



### 3. Regulation 14

Summary of Actions to go forward from first sift  
Community Consultation

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# 1 Summary of issues to be taken forward from first sift

The following Tables draws out the “green” issues from the First Sift Analysis (*2\_Regulation 14 Sift 1 – 2\_Regulation 14 Sift 1.docx*). These are proposals for further action as it relates to potential for amendments to the Draft Plan. These are just the actions that were those marked in green as follows:

Proposal for further Action	Agree – propose amendment to document
	Uncertain – for discussion

## 2 Vision and Objectives

### 2.1 Analysis

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The assessment and response to the comments raised on the chapter 'Vision and Objectives' is set out in the table below.

Comment	Response	Action
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No recommended actions under comments for this section.

## 2.2 Aims, Objectives and Policies of the Plan as a whole

This section covers over-arching comments made about the aims and objectives and the policies set out in the Plan as a whole.

Comment	Response	Action
<p>Regarding Green Belt, I found section 3.3, especially the last paragraph, to be downbeat and almost a bit negative. If Thornbury is to expand, that will necessarily be away from the centre. That is not the 'fault' of the Green Belt to the south. I do not recall seeing specific mention of Green Belt in the Policies. I think this is a missed opportunity to emphasise a popular planning concept. I think that that S Glos and Bristol also value the Green Belt buffer and we should be seen to be 'on the same page'.</p>	<p>Agree – amend 'lopsided' language.</p> <p>Green belt ???</p>	<p>Amend to improve language used in the Plan</p>
<p>Within these representations Vistry Homes has highlighted numerous concerns in respect of the DTNDP including in relation to statements made within the DTNDP without sufficient or robust evidence to justify their inclusion; and concerns in relation to the wording of the Plan's Objectives and Policies. Until amendments, as recommended above, have been made Vistry Homes is unable to support the DTNDP as drafted.</p> <p>In addition to the comments set out above, Vistry Homes makes the following additional comments relevant to the plan as a whole:</p> <ul style="list-style-type: none"> <li>• The DTNDP has been prepared in the context of the emerging West of England Joint Spatial Plan (JSP), including the anticipated strategic development locations (e.g. Buckover Garden Village). The JSP was withdrawn from Examination in April 2020 following the significant soundness concerns expressed by the Examining Inspectors in September 2019. As a result, much of the context described in Sections 3.3 (Green Belt) and Section 3.4 (Future Development Outside Thornbury) of the DTNDP is now out of date and irrelevant. These sections should, therefore, be removed from the TNDP.</li> <li>• The DTNDP refers to the now superseded version of the National Planning Policy Framework (NPPF) (2012). The DTNDP should be prepared having regard to the 2019 version of the NPPF and updated National Planning Practice Guidance.</li> </ul> <p>The DTNDP will be examined against the strategic policies contained within the now outdated South</p>	<p>Agree that Plan should be updated to reflect changes in national and local policies</p>	<p>Amendment to the context to reflect current changes and the updated NPPF</p>

<p>Gloucestershire Core Strategy (2013). It should, however, be borne in mind that the strategic policies require updating (as acknowledged by South Gloucestershire Council within the New Local Plan prospectus document 2017). The TNDP will, therefore, require review in the short term to reflect strategic policies contained within a new sub-regional, spatial development strategy and/or Local Plan for the area. Such a review will likely require material modifications that change the nature of the plan requiring examination and a referendum.</p> <p>The DTNDP does not meet the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. For the reasons described within these representations the DTNDP is not in general conformity with the strategic policies of the Development Plan; does not contribute to the achievement of sustainable development; and does not have regard to national policy.</p> <p>Vistry Homes would welcome the opportunity to engage with the Neighbourhood Plan Group to address these concerns and comments.</p>		
<p>page 7 3.2</p> <p>why was Oldbury on Severn not included in the outlying villages</p>	<p>Review Policy 1</p>	<p>Amendment to reflect community comments in relation to Policy 1</p>
<p>Maps should be brought up to date in plan to show on-going buildings.</p>	<p>Agree – update maps</p>	<p>Update maps</p>

## 3 Identity and Coherent Development

### 3.1 Analysis

The assessment and response to the comments raised on the chapter 'Identity and Coherent Development' is set out in the table below.

Comment	Response	Action
Please add Whitfield to the list of surrounding hamlets whose character could be threatened by development around the edge of Thornbury, particularly Buckover Garden village. As well of the rural views out of Thornbury, the views from the the rural approach into Thornbury are also important. Also mention that Thornbury has some of the best grade agricultural land in the entire south west region around it (Grade 2 best and most versatile) and being a market town we are proud of this, perhaps state where greenfield development is proposed that preference is towards locating it on fields with lower grade land rather than our best agricultural assets.	Review text Policy 1	Amend Policy 1 text reviewed to improve clarity
Policy 1 aims to prevent development that 'effectively merges' Thornbury with these identified 'villages and hamlets'. It is not clear what 'effectively merges' means: whether this applies to development that abuts, encircles, or is in close proximity to; the term is ambiguous and therefore open to different interpretations. However, in any event, for the reasons described above, there is no clear evidence or justification to support the principle of the policy.		Amendment made to Policy 1 to improve clarity
With reference to views and vistas, the objective under Chapter 5 is again to 'preserve' countryside and architectural views, which maintain the 'essential character of its market town ethos and history'. Such an approach (to preserve views) is not in general conformity with South Gloucestershire Council's strategic policies as set out within the adopted Core Strategy (2013). For example, Policy CS1 of the Core Strategy states that development proposals should safeguard and enhance, through incorporation into new development, existing landscape features; while Policy CS5 expects developments to conserve and enhance the character, quality, distinctiveness and amenity of the landscape. Appendix C to the DTNDP outlines a number of 'key views and vistas' but, again, these are not supported by an appropriate or robust evidence base.	Discuss	Discuss

Comment	Response	Action
<p>Policy 2 - Neighbourhood Development Frameworks</p> <p>The plan isn't seeking to make provision for housing, and it does not allocate any land for 'major' developments. We have some reservations therefore, about the need for this policy as there are no major developments proposed. If it is retained then it should be clearer on what it means by major development, as the planning authority will need to decide on whether the policy is relevant or not in any particular instance.</p> <p>We are supportive of placemaking through good design, and have no objection to most of the bullet points. However, depending on how 'major' is defined, most housing developments will not be of sufficient scale to provide their own supporting services such as local centres, health and education. This section therefore should be revised to make this clearer. Requiring developments below a certain size to provide their own facilities on site will simply lead to schemes becoming unviable and therefore undeliverable and may well undermine the vitality, viability and function of Thornbury town centre.</p>	NFA except define major development using CGT's paper	To Amend to define 'major development' for clarity

### 3.2 Consultee Letters in relation to vision, Objectives and Identity & Coherent Development

In addition to responses provided via the website which are addressed in the above tables, individual letters were sent which have been considered and addressed as relevant in the tables below.

Comment	Response	Action
<ul style="list-style-type: none"> <li><i>The DTNDP has been prepared in the context of the emerging West of England Joint Spatial Plan (JSP), including the anticipated strategic development locations (e.g. Buckover Garden Village). The JSP was withdrawn from Examination in April 2020 following the significant soundness concerns expressed by</i></li> </ul>	Agree – amend report wording	Amend to bring up to date

Comment	Response	Action
<p><i>the Examining Inspectors in September 2019. As a result, much of the context described in Sections 3.3 (Green Belt) and Section 3.4 (Future Development Outside Thornbury) of the DTNDP is now out of date and irrelevant. These sections should, therefore, be removed from the TNDP.</i></p>		
<p><i>• The DTNDP refers to the now superseded version of the National Planning Policy Framework (NPPF) (2012). The DTNDP should be prepared having regard to the 2019 version of the NPPF and updated National Planning Practice Guidance.</i></p>	Agreed – amend report	Amend to bring up to date
<p><i>Policy 1 aims to prevent development that ‘effectively merges’ Thornbury with these identified ‘villages and hamlets’. It is not clear what ‘effectively merges’ means: whether this applies to development that abuts, encircles, or is in close proximity to; the term is ambiguous and therefore open to different interpretations. However, in any event, for the reasons described above, there is no clear evidence or justification to support the principle of the policy.</i></p> <p><i>With reference to views and vistas, the objective under Chapter 5 is again to ‘preserve’ countryside and architectural views, which maintain the ‘essential character of its market town ethos and history’. Such an approach (to preserve views) is not in general conformity with South Gloucestershire Council’s strategic policies as set out within the adopted Core Strategy (2013). For example, Policy CS1 of the Core Strategy states that development proposals should safeguard and enhance, through incorporation into new development, existing landscape features; while Policy CS5 expects developments to conserve and enhance the character, quality, distinctiveness and amenity of the landscape. Appendix C to the DTNDP outlines a number of ‘key views and vistas’ but, again, these are not supported by an appropriate or robust evidence base.</i></p>	Include in Policy 1 review. Agree to check the text	Amend Policy 1 to improve clarity
<p><b>AP2.13 - Policy 1 - Rural Character and Landscape Setting</b></p> <p>Savills/Barwood</p> <p><i>We support the intentions of this draft policy, however, as currently drafted the policy is unclear, and thus not effective in practice.</i></p> <p><i>The explanatory text and the subsequent policy text in regard to coalescence present a clear policy objective within the draft NDP, and provide a basis upon which to assess development proposals. However, the generic reference within the policy wording to ‘protect the landscape setting of Thornbury’ is not clearly supported by the explanatory text, and would be ineffective in practice. In contrast</i></p>	Agree we need to look at that in review of policy 1	Amendment to improve clarity of Policy 1

Comment	Response	Action
<p><i>adopted Policy PSP2 (Landscape), confirms that in assessing development proposals in relation to landscape impact it is necessary to identify the ‘special character’, and landscape attributes which are inherent to the character of the area etc. These are standard requirements within any Landscape and Visual Impact Assessment. If the intention of the draft policy is protect a particular element of the landscape setting of Thornbury, such as the ridgeline as mentioned within the explanatory text, then this should be made clearer to ensure that the intentions of the policy are understood by any party proposing development, and also South Gloucestershire Council when assessing a proposals conformity with the policy.</i></p>		
<p>Trapped  <i>Strongly agree with the sentiment in Policy 1 about preventing the coalescence of Thornbury with surrounding hamlets, but would go further by extending Policy 1, or adding a new Policy 1a, establishing the need for strategic green gaps in the case of new major developments (over 50 dwellings) around the north and east of the town. Propose that the larger the proposed development the greater the need for, and extent of, the required green gap which should be measured from the proposed built area within any such development to the nearest existing or planned approved housing. Propose that the green gap should be not less than 25% of the diameter of the proposed built area at its widest point. Note that Thornbury Residents Against Poorly Planned Development (TRAPP’D) submitted an e-Petition requesting a Green Belt Review to South Gloucestershire Council (SGC) in August 2019. Following a meeting with Senior Strategic Planning Managers on 30th July 2019, TRAPP’D was informed that SGC had commissioned an independent Review following which interested parties would be involved, but no subsequent response has been forthcoming</i></p>	<p>for inclusion in discussion re Policy 1</p>	<p>Amend Policy 1 to improve clarity and robustness</p>
<p>Michael Neale  <i>If this policy is supported by Planning Statute then it should be identified. Is it really part of the democratic remit?</i></p>	<p>can we identify planning regs? I think this policy was copied from another NP which had been approved. If so, it gives it planning legitimacy. Can we</p>	<p>Discuss</p>

Comment	Response	Action
	quote the NP? I would like CGT to check this one	

## South Gloucestershire Comments

Page	Paragraph	Comment	Reason	Response
iii	1.2	<p>Reference to: <i>National Planning Policy Framework <del>2012-2019</del></i></p> <p><i>The current local plan for Thornbury Parish is the South Gloucestershire Local Plan: Core Strategy for 2006 - 2026 which was adopted in December 2013 and the Policies, Sites and Places Plan which was adopted in November 2017</i></p> <p><i>In April 2020 the <del>However, in August 2019, this</del> Joint Spatial Plan was formally withdrawn from the examination process rejected by Planning Inspectors. At the time of writing, 8th November 2019, for the purposes of conformity, <del>the</del> Core Strategy and Policies, Sites and Places Plan for 2006-2026 remains the higher-level adopted local development plan in place.</i></p>	<p>Factual correction – Updates on NPPF revisions, JSP withdrawal and the position of SGCs adopted local development plan.</p>	<p>Amendment to update on NPPF</p>
16 - 17	Section 5.4 Character and Setting	<p>With this in mind it is suggested that some additional information relating to important historic places within the town and important views are needed if maintaining this valued character is to be part of the plan. Thornbury Castle and St Marys' Church are extremely important sites, providing a unique character and an important link to its past. However, neither are mentioned in any part of the plan. They are worthy of mention in the history section and within policies relating to preservation of character and important views.</p>	<p>To highlight the important wealth of heritage assets within Thornbury.</p>	<p>Amendment to improve clarity</p>

Page	Paragraph	Comment	Reason	Response
17	Second paragraph	<p>Reference made to the South Gloucestershire Landscape Assessment.</p> <p>May be helpful to add a link to the SGC webpage:  <a href="https://www.southglos.gov.uk/environment-and-planning/countryside/planning-landscape-character-assessment/">https://www.southglos.gov.uk/environment-and-planning/countryside/planning-landscape-character-assessment/</a></p> <p>The plan could make reference to the specific Character Area th cover or are adjacent to Thornbury:</p> <ul style="list-style-type: none"> <li>• 7 Falfield Vale</li> <li>• 18 Severn Ridges</li> <li>• 19 Oldbury Levels</li> </ul>	To provide the Examiner with a direct link to the specific documents that the plan makes reference to and provide clarity.	Amendment to improve clarity
17	Third Paragraph	<p><i>It is also important that there are easy access routes into the open countryside which link in with the footpath networks within the town. The Rural Character and Landscape Setting Policy favours any future development to be on the flat, to ensure Thornbury stays within the bowl of the Severn Vale and does not impinge on the Severn Ridges. Any future development proposals should take into account these amenities and ensure that the visual and access links to the countryside around are maintained. Thornbury's location within the bowl of the Severn Vale is shown in Figure 6.</i></p> <p><i>The highlighted text above and beyond appears to direct development, however this is not included within the policy text. The text in this paragraph goes that in the policy text set out in Policy 1. Also see the section at the beginning of this document regarding policy 1</i></p>	Include in review Policy 1	Amend Policy 1 to improve clarity

Page	Paragraph	Comment	Reason	Response
18	Figure 6	This page should reference the source of Figure 6 as the S Glos Landscape Character Assessment SPD Adopted November 2014.	Factual correction. Agree – propose amend document	Amend for accuracy
19	Policy 2	When making reference to ‘major development’ is this intended to be the National Planning Policy Framework Definition? It may be worth clarifying either way.	For clarity. Agree clarification	Amendment for clarity

# 4 Housing

## 4.1 Analysis

The assessment and response to the comments raised on the chapter 'Housing' is set out in the table below.

Page	Para	Comment	Response	Action
South Glos Council Response – Appendix 3				
21	6.2	<p><i>To provide high quality, affordable, tenure blind sustainable housing that meets the needs of people of all ages.</i></p> <p>Does the above reference to affordable refer to National Planning Policy Framework (NPPF) Affordable Housing or affordable low cost market housing which falls out the NPPF definition of affordable housing? There should be a clear distinction between the two.</p>	Agree – propose amend document for clarity.	Amend for clarity
22	Policy 3	<p>Revised wording is suggested to the second bullet point to ensure robust policy that delivers development that builds on the best of the local character and respects traditional building materials, development grain, pattern and forms etc:</p> <p><i>Ensure all buildings, spaces and the public realm are well designed and display a high level of architectural quality which responds positively to local context, paying particular attention to traditional local character and distinctiveness</i></p>	<p>Agree – propose amend document</p> <p>Revised wording suggested for clear, robust policy.</p>	Amend for clarity
25	Policy 5	<p>The policy suggests approaches to sustainable design and construction in new developments, however it may also be worth outlining that the re-use of buildings is also more sustainable than replacement. This also takes account of the high proportion of traditional buildings that currently make up the town.</p>	Agree – propose amend document for robust policy	Amend for clarity

Page	Para	Comment	Response	Action
25	Policy 5	Please note that the Waste Collection Guidance SPD has recently been updated.	Agree – propose amend document	Amend to update
25	Policy 5	It may be helpful that reference should be made either under Policy 5 or elsewhere in the document that there is a planning policy requirement for all secured NPPF affordable housing to be built to meet internal Nationally Described Space Standards and Building Regulations Accessibility Standards M4(2) and M4(3) as required by Policy PSP37 of the adopted Policies, Sites and Places Plan (Adopted November 2017).	Agree – propose amend document for clarity	Amend for clarity
26	6.7 Housing need	Reference should be made either under the heading of 6.7 Housing Needs or Policy 8 Mixed Development that the provision of 35% affordable housing in terms of tenure & house type shall be in line with the West of England Strategic Housing Market Assessment or as updated by future housing market assessments. Also, reference should also be made to the Affordable Housing and Extra Care Housing Supplementary Planning Document May 2014 or as updated.	Agree – propose amend document for clarity	Amend for clarity
27	Policy 8	<i>A minimum of 35% affordable housing is expected for developments of 10 dwellings or more as set out in the South Gloucestershire Core Strategy.</i>  Policy CS18 of the Core Strategy threshold refers to 10 dwellings or 0.33 hectares. Please note that National guidance regarding planning obligations was brought into line with the NPPF 2018 through amendments to the National Planning Practice Guidance (NPPG): Planning Obligations in March 2019. Paragraph 023 Reference ID 23b-023-20190315 of that guidance relates to the threshold below which affordable housing contributions should not be required. The main amendments to national policy are:	Agree – propose amend document for NPPF 2019 update.	Amend for update

Page	Para	Comment	Response	Action
		<ul style="list-style-type: none"> <li>• Provision of affordable housing should only be sought for residential developments that are major developments.</li> <li>• Major development is defined by the NPPF as defined as development of 10 or homes will be built or the site has an area of 0.5 hectares or more.</li> </ul> <p>Whilst Policy CS18 of the core strategy is still material the Affordable Housing threshold element is superseded by the NPPF definition of major definition i.e. 10 dwellings or 0.5 hectares.</p>		
28	Policy 9	<p>The council support the preference for ‘main town centre uses’ within the town centre boundary to ensure the long term vitality of the town centre.</p> <p>Suggested wording:  <i>The development does not result in the loss of locally important green space as set out in Policy 19: Local Green Space.</i></p>	Agree – propose amend document for clear, robust policy	Amend for clarity
28	Policy 9	<p>Policy 9 on page 28 sets out that ‘Development of infill sites within the settlement boundary or redevelopment of previously developed sites, for example the Castle School Sixth Form Centre, will be supported where...’ [certain criteria met]. Support for the Castle School to relocate to a new site is critical to the successful delivery of a future scheme. It would be helpful if similar support could be extended to the aspiration of the Council and Castle Schools Education Trust (CSET) to develop a new Special Free School on the Marlwood School site.</p>	Agree – propose amend document to address education support.	Amend to strengthen policy

Page	Para	Comment	Response	Action
Other comments – Appendix 4.3				
		Passivhaus is a high standard to achieve but also be aware that there are compromises necessary in achieving it which affect the aesthetics of the houses, which are not always to everyones taste or to the local vernacular. There are also restrictions on which products can and cannot be used to achieve this standard, some of which involve partnering with a limited number of large multinational building product manufacturers and suppliers, who can afford to meet the conditions and requirements set and commission the rigorous training, testing and certification required, as opposed to smaller more local construction related businesses, tradespeople and craftsmen who would be excluded if it's too costly for them. Maybe add a note to encourage local industry and construction businesses which also reduces mileage to site / carbon footprint and helps the local economy.	Review Standards  Add reference to encouraging local industry and construction businesses in the supporting test  Policy 5	Standard check to ensure policy is consistent.  Policy amend to add clarity
	Policy 7	Within the legal limitations of the plan, support should be stated for community scale renewable energy installations. For example, field scale solar PV could be integrated with natural grazing and great biodiversity to offset energy use in new developments; there are potential sites with the Neighbourhood plan boundary for 'big' wind. Such installations would be at appropriate scale (like the existing wind turbine within the plan area above Rockhampton), and could also be linked to new developments or may be community supported projects to offset the emissions within the parts of the built environment where energy efficiency is harder to address	Agree add community scale renewable energy support in text Policy 7	Amend to include addition as policy enhancement
	Policy 6	because the referenced Code for Sustainable Homes has been withdrawn, it may be preferable to refer (again) to Passivehaus standard. Passivehaus is equivalent to CFSH level 4.	Agree – propose amend document – Is this right - to check? Policy 6	Standard check to ensure policy is consistent with standard and SGC policy

Page	Para	Comment	Response	Action
	Policy 4	The emphasis on good design and respecting local character is very welcome, alongside ensuring the highest standards of sustainable design and construction. I particularly support Policy 4 - Design Review. More might usefully be said about retrofitting existing buildings to improve energy efficiency. See the section on Sustainable Development and Connectivity for a reference to 'Building with Nature'.	Agree – propose amend document – on retrofitting energy efficiency Policies 4, 6	Amend to include addition as policy enhancement
22	Policy 3	Many of the sentences in the paragraphs below are worded such that developers can ignore them. Applications for major developments “are encouraged to demonstrate” how they respond to best practice through the submission of Building for Life 12. Why “encourage” – this does not mean compliance – if this word is left out is it much more enforceable to use the traffic light system for checking compliance?	Check wording to ensure we are as positive as we are permitted Policy 3	Plan review for positive language
23	Section 6.6	Many of the sentences in the paragraphs below are worded such that developers can ignore them. “High level of insulation within homes” what is the specification for builders to use? “Acknowledgement of need” – change to must? “Generation of low carbon energy” – does this mean a zero carbon home which was dispensed with by central government? BREEAM – “housebuilders are encouraged” – why not “are to reach BREEAM 5 star rating”? Proposals for new development are encouraged to incorporate the following: - “encouraged”! should be “are to” to comply with climate change goals. “Passivehaus” standards are “encouraged” – why not “required”? “Code for Sustainable homes” was withdrawn in 2015 according to the Gov.UK website – level 6 is needed for climate change needs?	Check standards referred to and wording	Standards check and policy amend where inconsistent. Use of language consistent with guidance

# 5 Town Centre and Economy

## 5.1 Analysis

The assessment and response to the comments raised on the chapter 'Town Centre and Economy' is set out in the table below.

Comment	Response	Action
<p>In principle, Vistry Homes supports the Aim and Objectives listed in Chapter 7, which support a vibrant town centre and a thriving economy.</p> <p>While Vistry Homes has no specific comments to make on Draft Policies 10, 11, or 12 recognition should be given within the supporting text to the important role that new development will play in supporting and enhancing the vibrancy of the town centre via increased footfall and expenditure. The statement made under section 7.5 that new housing around Thornbury is 'mostly farther away from the centre than many people would walk, so there is a real risk they will drive elsewhere', is unjustified. Indeed, recent planning decisions acknowledge that new housing developments around Thornbury's northern and eastern edges are accessible to the town centre via foot, bike and/or public transport.</p>	<p>Uncertain. Should we give more recognition, as suggested, to the positives of the increased population from recent development?</p>	<p>Plan amendment to reflect positive impact of increased population</p>
<p>The plan should acknowledge the benefit of new homes close to the Town Centre and High Street in terms of improving the vitality of the Town.</p>	<p>We could give more recognition, as suggested, to the positives of the increased population from recent development in supporting text?</p>	<p>Plan amendment to reflect positive impact of increased population</p>

## 5.2 Consultee Letters

Comment	Response	Action
<b>AP2.22 - 7 Town Centre and Economy</b>		
<p>Vistry Homes</p> <p><i>In principle, Vistry Homes supports the Aim and Objectives listed in Chapter 7, which support a vibrant town centre and a thriving economy.</i></p> <p><i>While Vistry Homes has no specific comments to make on Draft Policies 10, 11, or 12 recognition should be given within the supporting text to the important role that new development will play in supporting and enhancing the vibrancy of the town centre via increased footfall and expenditure. The statement made under section 7.5 that new housing around Thornbury is ‘mostly farther away from the centre than many people would walk, so there is a real risk they will drive elsewhere’, is unjustified. Indeed, recent planning decisions acknowledge that new housing developments around Thornbury’s northern and eastern edges are accessible to the town centre via foot, bike and/or public transport.</i></p>	<p>It may be reasonable to adjust our text as suggested.</p> <p>However, our statement in section 7.5 still stands.</p>	<p>Discuss</p>
<b>AP2.23 - Policy 10 - Town Centre Design Principles</b>		
<p>Graham Lanfear</p> <p><i>G. Conservation area – Shop Frontage Design , Wall Colouring.</i></p> <p><i>Many of the market towns situated in the Cotswold have a specific R.A.L colour code which is to being used to controls the hotchpotch effect/approach to wall/shop front colouring, shop front styles, materials etc. as can be found in Thornbury’s Town Centre. As someone who has lived in Thornbury all my life I can’t believe how the shopping experience and facilities have deteriorated over the years, you could obtain more goods and services when the town had only three thousand residents all we have now are charity, coffee and unlet shops etc. I believe we need urgent expert marketing advice to help us to create a niche market town culture and/or environment selling quality goods including a range</i></p>	<p>NFA: comments are largely beyond our remit, beyond what we have already put in the plan.</p>	<p>Discuss</p>

Comment	Response	Action
<p><i>of fine arts and antiques etc. I believe The town development committee is nothing more than a “talking shop” and not fit for purpose to sell our town and attract inward investment. The development committee may be ok to decide on a couple of directional signs but do not have the range of expertise to achieve the kind of makeover that is required to turn it into a vibrant place to live with must have goods. It would appear that at the moment each shop owner is doing his own thing - this has got to stop and the Neighbourhood Plan must be designed to enable residents to take control and reset the image standards it requires this obviously to include shops owned by large corporate organisations.</i></p>		
<p>Michael Neale  <i>1st para:- why not include this map (relative to Thornbury) within this document.</i></p> <p><i>2nd &amp; 4th bullet points:- defined by the limits of the Conservation Area and Listed Building status.</i></p> <p><i>6th bullet point:- Why, surely a variable back line of a path enhances the existing character of the area.</i></p>	<p>Michael Neale’s comments re Policy 10:  1<sup>st</sup> para: Uncertain: is he suggesting we add another map illustrating the town centre area? Worth considering</p> <p>2<sup>nd</sup> &amp; 4<sup>th</sup> bullets: Uncertain: does this mean “already covered, so no need to state it”?</p> <p>6<sup>th</sup> bullet: Agree. Can we consider omitting this?</p> <p>Michael Neale’s comments on 7.5 text</p>	<p>Discuss</p> <p>Discuss</p> <p>Discuss</p>
<p><b>AP2.24 - 7.5 Town Centre Vitality</b></p>		
<p>Michael Neale  <i>1st. para. Is this really a planning matter; surely its dependent on Rents and Business Rates.</i></p>	<p>1<sup>st</sup> para: Agree: many respondents commented on a perception of high rents and business rates. Should we add a sentence to this para acknowledging this perception as part of the reason for losing shops?</p>	<p>Discuss</p>

Comment	Response	Action
<i>2nd. Para. Again the reason for recent housing being too far away is the lack of a Town Plan which would have guided developers to approach landowners closer to the centre.</i>	2 <sup>nd</sup> para: Not sure if it is helpful at this stage to state that it is due to the lack of a town plan that all this extra development has happened arguably in the wrong areas.	Discuss
Policy 12 - Town Centre Vitality Michael Neale 6th. bullet point:- Planners classification of user classes. Would help the casual reader if these were described	6 <sup>th</sup> bullet: Good suggestion. Could we include these here? Or else as an appendix?	Discuss

#### South Gloucestershire Council Comments

Page	Paragraph	Comment	Reason	Steering Group Action
30	Policy 10	<p>Mention should be made here of the very high number of listed buildings within the town centre, protected by legislation.</p> <p>Development to the rear of these buildings may be harmful to their setting. There are locations within the town centre where 'active frontages' would not be appropriate, for example the more tranquil and private rear spaces. The revised wording below is therefore suggested.</p> <ul style="list-style-type: none"> <li><i>Development to the rear of existing buildings will be considered acceptable where it would be appropriate to enclose space, define the public and private realm or create new active frontages, and would not unduly impact upon the operation of existing units or the historic</i></li> </ul>	Revised wording suggested for clear, robust policy.	Plan amendment to improve clarity

Page	Paragraph	Comment	Reason	Steering Group Action
		<p><i>importance of the place, for example protecting burgage plots or the setting of a listed building.</i></p> <ul style="list-style-type: none"> <li><i>Proposals for new development should respect local context through continuity of the building line, responding to adjacent building heights, roof and cornice <b>lines and protecting important views or gaps.</b></i></li> </ul> <p><i>Applications will need to demonstrate how they reflect local vernacular <b>and urban grain/historic pattern of development</b> through the scale and design for buildings and use of materials, contributing positively to the quality and character of the town centre, and the high-quality historic townscape of the conservation area.</i></p>		

Page	Paragraph	Comment	Reason	Action
31	Policy 11	In addition to those mentioned already on policy 11, one of the overarching preservation and enhancement strategies of the 2004 conservation area appraisal is the protection of the important landscape features and setting to the town and the open spaces within it. Of particular importance are the views over the lowland levels and Severn Estuary and the open aspects to the west and north with the old town walls set within open space and the open spaces identified within the town development boundary. This could be added to policy 11 as an additional bullet point.	Additional text suggested for robust policy. Agree: add a bullet point to policy 11 as suggested, e.g. "Maintain the views over the lowland levels..."	Plan amendment to improve clarity
33	Policy 12	The first two paragraphs slightly contradict each other as one states any proposals should broaden the retail offer while the second paragraph welcomes complementary non-retail uses. It may be worth rethinking the wording.	For clarity. Agree: adjust wording of para 1 to omit the words "broaden the retail offer" and adjust the	Plan amendment to improve clarity

Page	Paragraph	Comment	Reason	Action
			end "... as a destination for a rewarding and enjoyable shopping or leisure experience"?	
33	Policy 12	☑ <i>On upper floors will be welcomed, subject to appropriate signage.</i>	Revised wording to ensure clear and robust policy. Agree: adjust as suggested	Plan amendment to improve clarity
33	Policy 12	Officers support the policy intent to protect the vitality of the town centre however we would expect any proposal for change in employment use to be able to adequately demonstrate how it would enhance vitality before fully supporting as this may indeed be counter-productive to the intent of the policy itself. We agree that the range of shops identified should be an important priority for the town. And while recognising the potential for residential development within the town centre, the focus should remain on encouraging retail use in line with the intent of CS11, 12 & 14 and PSP 31 & 33.	Agree. Stress on vitality of town centre, but not sure how we adjust the policy. However, it is very important that we understand how SG will look at future proposals.	Plan amendment to support SGC policy

Page	Paragraph	Comment	Reason	Action
35	Policy 13	The provision of employment within Thornbury is welcome and will reduce the pressure on the local network form out commuting from Thornbury.  Provision of office and light industrial units, particularly as a means to ensure that further safeguarded employment sites are not lost to development. It is perhaps important to learn lessons	The examiner may be looking for justification for these specific land uses.  Discuss with South Glos	Discuss with South Glos

Page	Paragraph	Comment	Reason	Action
		<p>from other incubation centres and understand the needs and wants of businesses / starts up i.e. type of other support services (IT connectivity / transport infrastructure) / business support offering.</p> <p>It may be worth thinking about the evidence base available to assess the above to ensure the policy works for local business opportunity and requirements and ensure the provision of office and light industrial units is justified.</p>		
37	8.1 Context	<p>Page 37 of the Neighbourhood Plan refers to a previous version of the Commissioning of Places Strategy (2017–2021). The Neighbourhood Plan may wish to update these references to reflect the most up to date position. The Plan makes reference to concern by local residents that the pupil projections published by the Council are too low. It is important to note that the projections are generally accurate and include the impact of development already completed and occupied. Separately, the Council estimates the demand arising from new housing planned in line with build out rates. Build out rates published in the Council’s Authority Monitoring Report are used for this purpose. Importantly, the number of years it takes for children to be yielded from new housing are often, understandably, misunderstood and can be overstated. The Council is currently updating its pupil</p>	Updated reference document.	Reference update

Page	Paragraph	Comment	Reason	Action
		projections methodology and details of this will be available in future		

Page	Paragraph	Comment	Reason	Action
39	Section 8.6 Community Facilities	It may be helpful to acknowledge and include reference to Community Infrastructure Levy (CIL) as well as Section 106 (S106) as the key mechanisms to deliver community facilities. The use of S106 or CIL varies depending on the type of infrastructure to be delivered. For community centres S106 funding was secured from Park Farm and Morton Way developments to increase capacity and enhance centres in the town, but since August 2015 a CIL has been levied on new developments where as Public Open Space is still secured and funded through 106 agreements.	To acknowledge S106 and CIL in securing funding.	References update

## 6 Services and Facilities

### 6.1 Analysis

The assessment and response to the comments raised on the chapter 'Services and Facilities' is set out in the table below.

Comment	Response	Action
Vistry Homes recognises that delivery of infrastructure, and social infrastructure particularly, is important to both existing and future residents in the neighbourhood plan area. In this regard, while concerns are raised in Chapter 8 in relation to increased pressure on existing facilities and demand for local services (for example health facilities) the TNDP should also recognise the important role that new development can play, both in delivering new facilities and in funding infrastructure via community infrastructure levy receipts, to the benefit of both existing and future residents.	Agree that both CIL and S106 monies should be mentioned – see also SGC review of this section.	Plan amendment to improve clarity and robustness

### 6.2 Consultee Letters

Comment	Response	Action
<b>AP2.27 - Policy 14 - Phasing of Community Infrastructure with Housing Development</b>		
Savills/Barwood <i>We recognise the intention of this policy, and the local concerns around ensuring development proposals are delivered in parallel with necessary infrastructure improvements. The draft policy correctly identifies the role of s106 agreements and planning conditions in securing the timing of delivery and/or contributions to support</i>	Agree this element (also mentioned in SGC review)	Discuss

Comment	Response	Action
<p><i>delivery by a third party, such as South Gloucestershire Council. This should be extended to reference the Community Infrastructure Levy (CIL) which also has a role in the delivery of community infrastructure to support housing delivery.</i></p> <p><i>The phasing of infrastructure is based upon detailed assessments drafted as part of the planning application process, and is subject to detailed discussions during its determination as further information is provided by the local authority and statutory consultees. The 'tests' associated with the provision of these obligations are set out within the NPPF, see paragraph 56.</i></p> <p><i>The appropriate trigger for the obligations forms part of the detailed discussions, and must be supported by evidence; whilst also taking into account the timing of other obligation requirements. The requirement for infrastructure 'at the earliest possible opportunity' isn't therefore based upon the process in practice; and this reference should be removed.</i></p>	<p>NFA: the wording reflects all the factors that were raised in our consultation</p>	
<p>Michael Neale <i>Policy 14. OK if specifically related to a Town Plan – otherwise it will never happen.</i> Trapped <i>More emphasis needs to be placed on the provision of essential infrastructure to support housing development and inevitable population growth at a much earlier stage in the planning process. As a result of the limitations of the Section 106 Agreement contributions pertaining to individual developments, the highways improvements are woefully inadequate and will require more substantial funding to alleviate the resultant traffic congestion – see comments under Policy 20.</i></p>		<p>Discuss</p>
<p><b>AP2.28 - Policy 15 - Leisure Opportunities for Young People</b></p>		
<p>Michael Neale <i>Greater use should be made of the land behind the Leisure Centre and adjacent to the skate park. Possibly relocate the Tennis Courts!</i></p>		<p>Discuss</p>

Comment	Response	Action
<p>Trapped</p> <p><i>Whilst appreciating that walking, cycling and public transport are being prioritised under Policy 2, could Mundy Playing Fields be made more accessible to the private car? Currently access via Kington Lane and Castle Court Car Park are the only viable options.</i></p>		

### South Gloucestershire Council Comments

Page	Paragraph	Comment	Reason	Action
37	8.1 Context	<p>Page 37 of the Neighbourhood Plan refers to a previous version of the Commissioning of Places Strategy (2017–2021). The Neighbourhood Plan may wish to update these references to reflect the most up to date position. The Plan makes reference to concern by local residents that the pupil projections published by the Council are too low. It is important to note that the projections are generally accurate and include the impact of development already completed and occupied. Separately, the Council estimates the demand arising from new housing planned in line with build out rates. Build out rates published in the Council’s Authority Monitoring Report are used for this purpose. Importantly, the number of years it takes for children to be yielded from new housing are often, understandably, misunderstood and can be over-stated. The Council is currently updating its pupil projections methodology and details of this will be available in future submissions of the annual School Capacity</p>	<p>Updated reference document. Agree amend references</p>	<p>Reference update</p>

		(SCAP) return to the Department for Education. The DfE publish the return submissions each year.		
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Page	Paragraph	Comment	Reason	Response
39	Section 8.6 Community Facilities	It may be helpful to acknowledge and include reference to Community Infrastructure Levy (CIL) as well as Section 106 (S106) as the key mechanisms to deliver community facilities. The use of S106 or CIL varies depending on the type of infrastructure to be delivered. For community centres S106 funding was secured from Park Farm and Morton Way developments to increase capacity and enhance centres in the town, but since August 2015 a CIL has been levied on new developments where as Public Open Space is still secured and funded through 106 agreements.	To acknowledge S106 and CIL in securing funding.  Consider including CIL references Chris' view not necessary - discuss	Discuss

# 7 Sustainable Development and Connectivity

## 7.1 Analysis

The assessment and response to the comments raised on the chapter 'Sustainable Development and Connectivity' is set out in the table below.

Comment	Response	Action
Moving to a low carbon future needs to be given priority.	Agree: make this a stronger theme in this part of the document, within supporting text.	Amend to strengthen policy
Encourage the use of green buffers around existing hamlets under threat of being encircled by development. Create designated wildlife corridors / zones around them	Consider possible additional text within 9.4 –	Discuss
Moving to carbon net zero is crucial. Any new development should have biodiversity net gain as its aim (not just those as needed in the draft Environment Act).	Agree: strengthen net zero in the supporting text	Amend to strengthen policy
The maps must be updated to show the new houses already existing at Post Farm, Park Farm and Thornbury Fields, as the balance of the town is quite different already from what is shown in Figure 8.	Agree	
The policies here are all top notch, Policy 17, 18 and 19.		
— Vilner Lane Wood is perfect as community green space.		
In principle Vistry Homes supports the Aim and Objectives listed in Chapter 9 of the DTNDP.	agree that biodiversity net gain could be used here to make sure that new developments are strong enough. Need to reword policy 17 to cover several comments below	Amend to strengthen policy and improve clarity
However, regarding Draft Policy 17, it is noted that the wording seeks to 'retain' as well as enhance biodiversity and wildlife habitats, wildlife corridors and other aspects of green infrastructure. While biodiversity enhancement is a feature of national planning policy, it is not realistic to require retention of all biodiversity and wildlife		

Comment	Response	Action
<p>habitats, wildlife corridors and other aspects of green infrastructure. The policy fails to recognise that some loss of these sources may be necessary to facilitate development. It is common practice for new developments to mitigate habitat and other green infrastructure losses, providing enhancements and, more often, biodiversity net gain. Indeed, the expectation is that biodiversity net gain will become a legislative requirement once the Environment Bill (2020) is enacted. The policy should, therefore, be redrafted to reflect this position.</p>		
<p>The Plan should discuss in more detail the opportunity to improve and expand pedestrian and cycle links from the high street and Mundys Playing Fields to the Leisure Centre along the Jubilee Footpath. This could include provision of wildlife areas and improved habitat &amp; landscape which would be accessible to the public.</p>	<p>NFA but the Jubilee path, and other footpaths, could be identified as green infrastructure within an amended map</p>	<p>Maps update</p>
<p>The map provided for Ch 9 does not include the housing developments North of Butt Lane. These are built on land which has public footpaths linking Morton Street and Butt Lane which enable local residents of these and Park Farm estates access to the extensive network of footpaths and Bridle Tracks/Green lanes in the area of Lower Morton and Duckhole on the NNW margins of the town area outlined on the map. These lanes, footpaths and byeways have proved a popular asset to many families during the Covid period and deserve to be included in the green corridors on the map.</p>	<p>Agree – some of these well used footpaths could be marked on our Green Spaces map</p>	<p>Maps update</p>
<p>The Gloucestershire Wildlife Trust and the University of the West of England have developed 'Building with Nature', a new benchmark for the design and maintenance of green infrastructure. The benchmark has been well received. It would be applicable to new developments in Thornbury.</p> <p>see <a href="http://www.buildingwithnature.org.uk">www.buildingwithnature.org.uk</a></p>	<p>Consider including reference in supporting text? this is something we could refer to if we wanted to – It is new, but has relevance nationwide. We could state a preference that green infrastructure within any new developments gains Green infrastructure Excellent accreditation.</p>	<p>Discuss</p>

Comment	Response	Action
<p>The green spaces are vital not only to the rural character of the area but for the environment and health of the community. The recent circumstances of isolation due to Coronavirus have shown just how many residents have been able to make use of the countryside and lanes around the town for exercise, particularly around the Crossways Lane/ Hackett lane area. We cannot afford to lose these areas.</p>	<p>Agree – recent need for green spaces could strengthen our policy and go on map.</p>	<p>Map update</p>
<p>Very much agree. The new developments in the 60s did a good job in this respect; it is not too clear how the current developments will turn out as most are on the periphery.</p> <p>One key point - in existing developments most cul-de-sacs and closes have a footpath exit. Could this be 'encouraged' on all new designs as it encourages you to wander at will?</p> <p>One probably off plan issue: the streamside walks are noticeably overgrown, the grass and streams are being suffocated by encroaching bramble in many places. Reading old descriptions of walks, many flower areas are described that are now masses of undergrowth. Could this be addressed if only piecemeal, to get them back as they were?</p>	<p>Agree            Housing section supporting text?</p> <p>NFA: outside scope</p>	<p>Discuss</p>
<p>There should be no reduction of green space and every opportunity to increase or enhance it should be used. Areas of new development must include green space and link with previous developments. Walking and cycling routes must be prioritised. Surfaces of paths need to be upgraded to allow all users to be safe, including elderly, disabled and families with small children. Most of the current paths are quite old with broken surfaces and become slimy with leaves in the autumn, which deters less mobile users. A full upgrade is needed. A paths map should be created and advertised, with facility to change it as time passes and new connections are made. There needs to be a lot more tree planting alongside a public education programme to encourage food growing, even in public spaces as well as in gardens. All new developments must provide allotments for at least 20% of their dwellings. This could be achieved by reducing the size of individual gardens, many of which are only used</p>	<p>NFA re current footpaths as outside scope. But review current green spaces map for footpaths.</p> <p>Tree planting in existing spaces is part of current land management practice – see above comments.</p>	<p>Map update</p>

Comment	Response	Action
<p>for a table and chairs and a washing line, if that. Communal gardens with food growing plots would be a suitable alternative to private gardens, especially for apartments.</p>	<p>Addressed in Policy5</p>	
<p>More needs to be said about sustainability expectations ie all new homes and developments should have electric charging points and suitable bike storage- ie a specific secure structure or garage no less that 7x3m.</p> <p>Legibility of the town centre is good as is connectivity of many green spaces but these are not a feature of new developments so specify this in more detail so it's not watered down.</p>	<p>NFA</p> <p>Housing section – this can be expressed as new housing being ‘zero carbon ready’.</p> <p>Consider in supporting text for Policy 5 or other policy – discuss with Chris</p> <p>NFA comment only</p>	<p>Discuss</p> <p>Discuss</p>
<p>The objectives for this section are once again wishy washy. Climate change and the impact that the Thornbury residents and extended community has on the local and regional environment is very poor with many residents using vehicles for short journeys and as their main transport to and from work. The green areas in and around the town are important and need to be better maintained. The town centre is highly polluted due to allowing all kinds of traffic to access and park in and around the High Street area. The centre of the town should be made traffic free putting in place walking and cycling infrastructure instead An objective should be in place to make Thornbury a carbon neutral Town by xxxx date and any proposed development (houses, businesses, roads, parking, facilities) should only be agreed if it makes a positive contribution to the Zero carbon neutral target.</p>	<p>Consider whether we need to amend context/supporting text (agreed no policy changes) Done</p> <p>1<sup>st</sup> objective in 9.3 says this: “To ensure developments promote our community’s resilience to climate change through careful design.” With hindsight this is lacking climate change mitigation, which is implicitly required for UK to reach zero carbon by 2050. Suggest we upgrade it to this: To ensure developments promote our</p>	<p>Discuss</p> <p>Discuss</p>

Comment	Response	Action
	<p>community's resilience to climate change, and contribute fully to our national climate change mitigation commitments, both through careful design.</p> <p>We can add in the concept of carbon sequestration into policy 17 and 18 and 19.</p> <p>Housing to be 'zero carbon ready' can go in the Housing section.</p>	

## 7.2 Consultee Letters

Comment	Response	Action
<b>AP2.30 - 9 Sustainable Development and Connectivity</b>		
<p>Vistry Homes</p> <p><i>In principle Vistry Homes supports the Aim and Objectives listed in Chapter 9 of the DTNDP. However, regarding Draft Policy 17, it is noted that the wording seeks to 'retain' as well as enhance biodiversity and wildlife habitats, wildlife corridors and other aspects of green infrastructure. While biodiversity enhancement is a feature of national planning policy, it is not realistic to require retention of all biodiversity and wildlife habitats, wildlife corridors and other aspects of green infrastructure.</i></p>	<p>Agreed: we can refer to Biodiversity net gain as a principle we support. Include in redraft of policy 17 wording</p>	<p>Amendment made to strengthen policy</p>

Comment	Response	Action
<p><i>The policy fails to recognise that some loss of these sources may be necessary to facilitate development. It is common practice for new developments to mitigate habitat and other green infrastructure losses, providing enhancements and, more often, biodiversity net gain. Indeed, the expectation is that biodiversity net gain will become a legislative requirement once the Environment Bill (2020) is enacted. The policy should, therefore, be redrafted to reflect this position</i></p>		
<p>Michael Neale  <i>Fig 8. Amend to show additional streamside walks – in green. The area coloured pink to the South of the town is part of the escarpment, ground sloping down to Midland Way – which must remain development free - including Filnore Lane and Filnore Woods, the latter of which is already as previously stated in the text, a much used leisure facility.</i></p>	<p>Agree – map needs amending</p>	<p>Map updated</p>
<p>Graham Lanfear  <i>B. On street school parking with engines left running for long periods to the detriment and loss of social cohesion .</i>  <i>1. To support the Government’s initiative to reduce traffic pollution and improve social cohesion under the neighbourhood plan and a 100metre no parking zone shall be to be created outside all schools on the plan area. To support schools South Glos. Council will</i></p>		<p>Discuss</p>

Comment	Response	Action
<p><i>provide sufficient onsite parking for all school staff and visitors.</i></p> <p><i>2. School procured coaches will be allocated specific arrival/departure times and be contractually obliged to turn their engine off when parked without exception. At present coaches are parking outside schools for up to two hours with their engines left running. This is totally unacceptable.</i></p>		

### AP2.31 - Policy 17 - Planning for Green Infrastructure, Biodiversity and Food Production

<p>See Natural England’s generic advice letter for any further clarification on designations – no comments made specifically to this Neighbourhood Plan.</p>		<p>Check on designations</p>
<p>Savills/Barwood</p> <p><i>We support the recognition of the multi-functional purposes of green infrastructure, and consider that the policy will ensure the delivery of high quality green spaces within future development proposals. The application proposals for Land to the West of Park Farm has actively sought to deliver substantive open space; which provides for a number of multi-functional uses, including allotments, children’s play, attenuation, informal play, parkland, tree planting and new wildlife habitat.</i></p> <p><i>It is considered that sentence two of the policy should be reviewed – notably, it is not clear what is meant by a ‘significant’ tree, or ‘respect the pattern and form of the landscape’. The wording of this sentence</i></p>		

Comment	Response	Action
<i>should be reviewed, and/or additional text added to the explanatory text supporting the policy.</i>		
<p>Trapped</p> <p><i>We must ensure that the environment is not irreversibly damaged by development. Whilst we are always reading the mitigation measures being taken to protect wildlife, it is patently obvious that the numbers of species are rapidly decreasing. Genuine and enforceable protection needs to be added for hedgehogs, badgers and foxes etc. It is futile to put in mitigation strategies for wildlife if these are going to be flouted by developers. Possible solution would be to require a conservation consultative group to be set up for large developments for the duration of the project, with representation including local residents</i></p>	Review using CGT paper need to review text	Discuss

### AP2.32 - Policy 18 - Creating connections through Streamside Walks

<p>Savills/Barwood</p> <p><i>The Streamside Walks are an important local feature, and we support their enhancement. Whilst it is considered that this is the intention of the draft policy, a more explicit reference should be made to 'extending' these walks. Further, a reference should be included within the policy that consideration must be given to the ecological impacts of any proposals. The application proposals for Land to the West of Park Farm includes part of the Pickedmoor Brook. This has been retained within an area of open space, and the proposals include the provision of new routes</i></p>	<p>Agree ref to ecological impacts done</p> <p>NFA: see CGT comments policy 18 sufficient</p>	Discuss
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Comment	Response	Action
<p><i>through the open space, along the Brook, which connect with the wider public footpath network and the Active Travel Route to the east.</i></p> <p>Trapped</p> <p><i>It is essential that ‘temporarily’ suspended public footpaths and rights of way are returned to full access once developments are completed.</i></p> <p>Policy 19 - Local Green Space</p> <p>Trapped</p> <p><i>There are additional ‘green space’ locations in and around Thornbury that are equally deserving of special mention and it is therefore proposed that four further parcels of land should be identified as Local Green Spaces under Policy 19:</i></p> <p>1) <i>The fields to the east of Clay Lane (bordered by Clay Lane, The Hackett, the A38 and Whitewall Lane) are highly valued by ramblers, dog walkers and runners using the PROWs that criss-cross these fields. This land has thus far not been subject to planning permission requests and provides a critical bulwark against the coalescence of development granted permission at Cleve Park and existing housing along Morton Way, along with potential proposed development at Crossways Lane and Buckover.</i></p> <p>2) <i>Cleve Wood and Crossways Wood adjacent to the Cleve Park development were given the status of significant green infrastructure many years ago, they are much valued woodlands appreciated by all of the residents in Hackett Lane as well as a lot of walkers from Thornbury. They are Ancient Woodlands and</i></p>	<p>Disagree to inclusion of further Local Green Spaces</p>	

Comment	Response	Action
<p>are very significant wildlife havens; we have bats, 3 different species of wild deer, badgers, owls, buzzards and plenty more besides living in them.</p> <p>3) Land South of Gloucester Road which was the subject of a refusal of the planning application at Appeal, in large part due to the impact on the setting of nearby heritage assets. It also importantly provides a buffer against coalescence of development along Morton Way, and proposed developments at Crossways and Buckover, as well as the hamlet of Upper Morton.</p> <p>4) The green space between Phase 2 and 3 of the Thornbury Fields development forming the banks either side of the Pickedmoor Lane Rhine</p>	<p>Consider whether Section 12 could incorporate wider look at green infrastructure outside the plan.[Needs more thought and investigation which is not appropriate at this stage of the plan.</p>	

### South Gloucestershire Comments

Page	Paragraph	Comment	Reason	Action
43	Figure 8	The figure shows Local Green Space designations in the Policies, Sites and Places Plan policy PSP4 but may not be an accurate reflection of all Green Infrastructure within Thornbury.	For clarity.	Amend for clarity

# 8 Travel, Transport and Parking

## 8.1 Analysis

The assessment and response to the comments raised on the chapter 'Travel, Transport and Parking is set out in the table below.

Comments	Response	Action
<p>There is assumption that most traffic uses the southbound A38 route from Thornbury towards Bristol. The northbound route via Whitfield and Falfield to the northbound A38 and M5 junction 14 is also experiencing an increase in the volume of traffic due to new housing developments in Thornbury. Queues at Falfield and J14 traffic lights are lengthening and over the last year the green verges in Falfield Village are noticeably getting destroyed by impatient drivers who are mounting the kerbs and footpaths to undertake rather than wait for the lights to change. Regarding infrastructure, the plan and developers should maybe consider a wider circle of effect from Thornbury developments and build in consultation with adjoining parishes as their residents also need to travel to and from Thornbury as their nearest market town. I'd encourage dedicated cycle lanes particularly ones that do not share a road surface with cars, this would encourage family groups with young children to cycle more together and improve their skills as family cycling along roads shared with HGV's (often travelling at speed) leaves no margin for error.</p>	<p>NFA - Improvements for Falfield are outside scope of the TNP but the point is well made. - NFA</p> <p>Agree with this point for consideration for Section 12- Can you protect the verge - at the side of Morton Way and Grovesend Road - would be suitable for a cycle path.</p>	<p>Discuss</p>
<p>Planning obligations or conditions imposed on developments relating to, for example, phasing must meet the relevant tests set out in legislation and national planning policy and guidance. i.e. phasing conditions should be necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. Planning obligations should be necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. The</p>	<p>Chris has suggested some changes to those sections to bring in line with the latest NPPF update Need to discuss</p>	<p>Discuss</p>

Comments	Response	Action
objectives listed under Chapter 10 must, therefore, be reworded to reflect legislation and national policy.		
The statement made under section 10.4, relating to the adequacy of Transport Assessments, is not justified or supported by evidence. While Vistry Homes acknowledges local concerns relating to transport and accessibility, it is not reasonable or justified to formulate policy on generalised statements in the absence of a robust evidence base.		Discuss
In terms of Policy 20, the justification for the 50 homes threshold is unclear and requires further clarification. Insofar as transport matters are concerned, applications for development should be assessed in accordance with national planning policy and guidance, and the relevant adopted policies of the Development Plan. As worded Policy 20 of the DTNDP is not in general conformity with the strategic policies of the Development Plan and does not have regard to national policy and guidance. .	Align with NPPF guidance? ""Major development: For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m2 or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015	Discuss
I do not feel that a two storey car park would be a beneficial addition to Thornbury	Agree - propose remove two story car parks from Policy 23 pre-amble (Page 53). Policy 23 refers	Amend as contradicts another policy
1. I'd suggest 10.3 says " ..road AND PATH infrastructure are in place....". 2. The current TravelWest survey about buses, cycles and walking mentions Thornbury. The main weakness in that is that it does not mention paths or cycle paths from the town centre to the Butt Lane/Morton Way area. That should be a priority to connect the large numbers of new houses there to the centre and other existing parts of town. 3. I assume it would cost too much to erect a multi-storey car park at Rock street using the existing area (although the slope is favourable). I would not suggest	Agree - propose Add "AND Non vehicular" to 1st bullet in 10.3 <b>Section 10.3 Refers.</b> This contradicts on Policy 20 – review text.	Amend to strengthen policy

Comments	Response	Action
using any new space in the town centre for parking. Instead park and ride schemes at two ends of the town can mitigate parking issues. These could be at the leisure Centre (perhaps expanded into the field behind) and soewhere at Butt Lane/Morton way junction. These could serve out of town visitors and the large number of new residents near Butt Lane. The P&R sites should be served by frequent small buses at popular times to the town centre and other places, preferably zero emission buses.		
Your plan highlights don't mention walking or cycling.	Disagree - Policy 21 is all about that	Discuss
Quality cycle paths, see London CS network for quality, bring connectivity and encourage low level exercise, green transportation, and dissuade car driving. The A38 has no provision as it passes the town, only lip-service in the local villages.	Agree - uncertain - needs discussion	
Good pavements away from passing traffic, lined with trees and flowers decrease people's reliance on the car, negate the need for town centre parking. The High Street as a concept is dead. Online shopping will take over. Convert these properties to affordable living for 20-30yr olds to be able to buy.	NFA -- Opinion	

## 8.2 Consultee Letters

Comment	Response	Action
Michael Neale <i>This section apart from parking is in reality the remit of the Local Authority and should be appraised at the same time Planning Applications are submitted and as a Town Plan is developed for Thornbury. This latter should also locate an area designated for a station and line for a future Mass Rapid Transport System to Bristol, the only real logistical method for dealing with transport issues between the two</i>	Agree - NFA  NFA - out of scope	Discuss

Comment	Response	Action
<p><i>centres. Having had many years involved in the planning, design and construction of such systems the idea that the old rail connection between Thornbury and Yate, is despite FOSBR dreams, simply ludicrous. It will just not be used sufficiently to justify the costs. A more sensible solution in logistical terms but more expensive is a line to the West of the town starting close to the town centre and routed in a SW direction and after a short length of tunnel follows the foot of the escarpment connecting Thornbury to Elberton/Olveston/Tockington/Almondsbury/ Cribbs – Patchway/Filton then connecting with any plans that Bristol might conceive for the future. In the interim, Bus Company subsidies should be re-evaluated particularly with respect to the size of vehicles operated which at present are unbelievable in terms of wasted space.</i></p>	<p>For amendment as per CGT’s paper Partially amended Need to discuss with Chris</p>	
<p><b>AP2.35 - Policy 21 - Walking and Cycling</b></p>		
<p>Savills/Barwood</p> <p><i>We support the aspiration to extend and improve the current walking and cycling provision across the town. We suggest that the policy as currently drafted needs to distinguish more clearly the difference between the ‘need’ for an individual proposal to deliver/contribute to offsite improvements, and the more general requirement for improvements of the existing infrastructure. This is particularly pertinent as the use of CIL monies is well placed to deliver improvements to the existing pedestrian and cycle network.</i></p> <p><i>The design of cycle and pedestrian infrastructure is dictated by South Gloucestershire Council as the adopting Highway Authority, and they will stipulate the standards required. In this regard, we raise a concern to including a single design standard, and suggest that the more appropriate policy reference should be ‘relevant best practice’, and that the explanatory text could make reference to the Sustrans Handbook should this be the preference of the NDP.</i></p>	<p>Reword as per CGT paper – need to discuss with him</p>	

Comment	Response	Action
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### South Gloucestershire Council Comments

Page	Paragraph	Comment	Response	Action
50	Policy 21	<p>Policy 21 references design standards within the Sustrans Handbook for Cycle-friendly Design (2014), whilst this is also what is recommended in the SGC Cycle strategy, that document is due to be refreshed, and it should be noted that Sustrans themselves no longer promote this document, and instead recommend a selection of other, more current guidance (see link below), if the neighbourhood plan group wants to recommend guidance they should consider which of the Sustrans recommended guidance is appropriate.</p> <p><a href="https://www.sustrans.org.uk/for-professionals/infrastructure/walking-and-cycling-infrastructuredesign-guidance/">https://www.sustrans.org.uk/for-professionals/infrastructure/walking-and-cycling-infrastructuredesign-guidance/</a></p> <p>As mentioned in the point above the policy should also make reference to equestrian use on multi user routes. done</p>	<p>To take account of updated information</p> <p>Agree The specific guidance we have reviewed &amp; should be referenced:  * Design guidance link recommended by SGC, plus:  Greenways Design Guide -  <a href="https://www.sustrans.org.uk/for-professionals/infrastructure/sustrans-traffic-free-routes-and-greenways-design-guide/sustrans-traffic-free-routes-and-greenways-design-guide-contents/?location=null">https://www.sustrans.org.uk/for-professionals/infrastructure/sustrans-traffic-free-routes-and-greenways-design-guide/sustrans-traffic-free-routes-and-greenways-design-guide-contents/?location=null</a> and  And Inclusive Mobility which covers design of Footways &amp; footpaths (for example):  <a href="https://www.gov.uk/government/publications/inclusive-mobility/inclusive-mobility">https://www.gov.uk/government/publications/inclusive-mobility/inclusive-mobility</a></p>	<p>Do - but not as this – for checking</p>

Page	Paragraph	Comment	Response	Action
53	10.7 Town Centre Parking	The section explores the idea of two story car parking however further reference is made to the important views form Rock Street Car Park as outlined in Appendix C. It may be helpful give further thought to the future planning of Rock Street Car Park especially considering its central location and contribution to the vitality of Thornbury Town Centre.	For Clarity	<b>agree</b> take out references to a two storey car park in Rock St as none of the other policies support that?