

# Appendix - Additional Representations

**New Local Plan Strategic Development Locations  
Consultation Report – SECTION 4**



*Mark Pearson (Design Action) – 6th Feb 2018*

## **Further comments to the SDL Events**

As well as the Exhibition and Workshop Events regarding the Strategic Development Locations at Charfield, Coalpit Heath, Thornbury, Yate & Chipping Sodbury and Charfield, the Council invited attendees to email further comments following the events. Below is the compiled list of comments received in order of Strategic Development Location.

## **1. Charfield**

I attended the planning event in charfield on Wednesday 20/9/17 , however I was stuck by Lack of attendance by children and young people .

I have to say that it was totally not a young person friendly environment.

These young people represent the future of the local are and while it is important that everyone has there say you appear to be missing their views .

You need to address this and think about how to involve them , social media might be an option , addressing them through school however you need to remember that these young people travel all over Gloucestershire south Gloucestershire and bristol for education and higher education.

I feel it is very important that their thought opinions and voice is recorded . It is not appropriate for the older members of the community to assume they know what young people want and feel they need .

Thank you for your time and I hope you address this matter .

## 2. Charfield

### SOUTH GLOUCESTERSHIRE LOCAL PLAN

#### CHARFIELD AS A STRATEGIC DEVELOPMENT LOCATION

##### Introduction

1. I attended the consultation at Charfield Memorial Hall on 20 September concerning the future of Charfield in the context of the proposed new Local Plan. Last year I went to a consultation on the Joint Spatial Plan (JSP) at Falfield Village Hall and submitted comments on the documents “Towards the Emerging Spatial Strategy Document” (ESSD) and “Transport Summary Document” (TSD), both dated November 2016. I explained why some of the development proposals were not convincingly supported by arguments in the documents. In more detail I examined the rationale for including up to 1,000 houses at Charfield. I arrived at nine conclusions about the JSP, of which three related to Charfield in particular. They were:
  - g) The problems caused by the haphazard development at Charfield over the last 50 years would be exacerbated and not solved by the addition of another 1,000 dwellings.
  - h) To solve Charfield’s problems and provide the necessary infrastructure, a much larger allocation of dwellings would be required.
  - i) In the absence of a feasibility study for a bypass and large expansion of Charfield, and at least a draft town plan, the village should not be designated as a strategic development location in the JSP.
2. I appreciate that South Gloucestershire Council is in a difficult position because the JSP will partly control the locations of development. Consequently the current consultation is severely restricted, avoiding the strategic-level problems of developing Charfield. The restriction substantially reduces the value of the consultation, so that the public are being asked to comment on the basis of a draft ‘Concept Diagram’ in isolation. My concern is that this will lead to a continuation of the planning and development errors that are all too apparent in Charfield, with unconnected housing estates, multiple accesses on to B4058 Wotton Road, transport problems, lack of facilities and no village centre.

##### Housing Locations

3. When considering the northern part of South Gloucestershire in the Local Plan, the Council will have to liaise with Stroud District Council and Gloucestershire County Council about meeting housing need and providing the necessary infrastructure. **Wotton-under-Edge, Dursley and Cam** have facilities to support new development. **Berkeley** has unfortunately lost facilities and desperately needs development to rejuvenate the historic town. Then there is enormous potential to expand **Sharpness**. Because they lie on A38, the villages of **Stone** and **Newport** are also better placed for development than South Gloucestershire villages like Charfield, Wickwar and Cromhall.

4. Charfield has been developed over the last 50 years from a small settlement. The Manor Lane or “Willows” development of around 50 years ago included four shop units, two of which are now combined into a general store and post office local, one is a hairdresser’s and one is about to open as a hot food shop. There are three public houses and a petrol station.
5. Since the Manor Lane development, there have been significant residential developments at Woodlands Road, Longs View and on the vestige of Charfield Green behind the chapel. A development of 106 houses is now under construction south of Wotton Road at the eastern extremity of the village and another of 64 north of Wotton Road near the school. These developments are piecemeal, not well related to existing facilities or to each other. Ten years ago there were about 960 houses in the parish, including outlying hamlets such as Churchend and Huntingford. The current developments and smaller ones already completed will raise this to around 1200, an increase of some 25%. The sub-post office and general store on the main road through the village closed a few years ago and a hairdresser’s has recently been demolished and replaced by a house. There have been no additional facilities.
6. Simply adding 1,000 houses on more sites around the village would exacerbate the disconnected nature of the community. It would not be likely to encourage the provision of primary healthcare facilities. An additional 1,000 dwellings is either too many or too few. It would mean that the village would increase by roughly 130% since 2007 but would be insufficient to fund the necessary facilities. If substantial expansion of the village were intended, there would be a crucial need for a coherent plan to provide or attract facilities properly located to serve the community. Existing facilities are inadequate for such expansion and are also dispersed, so a new village or town centre would be needed.

## **Transport Infrastructure**

7. Charfield is a commuter village, with people travelling by car to work in many different locations. The park & ride proposed on A38 would not be useful for commuters to Bristol, who would continue to use M5 from Junction 14. A weekly shop is likely to be by car to Yate, Thornbury, Cam, Dursley or even Stroud. Figure 5 in ESSD shows Yate to Charfield as a corridor for strategic transport improvement, but this designation reflects only the vision of opening a station at Charfield.
8. In November 1998, Halcrow finalised a study on Charfield Station commissioned by Gloucestershire County Council and South Gloucestershire Council. It identified the preferred location and outlined some of the problems, including funding, parking provision, highway access difficulties, and the railway capacity restraints which precluded a stopping train at peak times. The last problem caused laughter and derision at a public meeting. Many factors have changed in the last 19 years. I understand that train paths might be feasible if speedier rolling stock became available in the future. On the other hand, rail operation might be limited by the lack of capacity at the Westerleigh junction. Furthermore, owing to the increase in traffic, highway problems have become more critical. In short, without a major expansion of Charfield and the provision of infrastructure to support a new town, the opening of a

station is not so much a vision as a fantasy.

9. The B4058 through Charfield is an access route for traffic from the neighbouring parts of Gloucestershire to M5 Junction 14. At quiet times, the main problem is speeding traffic. At busy times there are environmental, traffic flow and safety problems because of the junctions, poor alignment and mixture of village and external traffic including heavy vehicles. Another 1,000 dwellings in Charfield, together with development taking place over the county border, would cause unacceptable conditions. Some junction improvements might be funded by the development, but the practicalities are such that the mitigation would be minor and inadequate.
10. For the above reasons, the proposed 1,000 houses would be far too many for Charfield in its existing form. I hesitate to put a figure on the number of additional dwellings that would be necessary to turn Charfield into a genuine strategic development location, but maybe a minimum of 5,000 would be required. To achieve this number without causing an unacceptable effect on the landscape of the Churchend ridge, part of the expansion would have to be across the border into Stroud District. Associated development and infrastructure would include:
  - a bypass;
  - a new railway station;
  - town centre;
  - employment;
  - recreational areas;
  - schools;
  - primary medical facilities;
11. The bypass (envisioned at least 30 years ago) would be a catalyst for development. It would enable the town to be properly planned, rather than continue the piecemeal development from which the village has suffered. Suitably aligned, it could provide direct access to the new station and parking area. The station site might not be in the 1998 preferred location, thereby releasing the old station yard for possibly town centre/employment/retail uses. The population of around 14,000 would justify the provision of facilities which are unlikely to come with substantially less, including primary medical facilities. In the absence of a feasibility study and draft town plan, Charfield should not be designated as a strategic development location in the JSP.

## Conclusions

12.
  - a) Charfield is inappropriate as a strategic development location for 1,000 dwellings.
  - b) In order to achieve a successful expansion of Charfield, with the provision of coherently designed facilities and necessary transport infrastructure, a much larger expansion of perhaps 5,000 houses would be necessary.

### 3. Charfield

I do appreciate that we do need more houses, which is fine.

The village cannot sustain 1000 more houses due to the lack of infrastructure.

1. There are few jobs in area so everyone will be using the M5. Junction 14 cannot cope now. Traffic lights have to be used at rush times with long queues.
2. One small shop at the moment with limited parking.
3. If the houses go ahead next to Warners Court there will be no area for parking is the station was to be re-opened and the access will be dangerous on the bend near railway bridge.
4. Very few buses for going to and from village.
5. Not enough places in village school.
6. Over-stretched GP surgeries in Wotton-under-edge.
7. Parking is very limited in Wotton at the Moment for us to shop now. With a large influx of people it will not cope.
8. The land behind New Street has flooded several times in the past from the Little Avon.
9. Great Crested Newts have been in my pond in recent months (New St).

## **1. Coalpit Heath**

I wish to object to the planned development in Coalpit Heath for the following reasons` -

This area of land is green belt, and has a wide range of natural hedgerows and wildlife.

Specifically the land around Oakwood Gardens is of particular concern. The fields behind Oakwood Gardens have a number of Deer which roam the various fields.

There seems to be a large Bat population and these can be frequently seen at dusk flying around the fields and hedgerows and local gardens. This bat population will be severely impacted by any development in this area. Therefore I strongly urge that any bat surveys undertaken are done in conjunction with local residents and independent wild life experts.

The hedgerows are full of robins and blue tits. The fields are also home to various birds of prey which need to be protected.

Some of the land to the rear of Oakwood Gardens also as very poor drainage including my own garden. Any work on this and other areas of the proposed site can and will produce a flood risk. There is standing water in the fields which never drains and only disappears through evaporation. This area is currently planned for employment opportunity however this like mean disruption to natural drainage.

History has shown the development of significant urban areas can cause a significant flood risk and it is the existing home owners who will be impacted. Residents of Emerson Green were impacted by poorly planned development on land with poor drainage and this was previously allowed by South Glos council. Experts and the council got this wrong before. Severe flooding only ever occurs through mismanagement of land and poor planning. This led to flooding in some homes and the homeowners left to pick up the pieces.

The council will not have the funds to compensate residents who are impacted by flooding and therefore this will increase Council bills for all residents in the area.



## **2. Colapit Heath**

Feedback Team South Gloucestershire Local Plan Coalpit Heath & Joint Spatial Plan

Having viewed the plans at Coalpit Heath Village Hall on 22 Sept I wish to register my concern at the proposed destruction of green belt land and the village of Coalpit Heath.

What is needed is better road infrastructure and better public transport not thousands more homes and thousands more cars. A cycle track will not alleviate the chaos on the roads.

Lyde Green is already being built to provide homes for those working at Emersons Green, doubling the size of Coalpit Heath is not the right solution.

Hundreds of commuters from Coalpit Heath will not use Yate train station, it will not significantly reduce the congestion.

Coalpit Heath is a beautiful village, with views over wonderful open countryside do not ruin it.

### 3. Coalpit heath

I strongly object to this proposed development at Coalpit Heath for many reasons.

#### Green Belt.

This area of Coalpit Heath is designated as precious Green Belt. The S. Glos Strategic Green Belt Assessment in Dec 2011 stated that “The current Joint Replacement Structure Plan (adopted 2002) sets out the general extent of the current Green Belt. Detailed boundaries are identified in the South Gloucestershire Local Plan(2006). The Structure Plan policy remains relevant in understanding the general extent and the policy seeks to:

- check the unrestrictive sprawl of the Bristol conurbation and Bath;
- assist in safeguarding the surrounding countryside from encroachment;
- prevent neighbouring towns from merging into one another;
- preserve the setting and special character of villages, towns and historic cities; and
- assist in urban regeneration. “

All four of these objectives for the Green Belt continue to apply to these fields in Coalpit Heath.

The assessment continues by stating that “The Green Belt which surrounds and separates Bristol and Bath was broadly established in the mid 1950s, and now covers 47% of the area covered by the West of England authorities.” There is the strong implication from this figure of 47% that our particular Green Belt fields are not important and should be developed because the whole area has already got so much agricultural land, countryside, wildlife, woodland etc. However, our sections of Green Belt are very narrow, and it is very important that there is no encroachment at all on these vital fields. Bristol would expand outwards and the result would be a nightmare of endless, anonymous urban sprawl.

#### Frampton Cotterell and Coalpit Heath Village Design Statement. (VDS)

<http://www.southglos.gov.uk/environment-and-planning/planning/planning-policy/planning-policy-guidance/other-planning-guidance-documents/>

In 2001 we local residents so wished to protect our area that collectively a great deal of effort was made to involve everyone in producing a Village Design Statement, with the help of financial support and advice from South Gloucestershire Council. There were exhibitions, consultations, whole days when groups met in large venues such as Watermore School and the Miners Club hall. Issues were discussed, conclusions written down, maps poured over, a preliminary version drafted, and the Village Design Statement was subsequently endorsed by S. Glos Council as Supplementary Planning Guidance. On page 4 of the VDS is a Summary of the Recommendations and the very first two are that, “The present Green Belt should be maintained intact. Protection of existing green space on the village margins is a high priority.” These two recommendations still apply.

#### Frampton Cotterell and Coalpit Heath Parish Plan (Village Action)

<https://www.southglos.gov.uk/documents/frampton%20cotterell%20parish%20plan.pdf>

Several years later the local residents again worked extremely hard to debate and discuss issues similar to the issues of the Village Design Statement. Once more it was with the help

of financial support and advice from South Gloucestershire Council. In March 2012 the Parish Plan was produced, named Village Action. One of the questions in the consultation document was on page 4 “ Question 5. What do you/your family MOST VALUE about living here?

The total of the ‘valued’ responses was 8256 and the total ‘not important’ responses was 2144

The six features valued by an overwhelming majority of respondents are:

Rural environment (84% of respondents),

Friendly neighbours (82%),

Doctor/ health advice (77%),

Village atmosphere/community spirit (75%)

Local shops (74%)

Character of lanes (72%).

It is not surprising that such aspects of the environment, neighbours and amenities are valued in the village. The fact that convenience for work and local sports is valued by fewer respondents may possibly be partly age-related (see Q19 and also Q15). Every effort should be made to retain and maintain the above aspects that are so valued in Frampton Cotterell and Coalpit Heath. The evidence from this survey should be used in support of these aspects and to combat any threat to them. “

These final comments are now proving to be very prescient and relevant regarding this proposal to build in Coalpit Heath.

#### Heritage Walks Booklet

One of the many useful results from the Parish Plan was that a local resident suggested that a heritage walks booklet would provide information about and awareness of our heritage. Financial support and advice was provided for a third time by South Gloucestershire Council. Local historians combined their knowledge from their research of the area and a Heritage Walks booklet was published.

<http://www.southglos.gov.uk/leisure-and-culture/museums-and-galleries/heritage-walks-and-trails/>

The questionnaire accompanying the Coalpit Heath exhibition has questions such as what do I value, enjoy, which qualities do I like and dislike, about my area? These questions are comprehensively answered in all three publications. I have enjoyed being involved in helping others to produce all of these three because we do so value our unique heritage and environment and have tried to protect them through such means .

My vision for our future is that the communities remain at the same number of residents as they are at the moment, and also remain surrounded by green space. Any huge increase in the size of the population will completely ruin the community spirit, the mental and physical health and well being of residents, and the link between the residents and the natural world.

I consider that our unique heritage of early medieval coal mining in Coalpit Heath, combined with the Scheduled Ancient Monument of Ram Hill Colliery , the horse drawn Dramway leading to the River Avon near Keynsham, the hatting industry, Victorian chapels, school and a windmill tower, and the Woodlands Farm landscape which inspired the world famous author Dick King-Smith , could be considered as worthy of being declared a heritage conservation area.

#### **4. Coalpit Heath**

Comments following Coalpit Heath planning meeting on 22nd September regarding strategic housing and employment development.

Please submit the following comments to the planning office about the proposed development:

1. Appropriateness of the area - considerations needs to be given to the wildlife in the proposed area for development. There are bats, deer and may other wildlife for which studies should be completed to prevent impacting their habitat. Deer and bats are present in the fields the Oakwood Gardens backs onto.
  
2. Extensive new development continues to be undertaken in the area surrounding the Science Park & Enterprise. The proposal for development in Coalpit Heath cites this business park as a reason for development in Coalpit Heath. Lyle Green, which surrounds the Science Park, provides significant new housing and additional employment opportunities. The Science Park is not a valid reason for the development in Coalpit Heath. Lyle Green is more than adequate for this purpose.
  
3. Green space - clearly the proposed development will consume acres and acres of Coalpit Heath's treasured countryside. The proposed plans are not sympathetic enough to the existing residents, particularly in terms of the loss of the outlook across the fields which have boundaries with existing properties. My suggestion is for a wide belt of green space to be maintained along the border with existing properties from Oakwood Gardens to the railway line. This approach will lessen the detrimental impact to existing residents both in terms of their outlook onto the fields and property value. Existing residents have chosen their properties to enjoy the countryside view. This ought to be given due consideration and plans adjusted accordingly.
  
4. Flooding - the flooding risk at the far end of Coalpit Heath, on the border with Mayshill, has been recognised. However, the flooding and water logging extends further than indicated on the map. It is also evident in the field behind Oakwood Gardens where the industrial development is proposed. Areas prone to flooding and water logging should be ring fenced so they are not developmental upon.

If any of the above comments are unclear or if more, on site, local knowledge would help then please do get in touch.

I do object to the scale of the proposed development. It's unprecedented in its size and volume of housing and industrial properties in this area. It's unwelcome in its current proposal. Never before has planning to this percentage of the current dwellings been proposed for Coalpit Heath. There is a good reason for that. This area is a village area. It is not a new town and urban sprawl is not palatable. Some new homes, okay. But not in the hundreds or thousands please.

## **1. Thornbury**

Thornbury has had far too much housing development too quickly in the past few years.

The roads, schools, health and town parking infrastructure is already inadequate, the waiting time for a 'normal' appointment at my GP is five weeks.

Thornbury has recently seen a recent increase in anti social behaviour, vandalism, personal attacks and burglary at the same time as two of our familiar and respected police officers have been taken away.

The A38 is heavily congested at peak times and gridlocked on summer holiday weekends or whenever there is conjection on the the M5.

There is little local employment in Thornbury which adds to the traffic problems.

The new estates are too far from town to walk, and parking is already over stretched so no benefit comes to the town centre when once in the car, people go to Yate, Bradley Stoke or the Mall to shop.

Instead of the quiet, pleasant country town it has been, it is becoming another dormitory suburb of Bristol with too many people who have no affinity with the area.

Buckover GV is too large to be sited so close to Thornbury but too small to be sustainable in the way of shops so again people will be travelling to work and shops.

If a garden village is approved it should be moved further east, the other side of the M5 where it might have a chance of being sustainable and not just be a blot on the skyline.

Please, we've had enough! No more houses around Thornbury!

## 2. Thornbury

I am a Thornbury resident and I attended the above exhibition last Friday. I wish to submit the following comments:

1. The development at Hacket Farm now commonly referred to as Cleeve Park is unsuitable, the planning application was rightly refused by South Glos Council and therefore it should not now be included in your Strategic Plan for Thornbury. To do so suggests that officer's at SGC are still not following the correct, brave and democratic decision by our Council's Planning Committee. Our Town Council and our local MP have also made it perfectly clear that they oppose the plans for Cleeve Park.

2. The Cleeve Park proposal put to the SGC planning committee clearly demonstrated that this site is entirely unsuitable for many reasons. Examples of why the site is unsuitable are as follows:

- The site is constrained by ancient woodland and high voltage cables so that they cannot provide the correct dpa ratio without building dwellings that are far taller than anything else in Thornbury and completely out of keeping with the rural setting.
- The site drains to a level 3 flood zone and as a result development would need flood prevention measures involving some 17 attenuation ponds - a quite absurd amount of flood catchment and hence reduces the land available for buildings even further.
- The site is on land that is considerably higher than the rest of Thornbury and so the impact of very tall buildings will be accentuated further
- The site is adjacent to ancient woodland and the visually significant Severn Ridge that the previous core strategy for Thornbury seeks to protect as significant green infrastructure.
- Infrastructure such as schools, doctors, hospitals, shops are all too far to be accessed on foot so the site promotes the use of cars.

3. The land you have chosen to locate your new employment zone is also entirely unsuitable. It is surrounded by level 3 flood risk land and so flood protection measures will be impossible to accommodate. It is also located far too close to several residential properties and will completely destroy the rural residential amenity enjoyed by these householders. Surely it would be better to extend the existing industrial estate to the south of Thornbury where very few dwellings would be affected.

4. Buckover Garden Village – the proposal to site this huge development so close to Thornbury is quite absurd, not least because:

- It is far too close to Thornbury and will totally overwhelm Thornbury. Thornbury's infrastructure is already over-stretched and the rural countryside between the 2 settlements will become a rat run of traffic, pedestrians and cyclists.
- The plans at the exhibition show new links between Morton Way and Buckover across this rural countryside which will add to this problem and have absolutely no regard for the lovely rural communities that live in this area.
- The green zone drawn in the land between Morton Way and Buckover is obviously there in an attempt to divert concern over this. However the zone has no meaning and will inevitably be filled up with yet more development in the long run and the lovely market town of Thornbury will be destroyed forever.
- The development on the A38 will inevitably cause yet more traffic congestion as traffic approaches and travels through Buckover will be slowed down. This section of the A38 is already a problem area and is especially a big problem when the M5 is shut or heavily congested between jcn 14 and 15. This happens at least once a week throughout the summer and when it does this section of the A38 is a slow moving queue of traffic using the A38 to avoid the M5 nearly always for many hours.

I trust you will take full account of my concerns in preparing the new draft of your local plan for the next round of consultations.

Finally please add me to your consultation data base for both this and the JSP consultations – for some reason I do not appear to be receiving your emails on this and I previously used to. Fortunately a friend told me about your exhibition.



### 3. Thornbury

My husband and I attended this event at the Armstrong Hall on Friday 29 September 2017 and had an 'interesting' conversation with one of your 'Design Team'. In view of the reference to 'good planning' on the handout that I was given, I would like an answer to a number of questions so that I am sure of the accuracy of my feedback to different organisations.

When we asked about transport we were told that there were discussions about re-opening the disused railway station and unused railway line from Thornbury. I pointed out that there was no such thing, that the road Midland Way was well established when we arrived here 30 years ago and that the station had already been demolished and that since then Tanners Court, sheltered accommodation flats, had been built on the site. This gentleman then pointed to his map which, I have to admit, clearly showed a railway station and railway line running along the line of Midland Way. I offered to take him to the back of the building in which we were standing to show him Tanners Court which is immediately behind it and which fronts Midland Way. He declined and pointed to his map which appeared, in his eyes, to be more accurate than the actual physical proof and was, no doubt, easier than taking the 1 minute stroll around the building. He actually said that it was run by the Midland Railway as if this, in some way, proved his point. I pointed out that that was why the road built over it was called Midland Way, but that appeared to be irrelevant. Nor did the fact that this old line only ran to Yate and never to Bristol appear to be relevant with regard to commuting to Bristol. He also said that there were discussions about re-opening the disused Charfield and Coalpit Heath lines, I am sure that residents of Coalpit Heath will be interested in this.

He also said that there were discussions about extending the metro link from Filton which was now up and running. I pointed out that it was not up and running and that it was not expected to open until 2018. He said that someone else had said that earlier.

So, my questions are:

- 1) Does South Gloucestershire only provide extremely out of date maps to its planners?
- 2) Do South Gloucestershire Planners never query the accuracy or date of these maps?
- 3) Do South Gloucestershire Planners never investigate the situation on the ground by visiting the area before making decisions that will effect the lives of thousands of people?

- 4) Do South Gloucestershire Planners prefer to put all their faith in out of date maps than listen to and check facts given to them by the people who live in the area?
- 5) Would anyone from the Planning Department like to go on one of Thornbury Museum's railway walks or attend its Railway talk?
- 6) Are all South Gloucestershire Planners as lazy as this man who would not even walk to the back of the building to check a fact?
- 7) Has anyone told the residents of Coalpit Heath that they have a disused railway line and station that could be re-opened (and where it is)?
- 8) Do the people making these major decisions that will totally change an area like Thornbury speak to their own transport department?
- 9) Or are all these questions completely stupid because you regard the residents of Thornbury with such utter contempt that you have no intention of listening to us and were prepared to emphasise this fact by sending someone along to talk to us about possible future major developments who had no idea about them or Thornbury at all and was just there to 'make up the numbers' and to pretend that you do care and can tick the 'have you consulted the local population' box?

#### **4. Thornbury**

Re: suggested development in the area outside Morton Way, bounded by Hackett Lane, Clay Lane, Crossways Lane and Morton Way.

On the JSP, this area is shown as flood plain (very sensible) and employment use. If this development goes ahead it will change the nature of these quiet lanes which are used extensively by the people of Thornbury.

The three lanes; Hackett Lane, Clay Lane and Crossways Lane – locally known as the Triangle – form a quiet, rural, paved and largely traffic free route on the edge of the town. It is used by walkers, joggers, runners, cyclists, dog walkers, young people and families from all over the town. It is used in all weathers, and throughout the year. A favourite place to let young children walk or even ride their bikes on their own – an adventure for them and a peaceful, pleasant walk for their parents or grandparents.

I hesitate to say how many people use these lanes – some go every day, some only occasionally; it's busier in the summer and at weekends but you will always meet someone. Typically, this morning, in the half hour I was out in the drizzle, nine Other people were going the other way.

This area is, and has been for many, many years a recreational resource and could continue to be so for an expanding town. It costs nothing to use or to run, and would be an enormous loss if the nature of the area were to change significantly. The addition of commercial buildings or housing, and more importantly the consequent changes in the road system would destroy the resource.

With imaginative and appropriate planning surely this whole area could remain a positive feature for Thornbury, a rural space in an increasingly urbanised country town. It seems an ideal location, as it encompasses the flood plain, and an opportunity to let us retain what we have already established for ourselves.

## 5. Thornbury

I attended the event held at the Armstrong Hall on Friday 29th September and appended a number of written comments on the display boards as well as engaging with a number of your Planning Officers and Design Action consultants.

However, there is so much more to say on the proposed development of South Gloucestershire and how this all leads into the Joint Spatial Plan and I set out some of my views below:

### TRANSPORT STUDY

When I was reading through the findings of the WoE Joint Transport Study, there appeared to be a number of proposals to mitigate against current levels of private transport, mostly used in conjunction with residents commuting to work, in and around Bristol/Gloucester.

My reading of the figures was that you are targeting a 5% reduction from 78% use of private transport. Frankly this figure is a woeful response. You should be targeting a 50% reduction to bring this figure below 40% with an expectation of a minimum 10-20% reduction. The only way you are going to achieve this is to provide commuters with genuine alternatives, eg public transport hubs with park & ride facilities, frequently timed bus/train facilities (every 10-15 minutes during peak hours, ie 7.00-9.00am and 4.00-6.00pm) using the fastest routes including the M5/M4/M32 via further transport hubs in Almondsbury, Bradley Stoke etc. I have proposed a Park & Ride on Tortworth Estate land bounded by the A38/B4061/Old Gloucester Road at Whitfield/Buckover (the Whitfield Triangle) with bus services using the M5/A38 (as appropriate), in addition to a further park & ride at Rudgeway (your proposal) to link with Yate. We'll have to wait on the train front.

Talk to Bristol City Council about initiating a Congestion Charge for vehicles entering an agreed road ring around the City Centre, impose parking charges on Companies, with private parking facilities within this ring, to pass on to their employees using these facilities and possibly start charging for parking in excess of 2 hours at the local SGC operated car parks in Thornbury, Yate etc. Money raised to be used towards road/highway improvements and public transport subsidies.

Also, it is all very well collecting Section 106/CIL funding from developers towards public transport subsidies/cycle purchase schemes for new residents, but what about existing residents? You either want to reduce the use of private motor vehicles, congestion and pollution – or you don't! Make up your minds and be brutal.

Residents won't use public transport unless it is punctual, frequent, comfortable, economically viable, travels to desired destinations and within an acceptable time. Do you seriously think that, as an example, 5 daily services of the No. 60 bus running from Thornbury to Gloucester via Dursley with 4 return journeys taking 2 hours per journey is acceptable? You can catch a Megabus or National Express coach from Bristol which will get you to London in not much more time. No wonder residents prefer to travel by car!

One of your Strategic Policy Highways Officers pointed me in the direction of the TravelWest website which holds results of travel to work surveys. I haven't had a chance to view this website atm, but I wonder how globally (in a West of England sense) this survey has been distributed. Have you ever distributed survey forms to drivers of stationary vehicles leaving local settlements at traffic lights? Surely that is your target audience.

In short, you need to be really brutal, particularly with peak hours private car commuters, applying financial disincentives but offering subsidised incentives to change their ingrained travel to work behaviour.

Safe cycle routes will also need to be added to and improved.

Essentially more houses without significant additions to local employment will lead to more cars on the roads and this will require more than just a few speed reductions and traffic islands at junctions. Serious consideration needs to be given to installing part-time traffic lights at the junctions of Gloucester Road (B4061) with Butt Lane/Morton Way to cope safely with increased vehicle counts during peak periods. At least this would provide genuinely safe crossing places for children on route to school from the new developments. I understand that Bloor Homes have contributed towards the new Puffin crossing along Morton Way, but have you missed the boat on obtaining additional funding for controlled crossings from the Park Farm/Post Farm and Cullimore's field developers? Frankly I don't care what your Transport/Highways Officers say – expecting young parents pushing buggies with under 11 aged children using scooters/bikes and sometimes dogs on leads to safely cross these roads around 8.30am is not safe and presents a gross dereliction of duty! There are already two drop kerbs on Gloucester Road where you can't even see traffic approaching because they have been positioned a couple of metres from existing signage which obliterates the view if you are pushing a buggy. I have photographs to prove this.

Change your mind sets, start thinking 'outside the box', apply common sense, be creative and start with infrastructure improvements before more houses are built, otherwise you will be fighting a losing battle to carry out highways improvements against the greatly increased traffic flows and just generating even more pollution.

One final point, just remember that if and when the new nuclear power station at Oldbury is approved, there will be limited housing available in Thornbury and you will, logically, need park & ride facilities on the outskirts to ferry workers (from locations further afield) there by bus (whether run privately or using an existing service provider).

## **6. Thornbury**

### ***The impact of new housing in Thornbury.***

In composing the following paragraph I have listened to the views of many people in Thornbury, as well as reflecting my own.

There is great concern about the rapid growth of Thornbury since its selection as a housing growth area which has been exacerbated by a plethora of speculative planning applications. This is combined with, an increasing feeling of powerlessness and despondency which is not compatible with a truly democratic process. The ‘fait accompli’ thus has had an impact which is less tangible than traffic flows, pressure on health and education services and parking etc. There has been no opportunity to assimilate the increased population numbers of essentially commuting households into the community, let alone provide for an adequate infrastructure. In addition, many fear acutely the loss of an attractive and compact market town surrounded by countryside, as it is increasingly urbanised. Despite the views stated in the FAQ document for this informal consultation, the overall impression is that SGC cares very little about the views of the local population in its compulsion to satisfy nationally imposed housing numbers, and that consultation exercises are managed, constrained by politics, and therefore meaningless.

Summary: Loss of community feel in addition to tangible impacts. Democratic deficit.

### ***What is needed to support new housing.***

As mentioned above, the predictable population growth of younger households combined with an ageing population with require more extensive health services as well as educational provision. You will be aware that there is a national shortage of General Practitioners and this is not likely to improve in the future. At least one practice in Thornbury (according to a recent CQC assessment available online) has a doctor patient ratio below the national average but maintains an open list. Even with efficiencies, this is still likely to result in less access to medically – as opposed to other – qualified personnel. SGC need to think carefully about its obligations to the existing local population before placing increased demands on stretched services. It is simply not good enough to ask the local commissioners of health care to respond and leave the poisoned chalice with them.

Although there may be some increased employment opportunities in Thornbury, this is unlikely to meet the needs of the current, let alone future population. Housing prices alone in the new developments (albeit with some affordable properties) will demand incomes and jobs far in excess of what Thornbury can provide. The likelihood therefore, is that Thornbury will become a dormitory town for Bristol. As such, SGC needs to take action NOW to improve transport links rather than wait for an additional massive development (Buckover) eventually to prompt action. Whilst it is important to talk about the significance of cycle ways, footpaths and green spaces connecting the centre of Thornbury to the new developments, these relate to intra-community links and safety and, one would have thought, are easier to ‘plan in’ to development applications, than strategic transport links.

Summary: Need for improved transport links with Bristol now, not post- any Buckover development. In-step provision of medical practitioner services with housing development rather than waiting for crisis, similarly pre-primary, primary and secondary education.

***The appropriateness of new employment development at Crossways.***

More employment opportunities are needed, if only to reduce work commuting and pressure on roads and transport services.

***What should take place between Thornbury and the proposed garden village at Buckover.***

To prevent urban sprawl, loss of character to the town and to safeguard what remains of the setting of Thornbury and further loss of community, a much greater distance between Thornbury and any Buckover boundary. Moving the village further northwards and eastwards would achieve this. The existing green belt to the south of Thornbury must be maintained, not least because it fulfils all of the national criteria for green belts and protects the 'rurality' of space between Alveston and Thornbury and ultimately a ribbon of urban sprawl outwards from Bristol along the A38 to Thronrbury.

***What type of housing, services and facilities located in the new garden village would complement those available in Thornbury and, the relationship between the two.***

Additional medical and educational services are needed with encouragement of catchment area access to developments in NE Thornbury, achieving national averages in relation to doctor-patient ratios and class sizes. Some thought would need to be given to safety issues especially if Thornbury were to service Buckover in relation to secondary education, or perhaps developing a secondary school in Falfield would obviate the need to cross the A 38.

In addition, there will probably be a need to provide a large supermarket to the NE of Thornbury not least to discourage returning commuters resident in the new developments from using the over-stretched B4061 road to access the Tesco supermarket en route to and from home.



## **7. Thornbury**

I have seen the Concept Diagram for the future development in Thornbury. I note with considerable disquiet that there are large incursions into the Strategic Green Belt to the east of Morton Way, previously the boundary for development on that side of Thornbury. Specifically, my concern is the area earmarked for 'Employment Land' which is presumably a euphemism for Industrial or business development. I wholeheartedly oppose any such development - dumping industrial buildings in an essentially rural area where, apart from long-established agricultural buildings, the only structures are residential in nature. The proposed development is also on a Level 3 Flood Plain. The nearest commercial buildings are about a mile away on the long-established Thornbury industrial estate where such developments belong and where land exists for expansion. Building an industrial/business park as shown in the concept diagram would totally dominate the area and destroy its rural character. Moreover, it is yet another bite out of the Strategic Green Belt whose retention is essential if we are to preserve any rural aspect of Thornbury. I therefore object to the proposed development.

## 8. Thornbury

BIRMINGHAM  
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South Gloucestershire Council  
New Local Plan Consultation

Our Ref: 24699/A3/LKT/jmm

11<sup>th</sup> October 2017

Dear Sirs

### **SOUTH GLOUCESTERSHIRE NEW LOCAL PLAN INITIAL CONSULTATION: THORNBURY**

#### **Background**

South Gloucestershire Council has published a concept diagram for Thornbury as part of its early, informal consultation on the location and masterplanning of the potential Strategic Development Locations (SDLs) in the District. The SDLs identified are consistent with those identified in the emerging JSP.

Thornbury is one of five locations the Council is considering for strategic growth and whilst it points out that the JSP process is not complete (and hence the location of the SDLs is not yet fixed), the Council describe the aims of the consultation as:

- Starting the conversation with communities regarding what growth might look like including what infrastructure and community facilities should be delivered alongside new housing or business premises.
- beginning the early thinking about masterplanning the locations in consultation with local and community interests to avoid piecemeal and un-coordinated development that may not then deliver the benefits of good place-making and investment in necessary infrastructure.

The Concept diagram for Thornbury is specifically described as a starting point for the informal consultation where the aim is to obtain reaction and feedback on the diagram and to understand how the existing qualities (both good and bad) of Thornbury might usefully influence new development.

#### **Bloor Homes response to the Thornbury Concept Diagram**

Bloor Homes control Land at Crossways on the eastern edge of Thornbury, which has potential for circa 150 – 200 dwellings – see site location plan below.



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11<sup>th</sup> October 2017

The Council's concept diagram identifies the Crossways site as a potential site for employment. We object to the proposed allocation of this site for employment as it is wholly unsuitable. The site is located in a residential area. It lies between residential to the north, west and potentially to the south if Cleve Park is approved at appeal and therefore, employment would not fit well in an area residential in character. The implications of employment land in this location have not been considered in respect of:

- noise generation on surrounding residential properties; and
- traffic movement and air quality impacts.

The site is also half way around Morton Way which acts as a partial ring road around the town and therefore, is not well placed for the strategic road network which is a vital locational factor for a site to be attractive to potential businesses. We fear that the Council has suggested allocating this area for employment purposes due in part to an assumption that the area of flood risk on the western part of the site cannot be mitigated, and that following the sequential test, residential is not appropriate.



Figure 3.1 - Extract from Environment Agency Flood Map

In fact, most of the site is in flood zone 1 and the area in flood zone 2 and 3 can be mitigated so that the residential site can be properly integrated with the town (without there being a large flood zone gap to be avoided).

This is explained by more detailed Flood Risk Assessment information which has found that the source of flooding on the site is actually due to two undersized culverts beneath Hackett Lane and the farm access on the southwest boundary both of which are upstream of the site. The report concludes that this flood risk could be mitigated by upsizing the existing culverts or by intercepting overland flow on site and conveying it within a new channel around the perimeter of the site, back to the existing ditch network. Inclusion of a small flood alleviation area (i.e. a lowered dry basin that would contain excess water in extreme events) at the western end of the site would ensure no negative impacts downstream from the conveyance of the overspill and would also provide flood alleviation benefits to the surrounding area. This would significantly reduce the area of the site which is liable to flooding and increase the developable area, and hence residential capacity of the site.

Neither is the Crossways site appropriate in landscape terms to accommodate employment uses. The site is domestic in scale and while residential development would follow the evolving land use pattern of the area its use as an employment site would be out of scale. Employment would bring larger buildings, car parking fencing and lighting into direct contact with the historical pattern of lanes, houses and listed buildings that surround the site and such development would be harmful.

We are also aware that local residents do not consider that employment development would be suitable in this location. Some of the community felt that some local retail provision in the form of a local centre would be appropriate to help balance local provision on this eastern side of the town. The Morton Way site to the north will make provision for a convenience store and the Cleve Park development to the south proposes a flexible community/commercial facility which is likely to address this community aspiration, at the same time as helping to provide some additional employment.

### Metrobus extension

The Thornbury consultation FAQs states:

TOWN PLANNING  
MASTERPLANNING & URBAN DESIGN  
ARCHITECTURE  
LANDSCAPE PLANNING & DESIGN

ENVIRONMENTAL PLANNING  
GRAPHIC COMMUNICATION  
PUBLIC ENGAGEMENT  
RESEARCH

This product is printed  
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that conforms to the PEFC  
standards for sustainably  
managed forests.

*"Additional development at Thornbury would be part of the potential 'arc' of new growth from Oldbury on Severn (new nuclear build) to Buckover Garden Village, Charfield and Wotton-under-Edge providing new opportunities to meet housing pressures in the north of the district. Together, these growth points will also assist make the case for a step change in public transport in the locality, by extending Metrobus routes from the major employment centres of North Bristol, providing for additional bus services and potentially supporting the case to reopen Charfield railway station. Investment will also be made in the strategic road network (e.g. M5, J14)".*

We very much support the extension of Metrobus to Thornbury to provide both existing and new residents with fast, sustainable transport choices to destinations in the north fringe and Bristol city centre.

In conclusion, the Crossways site is not suitable for employment development, nor is it deliverable for employment. The Council has not produced any evidence on the level of employment need at Thornbury, nor completed an appraisal of suitable alternative locations based on employment specific locational criteria to demonstrate that the Crossways site is the most appropriate location for employment. Given the recent approval of the Ainscough site (Land West of Gloucester Road) for 130 dwellings and the potential of Cleve Park (350 dwellings) which is currently at appeal, land at Crossways is a suitable size to meet South Gloucestershire's residual housing requirement for Thornbury.

Bloor Homes is currently working the Environment Agency to design a suitable flood mitigation scheme and will be preparing a revised concept plan for the Crossways site. We would welcome the opportunity to meet with the Council to discuss the site's potential, and early masterplanning, to ensure good place-making and investment in the necessary infrastructure.



## **1. Yate and Chipping Sodbury**

I recently attended the public consultation at Chipping Sodbury High Street to see the proposed plans for the South Glos Local Plan 2018 – 2036.

I was informed that new consultants “Design Action” have drafted out a proposed area suitable for housing, based on various criteria (road networks, sloping sites, pylons etc)

To me it looked like they had simply drawn an arc so that new housing would simply balance out the view on google maps, the proposed development site lining up with Yate Outdoor Complex and Beeches Industrial Estate.

From what I could tell they had no idea about the previous battles over Engine Common or the huge issues the perched water table causes regarding drainage.

Surely, the public outcry regarding the previous planning applications and appeals goes to show the green spaces around Engine Common are wanted and needed in Iron Acton Parish?

As Yate becomes busier and more vibrant than the sanctuary of country lanes surrounded by un-spoilt meadows becomes even more vital to a balanced lifestyle.

I do realise there is a housing shortage, and I’m aware this could come across as nimby, but you genuinely don’t get many area’s so rural and so close to towns.

Leaving Yate and entering Engine common, the change in feeling and character is instant, from busy town to country side in a few hundred yards.

Please could you think long and hard about the impact building on Engine Common and the green belt would have, especially to the hundreds of locals who have fought tirelessly to preserve the land for the last 9 years.

When Sydney Freed recently submitted a Planning Application to build 93 houses they carried out extensive exploration of the land to determine how suitable it would be surface water to be disposed of via soak-aways.

After many test holes and equipment getting stuck in mud (because the land doesn't drain) they came to the conclusion that the only way to remove rain water from the site was to elevate the land by 5ft in places for a gravity fall and then discharge into local water courses via attenuation ponds and aqua breaks.

Please see my comments below regarding the drainage strategy for 93 houses on Engine Common, a flawed plan at 93 houses, even worse with more.

### Drainage

The following is taken from the Planning application –

Relating to drainage of the East side of the Estate:

“Runoff to the North Road culvert will be restricted by a complex flow control, which will restrict flows to 19.4l/s (QBAR) for storms up to and including the 30 year storm event and 47l/s in the

100 year + 40% climate change event. Storage will be provided by a combination of the oversized

pipes, attenuation basins and attenuation crates”.

So, this equates to:

19.4 litres per second =

1,164 litres per minute (over a cubic metre of water)

68,840 litres per hour

15,366 gallons per hour

To put this in perspective, a 40-tonne articulated waste tanker can carry 5000 gallons.

This flow rate is equivalent to emptying an entire tanker every 20 minutes.

This might be acceptable as long as the drains are in perfect working order, well maintained and there are no problems.

What if the slightest problem arises and there is a blockage or a restriction?

The housing estate will continue to drain its surface water nicely thank you, after all it is elevated over 5 feet so the new houses will be fine, the surface water will continue to flow, the attenuation pond and aqua brake will run out of capacity and the water will overflow onto North Road.

The houses opposite along North Road will flood as they are lower than the new houses (as we all are).

Now the maths for the maximum discharge rate ate even more horrendous.

47 litres per second =

2820 litres per minute

169,200 litres per hour

37,219 gallons per hour

This would equate to a fully loaded articulated waste tanker emptying it's entire contents every 8 minutes. Is SGC absolutely sure the drains can cope and is there a back-up plan if there is a problem?

So in summary, I am against the proposal regarding potential strategic development location for the next 20 year Local (development) Plan.

I would also like to add that the map below is vague and unclear, it's actually hard to decipher and work out which areas are effected.





## **2. Yate and Chipping Sodbury**

### **South Gloucestershire New Local Plan**

### **Response of Persimmon Homes Severn Valley to**

### **Proposals at Yate and Chipping Sodbury**

#### **1. Introduction**

- 1.1 This response sets out the comments of Persimmon Homes Severn Valley to the informal non-statutory consultation by South Gloucestershire Council on the new Local Plan in respect of proposals for Yate and Chipping Sodbury, in advance of the publication of the submission version of the Joint Spatial Plan. Persimmon Homes Severn Valley has various interests in the Joint Spatial Plan area including land East of Chipping Sodbury. In relation to Chipping Sodbury we have set out below comments on the consultation process and on the option for identifying land for development south of Yate/Chipping Sodbury and the main railway line.

#### **2. The Consultation Process**

- 2.1 Whilst the Council have carried out an informal consultation, it completely ignores and is at odds with the formal statutory process. The strategic process involving the preparation of the Joint Spatial Plan is still at an early stage, with only options considered so far. In addition, the proposal would involve removing land from the Green Belt which is a strategic issue and which needs to be considered in principle before it is appropriate to consider detailed proposals. The JSP identifies Yate/Chipping Sodbury as a strategic growth location but whether or not that also requires a Green Belt release, particularly when there are non Green Belt alternatives, is properly a strategic matter which should be examined and resolved in the context of the totality of the Bristol and Bath Green Belt and in association with the determination of development locations through the JSP process.
- 2.2 Without knowing the overall amount of development required and its distribution, there is little point in a consultation on two locations in Yate and Chipping in isolation without considering any other options and alternatives. In any event the proposals will need to be subject to a sustainability appraisal process which will require alternatives to be properly assessed. By consulting

on proposals at this stage without considering alternatives leaves the Council open to challenge that they have prejudged the issue.

- 2.3 Given the preparation of the JSP, which is reviewing the Green Belt comprehensively, it is inappropriate for one of the constituent Authorities to make local decisions which will affect the strategic decision making process. If the development requirements need land to be taken out of the Green Belt, this needs to ensure the right locational choices are made based on sequential and sustainability tests at a strategic West of England level, in particular to meet housing needs where they arise. If it is then determined that it is necessary to take this land out of the Green Belt, it is more appropriate to release land on the edge of the principal settlement, Bristol, where it can take advantage of existing facilities and transport infrastructure, or where improvements are already committed, before considering other locations.

### **3. Green Belt Issues**

- 3.1 Removing land from the Green Belt is not a decision to be taken lightly, as demonstrated by the words in NPPF paragraph 79:

*'The Government attaches great importance to Green Belts. The fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.'*

- 3.2 The highlighted parts of this paragraph demonstrate the overwhelming importance attached to Green Belts and provide the context for the very high tests involved if land is to be removed from the Green Belt, as discussed below.
- 3.3 It is significant that the concept of permanence is referred to twice in a single sentence of this paragraph. This is particularly important in respect of the land south of the railway line at Yate and Chipping Sodbury. This land was a late addition to the Green Belt through the Avon County Structure Plan Policy GB4 in 1985. This makes it doubly important that the land is not taken out of the Green Belt now as it would contravene the concept of permanence embodied in Green Belt Policy. It is not appropriate for Authorities to include

land within the Green Belt and then take it out again later without full justification and proper assessment of alternatives. If alternatives exist the presumption should be against taking land out of the Green Belt.

- 3.4 Paragraph 80 of the NPPF then sets out the five purposes of Green Belt which themselves have considerable longevity, and remain unchanged from the previous guidance in Planning Policy Guidance Note 2. However, these tests have been used in isolation as the sole basis for the JSP Green Belt Assessment, in two documents, part 1, November 2015 stage 2 in November 2016. Paragraphs 83, 84 and 85 of the NPPF include a number of other more detailed considerations for the review and definition of Green Belt boundaries:
- 3.5 Paragraph 83 states: *'Local Planning Authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, Authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.'*
- 3.6 Paragraph 84 states: *'When drawing up or reviewing Green Belt boundaries Local Planning Authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.'*
- 3.7 Paragraph 85 states: *'When defining boundaries, Local Planning Authorities should:*
- *ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
  - *not include land which it is unnecessary to keep permanently open;*

- *where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- *make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
- *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.'*

3.8 We note that these are not referred to in either of the JSP review documents and none of these factors have been considered or assessed against potential releases from the Green Belt. In respect of the specific issues relating to the proposed release in Yate/Chipping Sodbury we have particular concerns on the following issues raised by this guidance:

- Again paragraph 83 emphasises the permanence of boundaries in the long term and 85 says boundaries should be clearly defined using physical features that are recognisable and permanent (again). The current boundary south of Yate formed by the railway line clearly is clearly defined by a permanent physical feature which makes it absolutely unequivocal. Breaking this into an area of open countryside which in landscape terms extends as far south as the M5 motorway does not enable a clear, permanent and defensible boundary in the long term.
- Paragraph 84 refers to the need to promote sustainable patterns of development. So, a Green Belt review also needs to consider where development could be located not just where it should not be located;
- Similarly, paragraph 85 says there should be consistency with the Local Plan Strategy for meeting identified requirements for sustainable development, but on the basis that the JSP housing total and its overall distribution to the four constituent Authorities is not yet known or has

been examined, it is inappropriate for the Council to be considering individual locations such as this on an ad hoc basis.

- 3.9 Paragraph 5.10 of the JSP Green Belt Assessment November 2015 sets out subsequent stages of a review of a Green Belt. This says, '*The subsequent stages will therefore consider the impact of removing any locations from the Green Belt as well as considering the effect on the integrity of the remaining Green Belt area.*' This has not been done in the stage 2 assessment document and it has not been done by South Gloucestershire Council (as it clearly could not) in undertaking the current consultation exercise. In reality, the assessment repeats previous assessments by the Council of the Green Belt in South Gloucestershire in 2006 and 2011, by considering how the identified cells fulfil the purposes and function of Green Belt. This limited exercise provides a subjective view of each cell which is unrelated to a sustainability appraisal of strategic development opportunities and options, both inside and outside Green Belt and it does not balance the loss of open land against other planning considerations. It does not therefore provide any basis for the current consultation process.
- 3.10 There are also issues regarding the definition and boundaries of individual cells which effects the treatment of the land south of Yate/Chipping Sodbury. Paragraph 4.1 of the November 2015 JSP Green Belt Assessment document sets out a brief explanation of the definition of the 79 assessment cealls. Critically this says '*Cell definition reflects the need for the assessment to provide greater detail around the inner edges of the Green Belt and adjacent to larger urban areas. In these areas smaller cealls have been defined compared to those in areas further from the larger built up areas.*'
- 3.11 We note that the two cells south of the railway line at Yate/Chipping Sodbury, cell 23a (158 hectares) and 24a (196 hectares) are extensive cells forming large areas of open countryside not conducive to defining potential development areas south of Yate and Chipping Sodbury. The definition of these cells using landscape criteria clearly demonstrates land south of Yate and Chipping Sodbury is part of a substantial landscape area which should be treated as one. This confirmed when the specifics of the cells are looked at in greater detail.
- 3.12 It is also significant that the 2006 and 2011 South Gloucestershire Green Belt Assessments did not carry an assessment of all of the Green Belt in South Gloucestershire but identified specific areas for assessment and consideration

of whether there was a case for releasing them. We note that neither assessment included the land south of Yate and Chipping Sodbury.

- 3.13 Equally, notwithstanding our overall objection to the inadequacy of the process, the actual details of the JSP assessment, such as it is (or as it currently stands), equally does not justify the approach. The proposed area south of Yate and Chipping Sodbury sits on the boundary of the two assessment cells 23a and 24a and the overall conclusions in paragraph 3.20 of the November 2016 document says:

*'Cells to the south and west of Yate are assessed as making a contribution to Green Belt purposes. Cells contribute to preventing the merger of neighbouring towns in the corridor between the north fringe of Bristol and Yate by assisting in preventing the coalescence of settlements. Most of the cells also contribute to assisting in safeguarding the countryside from encroachment.'*

- 3.14 This is in contrast to the conclusions in paragraph 3.21 for cells 22b and 21d where it says:

*'Cell 22b, north of Engine Common and 21d, west of Yate are identified as making a limited contribution to Green Belt purposes.'*

- 3.15 Therefore in the light of these conclusions it would clearly be appropriate to consider cells 22b and 21d for potential Green Belt release, if necessary and at the right time but that cells 23a and 24a should remain as Green Belt.

- 3.16 Indeed this position specifically in relation to Yate and Chipping Sodbury is also matched by the overall assessment in the November 2016 document. So, notwithstanding our comments on the lack of proper assessment of a wider range of issues, even this narrower overall assessment does provide a view on the core purposes of the Green Belt. Paragraphs 3.32 to 3.39 identify that of the 146 cells assessed only 12 are identified as making a limited contribution to Green Belt purposes and these do not include cells 23a and 24a. Therefore, it can be concluded that the contribution cells 23a and 24a make to safeguarding the countryside from encroachment is considered to be a significant contribution to the purposes of the designation of the Bristol and Bath Green Belt.



## **4. Landscape**

4.1 The proposal would have a substantial landscape impact which is not addressed in the consultation documents. In the South Gloucestershire Landscape Character Assessment SPD November 2014, the land is included as part of the Pucklechurch Ridge and Boyd Valley landscape character area. A brief summary of the characteristics relevant to the proposed development south of Yate is as follows:

- It is a large scale generally undulating plateau and vale landscape;
- The Pucklechurch Ridge is a prominent medium scale landform rising from the Westerleigh Vale eastwards with a prominent scarp;
- The northern boundary follows the railway line which makes a subtle transition with the more wooded Wickwar Ridge to the north;
- The extensive residential area of Yate and Chipping Sodbury is contained by the railway cutting;
- The wider landscape is folded, with hedges and trees which emphasis the profile of the scarp;
- The hilltops are sensitive;
- Calcareous grassland and ancient woodlands are important, including the distinct area of Kingrove Common which the development would join;
- With the exception of Pucklechurch and Wick, the settlement pattern is small scale.

## **5. Responses to the Specific Questions on the Consultation Boards**



### What is valued about Yate/Chipping Sodbury?

- 5.1 The first two paragraphs under the heading 'Why Yate and Chipping Sodbury' of the FAQs paper sets out a clear case for the attributes of the two towns and why they provide an appropriate strategic growth location. However, the Green Belt forms a policy constraint at Yate which is important in protecting the long term setting of the town which needs to be respected and protected. The railway line clearly provides appropriate and defensible long term boundary to the southern extent of Yate.
- 5.2 We emphasise:
- Together Yate and Chipping Sodbury form a very sustainable growth location;
  - Chipping Sodbury itself has a wide range of facilities including education, retail, community and health facilities and access to employment;
  - Good public transport links with the opportunity for them to be improved further.

### What features should be respected/retained/enhanced?

- 5.3 Firstly the Green Belt should be respected and retained which proposals south of Yate and Chipping Sodbury fail to do, breaking a robust and permanent Green Belt boundary by breaking out into an area of open countryside with no defensible boundaries capable of providing a long term permanent Green Belt boundary and leaving a precedent for even more development to the south of the currently proposed option.
- 5.4 The concentration of sports facilities and Chipping Sodbury Common are an important green lung and provide comprehensive sports and recreation facilities in one area within easy reach of the whole town.

- 5.5 The high street will benefit from overall enhancement including new shops and public realm and management improvements which new developments specifically related to Chipping Sodbury would help deliver and provide the necessary boost.

What is not good or should change?

- 5.6 A new residential neighbourhood could help to provide issues identified through consultation which are important to locals as part of a town wide strategy and not as part of a development which is remote and separated from it south of the physical and psychological barrier of the railway line.

What investment would be needed to support a more sustainable community?

- 5.7 Yate and Chipping Sodbury are already sustainable communities but a new neighbourhood would need to be supported by new facilities to cater for its own new residents. This would need to be assessed in respect of the size and location of the development. In particular the development would provide opportunities to support public transport with the potential to extent the Metrobus link to Chipping Sodbury, thereby improving public transport links to Bristol City Centre, the North Fringe, the Science Park and Emerson's Green Enterprise Area from the town. In addition, there would be benefits to internal links between the two towns, including cycling, walking and public transport and links to Yate Station.

What sort of new neighbourhood should be aimed for? What would be your vision for the future?

- 5.8 The key to a substantial new neighbourhood developing into a good place is that it should be located in the right place. Location is an important factor and the fact is a good place does not happen immediately but evolves over time. Therefore it is important that new development is located where it is closely linked to existing facilities and communities to provide a basis for it to build on. Integration, not separation and being part of an existing community helps to create a sense of belonging and provides an immediate boost to cultivating a strong new community.

5.9 The importance of this principle is demonstrated when considering examples of what makes a good community in the consultation material. Therefore:

1. Safeguarded and strengthened green infrastructure is best achieved where new development is able to make the best use of existing green infrastructure and where new provision can be based on what is already there and provide appropriate enhancement;
2. We agree better facilities/amenities need to be close by, but this is particularly important because most facilities will not be provided up front and come forward in phases as development progresses. Often commercial facilities will follow development once the new population has arrived. Therefore again it is important that new development is located where new residents are able to make the maximum use of existing facilities where they exist. Therefore we consider development East of Chipping Sodbury provides more direct and deliverable access to existing facilities than a development south of the railway line, which requires the construction of effectively 3 new railway crossings to link the new development to existing facilities;
3. What makes a balanced place is also related to the relationship of the new community with the existing community. It is important that the mix of uses and people is balanced and appropriate for the whole place and not just the new neighbourhood and that the physical links between the two are in place from the outset. This is less likely to occur if the development is divorced from the main settlement, like the proposal south of the railway line, where past experience shows implementation and delivery of new/improved crossings are fraught with difficulties and delays resulting in an extensive process;
4. It is clearly important to plan for more active travel to promote healthier lifestyles and provide a better connected place, in the context of what exists in the whole town. What is equally important in the new development is that in doing this, the car is not ignored and appropriate measures are taken to accommodate realistic levels of car use, particularly in relation to parking. This will avoid subsequent problems as people find their own solutions to the problem with potential impacts on the public realm and the environment;
5. Achieving a positive identity is helped by recognising the importance of legibility of layout and external connections so people can find their way around easily by way of an obvious layout and links;

6. Encouraging social cohesion and neighbourliness is helped by an active local community and good local governance, which is assisted by good physical and local links between the existing and new communities.

## **6. Response to FAQ Papers for other Proposals**

- 6.1 There are a number of issues arising in the FAQ papers relating to the other proposals which are relevant in respect of the consideration of Yate and Chipping Sodbury. Firstly we learn that one of the reasons for selecting Buckover is that it is outside the Green Belt and is also noted in the Charfield paper that village is also the Green Belt. However what is surprising is that in the Coalpit Heath paper, whilst this proposal would involve a significant release of land in the Green Belt, the issue of Green Belt is not even mentioned!
- 6.2 Another reason for selecting Buckover is that it is noted that it is 100% owned by the Tortworth Estate and is therefore deliverable. Equally, East of Chipping Sodbury, which is under the control of a single developer, is also deliverable.
- 6.3 Like Yate and Chipping Sodbury the Thornbury paper identifies that an advantage of that settlement is that it is not wholly in the Green Belt and as a result it identifies locations outside the Green Belt. This is a principle which should also be applied to Yate and Chipping Sodbury.
- 6.4 One final issue is worthy of note. Both the Charfield and Thornbury papers identify speculative applications in those settlements as a '*common problem*' and there is a critical reference to planning by appeal in the Thornbury paper. However this is a necessary response to a failure by the Council to meet housing needs by abandoning its allocations plan. The danger is the Council will go down the same route through the new Local Plan by identifying unrealistic, undeliverable sites like that south of Yate and Chipping Sodbury.

## **7. FAQs relating to Yate and Chipping Sodbury**

- 7.1 The paper sets out some general attributes of Yate and Chipping Sodbury which demonstrate it is an appropriate location for further development and we support this. It also sets out a justification for its ideas west of Yate and a new Green Belt boundary along the northern and western boundaries. As the JSP Green Belt Assessment identifies this land as making a limited contribution to Green Belt purposes is appropriate this is the right starting point for producing the detailed evidence necessary to justify a Green Belt release in this location. However, given that the same assessment demonstrates land south of Yate and Chipping Sodbury does make a contribution to Green Belt purposes, the same assumption cannot be made about this land. To remove land south of Yate and Chipping Sodbury from the Green Belt would require a substantive analysis including consideration of options and a sequential test against other alternatives outside the Green Belt and alternatives within the Green Belt (if any).
- 7.2 The section on why Yate and Chipping Sodbury in the FAQs paper demonstrates why this location is not appropriate:
- It requires land to be removed from the Green Belt;
  - The land has extensive views of the surrounding area;
  - It requires confirmation of the JSP;
  - It requires funding for new rail crossings;
  - It requires land assembly and here we note that the land was not shown as being identified and promoted in the document entitled '*West of England Joint Spatial Plan Schedule and Mapping of Sites Submitted in Response to the Issues and Options Consultation*', November 2016;
  - It will be held back until the latter part of the plan period – ie it is not available, not achievable and not deliverable, in an authority where deliverability of allocations in previous plans has been a particular problem.

- 7.3 In contrast the East of Chipping Sodbury alternative is outside the Green Belt, does not require abnormal infrastructure provision, is in the control of a single developer, would provide substantial flood risk improvements which would protect existing houses and is equally within walking distance of the town centre, but also the Waitrose store. It is therefore available, achievable and deliverable.
- 7.4 In addition the land was promoted through the Core Strategy and whilst the Council sought to resist this on the basis of views from the Cotswold AONB, the Inspector in paragraph 127 of his report said he was *'less convinced this would be the case'* and that *'a mixed use scheme in this location offers similar opportunities as the new neighbourhood [allocated at North Yate in the Core Strategy] to increase self-containment of the settlement.'* He also suggested that accessibility could be improved if it were possible to reopen the railway station at Chipping Sodbury. However that is no longer necessary as the strategy set out in the Joint Transport Study is to improve Metrobus links and development East of Chipping Sodbury would benefit this aim and help extend the Metrobus link to the east.

## **8. Conclusion**

- 8.1 The Council have identified two proposals for residential extensions at Yate and Chipping Sodbury. Land south of the railway line would involve removing land from the Green Belt. The tests in the NPPF for doing this are high. The Council have neither considered alternatives (including known alternatives promoted in the past) nor carried out a sequential test. Had they done that it would have demonstrated that land East of Chipping Sodbury is available, achievable and deliverable without requiring a release of land from the Green Belt. It is entirely illogical for the Council to rely on a site which fails all these tests and even if identified constraints could be resolved would not be available until the end of the plan period.

### **3. Yate and Chipping Sodbury**

I recently attend a non-statutory public consultation arranged by SGC in relation to the above.

After 9 years of campaigning to keep our green spaces at the heart of our community and endless battles against building on the area known by developers as Engine Common, I was devastated to learn that South Gloucestershire Council (as part of the Joint Spatial Plan along with other neighbouring Councils) have proposed this area – as well as a large swathe of land between Mission Road, North Road, down to the Beeches Industrial Estate and into Nibley and back up beyond the west of Dyers Lane as a potential strategic development location for the next 20 year Local (development) Plan.

For me suddenly deeming this areas as suitable is unbelievable. The independent Design Company were given no prior knowledge of previous public feeling not to mention previous objections to building developments in this area and therefore I do not feel they were afforded a full brief in which to create their illustrations or designs.

I understand that SCG are classing any history all previous planning applications, objections and consultations as null and void as this is now part of the strategy for the next 20 years but I feel this is an utter disregard for local peoples' feeling and concerns which have been well known to SGC over many years.

Re-defining the green belt seems completely unnecessary as there must be suitable brown field sites in the Yate & Chipping Sodbury or wider South Gloucestershire area.

If SGC are now forced to develop this area – at least look at developing areas with good access off the main Bristol to Yate road not destroying areas that were once considered worth protecting by the Council due to wildlife (including wild deer which live and graze in the field behind Holbrook Cottage, Dyers Lane), poor drainage (due to a perched water table), traffic (causing the local lanes to be dangerous rat-runs for frustrated commuters) and the fundamental destruction of the character and feel of this area.

I have set out below my previous objections to developing in this area which I would urge you to consider before finalising plans to develop and destroy this area. Please note all this was written at a time when SGC backed local feeling in objecting developer plans and planning applications:

## **1. PREVIOUS APPLICATIONS & APPEALS**

Firstly, I'd like to point out that this is the third Planning Application that has been submitted by developers and/or Sydney Freed Holdings Ltd (SFH) in recent years. All previous applications were Rejected by SGC, Iron Acton Parish Council and residents for many reasons but overwhelmingly because any sort of development of this scale would cause considerable damage to the character and feel of this rural area and the small local community that reside there. These previous applications even went to Appeal and heard by Government Inspectors who also felt that this was an unsuitable development.

Therefore, my first objection is based solely around the fact that this latest Application has been submitted at a time when the developers are well aware that SGC (and other Councils around the country) are under intense pressure to grant planning consent for new homes given the perceived (in my view) housing shortage, given there are currently 139 homes up to the value of £350,000 currently for sale (not sold subject to contract) in the BS37 area. This is also notwithstanding the current pressures on local Councils following the Central Government austerity measures which mean SGC will be concerned about another Appeal due to the cost for the tax-payer and constraints on their budgets.

This does not however, in my view, make this Application right or appropriate even if the size of the proposed development has been reduced. Therefore as a local resident and member of the Save Engine Common Action Group I implore SGC planning officials and the Planning Committee to stick to their strategic planning principles set out in the Core Strategy and continue to reject this new Application with same rigor as was applied in previous years. I'd also like to remind SGC of all the hard work, time and effort that SGC Officials and their Planning teams put into rejecting the previous Applications in this area and urge you to do the same this time.

Furthermore, this area has never been a suitable or appropriate area to develop and build housing on any kind of scale therefore whilst SFH have held Public Consultations to try and convince locals and now SGC that their latest Planning Application has addressed all the points raised in previous Appeal decisions, notably downscaling the planned development from c250 to 90 homes, in fact nothing has changed, it would still completely change the character and feel of the area and is disproportionate to the small community and Parish.



This new proposal may be on a smaller scale but none of the previous objections have been overcome or addressed to appease residents and other visitors to the area. This is a small local community and any development on a mass scale as opposed to small infill type developments of up to c6 homes would completely change the character and feel of this rural area.

## **2. POOR DRAINAGE / FLOODING RISK**

My second point is that this area remains unsuitable to build on due to the make-up of the land and poor drainage, specifically:

- This area sits on a perched water table where surface water is unable to soak away and therefore drainage is exceptionally poor. It is common for Mission Road, parts of Dyers Lane and occasionally North Road to have visible surface water on road after rainfall. This is not limited to significant rainfall as parts of Mission Road flood across the entire lane regularly.
- Thus, many existing residents are forced to take their own precautions to protect their properties to mitigate the risk of flooding. The problem is such that this applies to those living with and without mains drainage.
- Within the last 4-5 years this area has had some localised flooding on North Road and other properties in surrounding lanes. In at least one case the Fire Brigade had to be called to pump water out of properties and gardens on North Road to prevent further flooding after prolonged rainfall. It is a fact that many residents do not publicise this due to the negative impact it might have on property prices in the area.
- It is also common knowledge that there is no regular maintenance plan in place to ensure all the ditches and drainage systems are cleared therefore adding to the problem with consenting to building a completely disproportionate number of homes would be criminal in my view. SFH have openly stated that drainage maintenance is not their responsibility. So, I am very concerned knowing that SGC don't have the resources or budgets to maintain this either. There seems to be no real consideration or guarantees offered to existing residents to the potential knock on effects of this ill-conceived development on surrounding properties.
- When we were informed by a SFH representative that the land was being raised by 5 ft. my neighbour and I virtually burst into tears. There were audible gasps around the Parish Meeting Hall as a result. This means the surface will be heading our way not to mention the detrimental visual impact on our area.

## **3. INCREASED TRAFFIC & SAFETY IMPLICATIONS**

This development does not seem to fit a strategic plan as it looks like a floating raft in the middle of a few fields. There does not seem to be any link with the more linear development on North Road so I cannot see what value this application adds to the area.

Looking at the site plan and proposed access road, this does not seem to be a particularly safe proposal for people who currently use this area for recreational purposes such as horse riding, walking and cycling as the knock on effect of c250+ additional vehicles using Dyers Lane, Mission Road and even Chaingate Lane as rat-runs to avoid the traffic build up on all routes in and out of Yate and the new development.

Additional traffic vehicles in this area alone will completely destroy the character and feel of the area and deny many local and other people the health and well-being benefits they have enjoyed and their children would like to enjoy for years to come as they will be driven off the local lanes for fear of being run over.

This poses a massive risk to public safety and children attending North Road School, compounded by the fact that there are already vehicles parked on North Road during School hours. I am aware that the Head Teacher at North Road School also opposes this application for this very reason.

Having only one access road in and out of the new development seems insufficient but unless other land owners are willing to sell their land for access, I would imagine this was the only option despite it not being appropriate for this size of development.

Having a round-a-bout on North Road will only annoy residents living in that area and again could cause a hazard and road safety issues for pedestrians and motorists alike.

#### **4. CHARACTER & FEEL**

In addition to all my points about this application destroying the character and feel of this area, there are also the wildlife and natural environment implications to be considered. This area has wild deer living on the very development area that this application poses to build upon. This poses a massive risk to the future of our wild animals not just the deer and I cannot comprehend why a proposal like this could be considered when there are many other brown field and other suitable sites which have either already been identified by SGC as part of their Core Strategy and in many cases Planning Permission granted.

I took a photograph of a Newt outside my front door a few years ago. Admittedly I have no idea what type of Newt it was but again I cannot believe the injection of 90+ houses will protect our local wildlife and will only destroy their natural habitat.

#### **5. RISK OF ADDITIONAL DEVELOPMENT BEYOND THIS APPLICATION**

I have a real grave concern that this latest application is the start of a much bigger plan that would over time see the entire area being completely developed and turned into a housing estate resembling one the former applications that was submitted when Bloor Homes were involved. If this were to happen the area itself will completely lose its identity and will simply become an extended area of Yate.

Many local people including my husband and I moved to this area for one main key reason – to move out of a housing estate and enjoy the benefits of a more rural community life. This application will completely ruin that for this reason. If we wanted to live on a housing estate we would move back to one.

In my particular case the proposed development of a number of Self-Build properties that SFH say have been specifically requested by SCG to be incorporated into the development proposal back right onto my back fence. So not only will I be living in constant fear of my property being at increased risk of flooding as a result of sinking thousands of tonnes of concrete into the fields that help soak up rain water and by virtue of raising the land by 5ft, I will be looking at a housing estate instead of a beautiful meadows and surrounding fields. The impact this will have on my health and wellbeing as well as my bank balance as my property will be worth far less is a major concern to me as it is to other residents.

## **6. LOCAL OPPOSITION**

I would hope SGC are aware of the strong opposing views and overwhelming feelings about this development and therefore it is important to point out that not only have we formed a local Action Group in the form of the 'Save Engine Common', we have secured support from the Parish Council and Luke Hall our MP. All of these were also present during the last 2 Applications with the exception of our MP being Steve Webb at the time.

I would wholeheartedly ask SGC to ensure they listen and carefully consider all local residents and recreational and other users of this area views and opinions regarding this matter.

## 1. Buckover Garden Village

Comments on the presentation material shown at the BGV event at Falfield Village Hall on 6<sup>th</sup> October are shown below. I continue to object to the location of BGV, mostly because of the proximity to Thornbury and the traffic issues, but for the purpose of this consultation I will confine my comments to the materials presented:

- The concept map is deliberately vague and indistinct. The roads are very difficult to make out, and the map is not to scale, so that it is impossible to clearly establish the proposed boundary for the development. This is a critical issue for residents with property adjoining this proposed development, and yet the footprint looks different to that which was published in Tortworth's concept brochure produced last year. Please provide a proper map with the council's proposed boundaries for this development, and then residents can comment effectively.
- The idea of a "green gap" is a good one in theory, but it is far too small. For any credible claim that BGV is a separate stand-alone development there should be some relationship between the size of the proposed development and the distance between it and the neighbouring town. I would propose a minimum gap to be the diameter of the proposed development.
- The other problem with the green gap is that it is unenforceable. Bovis has already submitted plans for 370 houses right through the middle of the green gap (planning ref: PT17/2006/O). This will surely be opposed by SGC in the first place, but Bovis is banking on winning at appeal using the 5-year land supply argument. I saw nothing in the displays about how the Local Plan will overcome this problem, without which SGC is deceiving the public into believing that BGV will not simply join onto Thornbury to create an urban sprawl. Will SGC compulsorily purchase land as a buffer, or require that Tortworth set aside some of their proposed development footprint to be maintained as farmland in perpetuity?
- There was nothing in the display about how to overcome the problem of the A38 running through the middle of this development. This road is the strategic alternative to the M5 and during peak times this is an extremely busy route with holiday traffic often backed through this area and beyond. There was nothing in the display about the additional junction(s) that will be created, presumably with traffic lights, that will turn a bad peak traffic situation into complete chaos. Either BGV will be two separate developments joined by a footbridge, or else will be "traffic calmed" to such an extent that peak time stand-still will be the norm. Without any proposals or suggestions we cannot comment.
- The public transport solution proposed is inadequate. Public transport journey times from Thornbury are already prohibitively long (most buses travel empty

for this reason), and extending them further to serve 3,000 new homes isn't good enough to achieve modal shift. The only idea put forward seems to be Metrobus, but we have no information about what proportion of the new residents will use this mode of transport to get to work, rather than use the car. New rail links would be the only way that we could say with confidence that a significant proportion of new residents would travel to work other than by car.

- Neither do we have any guarantee that any of the transport solutions would be delivered. At the moment, the transport “solutions” are unfunded studies – you get the houses then you dream about the transport.
- With regard to doctor's surgeries It is not good enough just to say that you are consulting with the NHS trust. Non-emergency doctor's waiting time in Thornbury is typically six weeks because the ratio of patients per GP (full time equivalent) is 2069 (as of January this year). This compares with South Glos stated capacity limit of 1,500. This will get much worse as the exiting developments around Thornbury become populated. The underlying problem is the ability to recruit and retain GPs, so why should we just assume that new practices will spring up and find doctors?