

PARK FARM, THORNBURY,  
HOUSING ALLOCATION

STATEMENT OF COMMON GROUND

WELBECK STRATEGIC LAND LLP &  
SAVE THORNBURY'S GREEN HERITAGE &  
BLOOR HOMES LIMITED

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11 July 2012

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## **1. INTRODUCTION**

1. This is a Statement of Common Ground between Welbeck Strategic Land LLP (hereafter “Welbeck”) and Save Thornbury’s Green Heritage (hereafter the “STGH”) and Bloor Homes Limited (hereafter “Bloor Homes” in relation to the proposed housing allocation at Thornbury, Park Farm by South Gloucestershire Council (hereafter “the council”) in its draft Core Strategy.
2. This Statement sets out the matters which have been agreed to date between STGH, Bloor Homes and Welbeck in advance of the Examination in Public (EiP) of the council’s Core Strategy.
3. This Statement is structured as follows:
  - Chapter 2 describes the site and its location;
  - Chapter 3 summarises the site’s planning history.
  - Chapter 4 describes the proposed development and capacity of site.
  - Chapter 5 considers the heritage, sustainability and environmental considerations for the development at the site.
  - Chapter 6 considers the appropriateness of the council’s Sustainability Appraisal.
  - Chapter 7 summarises the public consultation carried out by the council in relation to the housing allocation in Thornbury.

## **2. PROPOSED HOUSING ALLOCATION - THORNBURY**

### **Site Location**

4. The proposed housing allocation site is known as Park Farm and is located at land off Butt Lane, Thornbury. The council's Key diagram (Figure 13 in the draft Core Strategy) does not provide an exact location for the allocation, rather it is an area hatched on the plan. In general the site is bounded to the northeast by Butt Lane, to the east by housing at Manor Walk and Victoria Close and the medieval fish ponds, to the north by fields, to the south by Castle School playing fields, to the west by the Sheiling School and grounds.

### **Existing Use**

5. The existing use of the proposed allocation is agricultural.

### **Site Area**

6. The extent of the developable area of the proposed allocation is based on the site location plan submitted by Barratt Homes for development at the site. It extends to 26.21 ha (based on the Park Farm planning application red line area).

### **Planning Designations**

7. There are no statutory designated areas within the area defined by the site location plan submitted by Barratt Homes, however, there are a number of statutory heritage designations immediately adjacent to the red line area.
8. The site is adjacent to the medieval fishponds Scheduled Monument, Thornbury Conservation Area and a number of listed buildings comprising
  - Thornbury Castle, listed building, grade 1;
  - St Mary's Church listed building, grade 1;
  - Park Farm, listed building, grade 2;
  - Barn at Park Farm, listed building, grade 2,
  - Morton House, listed building, grade 2, and
  - The Sheiling School, listed building grade 2;
9. It is also within the setting of Thornbury Conservation Area and the Castle's Registered Garden, grade 2.
10. The central section of the site is within an identified flood risk area (Flood Zones 3a and 3b) as demonstrated by the council's Strategic Flood Risk Assessment Level 2 (December 2011).
11. The site is outside the settlement boundary for Thornbury.

### 3. PLANNING HISTORY

12. This section summarises the planning history for Park Farm.

#### Local Plan Review 2004

13. The site was put forward by objectors as a housing site for Thornbury in the Local Plan Review. The Inspector at the Examination of the Local Plan Review concluded that there was no need for housing in Thornbury and therefore no housing sites were allocated. However, in his assessment of Park Farm the Inspector stated:

*73.11 As regards this site, I am of the view that this omission sites is much less suitable for development than the Morton Way site. Park Farm is not that removed from the town centre or education facilities. There are, however, landscape and heritage issues of some force. The north western edge of Thornbury is an extremely attractive one. Development of some character edges the town as it merges gently into the surrounding countryside. It includes the listed buildings of the Castle, the Sheiling School, Morton House and Park Farm. The town's Conservation Area adjoins the objection site. The generally open nature of the landscape to the north and west means that the land is not well contained. In my opinion this is an important edge to the town, one that makes a considerable contribution to the overall character and appearance of the place.*

*73.12 The site does not include the listed buildings, nor any part of the Conservation Area or historic garden. The Castle and School are well set away from the site, with the trees and woods helping to contain their setting. In my opinion it should be possible to develop the site without a direct impact on the immediate setting of those important properties. Likewise, it may be possible, with very careful design and disposition of housing well away from their curtileges, to avoid unacceptable harm to the other two listed properties, albeit their settings would significantly change. The objectors place some emphasis on the longer term development of a strong framework of vegetation. This seems to me to emphasise the sensitivity and vulnerability of this edge of the town.*

*73.13 My concern is primarily related to the wider setting of these buildings and this fringe of the town. Although long distance views of this edge of the town would not be materially affected, there would be a substantial impact on closer views and the perception of an attractive semi-rural setting to the town and the fine buildings found here. Views of the site would be possible through the gap in development along Park Road. Views could also be achieved from the road to the north of the site, running across the Levels, and from the footpaths that cross this area. These views would be fundamentally changed. Whilst having only a little direct impact on the Conservation Area itself, I have no doubt that overall it would detract considerably from the perceived character and appearance of this edge of the town and the wider, open setting of the important properties found there. It is important to the character and appearance of this attractive fringe to retain the openness of this land. In my opinion, if a choice had to be made between various sites around the edge of the town, this would be a significant factor against choosing this site over others.*

*73.14 The objection site includes land which is the best and most versatile. This adds further weight to the already forceful objections to the allocation of this site.*

*73.15 In conclusion, I do not find that it is necessary for the achievement of the housing land requirement or the underlying strategies of the RPG or JRSP for sites to*

*be identified around Thornbury. I am considering a number of omission sites around Thornbury. Having regard to these, I consider that this site is not the most appropriate or suitable by some considerable distance. I do not consider that the opportunities for using modes of transport other than the car are so good as to override the strategic considerations. Development here would be unlikely to offer the same degree of opportunity for developing sustainable forms of transport than sites within or on the edge of the main urban area. Increased commuting flows along the A38 would result, with additional pressure on junction 16 of the M5. I am not convinced that the measures are in place to maximise the attractiveness of public transport in this area and so reduce reliance on the car. For all these reasons I do not support the allocation of this site as either an alternative or additional mixed development site.*

### **Material Changes Since the Inspector's Report**

14. Since the publication of the Inspector's Report the medieval fish ponds directly adjacent to the Park Farm site have been statutorily scheduled. This is a significant material consideration when considering the allocation of this site.

### **Park Farm Environmental Impact Assessment (EIA) Screening Opinion**

15. An application for an EIA Screening Opinion was submitted by Barratt Homes 25 January 2011. The council issued its Screening Opinion 15 February 2011 and confirmed that an EIA would not be required.

### **Park Farm Planning Application**

16. Barratt Homes submitted an outline planning application, with all matters reserved, 6 May 2011 (Ref: PT11/1442/O) for the erection of up to 500 dwellings on 26.21 ha of land with public open space, associated works and access. The application has yet to be determined. At the same time Barratt Homes submitted an outline planning application, with all matters reserved, for the creation of a balancing pond and associated drainage infrastructure to serve proposed residential development on land at Park Farm. The site of the balancing pond is west of the Park Farm proposed residential development and outside of the housing application area. This application is also yet to be determined.
17. The application has received a significant number of objections including from English Heritage and the Environment Agency. English Heritage's stated
 

*"The significance of the Castle and church are especially relevant to this proposal. Despite no formal designation for the New Park, it is relatively easy to read within the landscape and despite the applicant's claim of its brief existence and lack of physical remains, in our opinion is not only **an important non-designated asset in its own right** but as a unique example from the Tudor period of a **deliberately designed piece of landscape to be seen in conjunction with the Castle** providing a significant and comprehensive setting to this structure."*
18. English Heritage's response concludes
 

*"We regret that we are unable to support this proposal at this time. We would wish to understand how the new development will make a positive contribution to the character and local distinctiveness of the historic environment. In our view this proposal will create substantial harm to the setting of the historic town of Thornbury and constituent designated and non-designated assets that are closely associated to it. It therefore fails the tests set out in policy HE9.2 of PPS5."*

19. English Heritage have recently (21 June 2012) issued a further response to the Park Farm planning application. It is important to note the following:
- This letter is in response to a specific application and does not indicate any change in the English Heritage concerns about the Core Strategy;
  - Although English Heritage does not consider it can justify opposing this specific proposal, it states that "... the present iteration of this proposal will be less harmful ... (page 2, para 3) – this does not indicate no harm. Similarly, it states that the revised assessment "... indicates that there will be less than substantial harm to the significance of the majority of heritage assets" (page 2, bullet 1) – this suggest that there will still be substantial harm to some of the heritage assets (presumably to the Grade II listed buildings at Park Farm, the New Park, and the Fishponds).
  - The letter also raises concerns about the impact on the character and appearance of the Conservation Area and the potential for damage to the Fishponds (now a Scheduled Monument);
  - The lack of comments about the impact of the proposed development on the Grade II listed buildings at Park Farm and the undesignated New Park is the result of the statutory responsibilities of English Heritage, which do not extend to commenting upon proposals that affect the setting of Grade II listed buildings or the impact on undesignated heritage assets.
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20. The Environment Agency has now withdrawn its objection subject to development not being located within Flood Zones 2, 3a and 3b.

**4. THE PROPOSED ALLOCATION**

21. Draft Core Strategy policy CS32 provides the planning policy context for development at Thornbury.
22. Policy CS33 conflicts with policy CS32 section 5 as any development of the Park Farm site will adversely affect the important heritage assets that are located in this part of Thornbury.

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## 5. HERITAGE, SUSTAINABILITY AND ENVIRONMENT

23. This section of the Statement considers the heritage, sustainability and environmental credentials for Park Farm.

### Accessibility

24. The site is located on the edge of Thornbury. Existing vehicular access to the site is from Butt Lane and the site can also be accessed via public footpaths from Park Road.
25. Based on existing public footpaths and access routes, the site is a 23-minute and 28-minute (Butt Lane) walk of the town centre. Morton Way South is a 19-minute walk from the town centre. Morton Way NE is a 19-minute walk from the town centre.
26. Park Farm is a 26-minute and 28-minute (Butt Lane) walk from Tescos and further to the Midland Way area. Morton Way South is a 22-minute walk to Tescos and considerably less to the Midland Way employment area. Morton Way NE is a 26-minute walk to Tescos and 25-minute walk to Midland Way employment area.
27. Park Farm is a 10-minute walk from Manorbrook School and 12-minute walk from St Mary's School. Morton Way South is a 7-minute walk from Crossways Schools and 13-minute walk to Gillingstone School. Morton Way NE is a 12-minute walk from Manorbrook School.
28. Castle School is a 10-minute walk from Park Farm and 24-minute walk from Morton Way and 14-minute walk from Morton Way NE. The Sixth Form Centre (and hospital) is a 17-minute walk from Park Farm and 19-minute from Morton Way South.
29. Park Farm is 22 minutes walking distance of local shops at Oakleaze Road. There are no other local convenience stores within walking distance. Morton Way South is a 12-minute walk from Oakleaze Road shops and an 8-minute walk from the garage and shop in Grovesend Road. Morton Way NE is an 8-minute walk to Oakleaze Road shops.
30. Park Farm is not served by local bus routes with the nearest bus stops Gloucester Road or Morton Way. Morton Way South and Morton Way North are served by the existing local bus routes. There are three bus stops adjacent to Morton Way South in Morton Way and Grovesend Road.
31. The Park Farm site is not well located in terms of public transport provision or access to local services. Morton Way South has very good public transport access and access to local services.

### Flood Risk

32. The central part of the Park Farm site is located within Flood Zones 2, 3a and 3b, and is therefore at risk from flooding as indicated by the council's Strategic Flood Risk Assessment Level 2 (December 2011) (Examination Document EB31).
33. Development at the site may increase the risk of flooding elsewhere. Although not part of the allocation, a separate planning application has been submitted by Barratt to construct a balancing pond to the north of the Park Farm site. This is not within the allocated area.

34. Morton Way South is not located in an area identified as at risk from flooding. It is therefore a more sequentially preferable site for development. Morton Way NE has a small area of Flood Zone 3 which closely follows the route of Pickedmoor Brook and presents no constraints to development.

### **Landscape**

35. The Park Farm site has good access to the countryside with public footpaths running through the site which are well-used by local residents on a daily basis, these include the Severn Link which connects with the long distance Severn Way footpath. Morton Way South also has public footpaths through the site but these are generally towards the site boundaries.
36. Development at Park Farm would impact heavily upon the historic landscape of the deer park of Thornbury Castle. The site has an open western boundary falling to the Severn Estuary and long distance views would be significantly affected by development at Park Farm.
37. Morton Way South is both visually and physically contained and enclosed, thus preventing sprawl east into the countryside. The higher, more visible, land at Morton Way South would be used for a country park.
38. Morton Way NE has rising land to the south and east which restricts longer distance views to the site and existing hedgerows provide a natural boundary to any development.
39. Park Farm is not within the designated Green Belt. Morton Way South is not in the Green Belt.

### **Ecology**

40. Park Farm has a large number of active badger setts. In addition, evidence provided by Save Thornbury's Green Heritage indicates the presence of kingfishers, lapwings, bats, little egrets and slowworms plus the important wet woodland area of the medieval fishponds (February 2011) as well as the important stream corridor.
41. The ecological surveys carried out for Morton Way South indicate that there are no protected species on the site, although there is some evidence of bats using the site for foraging (Welbeck rep, February 2011, Appendix 11). There are two woodlands, both designated SNCIs, within Welbeck's control but both of these are outside the proposed development area, with a 100m buffer to Cleve Wood and at least a 15m buffer to Crossways Wood (Natural England Standing Advice for Ancient Woodland, para 7.5.1 advises a minimum of 15m buffer).
42. The ecological surveys carried out at Morton Way NE show that the most ecologically valuable part of the site is the Pickedmoor Brook corridor where no development would be proposed. Two badger setts were also identified on the outer boundaries of the site.

### **Agricultural Land**

43. The site comprises mainly high grade agricultural land with grade 2 agricultural land (47%, 12 ha) and grade 3a agricultural land (34%, 8.7 ha). Morton Way South comprises mainly grade 3a agricultural land (53%) with small areas of grade 2 (20%) (Welbeck rep, August 2010, Planning). The grade 3a land is probably the lowest grade

agricultural land around Thornbury. Morton Way NE would result in the loss of mostly Grade 3a agricultural land (50%), some Grade 3b land (30%) and a small area of Grade 2 land (20%). The Grade 3b land is probably the lowest grade agricultural land around Thornbury.

### Heritage

44. Although there are no designated heritage assets within the area indicated for allocation, the site is immediately adjacent to a number of very significant heritage assets. These comprise:
- The medieval fishponds Scheduled Ancient Monument. The fishponds are associated historically with Thornbury Castle and the surrounding countryside forms part of their setting. The proposed allocation will effectively isolate the fishponds from their countryside setting and any visual associations with Thornbury Castle and its former Deer Park will be lost. This represents a significant harmful impact on the setting and therefore the significance of these most important heritage assets.
  - Thornbury Castle, listed building, grade 1. The setting of the castle extends to the north and east to include the Park Farm site which is located within the castle's former Deer Park. The surrounding landscape is integral to the setting of the castle. Long distance views of the castle will be compromised by development at Park Farm. Development at Park Farm will urbanise this part of Thornbury and significantly affect the setting, and therefore the significance of this important heritage asset, resulting in substantial harm to this grade 1 listed building.
  - St Mary's Church listed building, grade 1. The immediate setting of St Mary's Church is of a quiet rural village, with the noise and bustle of Thornbury town centre at sufficient distance to not intrude. Long distance views of the church, the tower of which is visible from the Park Farm site, will be adversely affected by development at Park Farm. In addition, the urbanizing of this part of Thornbury will irrevocably reduce its village character, thus adversely affecting the setting and significance of St Mary's Church.
  - Park Farm, listed building, grade 2. The house at Park Farm is surrounded by agricultural land and Park Farm is prominent in this very open landscape setting. The setting of Park Farm will be totally lost by development at this site which will in effect wrap-around the Park Farm buildings. Thus, the setting and the significance of Park Farm will be irrevocably harmed.
  - Barn at Park Farm, listed building, grade 2. The barn at Park Farm has an integral relationship with Park Farm listed building. The two buildings contribute to each other's setting. Development at Park Farm will remove the countryside setting of the buildings, thus harming their setting and significance.
  - Morton House, listed building, grade 2. Morton House is located close to the development site on Butt Lane. Currently it is surrounded by countryside which forms its immediate setting and Morton House is at some distance from the built development of Thornbury. Development at Park Farm will significantly impact on the setting of Morton House as it will no longer be separated from the urban area of Thornbury. The development will have a harmful effect on the building's setting and significance.
  - The Sheiling School, listed building grade 2. The immediate setting of the School comprises the grounds of the school which are well planted with several smaller buildings located within the grounds. The setting is tranquil as would be expected on the edge of the urban area of Thornbury. The wider setting is that of the surrounding countryside. Development at Park Farm will impact on the

tranquility of this school for special needs children. Therefore the setting and significance will be harmed by development at Park Farm.

- Thornbury Conservation Area. The northern part of the conservation area includes Thornbury Castle, St Mary's Church and the Sheiling School. The immediate setting of this part of the conservation area is as detailed above. The wider setting is that of the surrounding countryside. Views into and out of the conservation area to the north and east will be affected by development at Park Farm. Development at Park Farm will result in an increase in traffic using Park Road and the tranquility of this part of the conservation area will be lost. Its setting, and therefore significance, will be harmed.
- Thornbury Castle, registered garden, grade 2. The immediate setting of the registered garden is the castle grounds. Its wider setting includes the surrounding countryside. Development at Park Farm is likely to affect the tranquility of the gardens.

### **Conclusion**

45. Welbeck, STGH and Bloor Homes conclude that the proposed allocation of Park Farm as a housing opportunity site for Thornbury will have significant harmful effects on many important heritage assets. It will result in substantial harm to the landscape setting of this part of Thornbury.
46. Park Farm is no more accessible than other sites considered by the council such as Morton Way South and Morton Way NE, and has no access to public transport.
47. Development at Park Farm would have a significant impact on protected species known to inhabit and visit the site.
48. The development of this site would result in the loss of high grade agricultural land when other more suitable sites are available.
49. A significant part of the Park Farm site is at risk from flooding which constrains the layout of development. Other sites such as Morton Way South and Morton Way NE have less or no flood risk and are sequentially preferable for development.

## 6. SUSTAINABILITY APPRAISAL

50. The proposed allocation at Park Farm is based on a flawed and what appears to be very biased Sustainability Appraisal. This section of the Statement considers how the six Thornbury potential housing sites were assessed in the various iterations of the Sustainability Appraisal. This section will demonstrate that Park Farm, the council's preferred option, is not the most sustainable location for housing development at Thornbury.

### **Pre Submission Sustainability Appraisal, March 2010**

51. The Pre Submission version of the Sustainability Appraisal was published March 2010 at the same time as the Pre Submission Core Strategy. Paragraphs 4.33-4.44 provide the council's assessment of Thornbury with additional information presented in Appendices 10 and 11.
52. Initially six "broad areas of search" were defined by the council. There is no explanation for how the broad areas were defined, in some cases "boundaries" align with existing roads but this is not true for all boundaries. The sizes of the areas are not consistent and the map illustrating the areas shows the very unequal areas in relation to distances from Thornbury that are considered. Despite the fact that the size of the areas is not provided, the council decided to split area F into two parts, "due to its large size". Area F as indicated on the broad areas map does not appear to be the largest area, in fact Area B appears considerably larger.
53. The "centre points" or points from where the council's distance calculations are taken for each area are not provided nor illustrated on the map. Without the centre points it is not possible to compare the different areas' distances from facilities.
54. The SA concentrates on accessibility as its main criteria for assessing sustainability, however, the methodology provided in paragraph 4.37 indicates that distances are "as the crow flies". This method of calculating distances ignores local conditions and produces very skewed results which if tested on the ground through actually walking using existing footpaths etc results in very different timings and distances. It also indicates that this was merely a "desk-based" exercise with no real understanding of local conditions. The same methodology is used to calculate distances for car journeys, which have more convoluted routes to negotiate than those available to pedestrians.
55. The initial methodology of the Sustainability Appraisal was flawed.
56. Paragraph 4.38 provides the results for each broad area of the accessibility assessment. The assessments contain many errors which have been highlighted previously by both Welbeck (see representations February 2011, paras 77-132 and 187-240; February 2012, paras 47-56 and Appendices W4-W7) and STGH (August 2010: Sustainability Appraisal, February 2011: Section 6, Comments on revised SA Report, Section 7 Critique of SA Matrices 1-6; February 2012 Section 1: SA Main Report, Section 2: SA Appendix 10, Section 3: SA Appendix 11, Appendix 3). The errors overwhelmingly promote Area F over other areas, and disadvantage Areas A and B.
57. Paragraphs 4.39-4.41 provide the council's reasoning for dismissing broad area C from further consideration. After 4.41 a map is presented of the six smaller areas for further consideration. Again the sizes of the areas are not provided but the potential number of houses each area could accommodate is provided, although these do not appear to relate to the relative size of the areas, as Area 1 appears to be the largest area but only

has a potential of accommodating 350-400 homes compared to the slightly smaller Area 3 which could accommodate 750-900 homes.

58. Paragraphs 4.42-4.44 provide the council's explanation for its preferred option of Area 6 – Park Farm. The main reason appears to be the site's close proximity to the town centre, which is based on inaccurate and misleading calculations, and that it is not in the Thornbury Conservation Area. It is also claimed that this site benefited from general community support at the Thornbury Workshop. This provides a misrepresentation of the workshop (see Save Thornbury's Green Heritage representation February 2011, Community Involvement and Consultation in the Preparation of the Core Strategy).
59. Despite Option 6's close proximity to the most important heritage assets in Thornbury and the potential adverse impact on the settings of these assets, and the known flood risk of Option 6, and access issues, the council concluded these will require further assessment and are included in the draft policy CS 33 so therefore the policy scores highly. This reasoning appears to contradict the methodology of sustainability appraisals. Paragraph 4.44 states that the main vehicular access would be via Butt Lane but a new access for pedestrians and cyclists would need to be created. The plan indicating the six option areas does not illustrate Option 6 as being located adjacent to Butt Lane but at some distance from it.
60. Appendices 10 and 11 provide the council's assessment of the broad areas and then of the six option sites. However, Appendix 11 virtually reproduces the results of Appendix 10 indicating that the assessments were not carried out consistently or accurately.

#### **Submission Version Sustainability Appraisal, December 2010**

61. An updated version of the Sustainability Appraisal was published in December 2010 and includes an additional 25 paragraphs relating to the assessment of the areas around Thornbury for housing. This is not mere updating, clarification or correcting errors, but a concerted effort to justify the council's preferred option following the large number of objections to the allocation of Park Farm.
62. The map indicated the "broad areas of search" for Thornbury is updated to include measurement points, although the location of these in Areas D, E and Fb are not located centrally indicating that any results will be skewed and open to question.
63. Further paragraphs are added to support the council's preferred choice of Park Farm although the main reason appears to be that it is not Morton Way. Paragraph 4.41c claims that the Park Farm site would integrate better with existing housing as it is not separated by a significant boundary such as Morton Way. The assessment fails to take account of the relatively isolated location of Park Farm which is separated from Park Road by playing fields and agricultural land and importantly is bisected by Pickedmoor Brook and its associated river corridor which creates a barrier to development within the site.
64. The great significance of the heritage assets which surround the Park Farm site are given little weight in this assessment.
65. Much is made of the ability of development at Park Farm to enable Castle School to consolidate onto a single site in Park Road. This assertion is not justified and there is no evidence to suggest that this would be the case.

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66. In paragraph 4.42 the council considers that the Local Plan Inspector would not necessarily come to the same conclusion of new evidence to support housing on the edge of Thornbury. The council has failed to take account of the importance of the heritage assets and their settings which surround the proposed allocation site.
  67. Paragraphs 4.43-4.44b provide the likely mitigation required for development at Option 6. This includes a rather woolly statement that further technical work must be undertaken to demonstrate it can be achieved without having any negative impacts on matters of acknowledged importance. A Sustainability Appraisal should have assessed these “matters of acknowledged importance” **before** concluding that Option 6 is the most sustainable. Presumably these matters are the heritage impact, flood risk, landscape impact and lack of access, matters that are not present on other option sites.
  68. Despite continuing to claim that Option 6 is closer to the town centre than the options identified on Morton Way, the council acknowledges that access between Park Road and the option will need to be provided to gain maximum benefit. The previous version of the Sustainability Appraisal restricted vehicular access from Park Road, this is amended in this version of the SA to allow limited access from Park Road despite the SA stating that “the route along Park Road and Castle Street to the Town Centre is unsuitable to accommodate all associated development traffic.”
  69. New paragraphs 4.44a and 4.44b indicate that there are a number of very important constraints to development at Option 6 – ecological, heritage and flooding. Again these constraints are not present on other options.
  70. Appendices 10 and 11 have been substantially updated to reflect the additional information and correct inaccuracies of the data collected. However, the subsequent assessment of available data has been persistently misinterpreted as with the previous version.

#### **Sustainability Appraisal, December 2011**

71. The report was updated at the request of the Inspector. The majority of changes cover the proposed allocation of Filton Airfield, however, the sections on Thornbury and the option sites were also updated to take account of the council’s Strategic Flood Risk Assessment 1 (SFRA2) published in December 2011 and the statutory scheduling of the medieval fishponds at Park Farm.
72. Despite indicating that Option 6 – Park Farm partially lies within a flood risk area and is adjacent to the fishponds Scheduled Monument, the assessment does not change. In fact at paragraph 4.44aa it states in relation to the fishponds “The significance of this and other heritage assets was taken into account when drafting the policy for Park Farm”. Policy CS33 was not revised or updated to reflect the change in significance of the status of the fishponds. There are alternative sites that have little or no impact on the setting or significance of heritage assets that are discounted by the council.
73. Paragraphs 4.44c-e provide additional information regarding the SFRA2 and again are very misleading. In paragraph 4.44c the council states that areas of flood risk are present within or immediately adjacent to Options 1, 2, 3, 4 and 5. This is clearly not the case but would appear to have been reported in this way to lessen the impact that Option 6 contains an area of Flood Zones 3a and 3b. Again there are alternative sites that have no or little flood risk which are discounted by the council because they have misinterpreted the SFRA2.

74. Minor updating of Appendices 10 and 11 took place but again the potential impact on heritage assets and flood risk associated with Area Fa and Option 6 are discounted and bizarrely considered to be advantages to development in this area.

**Conclusions**

75. Welbeck, STGH and Bloor Homes agree that the Sustainability Appraisal carried out to inform policies of the Core Strategy is fundamentally flawed. It does not objectively nor systematically assess each of the broad areas identified for Thornbury and fails to accurately assess the six option sites. The SA misinforms and misinterprets data such as the SFRA2 resulting in a very unsound proposed housing allocation for Thornbury.
76. Furthermore, the SA has not taken account of the council's own evidence prepared on the assessment of heritage assets around Thornbury (Examination Document SG13). This document was prepared by the council's heritage team and is dated January 2010. It was prepared and available for policy officers to take account of its findings and to use its very significant findings when assessing the option sites for Thornbury. It is evident that the report's findings do not appear in the SA dated March 2010 and are not included in later versions of the document.
77. The council has not prepared a landscape character assessment for the options around Thornbury and has not robustly assessed the impact on the high quality landscape at Park Farm. The loss of some of the highest grade agricultural land at Park Farm does not take account of the availability of lower grade agricultural land elsewhere around Thornbury.

**74. PUBLIC CONSULTATION**

78. When the statutory consultation took place in June 2008 there were no “Options” identified for Thornbury. This consultation was therefore an investigation into some of the “Issues” facing the Town and could not have been a consultation on the Draft Plan for Thornbury because none existed.
79. When the “Options” were presented in October 2009, it was to an invitation only Workshop which was advertised as “The Launch of the Thornbury Town Centre Strategy”. Two local members of the public were denied entry.
80. The information that was presented to the Workshop was inaccurate and misleading.
81. The conclusions stated by the Council, based on the Workshop, are not supported by the evidence.
82. The subsequent period of public consultation was web-based for a period of 4 weeks only. The information provided was the same as that provided to the Workshop so was, again, inaccurate and misleading. The conclusions drawn by the Council from this consultation are not supported by evidence.
83. There was no widespread consultation on a Draft Plan, nor was a Sustainability Appraisal provided at the same time to clearly inform the evaluation of alternatives.
84. Thornbury does not feature in the Council’s Proposals Map.

**8. AUTHORISED SIGNATORIES**

85. This Statement of Common Ground has been prepared by Dominic Lawson Bespoke Planning on behalf of Welbeck Strategic Land LLP.

Authorised Signatory:

Name and Position: Dominic Lawson  
Director  
Dominic Lawson Bespoke Planning Ltd

86. The contents of this Statement of Common Ground have been agreed by Save Thornbury's Green Heritage.

Authorised Signatory:

Name and Position: [name]  
[position]  
Save Thornbury's Green Heritage

87. The contents of this Statement of Common Ground have been agreed by Bloor Homes.

Authorised Signatory:

Name and Position: [name]  
[position]  
Bloor Homes Limited

**8. AUTHORISED SIGNATORIES**

85. This Statement of Common Ground has been prepared by Dominic Lawson Bespoke Planning on behalf of Welbeck Strategic Land LLP.

Authorised Signatory: *D.R. Lawson*

Name and Position: Dominic Lawson  
Director  
Dominic Lawson Bespoke Planning Ltd

86. The contents of this Statement of Common Ground have been agreed by Save Thornbury's Green Heritage.

Authorised Signatory: *G.D. Davies*

Name and Position: [name] GRACE DAVIES  
[position] CHAIR  
Save Thornbury's Green Heritage

87. The contents of this Statement of Common Ground have been agreed by Bloor Homes.

Authorised Signatory: *Jeff Richards*

Name and Position: [name] JEFF RICHARDS ASSOCIATE DIRECTOR, WYU  
[position]  
ON BEHALF OF Bloor Homes Limited