

### Comments related to question 3

South Gloucestershire Council (SGC) states that the statutory scheduling of the Medieval Fishponds has been taken into account in their assessment for choosing Park Farm, but that it makes no difference to their preferred site. It seems incredible that SGC are prepared to engulf Thornbury's **ONLY** scheduled monument with housing. Not only will this make the site more prone to vandalism and other anti-social behaviour but will divorce it from its historical context.

Another concern that has not been properly addressed is the continual downplaying of the ecological value of the Park Farm area by SGC. An extremely significant aspect of this is, again, the medieval fishponds. Its role as an important Nature Conservation site has been ignored by SGC. Over the years, they have failed to accord it any form of official Nature Conservation designation. Either due, at best, to complacency or, at worst, because of a deliberate policy to ensure that it does not put at risk the selection of their chosen "area of housing opportunity".

The medieval fishponds represent a unique area comprising **THREE Biodiversity Action Plan (BAP) Priority Habitats:**

- Wet Woodland
- Pools
- Swamp

Not only that, the site has:

- Indicator species denoting Ancient Woodland
- Fat Duckweed (*Lemna gibba*)- an Avon Notable Species
- Thin spiked wood sedge (*Carex stigosa*) an Avon Notable Species for which Britain is internationally important
- Protected species (e.g. Slow Worms)
- Rare moths (e.g. *Stigmella Viscerella*)
- An abundant population of a South West England rare insect ( Iris SawFly – *Rhadinocerea Micans*)
- Birds of conservation concern (e.g. dunnock; starling etc.)

(Information obtained from "*Thornbury Medieval Fishponds Ecological Surveys 2011*" produced by R Higgins, a professional ecologist)

Nowhere else in Thornbury can exhibit this valuable ecological mix in such a relatively small area. The fishponds site is at least worthy of SNCI (Site of Nature Conservation Interest) status, perhaps even one of the national statutory designations (e.g. SSSI – Site of Special Scientific Interest).

In light of the site's ecological importance it just seems inconceivable that SGC should consider surrounding it with a major housing development (probably the biggest single housing development that Thornbury has ever experienced). This would disconnect it from the existing well developed wildlife network, potentially turning it into a sterile environment subject to much vandalism and abuse. There is much talk of wildlife corridors maintaining the link along the stream. This overlooks the fact that the stream will be breached by at least one bridge large enough to handle road traffic including buses. Without such a bridge there would be no vehicular access to the southern part of the proposed development area. This also fails to take account of wildlife migration paths from areas other than the stream (e.g. routes used by badgers).

The Medieval Fishponds site is the jewel in the crown of Thornbury's historic landscape. To quote the interpretation panel "***The site is an important asset to the town and people of Thornbury***". Also the SGC guide to the Fishponds states "***This site is a considerable asset to the town of Thornbury and an important amenity for local people.***", "***A site of historic and nature conservation importance.***" It is generally an area of peace and tranquillity; normally the loudest sounds you hear are the multitude of bird songs. It attracts a

variety of people for study; reflection; recreation; health & wellbeing, but in numbers that a site of this size can reasonably tolerate. Visitation would increase considerably if the proposed housing development goes ahead and, even if most of the new visitor's motives are benign, will inevitably lead to degradation of this nationally important site.

It should be noted that the "National Planning Policy Statement Paragraph 123, bullet point 4 states:

**123. Planning policies and decisions should aim to:**

- ***identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.***

This surely applies to the Medieval Fishponds. It should be an important factor when considering the suitability of the area for a housing development.

Despite claims to the contrary, SGC Planners have consistently failed to take any of the above important factors into account when coming to, what can only be described as an arbitrary, decision regarding the choice of Park Farm as the preferred location for Thornbury's "area of housing opportunity".

Finally, unsoundness of the Sustainability Appraisal can be demonstrated by one simple example. Paragraph 4.41C with regard to option 6 states:

*commuter suburb. The option is well screened from Thornbury Castle and the Conservation Area by existing mature landscaping and would not thus impact on long distance views to those features or the town centre. In addition,*

The Sheiling School is an important component of the Conservation Area and it is certainly not well screened from the proposed development as the photographs below show.

The first photograph was taken from inside the School's therapy building, which was deliberately sited in the quietest area of the Sheiling School Estate. Unfortunately, it is adjacent to the field that would be used for the southernmost part of the development. From the photograph you can clearly see the ploughed field where housing would be situated, with a view across to the medieval fishponds in the distance.



To give a view from the opposite direction, this photograph was taken from the public footpath that runs along the stream by the medieval fishponds (before the field was ploughed).



These photographs clearly show that the Council's claims that the proposed development would be hidden from the conservation are incorrect. This highlights yet again the very shaky foundations on which the selection was made of Park Farm as the preferred area of "housing opportunity".