

Save Thornbury's Green Heritage

Response to Inspector re: Additional Housing Sites

1. In view of SGC's public defence of Morton Way over the past three years, (through the Council's flawed Sustainability Appraisal and during the EiP in 2012,) we are somewhat surprised that the Council has now identified this area as preferable for development **above all other option sites in South Gloucestershire**.
2. It appears that the Council agrees with us that Morton Way is indeed a highly sustainable site for development, as we have attempted to demonstrate through our previous statements. It is already on established bus routes, has no flood risk, and will not cause substantial harm to heritage assets, so it could be argued that Morton Way sites are preferable to the Park Farm site.
3. Having promoted Park Farm above other sites in Thornbury, despite all its issues, the Council cannot defend other, more sustainable sites.
4. Furthermore, having failed to justify its housing requirements for Thornbury, the town will be left at risk of planning appeals from developers.
5. The Council claims that its approach to calculating housing delivery (in CS 15) is "*based on ambitious but realistic phasing across three 5 year periods*" and concludes this is "*consistent with the Plan's overall vision and spatial strategy.*" A further claim is "*the housing delivery rates were set at a demonstrably realistic and achievable level.*"
6. This is not the case for Thornbury. The Inspector agreed a Main Modification for Park Farm "*up to 500 dwellings*" with the exact housing figure to be determined by "*An Historical Environment Character Assessment*" and "*Technical Work*" with regard to flood risk. The Council has shown it does not heed advice or comment from either its own specialist officers or English Heritage regarding important local heritage assets and so this Assessment is unlikely to affect anticipated housing provision at this site. However, the "technical work" to determine flood risk still continues so we do not yet know how many dwellings can be accommodated on the site. Despite the determination of the Council to approve a higher density development for the site than anywhere else in the town, the geology and hydrology of the area may yet prevent anywhere near 500 dwellings being attainable. Whether the recent hydrological discoveries could impact on the Scheduled Ancient Monument has not yet been assessed, even though an Outline Application has been approved. Therefore, we suggest, housing delivery for the site is not realistic as it is not yet known what is achievable.
7. STGH has highlighted in previous submissions the lack of Sequential Testing for Thornbury, and that the Council identified Park Farm as the preferred site **without any flood risk evidence**. The Environment Agency (EA) cautioned the Council, in its comments on the Core Strategy in August 2010, "*the risk based Sequential Test should be applied at all stages of planning.*" By failing

to apply this Test during the strategic planning process for Thornbury and subsequently adopting a “sequential approach” to locating housing within a previously identified, and preferred, site the Council has not presented a robust approach to a fundamental planning requirement and fails to demonstrate that its housing targets are achievable through sound site selection.

8. The EA repeated its warnings to the Council in its comments on the Draft Core Strategy in February 2011, stating that “*good practice dictates that new evidence should not be used to merely retro-fit identified preferred sites.*”
9. When new evidence highlighted the “substantial flood plain” through the middle of the Park Farm site the reaction was to modify the master plan rather than re-assess the suitability of the site.
10. It has been clear to the local community that the Council was determined to pursue the Park Farm site at all costs, regardless of flood risk, or any other issues. Bearing in mind the initial lack of flood risk evidence for Thornbury this does not seem to be a rational approach to developing a sound development plan.
11. Severe weather incidents are anticipated to be more frequent and prolonged in the future due to global warming leading to more frequent flooding and new areas being affected. Should the Council have ignored the warnings of the EA regarding Sequential Testing and continued with its “preferred sites at all cost” policy?
12. The Council attitude that housing numbers would be reduced rather than selecting a sequentially preferable site suggests a cavalier attitude to both housing targets and flood risk. The Council seems to assume that having a sequential approach within a site, rather than a proper sequential approach to strategic planning, is an acceptable method of reducing flood risk.
13. The Inspector has made no comment regarding the processes that the Council has undertaken regarding flood risk, so we can only assume he was satisfied with the evidence made available at the time. As the Council has now identified Morton Way as its preferred area for a further allocation of housing, above any other site in South Gloucestershire, is he satisfied that this site was significantly less sustainable than Park Farm?
14. To put it another way; if the Council had originally identified Morton Way as its preferred site for development in Thornbury, rather than Park Farm, would it now be putting forward Park Farm in order to meet the housing shortfall?
15. If the answer is “no”, then it brings into question the whole soundness of the decisions made for Thornbury.
16. We believe that by identifying a site which has: significant flood issues requiring infrastructure development across the floodplain, site capacity constraints, flood mitigation outside the development area, an imperfect solution to transport connections, and “*substantial harm being caused to designated historic assets*”, (the Council’s own words) the Council has made the wrong decision.

17. The Council, in its recent identification of Morton Way as its preferred site for further housing, has served to highlight again the inadequacies of its site selection process in the first place.
18. All other development sites along Morton Way have preferable transport connections to the Park Farm site, as Morton Way is already served by both local and district bus routes, whereas the provision for a (local only) transport link for Park Farm cannot come forward until **after** residential care has been re-provisioned for Thornbury and the current care home is decommissioned. No date for this has yet been set. If the transport link is to come forward at some, unspecified, date in the future it will require the re-routing and expansion of the existing local service.
19. Morton Way is, sequentially, a preferable site to Park Farm as there is no requirement for infrastructure development across the flood plain and housing numbers are likely to be more certain as the site does not require "*further technical work*" to determine flood risk. Furthermore, there is not anticipated to be substantial harm to heritage assets, nor will development cause the loss of landscape described by English Heritage as "*of considerable local importance*".
20. Having identified a less than perfect site at the beginning of this process, as well as failing to robustly determine the number of houses that are required to support the Core Strategy vision for Thornbury, the Council is now in the position of identifying further sites to meet the Inspector's directive.
21. This approach by the Council leaves Thornbury at risk of planning by appeal from developers who have already identified preferable sites for development around Thornbury.
22. The residents of Thornbury are again on the receiving end of an "ad hoc" approach to planning by the Council and deserve a better, more cohesive and sustainable approach to the development of this historic market town.
23. The upshot of the Council's belligerent pursuit of Park Farm is that multiple government organisations are put in the position of enabling the Council to develop in areas which should be protected. Such an attitude disobeys the rules of natural justice and goes against what the community would legitimately expect and is open to challenge.

Word count:1337