the design and orientation of roofs will assist the potential siting and efficient operation of solar technology.</li> </ul> <p>In addition, all major greenfield residential development will be required to reduce CO2 emissions further by at least 20% via the use of renewable and/or low carbon energy generation sources on or near the site providing this is practical and viable.</p>
<p>Policy PSP8 Residential Amenity</p>	<p>Development proposals will be acceptable provided that they do not create unacceptable living conditions or have an unacceptable impact on the residential amenity of occupiers of the development or of nearby properties; including loss of privacy and overlooking; overbearing and dominant impact; loss of light (daylight/sunlight); noise or disturbance; and odours, fumes or vibration</p>
<p>Policy PSP9 Healthier Impact Assessments</p>	<p>All new development proposals should provide an environment that promotes health and wellbeing, addresses adverse health impacts and reduces health inequalities.</p> <p>For Very Major Development proposals applicants will be required to consult the Director of Public Health at pre-application stage to ascertain whether a HIA is required and, if so, the requisite level. Where required, the applicant must submit a Health Impact Assessment and address its recommendations in the planning application.</p>
<p>Policy PSP10 Active Travel</p>	<p>Existing and proposed Active Travel Routes (ATRs) will be safeguarded. Development proposals that would reduce, sever or adversely affect the utility, amenity, safety and delivery of existing or proposed ATRs will be acceptable where</p>



Policy	Policy Summary (Extract Only)
Routes	<p>the developer can demonstrate that an alternative ATR of an equal or improved quality can be provided.</p> <p>Where appropriate, new development proposal(s) will be expected to provide links to an existing or proposed ATR. To deliver new/enhanced routes of an acceptable quality the following must be addressed:</p> <ul style="list-style-type: none"> <li>• local circumstances and character; and</li> <li>• purpose of travel and likely user(s) of the ATR; and</li> <li>• minimising conflict between potential multiple users of the ATR; and</li> <li>• usability; and</li> <li>• route safety; and</li> <li>• local community aspirations.</li> </ul>
Policy PSP11 Transport Impact Management	<p>Development proposals which generate demand for travel, will be acceptable where:</p> <ul style="list-style-type: none"> <li>• Appropriate, safe, accessible, convenient, and attractive access is provided for all mode trips arising to and from the proposal; and</li> <li>• Any new or improved bus stops meet SGC's adopted standards and the appropriate national guidance; and</li> <li>• Residential development proposals are located on: <ul style="list-style-type: none"> <li>i. Safe, useable walking and, or cycling routes, that are an appropriate distance to key services and facilities</li> </ul> <p>And then</p> <ul style="list-style-type: none"> <li>ii. Where some key services and facilities are not accessible by walking and cycling, are located on safe, usable walking routes, that are an appropriate distance to a suitable bus stop facility, served by an appropriate public transport service, which connects to destinations containing the remaining key services and facilities; and</li> </ul> <ol style="list-style-type: none"> <li>1. It would not generate traffic that would: <ul style="list-style-type: none"> <li>i. Create or contribute to severe congestion;</li> <li>ii. Severely impact on the amenities of communities surrounding access routes (local network to strategic road network);</li> <li>iii. Have an unacceptable effect on highway and road safety;</li> <li>iv. Harm environmentally sensitive areas; and</li> </ul> </li> </ol> </li> <li>• Any new transport related infrastructure provided in relation to the proposal would not create or exacerbate traffic congestion or have an unacceptable effect on highway and road safety; and</li> </ul>



Policy	Policy Summary (Extract Only)
	<ul style="list-style-type: none"> <li>• Unobstructed emergency vehicle access is provided; and</li> <li>• Potentially significant transportation impacts are accompanied by an appropriate Transport Assessment and where necessary a Travel Plan</li> </ul>
Policy PSP16 Parking Standards	New development proposals will be acceptable where SGC's parking standards are met.
PSP17 Heritage Assets and the Historic Environment	<p>Development proposals should serve to protect, and where appropriate, enhance or better reveal the significance of heritage assets and their settings. They should be conserved in a manner that is appropriate to their significance.</p> <p><u>Listed Buildings:</u> Development within their setting will be expected to preserve and, where appropriate, enhance those elements which contribute to their special architectural or historic interest, including their settings. Where development proposals affects listed buildings whose architectural or heritage significance has been degraded or eroded, the Council may seek the implementation of measures and/or management plans to secure the restoration of the heritage assets and/or their setting or contributions towards such works.</p> <p><u>Conservation Areas:</u> Development within or affecting the setting of a conservation area will be expected to preserve or, where appropriate, enhance those elements which contribute to their special character or appearance.</p> <p>Proposals should demonstrate that:</p> <ul style="list-style-type: none"> <li>• Buildings, groups of building, historic street and plot patterns, open spaces, building lines, views, vistas, ground surfaces, boundary walls and other architectural or hard landscape features, which contribute to the character or appearance of the conservation area are retained; and</li> <li>• Existing trees, hedges and green spaces, or other natural features, which contribute to the character or appearance of the conservation area, will be retained and protected</li> </ul> <p><u>Archaeology:</u> Scheduled monuments and other non-designated archaeological sites of equivalent importance should be preserved in situ. In exceptional cases, where this is not justifiable or feasible, provision should be made for evacuation and recording with an appropriate level of post-excavation assessment and analysis.</p> <p>Non designated archaeological heritage assets of regional and/ or local importance</p>



Policy	Policy Summary (Extract Only)
	<p>should normally be preserved in situ, but where harm to the asset is justified, provision should be made for excavation and recording with an appropriate level of post-excavation assessment and analysis. Curation and publication of findings will be expected in all instances to appropriate standards.</p> <p>Any impact on the setting of archaeological heritage assets (both designated and non-designated) will need to be assessed to determine how and to what degree these settings make a contribution to the significance of those heritage assets. Proposals will be expected to preserve and where appropriate, enhance the setting of archaeological heritage assets, and those elements which contribute to their significance.</p> <p><u>Historic Parks and Gardens and Battlefields:</u> Development proposals will be expected to:</p> <ul style="list-style-type: none"> <li>• Protect and, where appropriate, enhance the design, character, appearance and settings of historic parks, gardens or battlefields; and</li> <li>• Safeguard those features which contribute to their significance, character or appearance.</li> </ul> <p>Where development proposals affect a park, garden or battlefield of historic significance whose historic landscape character has been degraded or eroded, the Council may seek the implementation of measures and/ or management plants to secure the restoration of features, landscaping or historic planting schemes, or contributions towards such works.</p> <p><u>Locally important heritage assets:</u> Development proposals affecting locally important heritage assets should ensure they are preserved or enhanced, having regard to their significance</p> <p><u>Understanding the Heritage Asset and the Impact of Development</u> Development proposals involving or affecting heritage assets should demonstrate:</p> <ul style="list-style-type: none"> <li>• The significance of the heritage asset affected;</li> <li>• The impact of the proposal on the significance of the heritage asset and their setting; and</li> <li>• How the development will protect, enhance or better reveal the significance of</li> </ul>



Policy	Policy Summary (Extract Only)
	<p>the heritage assets and their settings</p> <p>The level of detail should be proportionate to the significance of the heritage assets affected and the nature of the works</p> <p><u>Assessment of development which affects the conservation or enhancement of a heritage asset</u></p> <p>The conservation of South Gloucestershire’s heritage assets is a priority for the Council and, as a consequence, where development would result in harm to the significance of a heritage asset to its setting, planning permission will only be granted when it can be clearly demonstrated that all the following can be met:</p> <ul style="list-style-type: none"> <li>• The proposal results in public benefits that outweigh the harm to the heritage asset, considering the balance between the significance of the asset affected, the degree of harm and the public benefits achieved;</li> <li>• There is no other means of delivering similar public benefits through development of an alternative site;</li> <li>• The harm to the heritage asset is minimised and mitigated through the form and design of the development and the provision of heritage enhancements; and</li> <li>• The heritage asset will properly recorded to professionally accepted standards.</li> </ul> <p>Where the loss of the whole or part of a designated or non-designated heritage asset is acceptable under this policy, the Council will ensure, via conditions or legal undertaking that all reasonable steps have been taken to ensure that development will proceed after the loss has occurred.</p>
<p>Policy PSP18 Statutory Wildlife Sites: European Sites and Sites of Special Scientific Interest</p>	<p><u>European Sites</u></p> <p>Development will not be acceptable where any adverse effects on the European features of interest arise, unless the effects are avoided; or where an adverse impact cannot be avoided, the impact will be adequately mitigated; or have imperative reasons of overriding public interest.</p> <p>Where development proposals cannot satisfactorily demonstrate that it would not adversely affect the European features of the Severn Estuary SPA/SAC/Ramsar, the precautionary principle will apply and proposals will not be acceptable.</p>

Policy	Policy Summary (Extract Only)
	<p><u>SSSIs</u></p> <p>Development proposals which would directly or indirectly have an adverse effect on the nature conservation or geological interests of a Site of Special Scientific Interest (SSSI) will only be acceptable where the benefits of the development at that location clearly outweigh both the impact on the site and on the wider national network of SSSIs.</p> <p>Development proposals will have to demonstrate that there are no other reasonable and satisfactory alternatives, including that of locating it elsewhere.</p> <p>Where a development proposal is to proceed, mitigation and/or compensatory measures will be required to minimise and reduce any potential impacts to an acceptable level. Such measures will form the basis of an appropriate planning condition or legal undertaking.</p>
<p>Policy PSP19 Wider Biodiversity</p>	<p>Development proposals resulting in the loss or deterioration of irreplaceable habitats, including unimproved grassland (lowland hay meadows), ancient woodland, and ancient trees will be refused unless the need for, and benefits of, the development in that location clearly outweigh the loss.</p> <p>Where appropriate, biodiversity gain will be sought from development proposals. The gain will be proportionate to the size of the scheme and be secured through an appropriate planning condition or legal undertaking. This will include sites of low nature conservation interest (for example, intensive agricultural land) where new semi-natural habitat (green infrastructure) would provide opportunities and gains for local wildlife.</p> <p>Development proposals, where they would result in significant harm to sites of value for local biodiversity, which cannot be avoided by locating it on an alternative site with less harmful impacts, adequately mitigated or, as a last resort, compensated for, will be refused.</p>
<p>Policy PSP20 Flood Risk, surface water and watercourse management</p>	<p>All development proposals should follow the sequential approach to flood risk, for all potential flood risk sources.</p> <p>Development proposals should be expected to:</p> <ul style="list-style-type: none"> <li>• Reduce surface water discharge from the site, wherever practicable and feasible on greenfield sites, by restricting discharge to a watercourse or</li> </ul>



Policy	Policy Summary (Extract Only)
	<p>surface water sewer to the estimated Greenfield runoff rate (QBAR) by means of a controlled outflow. The drainage system should be designed so that flooding does not occur on any part of the development for the 3.33% (1 in 30 year) rainfall event other than those areas/ systems designated to store or convey water. Flooding within the development site should not occur in any part of a building or utility plant susceptible to water during 1% (1 in 100year) event, with an allowance for climate change; and;</p> <ul style="list-style-type: none"> <li>• Incorporate Sustainable Drainage System (SuDS) to reduce surface water runoff and minimise the flood risk, supported by an appropriate surface water drainage strategy; and</li> <li>• Ensure that surface water drainage proposals are designed to not increase off-site flood risk; and</li> <li>• Wherever practicable achieve the top tier of the following Surface Water Discharge Hierarchy, providing justification where lower tiers are considered appropriate:             <ol style="list-style-type: none"> <li>1. Infiltration</li> <li>2. Surface water body (watercourse/ditch) (non-infiltration)</li> <li>3. Surface water sewer (non-infiltration)</li> <li>4. Combined sewer (non-infiltration)</li> </ol> </li> </ul> <p>Development proposals will be acceptable where:</p> <ul style="list-style-type: none"> <li>• Watercourses, ponds and lakes are retained, protected and enhanced as natural landforms, floodplains and wildlife habitats; and</li> <li>• It is designed and located to protect the existing floodplain and enable suitable access for maintenance; and</li> <li>• Practicable the water environment is left in its natural state, and designed to avoid engineering activities which would cause harm to the water environment; and</li> <li>• Prevention and mitigation measures are sensitively designed to minimise the risk of pollution to the water environment.</li> </ul> <p>Applicants must provide evidence of appropriate arrangements for future ownership, operation and maintenance of new existing surface water drainage features, including SuDS, for the lifetime of the new development proposal.</p>



Policy	Policy Summary (Extract Only)
Policy PSP21- Environmental Pollution and Impacts	<p>Development proposals will be acceptable where they clearly demonstrate that development is sited and designed to prevent unacceptable risks and avoid unacceptable levels of pollution adversely impacting, by way of; fumes, dust, noise, vibration, odour, light or other forms of air, land, water pollution, exposure to contaminated land or land instability, directly or cumulatively, on environmental amenity; and the health, safety and amenity of users of the site or the surrounding area.</p> <p>Account will be taken of:</p> <ul style="list-style-type: none"> <li>• The impact of existing sources of noise or other pollution in the new development; and</li> <li>• The impact of the new development on existing uses by reason of its sensitivity to noise or other pollution.</li> </ul>
Policy PSP22- Unstable Land	<p>Development proposals on land which may be affected by instability will be acceptable where adequate remedial, mitigation or treatment measures are taken to ensure that the site is safe, stable and suitable for the proposed use.</p>
Policy PSP37- Internal space and accessibility standards for affordable dwellings	<p>Affordable housing shall:</p> <ul style="list-style-type: none"> <li>• Be consistent with the nationally described (minimum internal) space standards; and</li> <li>• Meet accessibility standard M4(2); and</li> <li>• Provide 8% of units to meet wheelchair standard M4(3) (only applicable to dwellings where the Local Authority is responsible for allocating or nominating a person to live in that dwelling).</li> </ul> <p>M4 (2) and M4 (3) accessibility standards will only be required where step free access can be achieved.</p>
Policy PSP42 Self Build and Custom Housebuilding	<p>Require developers to supply at least 5% of the total dwellings on residential and mixed-use sites of over 100 dwellings, for sale to self and custom builders, on the following sequential basis:</p> <ul style="list-style-type: none"> <li>• As self and/or custom house building serviced plots (that meet the definition of self-build and custom housebuilding plots within the Housing and Planning Act 2016 as amended or any subsequent amendment); or</li> <li>• As shell homes</li> </ul>

Policy	Policy Summary (Extract Only)
Policy PSP43- Private Amenity Space Standards	All new residential units will be expected to have access to private amenity space in accordance with SGC's standards.

### Thornbury Neighbourhood Plan

5.18 Thornbury was designed as a Neighbourhood Plan Area in March 2017. An informal survey was undertaken by the Neighbourhood Plan Group in January-February 2018. Nothing further has been published at this time.

### Community Infrastructure Levy

5.19 SGC implemented CIL on the 1 August 2015. The Application Site falls within the district-wide CIL rate of £80/m<sup>2</sup> (housing) and £120/m<sup>2</sup> (retail) plus indexation. SGC's Regulation 123 List confirms that CIL will be used to support the delivery of primary and secondary school places, nursery facilities, youth facilities, community meeting places, libraries, health and social care facilities, indoor leisure facilities and centres and museum/heritage assets.

### West of England JSP

5.20 The West of England Joint Spatial Plan (JSP) (2016-2036) is currently at Examination, with hearing sessions commencing in 2019. The JSP sets the strategic development context for the four West of England authorities: Bristol, Bath and North East Somerset, North Somerset and South Gloucestershire, over the plan period 2016-2036.

5.21 The latest published draft JSP (Publication Plan – November 2017) identifies a draft housing requirement of 102,200 dwellings over the plan period (draft Policy 1) which supports the delivery of 82,500 additional jobs (draft Policy 4). To deliver this housing target, the JSP identifies a number of Strategic Development Locations, alongside existing commitments, urban capacity and non-strategic growth. South Gloucestershire has a draft housing requirement of 32,500 dwellings.

5.22 Thornbury is identified as a key location for strategic growth; with a Strategic Development Location for 500 units identified for the market town, alongside an employment allocation for 5ha of employment land (draft Policy 7.11).

### **South Gloucestershire Local Plan**

5.23 The emerging South Gloucestershire nLP 2018-2036 is at an early stage. It was subject to a scoping consultation in January 2017, informal community consultation in Autumn 2017 and an Issues and Options consultation in February 2018.

### **National Planning Policy Framework**

5.24 The revised NPPF was published in July 2018 and represents the national planning policy relevant to the determination of this planning application. The following extracts from the NPPF are directly relevant to the application proposals.

5.25 The NPPF states at paragraph 6 that the purpose of the planning system is to contribute to the achievement of sustainable development with the three dimensions of sustainable development being economic, social, and environmental.

5.26 Paragraph 9 states that *"pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment and in people's quality of life, including (but not limited to):*

- *Making it easier for jobs to be created in cities, towns and villages;*
- *Moving from a net loss of bio-diversity to achieving net gains for nature;*
- *Replacing poor design with better design;*
- *Improving conditions in which people live, work, travel and take leisure; and*
- *Widening the choice of high quality homes."*

- 5.27 Paragraphs 10 - 11 of the NPPF sets out that the presumption in favour of sustainable development lies at the heart of the Framework. The presumption in favour should be applied by local planning authorities in assessing and determining development proposals and in so doing, development proposals which accord with the development plan on where the plan is absent, silent or out of date should be approved without delay.
- 5.28 There are a range of policies relevant to particular topics; such as heritage, landscape, ecology, design, transport and infrastructure, and these are referenced below as appropriate.

### **Planning Practice Guidance**

- 5.29 On 6 March 2014 the Department for Communities and Local Government launched the PPG, which is an online resource that seeks to provide further guidance to the interpretation and application of the NPPF. The PPG is updated regularly, and as such reference is made to the date of any relevant guidance referenced.
- 5.30 The PPG is referenced within this Statement, and wider planning application documentation where relevant.



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## 6. Planning Considerations

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## Planning Considerations

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6.1 This section of the Planning Statement outlines the planning considerations relevant to the determination of the planning application. In accordance with paragraph 38(6), this section confirms the accordance of the proposed development with the adopted and emerging Development Plan, and identifies relevant material considerations for the determination of the planning application.

### **Principle of Development**

6.2 As set out in the Introduction of this Statement, the Application Site is being actively promoted within the emerging West of England JSP and South Gloucestershire nLP as a suitable and deliverable location for growth to meet the housing needs of South Gloucestershire and the wider West of England sub-region. The submission of this planning application, and the detailed evidence supporting it, confirm the opportunity that the proposal presents to meet these housing needs. The Applicants' will continue to promote the Application Site for allocation within the emerging plans.

6.3 However, in accordance with the purpose of a Planning Statement, this chapter sets out the current planning balance in relation to the planning application against the existing adopted and emerging local plans at the current point in time.

### *Are the policies absent, silent or out of date?*

6.4 The NPPF (2018) confirms that strategic policies should be reviewed every five years. In December 2018, this five year period will pass, and whilst the review has commenced, the JSP and nLP will not be adopted for some time.

6.5 Notwithstanding the five-year review period, SGC are currently unable to demonstrate a five year housing land supply against the adopted Core Strategy housing requirement; with the Annual Monitoring Report (2017) (as amended in evidence to subsequent Planning Inquiries during 2018) concluding SGC's position that for the period 2017-2021 a 4.55 year supply could be demonstrated, a shortfall of 931 units. The extent of this shortfall is disputed, with evidence published from other sources indicating that the housing land supply could be as low as 2.85 years (Coalpit Heath appeal): a shortfall of over 6,000 units. A number

of recent appeal decisions within South Gloucestershire have confirmed that the extent of the shortfall is likely to be greater than the 4.55 year supply published by SGC.

6.6 Irrespective of the extent of the shortfall, the failure to demonstrate a five year housing land supply in accordance with paragraph 73 (NPPF) triggers the provisions within paragraph 11 (NPPF). Paragraph 11 states that where there are no relevant development plan policies, or the policies which are the most important for determining the application are out-of-date (which footnote 7 confirms is the case where a five year supply of deliverable housing sites cannot be demonstrated in accordance with paragraph 73) that planning permission should be granted unless:

- *“the application of policies in this Framework that protect areas or assets of particular importance [set out at footnote 6] provides a clear reason for refusing the development proposed; or*
- *Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole”.*

*Are there policies in the Framework that provide a clear reason for refusing the development?*

6.7 Footnote 6 lists those policies from the Framework which are relevant to bullet one of paragraph 11. The Application Site is not subject to any of the designations identified in footnote 6. It is recognised however that the development would result in harm (albeit ‘less than substantial harm’) to designated heritage assets. In accordance with the principles adopted in *Forest of Dean District Council v Secretary of State for Communities & Local Government & Anor* [2016] EWHC 421 (Admin), it is therefore necessary to first consider the specific policy test contained in Paragraph 196 of the Framework before establishing whether the presumption in favour should be applied in the determination of the planning application.

6.8 In applying the test within Paragraph 196, consideration must be given to the duties set out in Sections 66 and 72 of the Listed Building Act 1990. Section 66 of the Listed Building Act states that:

*“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State*

*shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*

6.9 Section 72 of the Act states that:

*“(i) In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”*

6.10 As confirmed in *Barnwell Manor Wind Energy Ltd v East Northants DC* [2014] EWCA Civ 137 and by Lindblom J in *R (Forge Field Society) v Sevenoaks DC* [2014] EWHC 1895 (Admin), the assessment of likely harm is a matter of planning judgement which is to be weighed against other material considerations. Furthermore, at paragraph 49 of the judgement, Lindblom J reaffirmed the principle that in coming to a planning judgement, “it [provisions of the 1990 Act] does not mean that the weight the authority should give to harm which it considers would be limited or less than substantial must be the same as the weight it might give to harm which would be substantial”. This is consistent with the approach adopted in the Framework which applies separate policy tests to the determination of planning applications which are assessed to have likely ‘substantial’ and ‘less than substantial’ harm to designated heritage assets.

6.11 Irrespective, Section 66 of the Act is relevant and in coming to a planning judgement on the current application proposals it is necessary to have regard to the provisions of the Act when determining the planning application. Indeed, as Lindblom J states in the final sentence of paragraph 49:

*“The presumption is a statutory one. It is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. But an authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering.”*

6.12 In the case of the current planning application Paragraph 196 of the Framework requires the decision maker to weigh the harm that would be caused to the designated heritage assets against the public benefit of the proposals. This judgement has to be made in the context of the statutory provisions of the 1990 Act.



- 6.13 The likely harm to heritage assets has been assessed by a qualified heritage specialist on behalf of the Applicants. Chapter 7 of the Environmental Statement submitted in support of the planning application considers the impact of the proposed development on the relevant designated and non-designated heritage assets, and confirms that this falls within the 'less than substantial' category.
- 6.14 In regard to the relevant heritage assets identified within the study area, being the Thornbury Castle Complex (the Grade I listed Castle and separately listed wall; scheduled monument and Grade II Registered Park and Garden), Grade II listed lodges to the south of the complex, the Grade I listed Church of St Mary the Virgin and Grade II Listed Sheilings School (formally Thornbury Park), the heritage assessment concludes that the impact of the proposed development on these features will be negligible, by virtue of the distance from these features, intervening built (and committed development) form, existing landscaping and the lack of historical association between the Application Site and the features.
- 6.15 This harm must be weighed against the public benefits of the proposed development and in the context of the statutory provisions of the 1990 Act to give considerable and important weight to the desirability of preserving the setting of the listed building. Section 7 of this Statement sets out the benefits of this scheme in detail, and these are summarised below:
1. Provision of substantial market and affordable housing which will make a significant contribution towards delivery of the identified housing needs for Thornbury, and South Gloucestershire, in a highly sustainable location. The weight attributed to this public benefit is substantial due to a number of factors including the number of homes proposed, the considerable housing land supply shortfall against the Core Strategy requirement, and the very large existing and planned shortfall in the delivery of affordable housing. Further details of the housing supply shortfall are provided earlier within this section of the Statement, and in the Affordable Housing Statement.
  2. Delivery of substantial areas of public open space including informal and formal recreation space, natural green space, children's play area and allotment provision. The open space proposed is over and above that required to meet the needs arising from the development and will contribute towards addressing an acknowledged shortfall as evidenced by SGC's published Open Space Audit (2010). In the context of a existing shortfall in provision and the scale and range of facilities proposed, the open space is considered to be a substantial public benefit.

3. Implementation of a sustainable drainage strategy which will restrict site runoff to the greenfield 1 in 10 year rate, and provide long-term storage, thus reducing downstream flood risk by reducing peak flow rates in the Pickedmoor Brook;
4. Economic benefits arising from job creation during the construction and operational stages and the increased expenditure within the local economy. These two factors are assessed to have a moderate public benefit.

6.16 In establishing the overall public benefit to be weighed against the harm to the designated heritage asset, it is necessary to take into consideration the cumulative benefit of these separate factors. The combined public benefit is deemed to be substantial.

6.17 The combination of the Listed Building Act 1990 and Paragraph 196 of the Framework requires a weighing of harm against public benefits with an in built “special regard to the desirability of preserving the listed buildings and their setting” and with “special attention paid to the desirability of preserving or enhancing the character or appearance” of the conservation area. The judgement must be made having regard to the considerable importance and weight attached to the desirability of preserving the setting of the listed building.

6.18 In the circumstances of the current application proposals, the substantial public benefits arising from the development would significantly outweigh the identified harm to the designated heritage assets. It is therefore considered that the application proposals do satisfy the test in Paragraph 196, and the duties in the 1990 Act and that, as such, there are no policies in the Framework which provide a clear reason for refusing the development proposed.

6.19 Having come to this conclusion it is necessary to refer back to the approach defined in paragraph 37 of the *Forest of Dean District Council v Secretary of State for Communities & Local Government & Anor* [2016] EWHC 421 (Admin) judgement. In full this paragraph reads as follows:

*“The two alternative Limbs also make sense as a matter of policy. It means that Limb 2 encompasses the standard balancing exercise in circumstances where there is a policy of restriction on development. But if the result of that standard balancing exercise comes down in favour of development, notwithstanding the restriction, then it is rational that the broader review*

*under Limb 1, where the whole of the NPPF is considered, should be a weighted exercise, so as to give impetus to the presumption in favour of development.”*

- 6.20 The approach endorsed by Justice Coulson confirms that, having applied the balancing exercise required in relation to heritage impact (referred to as ‘Limb 2’), the presumption in favour and the tilted balance is then applied to the determination of the application proposals (referred to as ‘Limb 1’).
- 6.21 This has a significant effect on the decision-making framework and requires planning permission to be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of the Framework taken as a whole. The remainder of this chapter considers the potential adverse impacts and benefits of development in accordance with the requirements of paragraph 11.

### **Conflict with Spatial Strategy/Settlement Boundary**

- 6.32. The recent decision at Land East of Park Lane, Coalpit Heath (17/3191477, dated 06 September 2018), confirms that the failure to demonstrate a five year housing land supply results in little weight being attached to the conflict with the adopted spatial strategy, and the conflict due to the proposed development’s location outside of the current settlement boundary – set out in adopted Policies CS5 (Location of Development) and CS15 (Distribution of Housing) (see paragraph 64-65 of decision).
- 6.33. The emerging spatial strategy (contained in the JSP) identifies Thornbury as a location for strategic growth; identifying it as a Strategic Development Location for 500 dwellings. The JSP and associated evidence base has not identified any evidence which suggests that the 500 dwellings represents a cap to development in the town. This planning application demonstrates that there are no constraints in regard to further development within Thornbury above the 500 dwelling figure, with the application proposals deliver appropriate mitigation, and securing a range of planning benefits as set out elsewhere in this Statement.

### **Thornbury – Sustainable Location for Growth**

- 6.34. Thornbury represents a sustainable location for growth; the adopted Core Strategy and the emerging West of England JSP both direct strategic growth to the settlement over the respective plan periods.

- 6.35. The Sustainability Access Profile (February 2018) undertaken by SGC indicates that Thornbury has a “high level of sustainable access to a range of services and facilities”, and that Thornbury acts as a destination for surrounding rural villages and settlements as a result of the “extensive range of services and facilities”.
- 6.36. The emerging JSP identifies Thornbury as a suitable location for strategic growth; with the Authorities justification for inclusion stating that “As a market town, there is a good range of town centre services and facilities within Thornbury” (Sustainability Appraisal Addendum, April 2018). The Sustainability Appraisal, Appendix D (November 2017) states that Thornbury has a range of employment opportunities, and has good access to the strategic road network; including the Bristol North Fringe for employment opportunities (p91); which incorporates Filton, Emersons Green and Aztec West (WoE Economic Development Needs Assessment, 2016).
- 6.37. The appeal decision at Cleve Park, Thornbury (Ref: 17/3182296, dated 03 May 2018) confirms that Thornbury is a sustainable settlement, and is identified as an appropriate location to meet housing needs.

### **Thornbury – the Site**

- 6.38. The Application Site is well related to the existing built development of Thornbury, and represents a logical extension to the permitted, and under construction, Park Farm. As set out below, the Sustainable Travel Link provides an opportunity to link the two development sites, through a new pedestrian, cycle and bus link, alongside the retention of the existing links created through the Public Right of Way network.
- 6.39. The Application Site lies outside of the designated Green Belt and beyond the Conservation Area – both key determiners in the allocation of sites with the adopted Core Strategy (see Core Strategy paragraph 4.24). In addition, and of considerable weight in determining this application, the site represents the only available site on the edge of Thornbury which falls outside of the emerging strategic Green Infrastructure Network, as shown on SGC’s consultation on the emerging nLP in Autumn 2017.
- 6.40. The Application Site is the closest available large scale development site to the existing Town Centre, and its range of services and facilities. It is well located in regard to wider services and facilities which, through the historical growth of Thornbury, are concentrated within its western extent; discussed further below.

6.41. SGC, in a recent consultation on the nLP, produced a plan of the key strategic constraints around Thornbury. This plan, a copy of which has been reproduced in the DAS (p15), very clearly shows the strategic benefits of the Application Site and demonstrates why the site represents a demonstrably suitable and sustainable location for development.

### **Accessibility to Services and Facilities**

6.42. As set out above, Thornbury is identified as a sustainable settlement with “an extensive range of services and facilities”; and in accordance with Policy CS8, the Application Site represents an opportunity to direct development to a location whereby opportunities to travel by sustainable methods can be maximised. The location of the site and the connections proposed through this application, including the Sustainable Travel Link, maximise the benefits of the sustainability of Thornbury as a settlement. Indeed, the Application Site is considered to represent the most sustainable opportunity for strategic scale growth at the town.

6.43. Policy PSP11 includes guidance on a range of accessibility standards in regard to key services and facilities for walking and cycling distances. The Transport Assessment considers the range of these services and facilities and Chapter 6 (Socio-Economics) of the ES also utilises a Walkable Catchment to assess the impact of the proposed development on a range of services and facilities.

6.44. The proposed development delivers a range of services and facilities within the Application Site; including a Retail-Community Hub which has the potential to deliver a range of uses; including convenience retail, wider retail facilities, health centre etc. If the need is demonstrated, there are also provisions within the Draft Section 106 Heads of Terms for land to be transferred to the Education Authority for delivery of a new primary school.

6.45. The Walking and Cycling Strategy (Section 5.4, Figures 5.1 and 5.2 of the Transport Assessment) highlights the routes for walking and cycling from the Application Site to the existing pedestrian and cycle network; confirming that the routes are good quality and lit.

6.46. The guidance in Policy PSP11 utilises a range of appropriate distances depending on the relevant service and facilities. As set out in Table 4.1 of the Transport Assessment, the proposed development accords with a number of these distances; including primary and secondary school provision, major employment

opportunities and (depending on the uses which may come forward within the proposed Retail-Community Hub) healthcare and retail opportunities.

- 6.47. The remainder of the key services and facilities lie just beyond the guidance within Policy PSP11; however, as recently confirmed by the Inspector at Land east of Park Lane, Coalpit Heath (App Ref: 17/3191477, dated 6th September 2018), the standards are expressed as guidance distances in the explanatory text, and MfS and wider guidance documents confirm distances higher than SGC's guidance are appropriate where there is provision of safe and useful walking and cycling routes. The Application Site is within 1.6km of all of the services and facilities identified, and as set out above, the routes are safe, useable and accessible by pedestrians and cyclists; and as such the development proposals comply with Policy CS8 and PSP11 in this regard.
- 6.48. The Transport Assessment also identifies the Public Transport Strategy (Section 5.5) which sets out how the proposals will include a re-routing of an existing committed bus route, via the proposed Sustainable Travel Link, into the Application Site. As set out in the Transport Assessment, there are two potential routes for the service beyond the Application Site, with both delivering an acceptable bus route, which will enable accessibility to the services (within the PSP11 guidance of 400m) to all of the proposed development. In accordance with Policy CS8, the Transport Assessment confirms that a contribution to this bus service will be secured within the s106 Agreement. In addition, and in response to Policy CS32, the Transport Assessment confirms a contribution to provide better waiting facilities for bus passengers within the Town Centre.
- 6.49. The initial discussions with First have indicated that T1 represents the most appropriate bus route to extend into the Application Site. The current service provides a direct link to Bristol City Centre; stopping in Aztec West (20min journey from Castle School), Bradley Stoke, Harry Stoke (30mins – which is then a 10min walk to the University of the West of England and Filton) and Bristol City Centre (45mins).
- 6.50. The wider strategic transport proposals identified in Policy CS7 (A38 Metrobus Extension and Cycle City Route) are now included within the CIL Regulation 123 List, and as such, the proposed development will contribute to these proposals through its CIL receipts.

### Highways

- 6.51. The two junctions from Oldbury Lane are designed as ghost island priority T-junction; with right hand turn lanes (as requested by SGC). The access has been designed to achieve DMRB visibility splays of 4.5m x 120m, and the proposals will include a speed restriction of 40mph on Oldbury Lane. Swept path analysis has been undertaken on the junctions to confirm its acceptability for refuse trucks and buses. The junctions have been subject to a Stage 1 Road Safety Audit; which is included within the Transport Assessment. In accordance with Policy PSP11, vehicular access will be safe.
- 6.52. The Transport Assessment assesses the impact of the proposed development on the local highway network. It considers the impact of the development on key junctions within the local highway network, in addition to the potential impact of the development on junctions 14 and 16 of the M5; in the years 2017/18 (base) and 2028 (future year). The methodology and assumptions underpinning the Transport Assessment were agreed with SGC Highways and Highways England.
- 6.53. The Transport Assessment confirms that a single junction is predicted to operate above capacity in the 2028 Test Case (Butt Lane/Morton Way/Gloucester Road staggered junction) and proposes a mitigation scheme for this junction, which comprises a staggered signalised layout with arm widening on three arms (and a new pedestrian crossing). The Transport Assessment confirms that this scheme will result in a significant improvement to the future baseline functioning of this junction, in addition to delivering improved pedestrian safety with the provision of the signalised crossing.
- 6.54. The Transport Assessment confirms that the junctions assessed can accommodate the traffic associated with the proposed development, in addition to the committed schemes and projected traffic growth, without a severe impact in the road network; and as such, should not be prevented or refused on highway grounds in accordance with paragraph 109 (NPPF) and Policy PSP11.
- 6.55. Chapter 9 of the ES confirms that there are no Significant effects as a result of the Proposed Development; setting out either a Neutral or Minor Adverse Effect on the environment effects considered: Severance, Pedestrian Amenity, Fear and Intimidation, Driver Delay, Accidents and Safety and Hazardous Loads. The assessment concludes a Minor Beneficial Effect on Pedestrian Amenity and Accidents and Safety as a result of the application proposals. This accords with the findings of the Transport Assessment, which as per above, indicated that the proposals will not have a severe impact on the road network.



6.56. A Framework Travel Plan is included within the application, which established the principles for future detailed Travel Plans to follow; this seeks to increase further the share of trips made by sustainable modes; in accordance with Policy CS8. The proposals could deliver electric car charging points, and appropriate parking provision; with these details to come forward within future reserved matter applications.

### **Landscape**

6.57. The proposed development sits within a green infrastructure network, covering 17.93ha, which provides high-quality and multi-functional green space with varied recreational, landscape, drainage and ecological roles; in accordance with Policy CS2. The green infrastructure provides for significantly greater quantum of open space than the adopted Core Strategy standards (at 7.15ha); an overprovision of 10.78ha. A central element of the green infrastructure strategy is the creation of a new Parkland in the south of the Application Site; extending the existing Green Infrastructure Network of Thornbury, linking to the established PROW network (including the Thornbury Streamside Walk), providing an open landscape setting and a destination for future and existing residents of Thornbury.

6.58. The detailed hard and soft landscaping and associated open space will be designed in accordance with Policy PSP2 at the appropriate reserved matter stage; and will accord with the parameters established on the Green Infrastructure Parameter Plan. The delivery of and future management of this green infrastructure will be secured via a condition requiring a detailed Landscape and Ecological Management Plan (LEMP), and the s106 Agreement will secure the long term management of this resource.

6.59. The landscape and visual assessment in Chapter 13 of the Environmental Statement confirms that the development will have a negligible impact on the landscape character (Gloucestershire LCA – Area 18 Severn Ridges). In terms of local landscape character, six local landscape character areas (LLCA) are identified – five of these will see either negligible or minor impacts at 15 years. The LLCA within which the Application Site falls, LLCA1, will see a locally substantial adverse effect as a result of the development. This is an inevitable consequent of the Landscape Institute's Guidance as the development encompasses the entire LLCA1, and the change from agricultural fields to residential use is automatically deemed to have a substantial adverse effect.



- 6.60. The visual assessment concludes that the Application Site is visually well contained by surrounding vegetation, surrounding topography and the built form of Thornbury; as a result the initial visual envelope of the site is focussed on the immediate surrounding fields, the existing urban edge and the approach to the town on the adjacent Oldbury Lane. This is reflected in the assessment of visual effects; which indicates moderate and minor effects from receptors along Oldbury Lane, Rights of Way within the Application Site and to the immediate north, south and west, the existing edge of Thornbury to the east, and the receptors to the north in Lower Morton/Duckhole. The effect of development on receptors in the wider landscape is assessed as negligible.
- 6.61. The proposed development has been designed to retain existing arboricultural features as much as possible; with the Green Infrastructure Parameter Plan confirming the extent of proposed removals. The development will result in the loss of one Cat-B tree, 8 Cat-C trees, three Cat-C tree groups and the partial removal of five hedgerows (Cat. C and U). 1.3km of hedgerow is identified for removal; of which 0.485km will be translocated on the Application Site, in addition to 0.235km of new hedgerow planting. Whilst some loss is required to accommodate the proposed development, overall there will be a substantial increase in the number of trees proposed across the Application Site. The landscaping proposals include new tree planting, including a new broadleaved woodland (0.95ha) and a further 125 no. scattered broadleaved trees.
- 6.62. An Arboricultural Impact Assessment and Method Statement is submitted with the planning application, see Environmental Statement Volume 2, which confirms the measures required to ensure the protection of retained features during the construction and occupation periods. There will be no impacts on Cat. A features or the four Veteran trees identified on the Application Site. The long-term management of retained, enhanced and new arboricultural features will be secured through a Landscape and Ecological Management Plan. The proposals accord with Policy PSP3.
- 6.63. The offsite Ancient Woodland is protected during construction, as set out in the Arboricultural Impact Assessment and Method Statement. Chapter 12 confirms that as part of measures to address potential impact on the SNCI, it will be buffered from development through use of fencing, gates and (where appropriate) thorn planting to prevent direct access from the site, thereby reducing the risk of increasing recreational impacts to the woodland. On-site recreational routes and habitat creation will also direct walkers/dog-walkers away from the SNCI. These requirements would be set out in the LEMS and relevant

LEMP. Ecological input will be provided to the preparation of Homeowner Packs, which will be to all home purchasers. This would include information key ecological features within and adjacent to the site (e.g. Park Mill Covey SNCI), and the proposed ecological mitigation and enhancement measures. These measures will similarly protect the Ancient Woodland.

### **Heritage**

- 6.64. Chapter 7 of the Environmental Statement, and associated appendices, consider the impact of the proposed development on designated and undesignated heritage assets. There are no designated or un-designated assets identified within the Application Site, and as such, the proposals will not impact directly on any heritage assets.
- 6.65. The Application Site has been subject to LIDAR analysis, a geophysical survey and trial trenching, which have confirmed that the Application Site is low in sub-surface remains; with only a number of undated ditches and pits which are of low/negligible importance. The Environmental Statement confirms that an appropriate archaeological investigation will be secured via planning condition, in accordance with Policy PSP17.
- 6.66. Informed by the findings of the landscape and visual assessment, Chapter 7 of the ES confirms those relevant heritage assets identified within the study area: the Thornbury Castle Complex (the Grade I listed Castle and separately listed wall; scheduled monument and Grade II Registered Park and Garden), Grade II listed lodges to the south of the complex, the Grade I listed Church of St Mary the Virgin and Grade II Listed Sheilings School (formally Thornbury Park). The heritage assessment concludes that the impact of the proposed development on these features will be negligible, by virtue of the distance from these features, intervening built (and committed development) form, existing landscaping and the lack of historical association between the Application Site and the features.
- 6.67. The impact of the proposed development on Thornbury Conservation Area has also been considered. The boundary at its closest is 80m from the Application Site; with the proposed built form further north, and separated from the Conservation Area by the proposed open space in the south of the Application Site; which retains its open nature. Chapter 7 concludes that the character and appearance of the Conservation Area will not be affected by the proposed development.

- 6.68. In addition, Chapter 7 identifies a potential undesignated early post-medieval canal to the south and west of the Application Site, however, any substantive change to proposed land use would lie several hundred metres north or east of the possible route of the canal. The intervening level ground would remain open and grassed and built development would lie beyond a strong tree belt. No harm to the significance of the putative canal would stem from the proposed development.
- 6.69. The impact of the development on these heritage features will be at the lower end of less than substantial, and in accordance with paragraph 196 (NPPF), this harm should be weighed against the public benefits of the proposal. This balancing exercise has been undertaken earlier in this Section of the Planning Statement, without the application of the 'tilted balance'. Due to the limited nature of the identified harm, and the substantial benefits associated with the development, the application proposals pass the test at paragraph 196 of the Framework.

### **Ecology**

- 6.70. Chapter 12 of the Environmental Statement, and associated appendices, provide a detailed assessment of the impact of the proposed development on ecological features in accordance with guidance provided by the Chartered Institute of Ecology and Environmental Management (CIEEM 2018) and BS42020: Biodiversity: Code of Practice for Planning and Development. The assessment is based upon detailed surveys undertaken in 2016-2018.
- 6.71. The Application Site is within 10km of six European Sites, and 5km of four Sites of Special Scientific Interest. A number of these (the three geological SSSIs, the Wye Valley and Forest of Dean SAC, Wye Valley Woodlands SAC and River Wye SAC) have been scoped out of the assessment by virtue of the purpose of their designation, and the distance between the Application Site and the relevant designation.
- 6.72. The Severn Estuary lies 2.8km to the west of the Application Site, and includes a designated SAC, SPA, RAMSAR and SSSI. The sites are designated by virtue of their estuarine habitats, wintering bird assemblage and migratory-fish populations. Chapter 12 of the ES confirms that the surveys on the Application Site did not identify any birds associated with the designations, and that the habitats on the Application Site are unlikely to be favourable to these species. The distance from the Application Site to the discharge of the Pickedmoor Brook into the Severn Estuary, means there would be no effect on the water

quality of the complex. Finally, the distance between the Application Site and the designations, the limited accessibility of the designations, alongside the onsite provision of recreational open space, results in the number of visits to the Severn Estuary Site complex by residents resulting in no risk or probability of a Likely Significant Effect, alone or in combination, to the designations.

- 6.73. In accordance with Policy CS9, the proposals retain and protect existing habitats, provide enhancement to retained habitats, and create new habitats within the Application Site. As set out in Table 12.7 (ES Chapter 12); the proposals will result in the loss of 33.5ha of improved grassland, 0.2ha of dense scrub, 6 no. trees, one pond, and 1.3km of hedgerow; however, creates 12.95ha of parkland (including wildflower meadow, SuDS basins and amenity grassland), 0.95ha of broadleaved woodland, translocate 0.485km of hedgerow alongside 0.235km of new hedgerow planting, 125 no. new scattered broadland trees, and two new ponds. The proposed development will not result in an impact on any irreplaceable habitats, as defined by Policy PSP19 and the NPPF (2018).
- 6.74. In regard to species on the Application Site, Chapter 12 of the ES identifies a range of protection and enhancement measures for the Application Site, including provision of hibernacula, bat boxes, nest boxes, a lighting strategy, structural landscaping and detailed drainage design, which will be delivered through detailed design and the LEMP.
- 6.75. The long-term management of these ecological habitats, and wider open space, will be secured through the LEMP, and the protection of retained ecological habitats over the construction period will be secured through the CEMP and Arboricultural Method Statement. Chapter 12 of the ES confirms that over the long term, the proposed development will result in a net gain in biodiversity; in accordance with Policy PSP11.
- 6.76. Chapter 12 of the ES considers the potential for effects on the designated Park Mill Farm Covert SNCI, directly to the west of the Application Site. It confirms the delivery of mitigation; including pollution control measures secured during construction through the CEMP, and the long-term management of the Application Site - including the buffering of the proposed development from the designation by fencing, gates (where appropriate) and thorn planting to prevent direct access. It concludes that alongside the significant onsite provision of recreational routes and habitat creation, that the residual effect on this designation will be neutral.

### Flood Risk

6.77. In accordance with Policy CS9, the development proposals are located away from areas of flood risk. A detailed Flood Risk Assessment has been undertaken for the proposed development, found in the Environmental Statement Volume 2, which confirms that the drainage strategy accords with Policy PSP20. The Phase 1 and 2 Ground Conditions Assessment confirms that the Application Site is not suitable for infiltration, and as such, the drainage strategy proposes the discharge of the surface water into an appropriate water body (Pickedmoor Brook). The strategy includes open attenuation features which will restrict surface water runoff to greenfield QBAR rates, and as set out in the FRA, will result in a betterment in peak flow rates and a commensurate reduction to flood risk downstream (see Section 6.5, FRA). This responds to South Gloucestershire's Strategic Flood Risk Assessments (Policy CS1) and the objectives for development in Thornbury (Policy CS32).

6.78. The FRA confirms the principles for the design and management of the SuDS; which will come forward as part of future detailed planning applications. In accordance with the measures identified in Chapter 12 (Ecology) of the Environmental Statement, this includes opportunities to utilise the open attenuation ponds to create biodiversity enhancement opportunities, and to improve the quality of the water which is being discharged into the Pickedmoor Brook. Overall therefore the development proposals would have a positive bearing on the water environment and downstream flood risk.

### Thornbury

6.79. Policy CS32 sets out a range of vision and priorities for Thornbury. A number are relevant to this proposed development and careful thought has been given to how those can be addressed through the application proposals. These are set out below:

Objective	Proposed Development
Secure better use of Thornbury's network of open spaces, including the Streamside Walk, through improved signage, legibility and accessibility.	The proposed development secures significant open space, and extends the strategic Green Infrastructure Network identified within the emerging nLP.  The Streamside Walk is an identified Active Travel Route which follows PROW OTH/18, and as such, crosses the top



	<p>of the Application Site. This route is retained in situ, and will be located within the proposed open space network.</p> <p>The proposed development's location enables the delivery of an extended Thornbury open space network, by linking existing provision to the new streamside walk along the Pickedmoor Brook, which will sit within the proposed parkland within the south of the Application Site. As set out in the DAS, this area will be actively managed, and will deliver new pedestrian routes through the public open space, securing an enhanced network of open spaces within Thornbury.</p>
<p>The character and setting of Thornbury's open spaces will be maintained and enhanced.</p>	<p>As set out above, the Application Site sits outside the identified key open space network; beyond the Green Belt, Conservation Area and the emerging Green Infrastructure Network. The proposals will extend the existing open space network, and provide a valuable new parkland for Thornbury.</p>
<p>Support opportunities to retain and enhance the arts, cultural and community provision.</p>	<p>The proposals include potential space for additional community uses. The subsequent implementation of the Community Infrastructure Levy (CIL) by SGC enables CIL receipts from the proposed development to be spent on delivering improvements to existing community facilities within Thornbury, which are identified as within acceptable walking distance of the proposed development.</p>
<p>Conserve and enhance the special character and significance of Thornbury's historic assets and their setting.</p>	<p>As identified above, the proposed development will have a negligible impact on designated heritage assets.</p>
<p>Support the provision of extra care housing and the improvement of health facilities through the provision of a hospital and a new health centre to meet the requirements of the local population</p>	<p>Chapter 6 of the Environmental Statement indicates that the need for additional health facilities as a result of the proposed development will be low, and that CIL receipts can be used to support the delivery of new healthcare infrastructure as may be required.</p>

# Planning Statement

Land to the West of Park Farm, Thornbury



	<p>Nevertheless, in response to comments from the local community, the Retail-Community Hub includes sufficient space which would enable the delivery of an onsite health centre (and/or dentist) should a provider come forward in the future.</p>
<p>Promote development of high quality housing and associated infrastructure</p>	<p>The vision for the new neighbourhood seeks the delivery of a healthy and sustainable community; with a range of housing, alongside supporting infrastructure.</p>
<p>Supporting the continued excellence, viability and quality of all the educational provision and seeking to increase pre-school nursery provision in Thornbury</p>	<p>Land will also be made available for a primary school with early years provision on site if a need requirement exists.</p> <p>In addition, CIL receipts from the proposed development can support existing pre-school, primary and secondary school provision in Thornbury.</p>
<p>Maximising opportunities for sustainable travel by improving the legibility and publicity of bus routes through the town and enhancing opportunities for walking and cycling to, from and within the town and town centre</p>	<p>The Access Strategy for the Application Site provides a link to the existing pedestrian and cycle network. Through the offsite mitigation proposals, a new pedestrian crossing is proposed on Gloucester Road.</p> <p>The Public Transport Strategy sets out the proposal which would enable the extension of the committed bus service into the development site, and this will be supported by a contribution secured through the S106 Agreement.</p> <p>In addition, a contribution is proposed to deliver improvements to existing bus waiting facilities within the Town Centre.</p> <p>CIL receipts from the proposed development can be used to deliver the strategic transport proposals set out in Policy CS7.</p>
<p>Demonstrating through the preparation of appropriate Flood Risk Assessments, surface water management plans and drainage strategies, how flood risk will be</p>	<p>The FRA and associated drainage strategy delivers a betterment in peak flow rates and a commensurate reduction to flood risk downstream (see Section 6.5, FRA).</p>

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### Development Management Policies

6.80. The following table confirms the compliance of the application proposals with the broader development management policies:

Element	Policy	Compliance
Design	CS1; CS16; PSP1	<p>The DAS sets out the design concept, parameters and guiding principles underpinning the vision for the development at Pickedmoor.</p> <p>The proposals sit in a strong green infrastructure network, which provides multi-functional open space – addressing recreational, ecological and landscape roles. A network of pedestrian and cycle links are to be provided within the proposed development, and through the retention of existing Rights of Way and the delivery of a new Sustainable Travel Link.</p> <p>The scheme is designed to integrate into the existing landscape; representing a logical extension to the committed Park Farm scheme; in a location which provides suitable and safe walking and cycling routes to key local services and amenities.</p> <p>The detailed design of the scheme will come forward as part of future reserved matter applications, however the parameter plans and the principles established in the DAS provide a framework which will ensure that the detailed proposals are high quality, distinctive, legible and attractive.</p>
Housing	CS17; CS18; PSP37; PSP42; PSP43	<p>The proposed development seeks permission for up to 630 dwellings; which will be delivered across a range of sizes and tenures: the mix is to be agreed as part of future reserved matter applications.</p> <p>As set out in the Affordable Housing Statement accompanying this</p>



# Planning Statement

Land to the West of Park Farm, Thornbury



Element	Policy	Compliance
		<p>planning application, the proposed development will deliver 35% affordable housing (up to 220 dwellings); with the detailed mix to be agreed with SGC in accordance with local need, national policy and the delivery of a mixed community. The affordable housing units will comply with the standards set out in Policy PSP37.</p> <p>The detailed design of residential units, and the associated amenity space, will be a matter for future detailed planning applications.</p> <p>The proposed development does not include provision for custom build, and as such is contrary to Policy PSP42; which must be weighed in the planning balance.</p>
Energy	CS4; PSP6	<p>Policy CS4 is not relevant to this development proposal, with no part of the proposed development at a density of 50dph or higher.</p> <p>The Energy Statement submitted with this planning application confirms that the future detailed design will seek to minimise energy use beyond the building regulations in accordance with the principles set out in the document.</p>
Infrastructure	CS6	<p>SGC have subsequently adopted CIL, and as such, a number of strategic infrastructure projects will be funded through the CIL receipts delivered by this development.</p> <p>The proposed development include a range of mitigation measures which have been identified; including improvements to an off-site junction (alongside delivery of a new pedestrian crossing) at the Gloucester Road/Morton Way staggered junction; and a contribution to support outdoor sport activities within Thornbury.</p>
Strategic Transport Infrastructure	CS7	<p>The Application Site will be subject to CIL, and the Regulation 123 List confirms that the strategic transport infrastructure relevant to Thornbury, being the extension of the A38 Showcase Bus Corridor and the A38 Cycling City Route, is to be funded by the collection of CIL receipts.</p>
Agriculture/ Soil	CS9; CS34	<p>Following the revised NPPF (2018), it has been confirmed (Appeal Ref: 17/3191477) that these policies do not accord with the NPPF,</p>

Element	Policy	Compliance
		<p>and as such, they are afforded less than full weight.</p> <p>The proposed development will result in the loss of 24.7ha of best and most versatile land which must be considered in the planning balance.</p>
Pollution	CS9; PSP8; PSP21; PSP22	<p>The planning application is supported by a Phase 1 and 2 Ground Conditions Assessment, and the Environmental Statement Chapters on air quality, noise and water environment.</p> <p>The Ground Conditions Assessment identifies no constraints to the development of the site; and recommends a number of measures to be incorporated into the detailed design.</p> <p>Chapter 11 of the Environmental Statement considers the impact of air quality comprising dust and particulates during construction and operation road traffic's associated nitrogen dioxide and fine particulate matters; alongside potential odour effects as a result of the Thornbury Sewage Treatment Works to the northwest of the Application Site. It concludes that subject to appropriate mitigation, in the form of a CEMP, that there are no significant effects as a result of the proposals; and that relevant objectives will be met.</p> <p>Chapter 10 of the Environmental Statement considers the impact of noise; and confirms that subject to appropriate mitigation, and detailed design, that the proposals will not result in a significant noise impact on existing or proposed receptors.</p>
Retail and Town Centre	CS14	<p>Thornbury is an identified Market Town, and as set out above, the Application Site is within walking and cycling distance of its Town Centre, with direct access by non-car modes of travel encouraged through the delivery of the proposed Sustainable Transport link.</p> <p>The proposals include up to 700m<sup>2</sup> of floorspace for retail and community uses, and as such, falls below the requirement for an impact assessment.</p>

Element	Policy	Compliance
		<p>As set out in Policy CS14, proposals for convenient and accessible location shopping facilities, which meet the day to day needs of residents and contributes to social inclusion, will be supported.</p>
<p>Community Infrastructure and Cultural Activity</p>	<p>CS23</p>	<p>SGC subsequently implemented CIL, and as such, CIL receipts from the proposed development can be used to provide enhancement of existing, and new, facilities within Thornbury.</p> <p>Chapter 6 of the Environmental Statement confirms that the proposed development, subject to the delivery of onsite community infrastructure and the spending of CIL receipts, will not result in an adverse impact on the existing resident population.</p>
<p>Green Infrastructure</p>	<p>CS2; CS24</p>	<p>Significant green infrastructure is being proposed as part of the scheme; totalling 17.93ha. This is delivered as multi-functional green space; meeting recreational, ecological, landscape and drainage requirements.</p> <p>In accordance with SGC's standards the proposed development meets or exceeds the open space quantum for all typologies except outdoor sport facilities. Discussions with SGC during the determination of the planning application will consider the requirement for new or enhanced active open space in Thornbury in light of SGC's recently updated evidence base and the scale of committed outdoor sport facilities in Thornbury.</p> <p>As set out above, the proposed development extends the Green Infrastructure Network identified within the emerging nLP, and provides a direct link to Thornbury's Streamside Walk; which will meet with the proposed parkland and associated walking routes DAS.</p>
<p>Health</p>	<p>PSP9</p>	<p>Chapter 6 of the Environmental Statement (Socio-economics) sets out the impact of the proposed development on local health infrastructure. It concludes that there is sufficient existing capacity with the local GPs, and a need for a 0.5 of a dentist as a result of the proposed development.</p>

# Planning Statement

Land to the West of Park Farm, Thornbury



Element	Policy	Compliance
		<p>As set out above, the proposals include space for a Retail-Community Hub which provides sufficient space for the delivery of a healthcentre, should a provider come forward.</p> <p>CIL receipts from the proposed development may be invested in healthcare infrastructure in accordance with the Regulation 123 List.</p> <p>Beyond health infrastructure, the sustainable location of the proposed development, and the network of walking and cycling routes identified both to existing services and facilities within Thornbury, and also as recreational routes within the green infrastructure will support healthy movement of local residents. This will be supported by the measures identified in the Framework Travel Plan.</p> <p>The affordability of housing is identified as a key concern in the West of England in regard to deprivation and healthy communities; and the delivery of housing, including substantial affordable housing, will directly address local housing needs.</p>
Active Travel Routes	PSP10	<p>An identified Active Travel Route traverses part of the Application, in the north-east corner. This is retained in situ within proposed open space.</p> <p>The proposed development provides the opportunity for the existing PROW, including the Streamside Walk, to link into the new Parkland being provided as part of the development proposals.</p>



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## 7. Planning Benefits

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## Planning Benefits

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7.1 The preceding sections of this Statement assess the application proposals against the policies of the development plan and other material planning considerations. Many policies are framed in the negative and it is inevitably therefore the case that the assessment focuses on the ‘harm’ caused by the development and how this can be avoided or mitigated. As important are the benefits that development can have on the social, economic and environmental sustainability of a community. This section of the Statement explains the benefits that would arise through delivery of the proposed development. These benefits are all material considerations and must feature in the planning balance when the application is determined.

7.2 The vision for the new neighbourhood at Thornbury is to:

*“Create a sustainable and healthy neighbourhood that helps to meet the identified local need and growing demand for new homes within the thriving market town of Thornbury. The development will be well integrated within its surroundings through excellent local connections and the provision of new green space for the enjoyment of the whole community. The design will sensitively respect the characteristics of the town to ensure the creation of an attractive, high quality and locally distinctive place to live”.*

7.3 The proposals achieve this vision and in doing so, deliver a significant number of benefits both for future and existing residents of Thornbury and the wider area. These benefits are summarised below:

- Up to 630 dwellings providing a significant source of housing land supply for South Gloucestershire over the (emerging) plan period to 2036;
- The delivery of 240 dwellings within the next five year housing land supply period (2019-2024) which would make a significant contribution towards addressing the existing shortfall;
- Up to 220 affordable housing units providing a substantial benefit to Thornbury, South Gloucestershire and the wider West of England region. There is a widely recognised and accepted housing crisis in the West of England, as set out in the accompanying Affordable Housing Statement. Affordability has worsened substantially in the past decade. The challenge facing the

West of England is so acute that despite allocating a number of Strategic Development Locations, that the JSP is explicitly acknowledging that not all of the need for housing will be met during the plan period. In this context, the delivery of an additional 220 affordable dwellings will significantly increase the level of supply and thereby deliver a planning benefit of substantial weight;

- Delivery of housing in a demonstrably sustainable location at the market town of Thornbury – a location identified by SGC as a sustainable location for growth;
- The application site represents the best opportunity to meet the housing needs at Thornbury: lying beyond the identified constraints (Green Belt, emerging Strategic Green Infrastructure Network and Conservation Area) and within a location which provides for access to key services and facilities by sustainable travel modes;
- The Retail-Community Hub provides space for a range of uses including retail, and potentially community and health care uses, meeting an identified need locally and minimising the need for future residents to travel by car;
- Land for a primary school with early years provision has been identified within the application site which could be secured if the Education Authority conclude that a need exists for a new primary school in Thornbury;
- The proposals provide for the substantial provision of green infrastructure and open space. A total of 17.93ha of open space is identified on the application site; including a destination parkland incorporating recreational walking routes around the Pickedmoor Brook; natural green space; allotments; and a range of play spaces including LAPs, LEAPs and NEAPs. The new housing is linked to the open space through a network of safe pedestrian routes, and cycle links, which will encourages its use as a recreational resource, and supporting healthy lifestyles;
- The proposed open space extends Thornbury's emerging strategic Green Infrastructure Network, and provides a direct link to the established Thornbury Streamside Walk, and the identified Active Travel Route. Integrating the open space in this manner provides a wider recreational resource for the benefit of the town as a whole;

- The proposals will result in a net biodiversity gain through the retention and enhancement of existing habitats, and creation of new habitats alongside delivery of a range of ecological mitigation and enhancement measures;
- The Sustainable Travel Link enables direct pedestrian and cycle connectivity to the services and facilities of the town centre, benefiting the future residents and also increasing the net spend in the town centre, thereby enhancing its vitality and viability. The link will also enable the routing of existing bus services through the application site. This service will be supported by a financial contribution;
- A financial contribution is proposed to improve existing bus waiting times within Thornbury town centre enhancing the appeal and attractiveness of sustainable modes of travel;
- Improvement works to the existing junction at Butt Lane/Morton Way/Gloucester Road have been identified. These include the provision of a new pedestrian link and, as demonstrated in the Transport Assessment, these works will deliver an overall improvement to the future baseline highway situation in the local area;
- The proposals include a sustainable drainage strategy which will restrict site runoff to the greenfield 1 in 10 year rate and provide long-term storage, thus reducing downstream flood risk by reducing peak flow rates in the Pickedmoor Brook
- A total of 97 operational jobs will be created by the development on-site comprising workers from the proposed retail/community uses and home workers;
- Construction jobs for 100 on-site workers per annum (over 8 years) and 32 off-site workers per annum (over 8 years) which would make a significant contribution to the local economy. This will likely result in a number of apprenticeships for young people throughout the construction period;
- The development will support the existing local economy through additional residential expenditure; with this estimated at £1million per annum equating to 29 new jobs. A significant proportion of this local expenditure is likely to be spent in Thornbury; supporting its existing services and facilities;



# Planning Statement

Land to the West of Park Farm, Thornbury

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- Estimated CIL revenue for the local authority of £3.5million (based upon 390 market homes at national average property size of 92.3m<sup>2</sup>); and
- £730,000 in additional council tax revenue per annum once fully operational (Band D, 2018 rates, market housing only).

7.4 There are a considerable number and range of benefits associated with delivery of the application proposals. These individual benefits will have different weights in the planning balance the overall benefit is however deemed to be substantial.

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## 8. Conclusions and Planning Balance

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## Conclusions and Planning Balance

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- 8.1 This Planning Statement has been prepared by Savills on behalf of the Applicants in support of a planning application for a residential-led development at Land to the West of Park Farm, Thornbury; for up to 630 dwellings, a Retail-Community Hub and substantial open space.
- 8.2 The development represents an exceptional opportunity to deliver a high quality new development as part of the sustainable expansion of Thornbury, and this planning application confirms the suitability and deliverability of the proposals.
- 8.3 In light of the failure to demonstrate a five year housing land supply, paragraph 11 is engaged, and therefore the application must be determined having regard to the 'tilted balance'; in other words, the proposals must be approved unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. As set out above, there are no policies or assets, as identified in Footnote 7, which indicate that development should be refused.
- 8.4 The proposed development is in a sustainable location, and as demonstrated within this Planning Statement and the accompanying evidence base, is suitable for the development proposed.
- 8.5 The conflict with the spatial strategy and location of the development outside of the settlement boundary is afforded little weight; in accordance with recent appeal decisions. The loss of best and most versatile agricultural land is weighed in the planning balance. Landscape harm is identified, albeit this is localised, and an inevitable consequence of the Landscape Institute Guidelines resulting from the change in land use from agricultural to residential. The heritage harm is deemed as low, and at the lower end of 'less than substantial'.
- 8.6 The benefits of the proposed development, as set out in Section 7, significantly and demonstrably outweigh these identified harms. Indeed, there are a number of benefits which should be afforded substantial weight in support of the grant of planning permission. In accordance with paragraph 11 of the Framework and Policy CS4A, the development proposal clearly constitutes 'sustainable development'. Accordingly, it is clear there are significant material considerations which outweigh the statutory presumption in favour of the Development Plan. It is respectfully requested the application is approved without delay.