



Who We Are

Sustainable Thornbury is a group of people in Thornbury and the nearby villages in South Gloucestershire who are concerned about climate change, world oil shortages, the rising cost of oil and food and how that will affect our area. We want to help make our community ready for the changes we expect to see in the future.

We look for solutions that ordinary people can implement, either as individuals or as the local community. We run practical projects and campaigns on food, energy, waste and transport.

The group was started in 2006 and, in 2009, we secured Transition status for Thornbury.

Scope of our Comments

Sustainable Thornbury encompasses the town, its surrounding villages and rural area. Consequently, our comments here are restricted to the strategies and policies which affect:

- Thornbury
- Rural areas (insofar as they impact the area surrounding Thornbury)
- The interface with other areas

or which are all-encompassing.

Formulation of our Comments

Sustainable Thornbury has about 120 members. All were invited to a meeting to discuss the proposals and to formulate a consolidated response. The comments here are a consolidation of those comments and suggestions expressed, and gaining a majority support by the members at that meeting.

Where members made comments and suggestions that did not receive majority support at the meeting, they were encouraged to submit these to South Gloucestershire as personal comments.

Our Comments on the Core Strategy for Thornbury

In November, last year, Sustainable Thornbury submitted comments on South Gloucestershire's Core Strategy for Thornbury. Whilst we are pleased to see some of our suggestions have been adopted in the Pre-submission, many of the issues are still outstanding. These have been incorporated into this set of comments.

R.S.Dale

Total 11 representations

Submitted by e-mail 3/8/2010

Part B – Sustainable Thornbury representation 1

3. To which part of the Core Strategy does your comment relate?

Paragraph	<input type="text" value="5.1"/> <input type="text" value="7.20"/>	Policy	<input type="text"/>	Other e.g. Map, table, figure, key diagram	<input type="text"/>
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4. Give details of your comment. Please be as precise as possible.
If you wish to support the Core Strategy, please also use this box to set out your comments.

Paragraph 5.1 starts: "High quality urban design ..." Sustainable Thornbury is concerned that this could be interpreted as excluding rural development.
This is repeated elsewhere, such as 7.20.

5. Please set out what change(s) to the Core Strategy you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete "urban"

6. Do you consider the DPD is:

a) Legally compliant? (please refer to guidance notes)	Yes	<input type="text" value="x"/>	No	<input type="text"/>
b) Sound? (please refer to guidance notes)	Yes	<input type="text"/>	No	<input type="text" value="x"/>

7. If you consider the DPD is **unsound** is this because it is not:

(1) Justified?	<input type="text"/>
(2) Effective?	<input type="text" value="x"/>
(3) Consistent with national policy?	<input type="text"/>

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

<input type="text" value="x"/>	No , I do not wish to participate at the oral examination	<input type="text"/>	Yes , I wish to participate at the oral examination
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Part B – Sustainable Thornbury representation 2

3. To which part of the Core Strategy does your comment relate?

Paragraph	<input type="text" value="5.11"/>	Policy	<input type="text" value="CS1 (8)"/>	Other e.g. Map, table, figure, key diagram	<input type="text"/>
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4. Give details of your comment. Please be as precise as possible.
If you wish to support the Core Strategy, please also use this box to set out your comments.

Specifying the standard for the quality of housing as the Code for Sustainable Homes level 3 (level 4 from 2013) is a meagre contribution to "minimising the amount of energy and resources consumed during the lifetime of the development". Sustainable Thornbury believes that global economics and energy supply will strongly influence the affordability of house ownership before 2026. Together with a National commitment to reduce carbon emissions, this means that (as stated in many eminent texts) business-as-usual is not an option. Enhancing energy conservation on a new-build is far simpler and cheaper than trying to retro-fit, so measures must be taken from the building planning stage. The current government has issued an aim of all new homes being "zero-carbon" by 2016. We believe that the strategy is **not** "The most appropriate strategy when considered against reasonable alternatives." (No alternative aims or timescales are considered in the Sustainability Appraisal.)

5. Please set out what change(s) to the Core Strategy you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Give a timescale of requiring new developments to achieve Code of Sustainable Homes to level 6. Appreciating that small, local building firms may need skill upgrades to achieve this, we would suggest that all planning applications in 2011 be level 3 or higher, with year-on-year increases until 2014 when all applications must be level 6.

6. Do you consider the DPD is:

a) Legally compliant? (please refer to guidance notes)	Yes	<input type="text" value="x"/>	No	<input type="text"/>
b) Sound? (please refer to guidance notes)	Yes	<input type="text"/>	No	<input type="text" value="x"/>

7. If you consider the DPD is **unsound** is this because it is not:

(1) Justified?	<input type="text" value="x"/>
(2) Effective?	<input type="text"/>
(3) Consistent with national policy?	<input type="text" value="x"/>

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

<input type="text" value="x"/>	No , I do not wish to participate at the oral examination	<input type="text"/>	Yes , I wish to participate at the oral examination
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Part B – Sustainable Thornbury representation 3

3. To which part of the Core Strategy does your comment relate?

Paragraph	<input type="text" value="16.7"/>	Policy	<input type="text" value="CS34 (2)"/>	Other e.g. Map, table, figure, key diagram	<input type="text"/>
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4. Give details of your comment. Please be as precise as possible.
If you wish to support the Core Strategy, please also use this box to set out your comments.

"Protect valuable agricultural land ...". This is ambiguous: it could mean:
1 all agricultural land is valuable and must be protected (a view supported by paragraph 16.7)
2 Only agricultural land that is determined to be valuable needs to be protected.

Para 16.7 adds further obfuscation by stating that the land should "be protected from **unacceptable** development".

We believe that interpretation 1 is correct and the land should be protected from **all** development other than that specifically to promote agriculture (as recognised in CS34 (6)). A minor change of wording would prevent malicious interpretations.

5. Please set out what change(s) to the Core Strategy you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Omit "valuable" in CS34 (2).
Omit "unacceptable" in para 16.7.

6. Do you consider the DPD is:

a) Legally compliant? (please refer to guidance notes)	Yes	<input type="text" value="x"/>	No	<input type="text"/>
b) Sound? (please refer to guidance notes)	Yes	<input type="text"/>	No	<input type="text" value="x"/>

7. If you consider the DPD is **unsound** is this because it is not:

(1) Justified?	<input type="text"/>
(2) Effective?	<input type="text" value="x"/>
(3) Consistent with national policy?	<input type="text"/>

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

<input type="text" value="x"/> No , I do not wish to participate at the oral examination	<input type="text"/> Yes , I wish to participate at the oral examination
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Part B – Sustainable Thornbury representation 4

3. To which part of the Core Strategy does your comment relate?

Paragraph

5.47

Policy

CS4 (8)

Other e.g. Map,
table, figure,
key diagram

4. Give details of your comment. Please be as precise as possible.

If you wish to support the Core Strategy, please also use this box to set out your comments.

There is ambiguity in the level of compulsion. Policy CS4 (8) gives unfeasibility as the only reason for non-compliance. 5.47 however allows economic considerations – a far weaker constraint as this ignores the other sustainable development criteria.

5. Please set out what change(s) to the Core Strategy you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

6. Do you consider the DPD is:

a) Legally compliant? (please refer to guidance notes)

Yes

No

b) Sound? (please refer to guidance notes)

Yes

No

7. If you consider the DPD is **unsound** is this because it is not:

(1) Justified?

(2) Effective?

(3) Consistent with national policy?

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

Part B – Sustainable Thornbury representation 5

3. To which part of the Core Strategy does your comment relate?

Paragraph	<input type="text" value="4.25"/>	Policy	<input type="text" value="CS32"/>	Other e.g. Map, table, figure, key diagram	<input type="text"/>
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4. Give details of your comment. Please be as precise as possible.

If you wish to support the Core Strategy, please also use this box to set out your comments.

The Core Strategy at the South Gloucestershire level is that Thornbury, Yate and Chipping Sodbury should be developed "to provide greater self-containment" (4.6); we support this direction. However, many of the features of Policy CS32 do not lead from this, and their pursuance may detract from its accomplishment.

For example, Paragraph 15.12 says that for "vibrancy in the town centre it is **vital** that the town ... markets itself as a tourist attraction" – seemingly an admission that being more self-contained will not lead to vibrancy.

A further example is the bringing forward of "The Castle School have indicated that they would like to consolidate onto a single site" (15.3) – an aspiration they have had since the school was founded. A large proportion of the current pupils of Castle School reside outside of Thornbury and its immediate neighbours, so will development be driven by the needs of incomers (with their impact on vehicular movements in the town and the A38) or those of local residents?

As no alternatives to the proposed ways of achieving self-containment and overall vibrancy are presented or considered in the Sustainability Appraisal, we believe that these policies in CS32 are unjustified and simply a wish-list of various organisations in the town.

[Sustainable Thornbury believes that global economics and energy supply will strongly influence local matters before 2026. It is therefore important that the rationale for current decisions is recorded so that it can be supported or challenged in these changed circumstances.]

5. Please set out what change(s) to the Core Strategy you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The vision needs to present a clear distinction between what produce, goods, facilities, leisure, education and employment opportunities should be (a) provided within the area for its residents; (b) provided within the area for "outsiders" and (c) provided only outside the Thornbury area. Only in this way can transport, employment and development policies be formulated and co-ordinated.

6. Do you consider the DPD is:

a) Legally compliant? (please refer to guidance notes)	Yes	<input type="text" value="x"/>	No	<input type="text"/>
b) Sound? (please refer to guidance notes)	Yes	<input type="text"/>	No	<input type="text" value="x"/>

7. If you consider the DPD is **unsound** is this because it is not:

(1) Justified?	<input type="text" value="x"/>
(2) Effective?	<input type="text"/>
(3) Consistent with national policy?	<input type="text"/>

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

Part B – Sustainable Thornbury representation 6

3. To which part of the Core Strategy does your comment relate?

Paragraph

Policy

CS33

Other e.g. Map,
table, figure,
key diagram

4. Give details of your comment. Please be as precise as possible.

If you wish to support the Core Strategy, please also use this box to set out your comments.

The Vision of Thornbury suggests "an appropriate amount of housing growth". Policy CS33 defines a "housing opportunity ... of 500 dwellings". There is nothing to justify the connection between these two statements. Is 500 appropriate? Should all development be at a single site? Are other sites, and more dwellings, also necessary (sites near the hospital are cited in CS32(6) and the current 6th form site is mentioned in 15.13.)

The Town Centre and Retail Study referenced by the Core Strategy suggests – based on current figures – that 500 house will bring a spending power of around £2m pa on convenience shopping and £3.6m on comparison shopping. Of this the town centre (excluding Tesco) will capture £350,000 (equivalent to about 120sqm of floor-space) in each of the two shopping categories. Is this an appropriate contribution to making the town "vibrant" considering the current number of empty shops? On the other hand, without prior expansion of employment opportunities appropriate to the capabilities and aspirations of the town's residents, housing expansion will exacerbate the congestion on the A38 and in the North Bristol fringes. (as stated in SA 5.97)

The Sustainability Appraisal does not address the number of houses, merely their location.

[Sustainable Thornbury believes that global economics and energy supply will strongly influence local matters before 2026. It is therefore important that the rationale for current decisions is recorded so that it can be supported or challenged as circumstances change.]

5. Please set out what change(s) to the Core Strategy you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Core Strategy or Sustainability Appraisal should include a statement such as "500 houses is an appropriate expansion of the town in the period to 2026, considering the following:..."

6. Do you consider the DPD is:

a) Legally compliant? (please refer to guidance notes)

Yes

No

b) Sound? (please refer to guidance notes)

Yes

No

7. If you consider the DPD is **unsound** is this because it is not:

(1) Justified?

(2) Effective?

(3) Consistent with national policy?

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

Part B – Sustainable Thornbury representation 7

3. To which part of the Core Strategy does your comment relate?

Paragraph	<input type="text"/>	Policy	CS33 para 2	Other e.g. Map, table, figure, key diagram	<input type="text"/>
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4. Give details of your comment. Please be as precise as possible.

If you wish to support the Core Strategy, please also use this box to set out your comments.

The Sustainability Appraisal (Paragraph 4.38) erroneously identifies Broad Area E as being in the Green Belt. The statement that it is "partly within the Conservation Area" is purely due to the choice of boundary between areas E and F – there is ample land within area E that is outside the Conservation Area. Whilst we recognise that vehicular access through the conservation area to the town centre would need consideration, the recent development at Warwick Place has provided a route between Area E and Castle Street. Pedestrian access to the town centre from Area E is already served by public footpaths.

Despite giving excellent access to the town centre and employment areas, Area E is not represented in any of the options in SA Appendix 11. The reason for omission is not stated in the Submission or the SA.

The SA (para4.41) states that the six sites chosen were influenced by "submissions by third parties to the Council"; no reference is given as to what these submissions said or by whom they were made. It is thus impossible to audit for vested interests.

[Sustainable Thornbury believes that global economics and energy supply will strongly influence local matters before 2026. It is therefore important that the rationale for current decisions is recorded so that it can be supported or challenged in these changed circumstances.]

5. Please set out what change(s) to the Core Strategy you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Either a) perform a detailed SA study for a site with area E and compare with the results from the other areas, or b) add a clear statement to the SA (following on from para 4.40) as to why area E was not taken forward for further consideration.

6. Do you consider the DPD is:

a) Legally compliant? (please refer to guidance notes)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
b) Sound? (please refer to guidance notes)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

7. If you consider the DPD is **unsound** is this because it is not:

(1) Justified?	<input checked="" type="checkbox"/>
(2) Effective?	<input type="checkbox"/>
(3) Consistent with national policy?	<input type="checkbox"/>

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

<input checked="" type="checkbox"/> No , I do not wish to participate at the oral examination	<input type="checkbox"/> Yes , I wish to participate at the oral examination
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Part B – Sustainable Thornbury representation 8

3. To which part of the Core Strategy does your comment relate?

Paragraph

4.1

Policy

Other e.g. Map,
table, figure,
key diagram

4. Give details of your comment. Please be as precise as possible.

If you wish to support the Core Strategy, please also use this box to set out your comments.

The Vision for South Gloucestershire includes recognition of climate change and the need to adapt to its effects. However, Sustainable Thornbury is saddened by the totally reactionary stance and the omission of a statement to proactively playing a part to mitigate climate change before its effects are irredeemable.

Paragraph 3.2 sees "the need to reduce emissions" as an Issue, but this is only addressed by a corresponding Overarching Objective, for which there are no specific policies. Whilst some of the policies in the Core Strategy do help to mitigate climate change, this is often as a spin-off from other considerations; others (such as the ones we have highlighted in other representations) miss the mark. Having a focus on mitigation would form a justification for pushing the policies further towards supporting national and world aims.

5. Please set out what change(s) to the Core Strategy you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Add climate change mitigation to the Vision. Such as change: ***"Adaptation to a changing climate will be taking place through the active management of impacts"*** to: ***"Adaptation to a changing climate will be taking place through the active management of impacts, whilst continuing to pursue ways of minimizing further climate change."***

6. Do you consider the DPD is:

a) Legally compliant? (please refer to guidance notes)

Yes

x

No

b) Sound? (please refer to guidance notes)

Yes

No

x

7. If you consider the DPD is **unsound** is this because it is not:

(1) Justified?

(2) Effective?

(3) Consistent with national policy?

x

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

x

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

Part B – Sustainable Thornbury representation 9

3. To which part of the Core Strategy does your comment relate?

Paragraph

4.1

Policy

Other e.g. Map,
table, figure,
key diagram

4. Give details of your comment. Please be as precise as possible.

If you wish to support the Core Strategy, please also use this box to set out your comments.

Sustainable Thornbury believes that, by 2026, the production of oil will be reduced and the global demand for oil will have dramatically increased. This will result to higher fuel costs and, potentially, fuel shortages, which in turn will lead to increased costs of goods and transportation and restriction on personal travel. The price of other forms of energy will also rise in response. The Core Strategy responds to the resulting pressure to source both goods and services more locally, as exemplified by the desire for greater self-containment of Thornbury, Yate and Chipping Sodbury, but without citing fuel constraints as a driving factor. We believe that, making this consideration explicit can have subtle changes on policies as diverse as housing standards, congestion, and shopping and leisure patterns.

5. Please set out what change(s) to the Core Strategy you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Recognise (in section 3) fuel price escalation as a driving factor over the Strategy period.

6. Do you consider the DPD is:

a) Legally compliant? (please refer to guidance notes)

Yes

No

b) Sound? (please refer to guidance notes)

Yes

No

7. If you consider the DPD is **unsound** is this because it is not:

(1) Justified?

(2) Effective?

(3) Consistent with national policy?

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

Part B – Sustainable Thornbury representation 10

3. To which part of the Core Strategy does your comment relate?

Paragraph

18

Policy

Other e.g. Map,
table, figure,
key diagram

4. Give details of your comment. Please be as precise as possible.

If you wish to support the Core Strategy, please also use this box to set out your comments.

Sustainable Thornbury is disappointed that the effects of major infrastructure developments on Thornbury and District have been deliberately sidelined. Whilst we appreciate that this is currently a changing situation, and that emotions are highly charged, it seems wrong that impacts should only be assessed in retrospect (when they will be harder to change) rather than setting the criteria for debate. Maybe a new nuclear power station would be the demise of Thornbury, or maybe it would provide the fillip in terms of residents and employment that would save the town. Identifying the tipping points would lead to more-informed debate. Now is the time for thinking outside-the-box as to how by-products of the development (if planned sympathetically) could contribute to the area's well-being; for example, could waste heat be used in the new housing development to make homes more affordable? Or in masses of greenhouses to produce local food? Or in radically-different leisure facilities?

Boldly go, to find innovative solutions for an enlightened future.

5. Please set out what change(s) to the Core Strategy you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

6. Do you consider the DPD is:

a) Legally compliant? (please refer to guidance notes)

Yes

No

b) Sound? (please refer to guidance notes)

Yes

No

7. If you consider the DPD is **unsound** is this because it is not:

(1) Justified?

(2) Effective?

(3) Consistent with national policy?

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

Part B – Sustainable Thornbury representation 11

3. To which part of the Core Strategy does your comment relate?

Paragraph	<input type="text"/>	Policy	<input type="text" value="CS33"/>	Other e.g. Map, table, figure, key diagram	<input type="text" value="SA"/>
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4. Give details of your comment. Please be as precise as possible.

If you wish to support the Core Strategy, please also use this box to set out your comments.

Notwithstanding the representations herein regarding: the justification for additional housing in Thornbury, the quality of that housing, and the dismissal of Area E from considerations, Sustainable Thornbury are pleased that choosing a site for development has been conducted on sustainability grounds. The SA criteria afford a balanced view of development acceptability, although there will always be a variety of opinions as to which criteria should hold most weight and whether ratings have been correctly applied. We assume that SA, together with the policies in the Strategy will guide consent to particular planning applications

5. Please set out what change(s) to the Core Strategy you consider necessary. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

n/a

6. Do you consider the DPD is:

a) Legally compliant? (please refer to guidance notes)	Yes	<input type="text" value="x"/>	No	<input type="text"/>
b) Sound? (please refer to guidance notes)	Yes	<input type="text" value="x"/>	No	<input type="text"/>

7. If you consider the DPD is **unsound** is this because it is not:

(1) Justified?	<input type="text"/>
(2) Effective?	<input type="text"/>
(3) Consistent with national policy?	<input type="text"/>

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

<input type="text"/>	No , I do not wish to participate at the oral examination	<input type="text"/>	Yes , I wish to participate at the oral examination
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