



Land West of Park Farm, Butt Lane, Thornbury, Bristol, South Gloucestershire

Statement Covering Transportation and Highway Matters

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On behalf of Barwood Development Securities Ltd
and North West Thornbury Consortium

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For and on behalf of Stantec UK Limited				

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Contents

1	Introduction	1
1.1	Qualifications and Experience	1
1.2	Summary of Appeal Proposals	1
1.3	Purpose of Statement	2
2	Highway Safety	3
2.1	Existing Situation	3
2.2	Proposed Highway Improvements	6
3	Accessibility	9
3.1	Local Facilities and Amenities: Walking and Cycling	9
3.2	Public Transport Accessibility	15
3.3	Travel Plan	21
4	Third Party Comments	22
4.1	Introduction	22
4.2	Response to Concerns Raised by Third Parties	22

Figures

- Figure 3.1 - Existing Walking & Cycling Provision
- Figure 3.2 - Walking Routes Between Site and School
- Figure 3.3 - Walking Routes Between Site and High Street (Co-Op)
- Figure 3.4 - Walking Routes Between Site and Employment (Midland Way)
- Figure 3.5 - Existing and Committed Public Transport Provision
- Figure 3.6 - Access and Movement Proposed Strategy 1
- Figure 3.7 - Access and Movement Alternative Strategy 2

Appendices

- Appendix A – National Travel Survey 2019 Data
- Appendix B – Stagecoach Letter

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1 Introduction

1.1 Qualifications and Experience

- 1.1.1 My name is Neil Thorne and I am Director of Community Development, South West, with Stantec UK Ltd (Stantec).
- 1.1.2 I am a Bachelor of Science in Human and Physical Geography and a Master of Science in Transport Planning and Management; I am a member of the Chartered Institute of Logistics and Transport, a member of the Chartered Institute of Highways and Transportation and a member of the Transport Planning Society.
- 1.1.3 I have over 20 years' experience in Transport Planning and Engineering matters, joining Stantec in 2000. I provide a wide range of Transportation and Engineering advice to public and private sector clients, covering site development, masterplanning, integrated transport strategies, highway design and detailed design issues.
- 1.1.4 In particular, I have advised clients with regard to residential and mixed use developments ranging from small sites through to large scale urban extensions and Strategic Development Areas.
- 1.1.5 I am familiar with the site and issues applicable to the area, living locally and having visited the site and the surrounding locality on numerous occasions, including walking and cycling between the site and key local facilities and amenities.
- 1.1.6 I have been involved with the transport assessment of the site since the initial scoping discussions were held with South Gloucestershire Council (SGC, the Local Highway Authority) and National Highways (formerly Highways England) from October 2017.

1.2 Summary of Appeal Proposals

- 1.2.1 The application now subject to this appeal was submitted to the Council on 18th December 2018 under reference PT18/6450/O. The application was submitted in outline with all matters reserved for subsequent approval apart from the means of access. The description of development was:

Outline planning permission (PT18/6450/O) is sought for erection of up to 595 dwellings (Use Classes C3), land for a Primary School (Use Class D1), up to 700m² 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, with access to be determined and all other matter reserved.

- 1.2.2 An Appeal against non-determination was lodged on 30th November 2021. The Officers Report to Committee (dated 20th January 2022) set out the proposed Reasons for Refusal. Four reasons for refusal were given, with none relating to Transport and Highway Matters, save for the s106 (RfR4), which will be secured through the Appeal Inquiry process. All transport and highway matters, including the package of s106 mitigation measures, have been agreed with SGC and National Highways, with separate Statements of Common Ground agreed and submitted to the Inquiry.

1.3 Purpose of Statement

- 1.3.1 At the Case Management Conference on 7th February 2022, it was agreed that, although a Proof of Evidence was not required on Transport and Highway grounds, a Transport Statement be prepared to inform a round table session, covering the following topics:
- a. Highway Safety
 - b. Accessibility
 - c. Third Party Comments
- 1.3.2 This Statement therefore presents a summary of the relevant information set out within the Updated Transport Assessment and Updated Travel Plan submitted in support of the outline planning application, as well as any relevant updates since they were produced.

2 Highway Safety

2.1 Existing Situation

- 2.1.1 The Updated Transport Assessment sets out the analysis of Personal Injury Collision (PIC) data at Section 3.8.
- 2.1.2 Personal Injury Collision (PIC) data for an agreed area was obtained from SGC for a five-year period between 1st January 2013 to 31st December 2017. The PIC data was collected to establish the existing highway safety in the vicinity of the site, identify any highway safety issues and inform improvement measures where necessary.
- 2.1.3 As part of the scoping exercise, National Highways (then Highways England) requested that a PIC review also be undertaken in the vicinity of the M5 Junction 14. Therefore, additional PIC data was obtained from SGC for the five-year period between 30th April 2013 and 1st May 2018 to inform this review. The full PIC data reports can be found in Appendix E of the Updated Transport Assessment.

Methodology

- 2.1.4 The PIC data assessment provides an overview of the number and severity of accidents and a summary of the vulnerable road users involved in the casualties. The assessment also defines the likely causes of the collisions, considering any trends in the incidents recorded or collisions caused as a result of the existing highway layout.

Accident and Casualty Overview

- 2.1.5 A total of 20 collisions were observed in the study area, of which eight were identified at Junction 14 of the M4. Of the observed incidents:
- 0 were classified as fatal in severity;
 - 2 were classified as serious in severity; and
 - 18 were classified as slight in severity.
- 2.1.6 There were 25 casualties as a result of the 20 collisions. Of these 25 casualties, 8 were vulnerable road users. Vulnerable road users are classed as pedestrians, cyclists and powered two wheeled vehicles (P2W). A summary of the casualties by severity involving vulnerable road users is presented in Table 2.1 below.

Table 2.1: Summary of Vulnerable Road User Casualties by Severity

	Fatal	Serious	Slight	Total
Pedestrian	0	0	3	3
Cycles	0	1	1	2
P2W	0	0	3	2
Total	0	1	7	8

- 2.1.7 A detailed collision analysis has been undertaken of the study area junctions/links as set out below.

Oldbury Lane (site frontage)

- 2.1.8 There were no recorded collisions along the site's frontage within the five-year period.

Junction 1 - Butt Lane / Norton Way / Gloucester Road Staggered Junction

- 2.1.9 One collision was recorded at this junction within the five-year period. This collision was recorded as slight in severity and involved one vulnerable road user.
- 2.1.10 The incident was recorded as being the result of a cyclist swerving, losing control and falling from their bike after attempting to pass a car which was pulling out of Butt Lane.

Junction 2 - A38 / Gloucester Road Junction

- 2.1.11 One collision was recorded at this junction within the five-year period. This collision was recorded as slight in severity and did not involve a vulnerable road user.
- 2.1.12 The incident was recorded as being the result of a vehicle driving into the rear of another vehicle after getting their foot stuck in the pedals.

Junction 3 - Grovesend Road / Morton Way / Midland Way Roundabout

- 2.1.13 Two collisions were recorded at this junction within the five-year period. Both collisions were recorded as serious in severity and one involved a vulnerable road user.
- 2.1.14 The incident involving the vulnerable road user was the result of a vehicle colliding with a cyclist when attempting to enter the roundabout.
- 2.1.15 The second incident was the result of a vehicle swerving to avoid a collision with a second vehicle entering the roundabout.
- 2.1.16 These two incidents occurred on separate arms of the roundabout.

Junction 4 - A38 / Grovesend Road / Tytherington Road Signalised Junction

- 2.1.17 Two collisions were recorded at this junction within the five-year period. Both collisions were recorded as slight in severity and neither involved vulnerable road users.
- 2.1.18 Both collisions were the result of vehicles colliding with stationary vehicles at a red light. One was reporting to be the result of brake failure and the other driver error.

Junction 5 - Gloucester Road / Quaker Lane / The Plain / Castle Street / High Street Priority Junction and Mini-Roundabout

- 2.1.19 Four collisions were recorded at these junctions within the five-year period. All collisions were recorded as slight in severity and each collision involved a vulnerable road user. All four incidents occurred at least 50m away from the junction layout, and each one on a different approach arm.
- 2.1.20 Three of the incidents involved collisions with pedestrians as they were crossing the road.

- 2.1.21 The final incident involved a car and a motorcycle. The motorcyclist was overtaking stationary vehicles as the car made a right turn resulting in a collision.

Junction 6 - A38 / B4509 Signalised Junction

- 2.1.22 There were no recorded collisions at the A38 / B4509 signalised junction within the five-year period.

Junction 7 - A38 / Old Gloucester Road Priority Junction

- 2.1.23 Two collisions were recorded at this junction within the five-year period. Both collisions were recorded as slight in severity and did not involve a vulnerable road user.
- 2.1.24 Both collisions were reported to occur as a driver pulled into the path of another vehicle when making a right turn, one out of the minor arm and one into the minor arm.

Junction 8 - A38 / Church Road Signalised Junction

- 2.1.25 There were no recorded collisions at the A38 / Church Road signalised junction within the five-year period.

Junction 9 - A38 / B4061 Signalised Junction

- 2.1.26 Following submission of the TA, SGC has requested that the PIC data for the junction of the A38/B4061 is also considered.
- 2.1.27 A review of crashmap.com for the most recent five-year period from January 2014 to June 2018 identified one serious and one slight PIC at the junction.
- 2.1.28 The serious incident appears to have occurred on 19th February 2014 and involved two vehicles. The slight incident appears to have occurred on 18th November 2015 and involved two vehicles.
- 2.1.29 Two PICs in the five-year period is not considered to demonstrate an inherent highway safety problem in this location that would be exacerbated by the proposed development.

M5 Junction 14

- 2.1.30 Eight collisions were recorded in the vicinity of this motorway junction within the five-year period. All collisions were recorded as slight in severity and one involved a vulnerable road user.
- 2.1.31 The incident involving the vulnerable road user occurred on the B4509 when a motorcyclist collided with a vehicle stopped to allow for a right turning vehicle to manoeuvre.
- 2.1.32 Three of the collisions involved vehicles rear-ending the car in front whilst they were approaching stationary traffic or preparing to make a turn. Two of these collisions took place on the M5 mainline, and one on the B4059, approximately 300m east of Junction 14.
- 2.1.33 Two of the collisions involved vehicles attempting to change lane or driving at excess speed on the M5 mainline.
- 2.1.34 One of the collisions involved a vehicle who had pulled into the hard shoulder being hit (glancing blow) by a passing heavy goods vehicle.

- 2.1.35 The final collision involved a vehicle failing to give-way at one of the M5 slips roads and pulling out of the junction and colliding with a car travelling along B4509.
- 2.1.36 Overall at this location, there does not appear to be a pattern in collisions which is the result of a prevailing highway safety issue. The majority of collisions appear to be the result of driver error, reckless driving and failing to slow down when approaching stationary traffic.

PIC Data Summary

- 2.1.37 Overall the PIC analysis has demonstrated that there is no pattern of highway safety issues on the local road network within the study area.
- 2.1.38 Additional development traffic within the study area is not therefore anticipated to present a safety risk on the local road network.
- 2.1.39 National Highways undertook their own modelling of the queuing at M5 Junction 14 on the Strategic Road Network. They concluded that as the development impacted on the northbound off-slip, which exacerbates an existing mainline queue, mitigation is necessary to ensure that the development does not result in an unacceptable highway safety impact.

2.2 Proposed Highway Improvements

- 2.2.1 The Updated Transport Assessment and submitted Appeal documents set out details of proposed improvements to both the local and strategic road network, to be secured through Conditions. These include:
- i. **Development Access on Oldbury Lane.** The proposals include 2 ghost island priority T-Junctions, as set out in **Drawing 39209/5501/SK15-A**. The proposals also include the provision of street lighting, which will improve the safety of this section of Oldbury Lane.
 - ii. **Oldbury Lane Speed Limit.** As part of the access strategy for the development, a speed limit reduction is proposed along Oldbury Lane. The development will introduce a section of restricted road with a 40mph speed limit from approximately 200m west of the proposed western site access on Oldbury Lane. The position of the existing 30mph speed limit change at the far eastern end of Oldbury Lane would be maintained. The location of the proposed speed limit change, from national speed limit to 40mph, is shown on **Drawing 39209/5501/SK15-A** with the provision of a gateway feature incorporating rumble strips and coloured surfacing with speed limit roundels. This would also allow for a phased increase/decrease in speed as vehicles leave/approach the built up area and offer a safety improvement over the existing arrangement.
 - iii. **Oldbury Lane / Butt Lane.** Localised widening is proposed along Oldbury Lane and Butt Lane, as set out in **Drawings 39209/5501/SK23-A** and **39209/5501/SK24-A**. As well as allowing for potential future two way bus movement, these proposals would also provide safety benefits for HGV's using these roads to / from Oldbury and the power station.
 - iv. **Sustainable Transport Link.** The sustainable transport link, to include a bus gate with camera control/cctv, together with pedestrian and cycle provision, is proposed as set out in **Drawing 39209/5501/SK25 Rev A**.
 - v. **Butt Lane / Morton Way / Gloucester Road Junction.** The junction is proposed to be signalised to improve operation and safety in future years, by removing the potential conflict points from the current priority staggered junction. The proposals also provide safety benefits for vulnerable road users, with the provision of formal pedestrian crossings and cycle Advanced Stop Lines on all arms. The proposals are set out in **Drawing 39209/5501/SK08-H**.

- vi. **A38 / B4509 Junction, Falfield.** The junction is proposed to be improved through increased capacity of right turn lane towards M5 Junction 14, improved pedestrian crossing across the A38 and introduction of 'Keep Clear' markings to improve safety of vehicle egress from Mill Lane. The proposals are set out in **Drawing 39209/5501/SK37-B**.
- vii. **M5 Junction 14.** The proposed improvement comprises lengthening the two lane off-slip to 350m (from 150m) with a localised widening into the verge, as set out in **Drawing 39209/5501/SK31**. The improvement would result in an average maximum queue reduction on the northbound off-slip from 1,266 to 1,046m (-220m) during the morning peak period. The proposed scheme therefore not only mitigates the impact of the development, but provides material betterment to safety on the Strategic Road Network over the existing operation and performance of the junction during the morning peak period. This position is agreed with National Highways and presented within the submitted Statement of Common Ground.

2.2.2 The above proposed schemes have been subject to a Stage 1 Road Safety Audit (except for the Sustainable Transport Link, which is agreed will be undertaken at the detailed design stage), and agreed with SGC, as well as National Highways for M5 Junction 14.

2.2.3 In addition, it has been agreed with SGC that the development will provide financial contributions, secured through the s106 Agreement, towards other highway capacity and safety schemes within the local area:

- i. **Gloucester Road Zebra Crossing.** It is proposed that a Zebra Crossing is provided across Gloucester Road at the existing central refuge point (near the Anchor Inn) to provide safety improvements for pedestrians to access Manorbrook Primary and Castle Senior Schools.
- ii. **A38 Junctions with B4061 Thornbury Road and Church Road.** Financial contributions have been agreed with SGC towards capacity and safety improvements at these two junctions.

Benefits to the Community

2.2.4 In support of development proposals, highway improvements are proposed across both the local and strategy road networks. Where necessary, these have been subject to a Stage 1 Road Safety Audit and are agreed with the Highway Authorities. These proposals not only improve the operational performance of the network in terms of vehicular capacity and safety but also provide safety enhancements for vulnerable road users over the existing situation.

2.2.5 This is agreed with National Highways, who conclude (Statement of Common Ground, Para 4.1.4) that:

"NH accepts that the proposed scheme mitigates the impact of the development and provides some betterment for the Strategic Road Network (SRN) over the existing operation and performance of the junction during the morning peak period."

2.2.6 This is also acknowledged by SGC in their Officers Report (Para 5.69) which states that:

"The highway works and the M5 junction 14 works will provide a wider benefit beyond the development".

2.2.7 An extensive assessment of existing highway safety has been undertaken as part of the Transport Assessment. This has demonstrated that there is no pattern of highway safety issues on the local road network and additional development traffic is not therefore anticipated to present a safety risk on the local road network. National Highways confirmed that mitigation

is necessary to ensure that the development does not result in an unacceptable highway safety impact on the strategic road network.

3 Accessibility

3.1 Local Facilities and Amenities: Walking and Cycling

- 3.1.1 Thornbury is a busy market town. **Figure 3.1** demonstrates the accessibility of the site to key local facilities and amenities. The following section summaries the facilities and amenities in the local area which are accessible to potential future residents by walking and cycling.
- 3.1.2 In line with the local policy requirements set out within SGC's 'The Policies, Sites and Places Plan (PSP Plan, November 2017), the assessment considers the distances as the crow flies, to services and facilities as set out in the supporting text of Policy PSP11. However, as requested by SGC during scoping discussions, actual distances have been provided from the nearest and furthest parts of the proposed residential development on the application site, and hence the range in figures quoted. The use of actual distances therefore inherently increases the quoted distances in comparison with "appropriate crow fly" distances as set out within Policy PSP11.
- 3.1.3 As identified at paragraph 5.26 of the PSP, designated Town Centres are considered to meet the requirement for walking and cycling distances for the range of key services, facilities and employment opportunities. In addition, as identified at paragraph 5.27 of the PSP, Safeguarded Employment Areas are identified employment areas for assessing suitable walking and cycling facilities.
- 3.1.4 Thornbury Town Centre lies between 1.9 - 2.7km from the proposed residential development (from the nearest and furthest points of the site), and as such in accordance with paragraph 5.26 of the PSP, key employment services and facilities are within walking and cycling distance of the application site.
- 3.1.5 The Proposals include a Retail and Community Hub which provides an opportunity to deliver a range of the key services and facilities set out in PSP11. The planning application is not prescriptive on the precise nature of the uses which would be delivered, with this a matter for future reserved matter applications, however, the provision of up to 700m² of A1, A2 and D1 Uses could support the delivery of a community building, retail unit(s) and health provision within the Application Site. Importantly, these facilities would not only serve the residents of the proposed development, but also offer improved local facilities, within short walking and cycling distance of a significant number of existing and new residential developments in north Thornbury, thereby reducing the reliance on the private car.

Amenities

- 3.1.6 The nearest existing convenience shops are located in Thornbury Town Centre, the edge of which is 1.9 - 2.7km walking distance from the site. The town centre includes Aldi supermarket and other convenience and comparison stores. The nearest public house, Anchor Inn, is 1.4 - 2.2km to the east of the site, on Gloucester Road.

Employment

- 3.1.7 Thornbury Town Centre, 1.9 - 2.7km southeast of the site, hosts many independent and chain shops, cafes and services. In accordance with PSP11, these facilities would provide good opportunity for local employment.
- 3.1.8 Further south of the Town Centre is a large industrial estate, accessed from Midland Way, which hosts various businesses and is also a Safeguard Employment Area. The edge of this designation is 2.8 - 3.6km from the site.

Education

- 3.1.9 The nearest existing primary school to the site is Manorbrook Primary School, which accommodates children from 5 – 11 years old and is located approximately 1.0 - 1.8km walking distance. The nearest secondary school is The Castle School, which is a 1.1 - 1.9km walking distance south of the site. The school accommodates pupils from 11 – 18 years of age.

Health

- 3.1.10 Thornbury Hospital is located 1.5 - 2.3km south east of the site. The Hospital includes an inpatient rehabilitation ward, and outpatient department and physiotherapy suite. Adjacent to the Hospital is the Thornbury Health Centre.

Community Centres

- 3.1.11 There are two identified existing Community Centres in Thornbury; Turnberrie's and The Chantry, the closest of which is 1.9 - 2.6km from the application site.

Leisure

- 3.1.12 Thornbury has a local Rugby / Football club located 1.0 - 1.8km to the north on Gloucester Road. Thornbury Leisure Centre sits 2.8 - 3.6km south of the site. The Centre hosts many different fitness classes and contains a swimming pool, a gym, squash courts and Bowls Hall. Mundy Playing Fields are located 2.2 - 3.0km south of the site, which provides football pitches, tennis courts and a children's play area. The Park Farm development is providing further sports pitches, between 0.2 - 1.0km.

Walking Distances Guidance

- 3.1.13 **Table 3.1** lists key services and facilities and their appropriate crow fly walking and cycling distances as defined by the PSP Plan (PSP11). The corresponding actual distance from Land West of Park Farm site is provided for comparison. As above, distances have been provided from the nearest and furthest parts of the proposed site.
- 3.1.14 In addition, the development proposals including a Retail and Community Hub which provides an opportunity to deliver a range of the key services and facilities on site. The planning application is not prescriptive on the precise nature of the uses which would be delivered, with this a matter for future reserved matter applications, however, the provision of up to 700m² of A1, A2 and D1 Uses could support the delivery of a community building, small-scale retail unit(s), a children's nursery and / or health provision within the Application Site.

Table 3.1: Proximity to key service and facilities

Key services and facilities (PSP11)	Appropriate "crow fly" walking and cycling distances (PSP11)	Actual Distance from nearest residential area (comparable crow fly distances are shorter)	Actual Distance from furthest residential area (comparable crow fly distances are shorter)
Retail (comparison) shops and services and/or Market towns and Town Centres (CS14 of Core Strategy)	1,200 metres	1,910 metres to edge of town centre (24 min walk, 6 min cycle)	2,680 metres to edge of Town Centre (34 min walk, 8 min cycle)
(Weekly) Superstore or supermarket		*Potential on-site provision	*Potential on-site provision
(Day to Day) Smaller food (convenience) shops			
Local health services	800 metres	1,485 metres to Thornbury Health Centre (19 min walk, 5 min cycle)	2,250 metres to Thornbury Health Centre (28 min walk, 7 min cycle)
		*Potential on-site provision	*Potential on-site provision
Pharmacy	800 metres	1,670 metres (Eastland Road) (21 min walk, 5 min cycle)	2,440 metres (Eastland Road) (31 min walk, 8 min cycle)
		*Potential on-site provision	*Potential on-site provision
Community Centre	800 metres	1,865 metres (23 min walk, 6 min cycle)	2,635 metres (33 min walk, 8 min cycle)
		*Potential on-site provision	*Potential on-site provision
Post office	800 metres	1,910 metres (24 min walk, 6 min cycle)	2,680 metres (34 min walk, 8 min cycle)
		*Potential on-site provision	*Potential on-site provision
Public House	800 metres	1,443 metres (18 min walk, 5 min cycle)	2,215 metres (28 min walk, 7 min cycle)
Secondary school <ul style="list-style-type: none"> The Castle Secondary School 	3 miles (4,828 metres)	1,141 metres (14 min walk, 4 min cycle)	1,910 metres (24 min walk, 6 min cycle)
Primary school <ul style="list-style-type: none"> Manorbrook Primary school 	2 miles (3,219 metres)	1012 metres (13 min walk, 3 min cycle)	1,780 metres (22 min walk, 6 min cycle)
		*On site provision	*On site provision
Major employers. Designated Town Centres and Safeguarded Employment Areas (CS12 of Core Strategy) <ul style="list-style-type: none"> Thornbury Town Centre¹ Thornbury Industrial Estate 	2,000 metres	1,910 metres (24 min walk, 6 min cycle) 2,820 metres (35 min walk, 9 min cycle)	2,680 metres (34 min walk, 8 min cycle) 3,590 metres (45 min walk, 11 min cycle)

¹ Taken to Co-Op on High Street, as requested by SGC

- 3.1.15 In addition to local level policy, in considering the proximity of key facilities and amenities with regards to walking distances, the national transport statistics are set out within the Department for Transport (DfT) 'National Travel Survey: 2019 (NTS) Report'. The NTS 2019 report, indicates that 24% of all journeys are under one mile, that 80% of journeys under one mile are made on foot, and that the average walking trip length is 17 minutes.
- 3.1.16 Whilst the NPPF now supersedes the previous Planning Policy Guidance (PPG), the underlying principles of PPG13 'Transport' (March 2001) remain relevant as they are based on recorded travel behaviour and generally accepted accessibility indicators.
- 3.1.17 PPG13 indicates that:
- "Walking is the most important mode of travel at the local level and offers the greatest potential to replace short car trips, particularly under 2 kilometres."*
- 3.1.18 In addition, the guidance on this issue is provided by Manual for Streets (MfS) 2007 which, in Paragraph 4.4.1, states that:
- "Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes [up to about 800m] walking distance of residential areas which residents may access comfortably on foot. However, this is not an upper limit and walking offers the greatest potential to replace short car trips, particularly those under 2km."*
- 3.1.19 Whilst MfS suggests that the greatest potential to replace short car trips is for those under 2km, this is not a maximum distance to which pedestrians are willing to walk. The NTS (at Table NTS0308a) also identifies that 26% of walking trips are over 1 mile (1.6km) and 4% (c. 1 in 20) over 2 miles (3.2km) in length.
- 3.1.20 With regards to cycling, the NTS identifies that the average journey time by bicycle is 23 minutes, which is equivalent to 4 miles (6.4km). Furthermore, Table NTS0308a identifies that 85% of all cycle trips are over 1 mile (1.6km) and 54% of trips are over 2 miles (3.2km).
- 3.1.21 Together, these statistics demonstrate that 81% of all trips under 1 mile (1.6km) are by walking and cycling, and indeed, over half (60%) of all trips under 2 miles (3.2km) are by walking and cycling. The relevant NTS data is included at **Appendix A** of this Statement.
- 3.1.22 These statistics therefore indicate that trips to the majority of the facilities and services in the site surroundings are within a 2 mile walking or cycling distance from the site and could therefore reasonably be expected to be undertaken on foot or by cycle by the majority of people, except where car use is an obvious prerequisite or indeed the reason for the trip.
- 3.1.23 As noted within the Officers Report to Committee (Para 5.52):
- "The recent Land South of Gloucester Road appeal decision is a material consideration in determining this application, the Inspectors view on PSP11 in that case is set out in paragraphs 28 and 29 of the decision."*
- 3.1.24 The Appeal Decision noted by SGC is that with reference APP/P0119/W/17/3189592. The Officers Report continues at Paras 5.53 by stating that:
- "When assessing the current application it is noted that the walking distances from the two sites to local facilities are broadly similar. The development proposal at Land West of Park Farm includes land for a Primary School and up to 700m² for retail and community hub, which will also provide opportunities to walk and cycle to on site facilities."*
- 3.1.25 Further, the Officers Report concludes at Paras 5.56 and 5.57 that:

“Policy CS33 of the Core Strategy requires development in North Thornbury to address the need for improved sustainable transport links to the Town Centre via Park Road. These transport links have been secured in association with the Park Farm development in the form of a bus, walking and cycling only link incorporated into any future planning application on the Council owned land currently occupied by the Alexandra Way Residential Care Home or an upgrade of the existing public right of way route to Victoria Close to a walking and cycling link.

It is considered that the proposal is compliant in terms of policy PSP11, particularly taking account of the similarity with the distances from the development at Park Farm to local facilities.”

Micromobility

- 3.1.26 It is also important to note that, as an emerging micromobility mode, e-bikes have shown considerable growth globally and in the UK. E-bikes offer a longer range and increased distance travelled by bike, whilst also encouraging new users and less mobile people to cycle. In 18 European studies (including grey literature) (Cairns et al., 2017) it was found that depending on the study, the average weekly mileage by e-bike ranged from 15km to >70km, and the average commute trip length ranged from 9.8 to 17km. UK e-bike retailer Halfords also recorded that Electric bike sales are on the rise (around 50,000 – 60,000 are sold each year in the UK compared to overall UK bike sales of 3 million) Therefore, increased uptake of e-bikes will provide an alternative sustainable travel option (promoted through the Travel Plan) to desired destinations such as the significant employment opportunities in the North Fringe of Bristol.

Quality of Walking Routes

- 3.1.27 PSP11 item 3 states that development will be acceptable where there are:

“safe, useable walking and, or cycling routes, that are an appropriate distance to key services and facilities”. The Policy sub-text confirms that distances above the levels set out in the table will be considered appropriate where they are “high quality, safe routes or dedicated walking and cycling routes”.

- 3.1.28 The site is located on the edge of the existing built-area of Thornbury, such that there is little existing provision for pedestrians and cyclists. Oldbury Lane has no dedicated pedestrian or cycle facilities; however, footways are provided along Butt Lane, throughout the existing residential areas of Thornbury and as part of the adjacent Park Farm site.
- 3.1.29 There are two Public Rights of Way (PRoW) through the site. OTH/13 crosses the site west to east and connects to the existing residential area in north Thornbury. OTH/18 crosses the northeast corner of the site and runs north-south through the adjacent Park Farm development. The wider PRoW network connects OTH/18 to the Castle Secondary School via its playing fields. The PRoW runs through the school’s playing fields and becomes a surfaced, lit footpath running between residential properties and the school, with a 1.5m width, with access onto Park Road. Along the footway on Park Road, pedestrians can access the Castle School.
- 3.1.30 There is a wider network of footpaths throughout the existing residential area in north Thornbury. Three footpaths, shown on Figure 3.1, facilitate pedestrian movement from northwest Thornbury to the Town Centre. These are formal routes which are lit, of generous width at 1.5-2.0m wide, and are generally of good quality, with some localised unevenness. These footpaths are not adjacent to highway, running between residential streets or through wooded areas. Where the footpaths meet the carriageway, dropped kerbs are provided to facilitate crossing.

- 3.1.31 A number of predominantly informal pedestrian crossing points are provided along Gloucester Road between Butt Lane and town centre. A zebra crossing is also provided on Gloucester Road between the aforementioned footpath and Thornbury Hospital, health centre and pharmacy.
- 3.1.32 Cyclists are generally required to travel on-carriageway in Thornbury. There are cycle symbols on the carriageway, in the vicinity of The Castle Secondary School and Manorbrook Primary School which is the route of National Cycle Route (NCR) 410 (Avon Cycleway). NCR 410 is well sign-posted.
- 3.1.33 In addition to NCR 410, NCR 41 and a Local Cycle Route (Thornbury Loop) lie within 1km of the centre of the site. These routes connect Thornbury to Bristol and Gloucester and are a combination of on and off road.
- 3.1.34 The walking routes between the site and key destinations (education, town centre and employment) are shown at **Figures 3.2, 3.3 and 3.4**. These Figures demonstrate that key destinations can be accessed from the site via existing routes which are of good quality, with appropriate width, surfacing and lighting. It should also be noted that these routes are the same as those considered suitable for the consented Park Farm scheme.

Benefits to the Existing Community

- 3.1.35 The inclusion of a Neighbourhood Hub within the proposals will provide additional facilities to residents of neighbouring communities. This will also offer the opportunity for walk, cycle or public transport trips to and from these facilities, trips which may otherwise have been made by car to alternative facilities; thereby having a wider benefit on traffic within the Town.
- 3.1.36 The provision of a Primary School at the site will bring additional benefits which, from a transport perspective, would reduce walking distances to school from this and neighbouring developments.
- 3.1.37 In addition, and as set out within Section 2 of this Statement, the comprehensive package of off-site highway improvements proposed also provide safety enhancements for vulnerable road users over the existing situation.

Conclusion

- 3.1.38 It is accepted that walking / cycling distances from the furthest point in the site to some facilities in the town exceed the crow fly distances set out in Policy PSP11. However, national and local planning policy makes clear that accessibility of a site should not be judged on distance alone. Recent appeal decisions on other sites in Thornbury have reached the same conclusion.
- 3.1.39 The quality of committed and existing routes between the site and key destinations are of a good quality via existing footways and dedicated footpath connections and were considered suitable for the purposes of the consented Park Farm scheme. In addition, a local centre is proposed to be delivered on site, which could include small-scale retail, healthcare, nursery and/or other uses within Use Classes A1, A3 and D1.
- 3.1.40 It is therefore concluded that regardless of whether measured as the crow flies or the actual route option chosen, the proposed development will be served by appropriate, safe, accessible, convenient and attractive routes to key facilities both on and off site by walking and cycling. As such, the proposals accord with the relevant development plan policies including Core Strategy Policy CS8 and Policies, Sites and Places Policy PSP11.

3.2 Public Transport Accessibility

Existing Bus Network

- 3.2.1 Due to the time that has elapsed since the production of the Transport Assessment, up to date (February 2022) information on bus services has been reviewed and summarised below. The main changes are:
- The 77 service has been withdrawn, and replaced with Service 10.
 - The T1 now starts earlier weekdays and runs until past midnight 7 days per week.
 - The T2 service has a reduced frequency, and no longer runs late evening or on Sundays.
- 3.2.2 Bus services 60 and 622 serve bus stops on Park Road, off Alexandra Way, approximately 1km from the site. The services provide access to Cribbs Causeway, Chipping Sodbury and Dursley. The 60 bus has six services Monday to Saturday, between 07:25 and 17:40. The 622 has eight services per day between 07:48 and 19:08, Monday to Friday, with seven services on a Saturday and three on a Sunday. The bus stops are equipped with a flag and pole and timetable information.
- 3.2.3 Bus service 10 operates 11 times per day (Monday to Friday) in each direction, providing services between Thornbury and Avonmouth via Bristol Parkway. There are 9 two-way services on Saturday operating on an hourly basis. Service 10 is served by bus stops on Alexandra Way, approximately 1km from the site. Service 10 connects with the 3x service at Aztec West which provides direct access to & from Bristol City Centre with a peak time 30-minute service.
- 3.2.4 First in Bristol Bath & The West operate two services, T1 and T2. Both services operate from Thornbury Health Centre, within 1,500m of the proposed development, to Thornbury Town Centre. The T1 then routes to Bristol City Centre, via Bradley Stoke and M32, while the T2 routes to Bristol City Centre via Cribbs Causeway Bus Station and A38 Gloucester Road. T1 operates half hourly services from Thornbury Health Centre to Bristol City Centre Monday to Saturday with an hourly Sunday service. T2 operates approximately every 2 hours with 8 services per day Monday to Saturday. The T1 journey time from Thornbury to Bristol City Centre is approximately 52 minutes at peak periods.
- 3.2.5 The bus services operating in the vicinity of the site are summarised in **Table 3.2** below and shown in **Figure 3.5**.

Table 3.2: Local Bus Services and Frequencies

Operator	Service	Route	Frequency		
			Mon - Fri	Sat	Sun and Bank Holiday
Stagecoach West	60	Dursley – Wotton-under-Edge – Thornbury	Six per day (07:25 – 17:40)	Six per day (07:25 – 17:40)	No service
Stagecoach West	622	Chipping Sodbury – Yate - Thornbury – Cribbs Causeway	Eight per day (07:48 – 19:08)	Seven per day (08:01 – 17:11)	Three per day (11:21 – 16:31)

Operator	Service	Route	Frequency		
			Mon - Fri	Sat	Sun and Bank Holiday
Stagecoach West	10	Thornbury – Bristol Parkway – Southmead – Lawrence Weston - Avonmouth	Eleven per day (07:33 – 17:48)	Nine per day (08:43 – 17:43)	No Service
First Bristol, Bath & The West	T1	Thornbury – Alveston - Almondsbury– Willow Brook - Harry Stoke - Bristol City Centre - Colston Avenue	Every 30 minutes (05:15 – 00:30)	Every 30 minutes (06:15 – 00:30)	Every 60 minutes (07:40 – 00:30)
First Bristol, Bath & The West	T2	Thornbury - Alveston - Hortham Village - Almondsbury - Patchway - Cribbs Causeway Bus Station - Gypsy Patch Lane - Horfield - Bristol Bus Station	Eight per day (05:40 – 20:40)	Eight per day (06:10 – 20:10)	No service

Source: Traveline South West (<http://www.travelinesw.com/>), Frist Bus and Stagecoach West
 Note: Bus routes and frequencies correct as of February 2022.

3.2.6 **Table 3.2** indicates that the local area is served by a number of bus routes which together provide up to 3 services per hour to Bristol City Centre. Cribbs Causeway is accessed by two bus services, Southmead Hospital is served by one service per hour, and access to Dursley and Chipping Sodbury is every 1.5 – 2 hours during the weekday daytime. Bus services from Thornbury that serve Aztec West and Cribbs Causeway Bus Station provide opportunity to connect to other services to access wider Bristol destinations. Buses can also be used to make internal connections within Thornbury for facilities further away from the site, such as the Leisure Centre.

3.2.7 SGC’s Local Plan Policy PSP11 sets out an appropriate distance to a suitable bus stop and appropriate frequencies for public transport services connecting to destinations containing key services, facilities and employment opportunities. These are:

- Appropriate distance to a bus stop of 400m; and
- Appropriate service of:
 - i. Individual or combined services, total journey time under 1 hour; and
 - ii. at least 5 services a day during the week, 3 at weekends, to and from the destination; and
 - iii. during the week; one service arriving at the destination before 9am, and one leaving after 5pm.

3.2.8 A comparison of **Table 3.2** and **Figure 3.5** against PSP11 highlights the need for an appropriate bus service within 400 metres of the proposed development. The existing T1 service, satisfies the service frequency set out within PSP11, however the nearest stop is at Thornbury Health Centre, c.1,500m from the proposed development.

- 3.2.9 There are two committed bus improvement schemes in Thornbury which have associated infrastructure and public transport commitments. The following commitments are pertinent to the proposed development.
- Bus service extension through the Park Farm development (PT11/1442/O) connecting to the existing highway at Butt Lane and Alexandra Way (see next bullet). The Park Farm Section 106 Agreement listed routes 309/301 and 615 to be routed through the site; these routes have subsequently been amended and are replaced by T1/T2 and 77.
 - Construction of a bus only link between the southern boundary of Park Farm and Alexandra Way; secured through a legal agreement between the developers of Park Farm, SGC and relevant landowners (dated 24th March 2015)

Local Transport Plan Proposed Bus Improvements

- 3.2.10 SGC, and more recent West of England Combined Authority (WECA) transport policy laid out in the Joint Local Transport Plan for the West of England, continues to promote substantial improvements to the level of service for public transport (and walking and cycling) on the A38 corridor between Thornbury and Almondsbury. Beyond that point, comprehensive bus priority measures already exist to the south, including along Bradley Stoke Way, along the A38 Gloucester Road and on Highwood Road towards Cribbs Causeway, that form part of the branded MetroBus network.
- 3.2.11 SGC is currently engaged in public consultation about the specific bus priority measures they propose along the A38: (<https://consultations.southglos.gov.uk/gf2.ti/-/1358562/123549573.1/PDF/-/3.%20A38%20Alveston%20to%20M5%20J16.pdf>).
- 3.2.12 This includes:
- Comprehensive and substantial improvements to bus stop infrastructure on all the key bus routes within Thornbury and on the A38 as far as Almondsbury.
 - Bus priority southbound on the approaches to all the busiest junctions on the A38 at Church Lane, Hortham Lane and on the approach to the Almondsbury Interchange.
 - Beyond Almondsbury, further bus priority improvements on Bradley Stoke Way northbound at Patchway Brook, and southbound approaching Savages Wood roundabout, augmenting existing MetroBus infrastructure that is also used by First service T1.
- 3.2.13 These measures will be brought forward with WECA funding, with construction expected to commence in 2024.

- 3.2.14 These interventions would materially assist buses serving this corridor in improving the overall speed and reliability of the bus service offer. It will also allow the relative attractiveness of any service to improve, compared with driving from Thornbury. This would support in turn the development of passenger volumes and help support improved frequencies on this corridor.

Proposed Bus Improvements – Sustainable Travel Link

- 3.2.15 A Sustainable Travel Link will be provided in the south east corner of the proposed development; the closest point of the site to the facilities within Thornbury, as shown on **Drawing 39209-5501-SK25-A**. The Link will provide a bus, pedestrian and cycle only access into the development. The Link will connect the proposed development to adjacent committed development, Park Farm and through this scheme to existing connections in the town.

- 3.2.16 The Sustainable Travel Link comprises a bus only carriageway which is 6.5m in width, to allow for two-way bus movement in the future as appropriate. The design speed of the link is 20mph which is enforced by a priority pinch point.
- 3.2.17 Whilst the bus strategy for the proposals includes for a one-way bus loop, the 6.5 metre corridor is wide enough to allow for two-way bus movement if SGC choose to develop different routes in future.
- 3.2.18 The general alignment, footway, visitor parking spaces and traffic calming along the Sustainable Travel Link have been agreed with SGC highways officers, subject to a Stage 1 Road Safety Audit, which will be undertaken as part of the detailed design process.

Proposed Bus Improvements – Bus Service Extension

- 3.2.19 As set out above, there is a committed bus only link between the southern boundary of Park Farm and Alexandra Way. This has not yet commenced; with the trigger linked to the later stages of development at Park Farm. In this context, two transport strategies have been developed, with and without reliance on the Alexandra Way bus link connection. Whilst the proposed strategy utilises this bus link, the alternative strategy is set out to demonstrate that connectivity is deliverable in the interim until such time that it is delivered.
- 3.2.20 It is unclear at the time of writing exactly which bus service(s) will be extended to serve Park Farm as the routes listed at the time of planning permission (309/301, 615) now go under different route numbers (T1/T2 and 77). From discussions with local bus operator First in June 2018, it is considered that the T1 would be the more appropriate route to extend to Park Farm given its most direct routing to Bristol City Centre.

Proposed Strategy 1 – With the Alexandra Way bus-only link

- 3.2.21 As set out above, bus movement will be facilitated via the Sustainable Travel Link which provides a 6.5m bus-only link connecting into the adjacent Park Farm development. Discussions were held pre- application between Stantec and First as the local bus operator for potential bus improvements within Thornbury, including extending services through the Park Farm site.
- 3.2.22 An agreed financial contribution is proposed to extend the existing T1. The proposed routing is shown at **Figure 3.6**. The proposals are for a one-way bus loop to be formed to include Park Farm and Land West of Park Farm. To allow for any future two way operation if required, 6.5m wide access junctions have been designed, with a 6.5m corridor allowed for within the masterplan. The extension of the T1 service has been discussed with First who agree that this is the best service option for this site.
- 3.2.23 The proposed strategy is for the T1 service to route along Butt Lane and Oldbury Lane, accessing Land West of Park Farm via the western site access on Oldbury Lane. It would then route through the proposed development, exiting via the Sustainable Travel Link, routing through the southern part of Park Farm and the bus link at Alexandra Way. It would operate along Park Road to Gloucester Road to re-join the existing route.
- 3.2.24 The proposed route would mean that part of the Park Farm development will no longer be served in the same way as currently planned, as some of the committed Park Farm route would be bypassed. However, as demonstrated at **Figure 3.6**, bus stops within the combined Park Farm could be relocated such that all of the development would remain within 400m of the proposed route which is the typical desirable distance to a bus stop. This is supported by Local Plan Policy (PSP11).
- 3.2.25 The proposed anti-clockwise routing would also mean a reversal of the direction of the committed service extension to Park Farm. However, we understand from discussions with

First that they would now expect the extension to Park Farm be delivered in an anti-clockwise direction regardless of the proposed development coming forward.

- 3.2.26 The proposed routing will connect future residents of the proposed development with additional key facilities and services dictated by PSP11 i.e. to comparison retail, supermarkets, pharmacies, post office and public houses. This will also provide an alternative sustainable transport option to those facilities which residents will also be able to access via appropriate walking and cycling distances. The service will also provide a direct connection from the proposed site to further retail and employment destinations including Aztec West and Bristol City Centre. From here, there are further routes to other destinations within Bristol and the surrounding areas.
- 3.2.27 Technical Note 39209-5534-TN001 (included at Appendix F of the Updated Transport Assessment) sets out a business case for the extension of bus service T1 to the West of Park Farm site on the basis that a bus-only link is provided between Park Farm and Alexandra Way. The Technical Note:
- summarises the discussions held with local bus operators and South Gloucestershire Council;
 - considers the operational implications of a scenario where service T1 is extended into both the Park Farm and West of Park Farm developments; and
 - considers the financial implications of this scenario to inform a potential Section 106 obligation.
- 3.2.28 The Technical Note concludes that the proposed development could add an additional 650m of route length and additional journey time of two minutes which could be accommodated within any service extension to Park Farm. Therefore, no further contributions are required to make the service sustainable.
- 3.2.29 It also concludes that revenue from Park Farm is demonstrated to be insufficient to secure commercial viability in isolation, meaning that Park Farm could be left with no bus service in the longer term if development at the Appeal site does not come forward. However, revenue from the combined developments would be sufficient to fund the additional vehicle required to serve both sites in the long term, securing commercial viability of a frequent bus service to this area of Thornbury in the longer term.
- 3.2.30 In line with SGC's Local Plan Policy PSP11 new bus stops will be provided so that each part of the development is within 400m of the service. The bus stops will also meet the Council's adopted Bus Shelter Design and Procurement Process protocol.

Alternative Strategy 2 – Without the Alexandra Way bus-only link

- 3.2.31 The Sustainable Travel Link will be provided connecting to the Park Farm site as in Proposed Strategy 1. However, it will no longer connect the development to the Alexandra Way development.
- 3.2.32 In this scenario, the agreed financial contribution will be provided to extend the T1, with a proposed routing shown at **Figure 3.7**. The proposed route would be along Butt Lane and Oldbury Lane, accessing Land West of Park Farm via the western site access on Oldbury Lane. It would then route through the proposed development, exiting via the Sustainable Travel Link, routing through the northern part of Park Farm and re-join the Park Farm routing at Butt Lane.
- 3.2.33 As in Proposed Strategy 1, in line with SGC's Local Plan Policy PSP11 new bus stops will be provided so that each part of the development is within 400m of the service. The bus stops will also meet the Council's adopted Bus Shelter Design and Procurement Process protocol.

- 3.2.34 All other elements of the Strategy would be the same as in Proposed Strategy 1.
- 3.2.35 Whilst it is understood that SGC are committed to delivery of the bus link to Alexandra Way, SGC highway officers requested that an alternative business case was prepared should the bus-only link not come forward. This is set out in Technical Note 39209-5534-TN002 (included at Appendix G of the Updated Transport Assessment).
- 3.2.36 This Technical Note concludes that, in the event that the Alexandra Way link does not come forward, the proposed development site is necessary to promote the long-term sustainability of the already consented Park Farm site bus service. The revenue expected to be accrued from the Park Farm development alone is insufficient to provide for long-term commercial viability of the extended bus route. However, the relatively short extension to this through West of Park Farm will result in substantial additional patronage ensuring the combined development can be served by a viable extension to the T1 route.

Alternative Strategy 2 – Without the Alexandra Way bus-only link

- 3.2.37 Should, for whatever reason, it was decided by SGC that buses couldn't run through Park Farm, the appeal site can still separately be served by the extension of the T1. This would enter at one of the proposed access junctions with Oldbury Lane, circulating through the site, and exiting at the other, with little commercial prejudice compared with entering Park Farm.
- 3.2.38 Such an arrangement would also provide a bus service to Park Farm, albeit indirectly, as the proposed sustainable travel link between the two developments would enable Park Farm residents to walk to the bus stops on the Appeal site. Most Park Farm plots could be expected to be within about 500m of stops within the appeal site.

Recent Consultation with Bus Operators

- 3.2.39 In order to inform this up-to-date Statement, Stantec have approached both First and Stagecoach, as the predominant operators in Thornbury, to confirm their latest position and agreement to the public transport strategy proposed.
- 3.2.40 Unfortunately, despite best efforts, we have been unable to make contact with First. However, their in principle agreement to the strategy was obtained at the pre-application stage and reported within the Updated Transport Assessment.
- 3.2.41 Stagecoach have reviewed the strategy and have set out their informed industry views in a letter, included at **Appendix B** of this Statement. Stagecoach have confirmed their agreement to the key conclusions set out above, whilst also advising that other options exist for servicing both sites (only enabled by development at the Appeal site) that they would be happy to explore further with SGC.

Benefits to the Community

- 3.2.42 As noted above, due to the uncertainties over the delivery of the committed Alexander Way bus link, and the fact that revenue from Park Farm is demonstrated to be insufficient to secure commercial viability of a bus service in isolation, development at the Appeal site is necessary to secure a commercially viable bus service to serve a large number of existing residents in this part of the town.
- 3.2.43 This is acknowledged within the Officers Report (Para 5.69) which states that:

“The bus service is a wider benefit beyond the development”.

- 3.2.44 In addition to the bus service extension, a financial contribution is agreed to be provided for improved waiting facilities for bus passengers in the centre of Thornbury in line with the locally identified need, as set out within SGC's PSP Plan Appendix 3 'Thornbury'.
- 3.2.45 The contribution is for the provision of an improved bus shelter on Rock Street and new shelter/improved facilities on the High Street bus stop. These facilities would include bus timetables and real time information. These facilities would not only make the overall bus use more attractive for residents of the proposed development travelling to and from the town centre, but also existing residents and visitors to Thornbury, reducing reliance on the private car.
- 3.2.46 Furthermore, SGC are currently consulting on Local Transport Plan bus, walking and cycling improvements along the A38 corridor between Thornbury and Almondsbury. Additional development at Thornbury, and improvements to town centre waiting facilities would be expected to result in increased patronage for services and thereby increase the viability of this new strategic infrastructure.

Rail

- 3.2.47 There are several Rail Stations located near to the site. Bristol Parkway Station is located 12km south of the site, the rail station can be accessed by bus service 10 from Park Road, which provides direct access to the Rail Station and connections to destinations further afield. Rail services at the Station are provided by Great Western Railway who provide most of the services available. Services are provided to a wide variety of destinations including London Paddington, Plymouth, Aberdeen, Cardiff, Manchester and a range of local destinations.
- 3.2.48 In addition, Yate and Pilning are located c.11km to south east and south west of the site, respectively. Yate Rail Station can be accessed by bus service 622 from Park Road, which provides access to Yate town centre, within a short walk of the Rail Station. Rail services at Yate Rail Station are provided by Great Western Railway. Services from Yate Rail Station are provided to a wide variety of destinations including Weymouth, Westbury, Bath, Bristol Temple Meads, Gloucester, Brighton and Frome.
- 3.2.49 Yate Station also forms part of the WECA ambition to provide improved rail service frequency as part of their MetroWest rail service. This will see a half hourly frequency between Gloucester and Bristol Temple Meads delivered by 2024.

3.3 Travel Plan

- 3.3.1 A Framework Travel Plan (FTP) has been submitted to support the Planning Application. The FTP includes measures, incentives, targets and management details designed to promote sustainable travel to and from the site and reduce the number of single occupancy vehicle journeys.
- 3.3.2 SGC have confirmed within the Officers Report that the Travel Plan and financial contributions have been assessed by officers and are considered acceptable.

Benefits to the Community

- 3.3.3 The Travel Plan includes measures that will also benefit existing nearby residents. As well as the bus, walking and cycling improvements set out above, the Travel Plan also commits to the funding of a car club to be established at the site. This car club vehicle would also be available to other nearby residents, reducing their reliance on the private car.

4 Third Party Comments

4.1 Introduction

4.1.1 Having reviewed the comments on the application through the three separate outline planning consultation stages, and the Appeal consultation, it is considered that the relevant comments received can be summarised as follows:

- i Concerns over the volume of additional traffic generated by the proposed development, with references to between 600 and 1,200 additional vehicles on the local roads.
- ii Lack of cumulative assessment of infrastructure requirements in Thornbury, with specific reference to traffic impacts upon the local road network, including the Butt Lane / Gloucester Road junction, the A38 and M5 Junction 14.
- iii Highway safety concerns, in particular along Butt Lane / Oldbury Lane and the two proposed access junctions on Oldbury Lane.
- iv Concerns over use of Buttercup Road / Barley Fields by private vehicles.
- v The development is not considered accessible, resulting in private car use.
- vi Concerns over parking within the town centre.
- vii Concerns over lack of bus service provision, or commercial viability of proposed extension.

4.1.2 This section of the Transport Statement seeks to respond to each of these in turn, referencing where this has been set out within this Statement, or within the outline planning application submission.

4.2 Response to Concerns Raised by Third Parties

Concerns over the volume of additional traffic generated by the proposed development, with references to between 600 and 1,200 additional vehicles on the local roads.

4.2.1 The predicted level of traffic that will be generated by the proposed development is set out within Section 6 (Development Travel Demand) of the Updated Transport Assessment (January 2020).

4.2.2 The residential vehicular trip rate for the development has been based on a survey undertaken by SGC at Otter Way. It was agreed with SGC at the application scoping stage that this would present an accurate proxy for the proposed development. This is a cul-de-sac consisting of 44 residential dwellings, located off Badger Road, near to the proposed development. The observed trip rates are set out within Table 6.1 of the Updated Transport Assessment.

4.2.3 This has been discounted to take account of the reduction (internalisation) in trips associated with the proposed primary school at the development. However, despite the fact that further internalisation of trips can be expected from the proposed on-site local retail and community hub, no further trip reductions have been made.

4.2.4 Furthermore, the proposed development is supported by an agreed Travel Plan, which aims at reducing vehicular trips from the development and sets targets for modal shift away from the private car. However, these anticipated trip reductions (10% reduction in vehicular trips) have

not been included within the assessment. Therefore, the predicted level of traffic generation set out within the Updated Transport Assessment can be considered robust and presents a higher number of trips than would be expected.

- 4.2.5 The resulting vehicle trips calculated for the 595 dwellings are set out within Table 6.5 of the Updated Transport Assessment, and presented below as Table 4.1:

Table 4.1: Land West of Park Farm Vehicle Trips – 595 Dwellings (Table 6.5 within Updated Transport Assessment)

	IN	OUT	2-way
AM	51	291	342
PM	276	66	341

- 4.2.6 It should also be noted that the assessment of development impacts across the road network, set out within Section 7 of the Updated Transport Assessment, did not take account of the reduction in the number of proposed dwellings, from 630 to 595. This would otherwise have included a further reduction of 45 and 31 vehicular trips, during the AM and PM peaks, respectively.
- 4.2.7 Taking all of the above into account, it can be considered that the proposed development will generate in the order of 300 additional vehicle trips during each of the peak periods. These trips dissipate across the local road network, as set out within Figures 6.14 and 6.15 of the Updated Transport Assessment.
- 4.2.8 The traffic generation, assignment across the road network, and subsequent impact assessment has been agreed with SGC (see Para 5.63 of the Officers Report) and National Highways (see Statement of Common Ground).

Lack of cumulative assessment of infrastructure requirements in Thornbury, with specific reference to traffic impacts upon the local road network, including the Butt Lane / Gloucester Road junction, the A38 and M5 Junction 14.

- 4.2.9 The Updated Transport Assessment included a cumulative assessment of traffic impacts resulting from committed developments at the time of assessment as well as that of the proposed development. This included Park Farm (500 dwellings), Moreton Way (300 dwellings), Post Farm (125 dwellings), West of Gloucester Road (130 dwellings) and Moreton Way / Grovesend Road (350 dwellings and 70 sheltered units). Further details are set out within Section 3.9 of the Updated Transport Assessment.
- 4.2.10 Sections 7, 8 and 9 of the Updated Transport Assessment set out the assessment of development impacts across the local and strategic road network and identify where mitigation is required (see Section 2.2 of this Statement).
- 4.2.11 Improvements to junctions are proposed across the network, including the Butt Lane / Gloucester Road junction, junctions along the A38 and at M5 Junction 14. These improvements have been subject to a Stage 1 Road Safety Audit, and agreed with SGC, as well as National Highways for M5 Junction 14.
- 4.2.12 SGC confirm, at Para 5.68 of the Committee Report, that:

“The submitted Transport information demonstrates that the impact of the development on the surrounding highway network can be mitigated by improvements secured via s106 Agreement.”

Highway safety concerns, in particular along Butt Lane / Oldbury Lane and the two proposed access junctions on Oldbury Lane.

- 4.2.13 Section 2.1 of this Transport Statement sets out the assessment of existing highway safety across the local and strategic road network. The analysis demonstrated that there is no pattern of highway safety issues on the local road network within the study area and that additional development traffic is not therefore anticipated to present a safety risk on the local road network.
- 4.2.14 The proposed development does however propose changes to the local road network along Oldbury Lane and Butt Lane, as set out in Section 2.2 of this Transport Statement, namely:
- i Development Accesses on Oldbury Lane.
 - ii Oldbury Lane Speed Limit Reduction.
 - iii Oldbury Lane / Butt Lane localised widening.
- 4.2.15 As well as providing safe access to the proposed development, these highway improvements offer safety benefits over the existing situation, with reduced vehicular speeds, improved street lighting and widening to allow for two-way movement of HGV's using these roads to / from Oldbury and the power station.
- 4.2.16 The proposed access junctions and improvements to Oldbury Lane / Butt Lane (as well as other proposed improvements across the network) have been subject to a Stage 1 Road Safety Audit and agreed with SGC.

Concerns over use of Buttercup Road / Barley Fields by private vehicles and buses

- 4.2.17 The proposed Sustainable Travel Link connection to Buttercup Road is for buses, pedestrians and cyclists only, with private vehicles prohibited. A bus gate controlled by a camera and CCTV will ensure the link is not used by general traffic. This link and the control measures will be secured by the s106 Agreement.
- 4.2.18 The proposed development will not therefore increase the number of private vehicles within Park Farm.
- 4.2.19 In addition, whilst the proposed public transport strategy allows for the extension of the committed bus service through Park Farm (see Section 3.2 of this Transport Statement), should it be decided by SGC that buses shouldn't run through Park Farm, the appeal site can still separately be served by the extension of the T1 service. This would enter at one of the proposed access junctions with Oldbury Lane, circulating through the site, and exiting at the other.
- 4.2.20 Such an arrangement would also provide a bus service to Park Farm, albeit indirectly, as the proposed sustainable travel link between the two developments would enable Park Farm residents to walk to the bus stops on the Appeal site.

The development is not considered accessible, resulting in private car use

4.2.21 This concern has been addressed in detail within Section 3 of this Transport Statement.

Concerns over parking within the town centre

4.2.22 This matter was discussed and agreed with SGC at the time of the outline planning application.

4.2.23 The appellants for Cleve Park undertook a survey of town centre car parking in 2016 as part of their Transport Assessment. This found that available capacity ranged between 8.6% and 40% (Fri-Sat), depending on the car park location. This is set out in that application's Committee Report, which also subsequently confirms that SGC's transportation officer concludes that there is sufficient capacity and that, alongside Sustainable Transport Measures, there is not an issue in terms of town car parking capacity. The minutes of the DM Committee also indicates that Thornbury Town Council would be in receipt of Community Infrastructure Levy funds that could be potentially spent on a parking review.

4.2.24 It was also noted that the Statement of Common Ground between SGC and Bovis Homes for Land South of Gloucester Road Appeal confirms that:

"There is no planning policy requirement to provide additional car parking in the town centre to accommodate any demand which may arise from the Appeal site" (#2.32)

4.2.25 As demonstrated in the Updated Transport Assessment for this Appeal site, the development will provide on-site retail provision, is within walking and cycling distance of the town centre, provides a public transport strategy to connect to the town centre and Travel Plan to encourage travel by non-car modes.

4.2.26 Based on the above, it was agreed that there is not a requirement for development to contribute towards car parking capacity in the town centre. Indeed, it was considered that such a measure would be contrary to the sustainable transport strategy and potentially undermine the efforts made to encourage sustainable travel from the site to the town centre.

4.2.27 Therefore, a financial contribution towards cycle parking and enhanced bus stops within the town centre are proposed, in accordance with the SGC Policies, Sites and Places DPD.

4.2.28 The Officers Report confirms at Para 5.61 that:

"The provision of the bus service within the development will allow residents to reach services and facilities provided within the centre of Thornbury making the development compliant with Policy PSP11 and supported by paragraph 110 of the NPPF."

Concerns over lack of bus service provision, or commercial viability of proposed extension

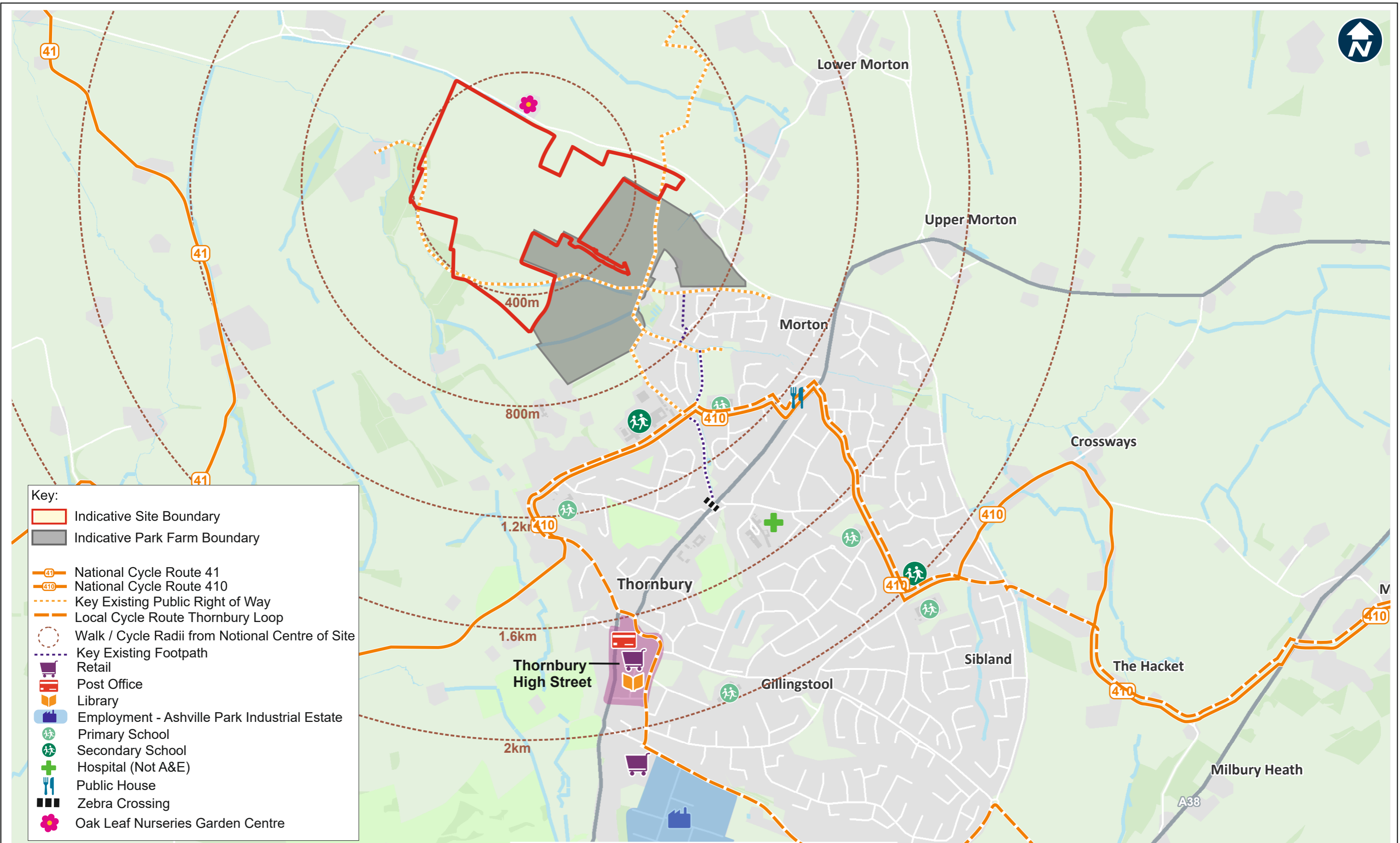
4.2.29 This concern has been addressed in detail within Section 3.2 of this Transport Statement.

4.2.30 In particular, it is noted that Park Farm is not currently served by bus due to issues over access and delivery of the committed Alexandra Way link.

4.2.31 Notwithstanding this, revenue from Park Farm has been demonstrated to be insufficient to secure commercial viability in isolation, meaning that Park Farm could be left with no bus service in the longer term if development at the Appeal site does not come forward.

- 4.2.32 However, revenue from the combined developments would be sufficient to fund the additional vehicle required to serve both sites with a half hourly service in the long term, securing commercial viability of a frequent bus service to this area of Thornbury in the longer term.

Figures



LAND WEST OF PARK FARM, BUTT LANE, THORNBURY, BRISTOL, SOUTH GLOUCESTERSHIRE

STATEMENT COVERING TRANSPORTATION AND HIGHWAY MATTERS

PLANNING INSPECTORATE REFERENCE: APP/P0119/W/21/3288019

FIGURE 3.1: EXISTING WALKING AND CYCLING PROVISION

Mark	Revision	Drawn	Date	Chkd
Date	08/06/2018			
Scale	A3 - N.T.S			
Drawn by	AA			
Checked by	Jsa			

FIGURE 3.1

A



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- Key:
- Indicative Site Boundary
 - Indicative Park Farm Boundary
 - Public Right of Way
 - Adopted Footpath
 - Location and Direction of Photo
 - Secondary School
 - Existing Footway (1.5m - 2.0m wide)
 - Walking Route to Schools
 - Primary School
 - Point of Furthest Residential Dwelling
 - Point of Closest Residential Dwelling