

Land West of Park Farm, Butt Lane, Thornbury,

Bristol, South Gloucestershire

**Statement of Common Ground with South Gloucestershire Council**

**Covering Transportation and Highway Matters**

**Planning Inspectorate Reference: APP/P0119/W/21/3288019**

**LPA Reference: PT18/6450/O**

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

Project Ref: 332310513 | Rev: Final Agreed | Date: March 2022

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

**Document Control Sheet**

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### Report Title: Statement of Common Ground with South Gloucestershire Council Covering Transportation and Highway Matters

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| **For and on behalf of Stantec UK Limited** | | | | |

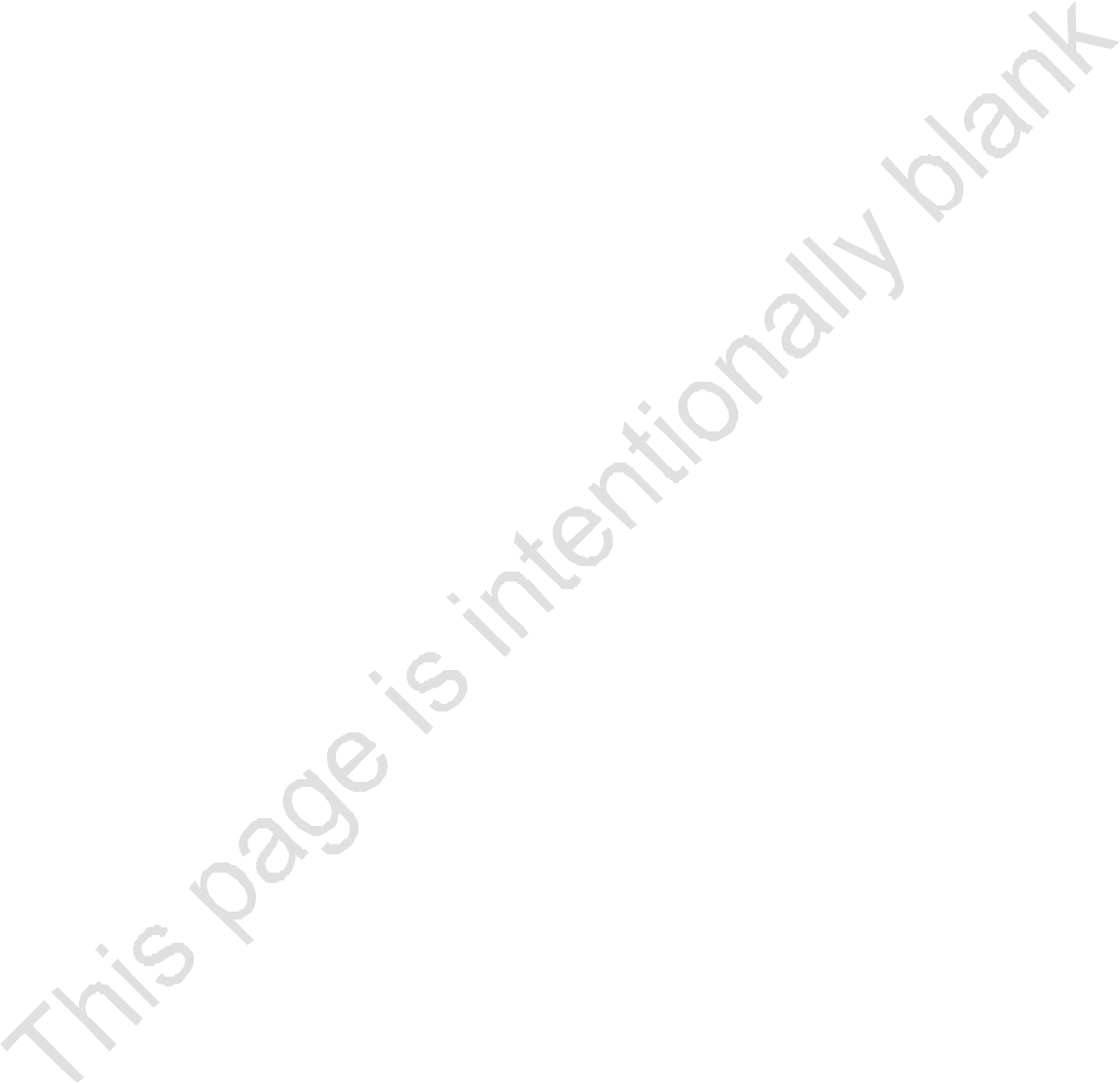
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**Appendix A** SGC Measured Distances



# Statement of Common Ground

This Statement of Common Ground (SoCG) has been prepared by Stantec UK Limited (Stantec) on behalf of Barwood Development Securities Ltd and North West Thornbury Consortium (the Appellant) and presents a summary of key agreed facts drawn from the Transport Assessment (December 2019, updated January 2020), Updated Transport Assessment Chapter 3 (January 2021), Framework Travel Plan (Rev G, January 2021) and subsequent post-application works undertaken in support of planning application Ref: PT18/6450/O, including the following:

* + - Stantec Technical Note ‘39209/007 – Response to SGC Comments dated 2nd April 2020’ (dated April 2020)
    - Stantec ‘Butt Lane / Gloucester Road / Morton Way Stage 1 Road Safety Audit Response Report’, dated 12th August 2020
    - Stantec ‘M5 Junction 14 and A38 / B4509 Signalised Junction Stage 1 Road Safety Audit Response Report’, dated 2nd September 2020.

This SoCG is based upon the Statement of Neil Thorne, which was appended to the appellant’s proof of evidence. This SoCG does not reference the detail of matters agreed in the separate National Highways SoCG and it provides an explanation of how the parties differ in respect of accessibility distances.

The key facts and findings set out within this SoCG have been agreed with South Gloucestershire Council, herein abbreviated as SGC.

We can confirm that this statement represents common ground between the parties.

|  |  |  |
| --- | --- | --- |
|  |  | *Christopher Rose* |

Neil Thorne Chris Rose

Stantec UK Limited South Gloucestershire Council

# Summary and Conclusions

* + 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. 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 Conditioned and s106 mitigation measures, have been agreed with SGC and National Highways, as set out within the separate agreed Statements of Common Ground.
    2. It is agreed that the development proposals meet the national Policy requirements, as set out in the NPPF (Paras 110 to 113), in that:
       1. appropriate opportunities to promote sustainable transport modes are taken up, given the type of development and its location;
       2. safe and suitable access to the site can be achieved for all users;
       3. the design of streets, parking areas, other transport elements and the content of associated standards, as set out in the agreed Design and Access Statement, reflects current national guidance, including the National Design Guide and the National Model Design Code 46; and
       4. any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
    3. Within this context, the application:
       1. gives priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second facilitates access to high quality public transport, with layouts that maximise the catchment area for bus services, and appropriate facilities that encourage public transport use;
       2. addresses the needs of people with disabilities and reduced mobility in relation to all modes of transport;
       3. creates places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoids unnecessary street clutter, and responds to local character and design standards;
       4. allows for the efficient delivery of goods, and access by service and emergency vehicles; and
       5. is designed, with appropriate conditions in place, to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.
    4. The proposals provide a travel plan, and a transport assessment so that the likely impacts of the proposal can be assessed.
    5. The proposed development does not create an unacceptable impact on highway safety, and the residual cumulative impacts on the road network are not severe. Development should therefore not be prevented or refused on highways grounds.
    6. It is also agreed that the development proposals meet the Local Policy requirements, as set out in the South Gloucestershire Local Plan Core Strategy (December 2013, Policy CS8) and South Gloucestershire Local Plan: Policies, Sites and Places Plan (November 2017, Policy PSP11).
    7. Subject to the agreed mitigation, SGC therefore agree that there are no transport related matters which would prevent planning consent being granted.

# Highway Safety

## Existing Situation

* + 1. The Updated Transport Assessment sets out the analysis of Personal Injury Collision (PIC) data at Section 3.8.
    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.
    3. Overall the PIC analysis has demonstrated that there is no pattern of highway safety issues on the local road network within the study area.
    4. Additional development traffic within the study area is not therefore anticipated to present a safety risk on the local road network.
    5. 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.

## Proposed Highway Improvements

* + 1. The Updated Transport Assessment and submitted Appeal documents set out details of agreed improvements to both the local and strategic road network, to be secured through Conditions. These improvements are agreed as necessary to provide safe and suitable access, to accommodate the additional traffic generated by the development, and to facilitate sustainable access. These include:
       1. **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.
       2. **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.
       3. **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.
       4. **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**.
       5. **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**.
       6. **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**.
       7. **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. 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.
    3. In addition, it is 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:
       1. **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.
       2. **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**

* + 1. 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. With regards to the M5 J14 improvements, this is 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*”.

* + 1. 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.

# Accessibility

## Local Facilities and Amenities: Walking and Cycling

* + 1. Thornbury is a busy market town. **Figure 3.1** within the Stantec ‘Statement Covering Transportation and Highway Matters’ (February 2022). 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.
    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. 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.

**Walking Distances Guidance**

* + 1. **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, as measured by Stantec, is provided for comparison.

Table 3.1: Proximity to key service and facilities – Stantec Measurements

|  |  |  |  |
| --- | --- | --- | --- |
| 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)  \*Potential on-site provision | 2,680 metres to edge of Town Centre (34 min walk, 8 min cycle)  \*Potential on-site provision |
| (Weekly) Superstore or supermarket |
| (Day to Day) Smaller food (convenience) shops |

|  |  |  |  |
| --- | --- | --- | --- |
| 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) |
| Local health services | 800 metres | 1,485 metres to Thornbury Health Centre (19 min walk, 5 min cycle)  \*Potential on-site provision | 2,250 metres to Thornbury Health Centre (28 min walk, 7 min cycle)  \*Potential on-site provision |
| Pharmacy | 800 metres | 1,670 metres  (Eastland Road) (21 min walk, 5 min cycle)  \*Potential on-site provision | 2,440 metres  (Eastland Road) (31 min walk, 8 min cycle)  \*Potential on-site provision |
| Community Centre | 800 metres | 1,865 metres (23 min walk, 6 min cycle)  \*Potential on-site provision | 2,635 metres (33 min walk, 8 min cycle)  \*Potential on-site provision |
| Post office | 800 metres | 1,910 metres (24 min walk, 6 min cycle)  \*Potential on-site provision | 2,680 metres (34 min walk, 8 min cycle)  \*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   * 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   * Manorbrook Primary school | 2 miles  (3,219  metres) | 1012 metres (13 min walk, 3 min cycle)  \*On site provision | 1,780 metres (22 min walk, 6 min cycle)  \*On site provision |
| Major employers. Designated Town Centres and Safeguarded Employment Areas (CS12 of Core Strategy)   * 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. As set out within the SGC Officers Report (at Para 5.50), SGC have undertaken their own review of the actual walking and cycling distances. This is included at **Appendix A**. Whilst there are some minor differences in the measured distances to key facilities between those measured by the Appellant and SGC, these are not significant.

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

* + 1. 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.
    2. Manual for Streets (MfS) 2007 provides guidance on this issue, at Paragraph 4.4.1, which 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.*”

* + 1. 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.
    2. 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. 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.
    4. 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.
    5. 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*.”

* + 1. 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.*”

* + 1. 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 complaint in terms of policy PSP11, particularly taking account of the similarity with the distances from the development at Park Farm to local facilities.*”

**Micromobility**

* + 1. 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**

* + 1. 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*”.

* + 1. 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.
    2. 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. 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.
    4. 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.
    5. 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.

* + 1. 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.
    2. 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** within the Stantec ‘Statement Covering Transportation and Highway Matters’ (February 2022). 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**

* + 1. 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.
    2. 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. 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**

* + 1. 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.
    2. 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. 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.
  1. **Public Transport Accessibility Existing Bus Network**
     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.
  + 1. 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.
    2. 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. 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.
    4. The bus services operating in the vicinity of the site are summarised in **Table 3.2** below and shown in **Figure 3.5** within the Stantec ‘Statement Covering Transportation and Highway Matters’ (February 2022).

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) |
| 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.

* + 1. **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.
    2. 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:
  + - 1. Individual or combined services, total journey time under 1 hour; and
      2. at least 5 services a day during the week, 3 at weekends, to and from the destination; and
      3. during the week; one service arriving at the destination before 9am, and one leaving after 5pm.
    1. 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.
    2. 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**

* + 1. 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.
    2. 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/-](https://consultations.southglos.gov.uk/gf2.ti/-/1358562/123549573.1/PDF/-/3.%20A38%20Alveston%20to%20M5%20J16.pdf)

[/1358562/123549573.1/PDF/-/3.%20A38%20Alveston%20to%20M5%20J16.pdf](https://consultations.southglos.gov.uk/gf2.ti/-/1358562/123549573.1/PDF/-/3.%20A38%20Alveston%20to%20M5%20J16.pdf)).

* + 1. 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.
  + 1. These measures will be brought forward with WECA funding, with construction expected to commence in 2024.
    2. 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**

* + 1. 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.
    2. 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. 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.
    4. 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**

* + 1. 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.
    2. 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

* + 1. 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.
    2. An agreed financial contribution is proposed to extend the existing T1. The proposed routing is shown at **Figure 3.6** within the Stantec ‘Statement Covering Transportation and Highway Matters’ (February 2022). 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. 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.

* + 1. 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).
    2. 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. 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.
    4. 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.
  + 1. 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.
    2. 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. 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

* + 1. 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.
    2. In this scenario, the agreed financial contribution will be provided to extend the T1, with a proposed routing shown at **Figure 3.7** within the Stantec ‘Statement Covering Transportation and Highway Matters’ (February 2022). 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. 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.
    4. All other elements of the Strategy would be the same as in Proposed Strategy 1.
    5. 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).
    6. 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.

**Benefits to the Community**

* + 1. 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.
    2. This is acknowledged within the Officers Report (Para 5.69) which states that: “*The bus service is a wider benefit beyond the development*”.
    3. 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’.
    4. 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.
    5. 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**

* + 1. 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.
    2. 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. 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.

## Travel Plan

* + 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.
    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**

* + 1. 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.

# Third Party Comments

## Introduction

* + 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:

1. 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.
2. 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.
3. Highway safety concerns, in particular along Butt Lane / Oldbury Lane and the two proposed access junctions on Oldbury Lane.
4. Concerns over use of Buttercup Road / Barley Fields by private vehicles.
5. 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.

* + 1. This section of the SoCG responds to each of these in turn, referencing where this has been set out within the Stantec ‘Statement Covering Transportation and Highway Matters’ (February 2022), or within the outline planning application submission.

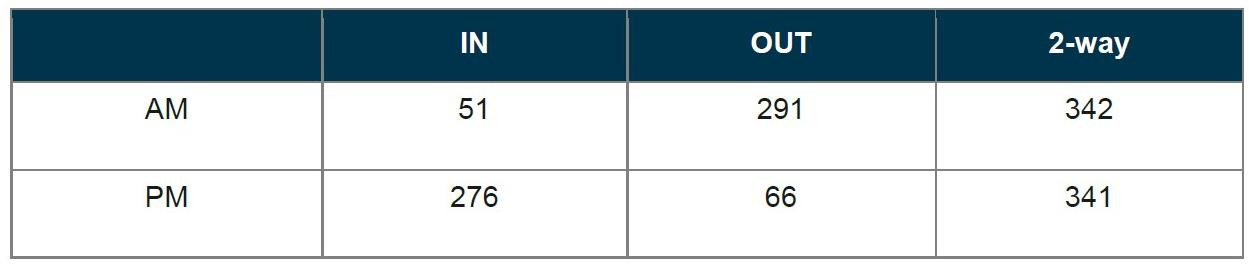
## Response to Concerns Raised by Third Parties

## 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.

* + 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).
    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.
    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. 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 considered robust and presents a higher number of trips than would be expected.

* + 1. 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)

* + 1. 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.
    2. 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.
    3. The traffic generation, assignment across the road network, and subsequent impact assessment has been agreed with SGC and National Highways (see separate Statement of Common Ground with National Highways).

**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.**

* + 1. 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.
    2. 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).
    3. 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. 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.**

* + 1. Section 2.1 of the Stantec ‘Statement Covering Transportation and Highway Matters’ (February 2022)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.
    2. 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 SoCG, namely:

i Development Accesses on Oldbury Lane. ii Oldbury Lane Speed Limit Reduction.

iii Oldbury Lane / Butt Lane localised widening.

* + 1. 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.
    2. 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**

* + 1. 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.
    2. The proposed development will not therefore increase the number of private vehicles within Park Farm.

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

* + 1. This concern has been addressed in detail within Section 3 of the Stantec ‘Statement Covering Transportation and Highway Matters’ (February 2022).

**Concerns over parking within the town centre**

* + 1. This matter was discussed and agreed with SGC at the time of the outline planning application.
    2. 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.

* + 1. 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)

* + 1. 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.
    2. 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.
    3. 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. 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**

* + 1. This concern has been addressed in detail within Section 3.2 of this SoCG.
    2. 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.
    3. 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. 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.

**Appendix A SGC Measured Distances**

