

Strategic Environmental Assessment for the Pilning & Severn Beach Neighbourhood Plan

Environmental Report to accompany the 'Regulation 14 version' of the
Neighbourhood Plan

Pilning & Severn Beach Neighbourhood Plan Steering Group

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Quality information

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Non-Technical Summary

Introduction

AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Pilning & Severn Beach Neighbourhood Plan (hereafter referred to as the P&SBNP).

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising potential effects. SEA for the P&SBNP is a legal requirement.

The P&SBNP is being prepared in the context of the Local Development Framework for South Gloucestershire Council, with due regard given to the New South Gloucestershire Local Plan (i.e., the emerging Local Plan). Once 'made', the P&SBNP will have material weight when deciding on planning applications alongside the local development framework for South Gloucestershire Council.

This report is the Environmental Report for the P&SBNP. It is published alongside the 'pre-submission' version of the Plan, under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended).

What is the P&SBNP seeking to achieve?

The vision of the P&SBNP is as follows:

"In 2035, the Parish of Pilning & Severn Beach will have retained its rural character and its sense of village communities. It will have preserved its green spaces, and improved access to countryside and the Severn estuary.

Some small-scale new development will have occurred to meet local needs. This development will have provided new market and affordable homes enabling young adults to remain, and some accommodation for older people to enable local residents to age in place.

These new developments, and the homes within them, will be well designed, attractive, and efficient places which build upon the existing sense of community. Important local community facilities and services, pubs and shops will have been protected, and in some cases new facilities will have been provided. All will support the sustainability of our community to the benefit of the wellbeing of residents.

Local public transport services and cycling and walking networks will have been improved. Visitors to the area will be encouraged and better accommodated.

The impacts of the Severnside industrial area on local communities will have been reduced and mitigated to enhance the environment for all."

To support this vision, a number of objectives have been identified and are detailed in **Chapter 2** in the main body of the Environmental Report.

What is the scope of the SEA?

The scope of the SEA is summarised in a list of topics, objectives, and assessment questions, which, taken together, indicate the parameters of the SEA and provide a methodological ‘framework’ for assessment. A summary framework is presented below, and a full framework which includes assessment questions is provided within the Appendix A.

SEA theme	SEA objective
Biodiversity	Protect and enhance biodiversity and geodiversity.
Climate change and flood risk	Reduce the contribution to climate change made by activities within the neighbourhood area and increase resilience to the potential effects of climate change, including flooding.
Community wellbeing	Ensure growth in the neighbourhood area is aligned with the needs of all residents, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.
Historic environment	Protect, conserve, and enhance the historic environment within and surrounding the Neighbourhood Area.
Land, soil, and water resources	Ensure the efficient and effective use of land, protect, and enhance water quality, and use and manage water resources in a sustainable manner.
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape.
Transportation and movement	Promote sustainable transport use and reduce the need to travel.

Establishing reasonable alternatives

In accordance with the SEA Regulations, an Environmental Report must include:

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of the alternatives appraised.

This is considered below, including details of how the top-down strategic factors (i.e., housing context, Green Belt context, and flood risk context), and bottom-up factors (i.e., site availability) have informed the alternatives considered through the SEA.

Housing context

The Regulation 19 version of the new South Gloucestershire Local Plan is the latest iteration of the emerging local plan. This plan does not provide a specific housing number for the Pilning & Severn Beach neighbourhood area, nor does it feature either Pilning or Severn Beach within Policy LPS2 – Locational Strategy for South Gloucestershire. As such, there is no allocated housing need in the emerging Local Plan for the neighbourhood area.

It is recognised that there are significant environmental constraints within the Pilning & Severn Beach neighbourhood area, which are likely to have informed South Gloucestershire Council's decision to not provide a specific housing target for the area. In addition, the emerging Local Plan does not provide numbers to smaller communities across the district. However, the Steering Group have sought to establish locally specific needs via a Housing Needs Assessment (HNA)¹. Reflecting the HNA conclusions, the local identified need is a minimum of 246 dwellings across the plan period – with between an additional 31 and 41 extra care units. This number has been confirmed by the Council as an acceptable amount of growth.

Green Belt context

The delivery of anything more than a small handful of new dwellings at Pilning will require a site, or a combination of sites, larger than any outside the Green Belt. This has the potential to adversely change the settlement character and pattern of development, and as such there is a need to review sites within the Green Belt. A Green Belt Review has been undertaken by Vision Planning (November 2023, accompanying the P&SBNP at Regulation 14 consultation)², alongside an 'exceptional circumstances' case setting out why additional homes are needed at Pilning, and why the delivery of these homes requires land to be released from the Green Belt. This evidence has identified that there are only three infill sites of limited capacity within the Pilning settlement area that are not located in the Green Belt. Providing that these sites remain deliverable, they could accommodate up to 27 new homes across the P&SBNP period. The P&SBNP Steering Group states that "none of the sites outside the Green Belt are large enough to meet the Parish's housing needs in any meaningful way."

The emerging Local Plan accepts that exceptional circumstances warrant alterations to the Green Belt to enable the delivery of additional homes. The WECA Green Belt Assessment, which forms a background paper to the emerging Local Plan, notes that: "... the area contained between Pilning, Bank Road, the B4055 and the A403 to the north of Pilning, has some urbanising development which would limit harm if land in that area were released, even though a mature, well-treed hedgerow creates relatively strong separation from the inset settlement."

Furthermore, an update to Green Belt guidance (February 2025) has triggered a Green Belt review, which could lead to the identification of 'grey belt' land within the neighbourhood area. South Gloucestershire Council (along with four other authority areas) are currently undertaking a joint Green Belt review.

Reflecting on the above, the P&SBNP Steering Group has obtained some assurance from South Gloucestershire Council that the emerging South Gloucestershire Local Plan will include a policy hook enabling the P&SBNP to propose Green Belt changes at Pilning. However, it is noted that the P&SBNP could be made before the Local Plan is adopted, and all other examples of neighbourhood plans that have successfully amended Green Belt boundaries have been adopted after the corresponding Local Plan.

If the emerging Local Plan does not include the necessary strategic policy supporting Green Belt release within Neighbourhood Plans, an immediate review of the

¹ AECOM (2021): [Pilning & Severn Beach Housing Needs Assessment \(HNA\)](#)

² Vision Planning (2023): Pilning & Severn Beach Neighbourhood Plan Green Belt Review

P&SBNP will be undertaken to determine how any shortfall in housing needs can be met.

Flood Risk context

Flood risk is also a significant constraint in the Pilning & Severn Beach neighbourhood area. In recognition of this, the P&SBNP Steering Group engaged with South Gloucestershire and the Environment Agency and agreed a specification to complete a Level 2 SFRA³ and a Statement of Common Ground (February 2025)⁴ with respect to how flood risk issues should be dealt with through the preparation of the P&SBNP. Specifically, applying the provisions within the NPPF relating to flooding (Para 170 to 182)⁵.

The conclusions within the initial draft of the Level 2 SFRA confirm that development in the neighbourhood area will be appropriate subject to the mitigation measures provided.

Sequential testing has been undertaken to assess potential flooding solutions in the neighbourhood area. It has identified that the suitable and available site options within the neighbourhood area (sites close to the village centres and / or adjacent to settlement boundaries) all have a similar flood risk and are all within Flood Zone 3. The test has also demonstrated that development in these locations will provide sustainability benefits that outweigh the risk of flooding, and that development will be safe for its lifetime.

Site Availability

A Site Options and Assessment (SOA)⁶ process was completed in August 2025. The SOA assessed sites to establish which are suitable, available and likely to be viable for development, taking into consideration the policies of the adopted South Gloucestershire Local Plan and national policy provisions. These are split into sites within the Green Belt, and sites outside of the Green Belt. Detailed assessment findings are presented in the SOA Report accompanying Regulation 14 consultation.

Options for the focus of growth

As outlined above, the Pilning & Severn Beach neighbourhood area is constrained by significant flood risk and designated Green Belt land, which have led to challenges in unlocking growth in the area. Furthermore, the P&SBNP Steering Group have evidence to demonstrate the significance of these constraints, which justifies that there are no suitable alternative locations for growth in the neighbourhood area to those which are being considered for a potential allocation within the P&SBNP. Therefore, the SEA of the P&SBNP has not explored options for alternative sites. Instead, the SEA has focused on factors which the P&SBNP has the potential to influence, notably with respect to the broad locations of potential growth. Taking this into consideration, the SEA has considered the following options with respect to the focus of growth:

- **Option A:** Deliver growth within / adjacent to Severn Beach.

³ JBA Consulting (2025): Pilning & Severn Beach Neighbourhood Plan – Level 2 Strategic Flood Risk Assessment

⁴ South Gloucestershire Council, Environment Agency, and P&SBNP Steering Group (2025): Pilning & Severn Beach Neighbourhood Plan Statement of Common Ground between Pilning & Severn Beach Neighbourhood Plan Steering Group, The Environment Agency, and South Gloucestershire Council

⁵ Ministry of Housing, Communities, and Local Government (2024): [National Planning Policy Framework \(NPPF\)](#)

⁶ AECOM (2025): Site Options and Assessment. The SOA accompanies the P&SBNP at Regulation 14 consultation.

- **Option B:** Deliver growth within / adjacent to Pilning.
- **Option C:** Deliver growth within / adjacent to Severn Beach and Pilning.

The appraisal considers the relative sustainability merits of the three growth distribution options, as shown in **Table 4.1** and **Table 4.2** within the main body of the Environmental Report. Findings are presented as a commentary on effects. To support the appraisal findings, the options have been ranked in terms of their performance against the relevant SEA theme. It is anticipated that this will provide the reader with a likely indication of the relative performance of the options to each theme considered. A summary of the appraisal findings is presented below in **Table NTS1** below.

Table NTS: Summary of assessment findings for the distribution of growth

SEA Theme		Option A	Option B	Option C
Biodiversity	Rank	3	1	2
	Significant effect?	Yes - negative	No	No
Climate change and flood risk	Rank	3	2	1
	Significant effect?	Yes - negative	Yes - negative	Yes - negative
Community wellbeing	Rank	3	2	1
	Significant effect?	Yes - mixed	Yes - mixed	Yes - positive
Historic environment	Rank	1	3	2
	Significant effect?	No	No	No
Land, soil, and water resources	Rank	1	3	2
	Significant effect?	No	Yes - negative	No
Landscape	Rank	1	3	2
	Significant effect?	No	Yes - negative	No
Transportation	Rank	1	3	2
	Significant effect?	Yes - mixed	Yes - negative	Yes - mixed

Options to inform policy approaches

The neighbourhood area has a strong visitor economy, supported by its access to the coastline and key open areas (notably around Severn Beach). Initiatives such as 'A Forgotten Landscape'⁷ has supported opportunities to improve community access to and engagement with the Lower Severn Vale Levels in order to improve the

⁷ Pilning & Severn Beach Parish Council (2025): [A Forgotten Landscape](#)

recreational offer for both residents and visitors. Additionally, strategic employment land at Severnside Enterprise Area is likely to expand during the emerging Local Plan period. Residents have observed an increase in parking and traffic through the neighbourhood area linked to employment uses, including HGVs increasing congestion, and commuters parking in residential areas.

With a view to improving traffic management within the neighbourhood area, the SEA has explored the relative sustainability merits of the following options:

- **Option A:** Do not allocate sites for parking in the neighbourhood area
- **Option B:** Allocate sites for parking in the neighbourhood area.

The appraisal considers the relative sustainability merits of the three growth distribution options, as shown in **Table 4.3** and **Table 4.4** within the main body of the Environmental Report. Findings are presented as a commentary on effects. To support the appraisal findings, the options have been ranked in terms of their performance against the relevant SEA theme. It is anticipated that this will provide the reader with a likely indication of the relative performance of the options to each theme considered. A summary of the appraisal findings is presented below in **Table NTS2** below.

Table NTS2: Summary of assessment findings for the traffic management options

SEA Theme		Option A	Option B
Biodiversity	Rank	2	1
	Significant effect?	Yes - negative	No
Climate change and flood risk	Rank	2	1
	Significant effect?	No	No
Community wellbeing	Rank	2	1
	Significant effect?	Yes - negative	Yes - positive
Historic environment	Rank	2	1
	Significant effect?	No	No
Land, soil, and water resources	Rank	=	=
	Significant effect?	No	No
Landscape	Rank	2	1
	Significant effect?	No	No
Transportation	Rank	2	1
	Significant effect?	Yes - negative	Yes - positive

Establishing the preferred approach

Options for the focus of growth

In relation to the distribution of growth, the P&SBNP Steering Group have decided to approach growth in the neighbourhood area through **Option C**: delivering growth within and / or adjacent to Severn Beach and Pilning. This option has been chosen as it is best positioned to support the sustainability of both villages, with significant positive effects for community wellbeing. Additionally, growth through Option C is likely to help reduce impacts to the Green Belt, given that development is not solely focused in Pilning. The allocated sites in the P&SBNP are as follows:

- Pilning
 - **Policy H1:** Site SG807 / NP13 - Land at Pilning Village Hall and Playing Field, for up to 30 dwellings.
 - **Policy H2:** Site SG136 / NP14 - Land west of St Peter's School, Pilning, for up to 25 dwellings.
 - **Policy H3:** Site SG808 / NP15 - Land behind surgery and allotments, Pilning, for up to 41 care units and 30 dwellings.
 - **Policy H4:** Site CFS9 / CFS10 - Rear of 21/23 Cross Hands Road, Pilning, for up to 18 dwellings.
 - **Policy H5:** Site CFS13 - Pilning Forge, Whitehouse Lane, Pilning, for up to 9 dwellings.
 - **Policy H6:** Site CFS1 - Adjacent to 19, Vicarage Road, Pilning, for up to 3 dwellings.
- Severn Beach
 - **Policy H7:** Site SG778 / SG907 / NP8 - Land at Station Road, Severn Beach, for up to 25 homes.
 - **Policy H8:** Site SG135 / NP1 - Land to the west of Ableton Lane, Severn Beach, for up to 75 homes.
 - **Policy H9:** Site CFS8 / SG33 / NP6 - Land south of Church Road, for up to 80 homes.

It is noted that the Green Belt Study / Exceptional Circumstances case recommends removing areas of the Green Belt (i.e., the areas covering their preferred site options) and establishing new areas of Green Belt land in locations which the P&SBNP Steering Group feel better reflect the purposes of the Green Belt. This is subject to approval from South Gloucestershire Council, and supporting evidence has been prepared on this basis.

Options to inform policy approaches

The P&SBNP Steering Group have decided to take forward **Option B**: allocate sites for parking in the neighbourhood area. This is anticipated to allow for a coordinated approach to managing traffic and congestion impacts linked to visitor and industrial movements.

Appraising the Regulation 14 version of the P&SBNP

The Regulation 14 version of the P&SBNP presents 26 planning policies for guiding development in the neighbourhood area.

Chapter 5 within the main body of the Environmental Report presents the findings of the appraisal of the Regulation 14 version of the P&SBNP. Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the Environmental Report presents the findings of the assessment as a commentary of effects under the SEA themes.

A summary of the appraisal findings is presented below.

The P&SBNP performs positively in terms of supporting priority habitats and ecological networks in the neighbourhood area. This is anticipated to be achieved through design stipulations included in the housing allocations and car parking allocations, which work to ensure biodiversity quality and connectivity are considered through development. Providing the HRA recommendations are given due consideration by plan makers, it is concluded that there would be no significant effects to the integrity of European designated sites, either alone or in combination with other plans and programmes. Overall, **minor positive effects** are concluded.

With respect to climate resilience, it is considered that the P&SBNP policies work well to help reduce negative effects related to climate change and flood risk. This is primarily achieved through supporting sustainable growth that strives to be energy efficient and including appropriate flood risk management techniques. Reflecting this, **minor positive effects** are considered likely. This is due to the P&SBNP policies taking a proactive approach to mitigating and adapting to climate change.

The P&SBNP is considered likely to lead to **significant positive effects** in relation to community wellbeing. The Neighbourhood Plan allocates sites across the two key villages of Severn Beach and Pilning to meet (and exceed) the local housing requirements identified within the HNA. Growth across the two key villages will help to sustain their vitality and encourage balanced and sustainable communities within the neighbourhood area. The wider policy framework has a strong emphasis on design quality, including provisions to improve accessibility, support healthy lifestyles, and enhance the quality of the public realm.

The majority of the site allocations are removed from designated heritage assets, areas and features (and their associated setting); nor would they deliver growth within proximity to non-designated heritage assets and their associated settings. Overall, **minor positive effects** are considered likely in relation to the historic environment. This largely reflects the focus of the plan on design – incorporating provisions to help safeguard the integrity and historic character of the villages.

Overall, no significant effects to land, soil and water resources are anticipated upon consideration of the policies and proposals in the P&SBNP. This reflects the sites being suitably located in areas with a reduced potential to support agricultural activity. It also reflects the provisions of the P&SBNP on focusing new growth within and adjacent to existing development, which further reduces the potential for productive soil loss, and on measures that could contribute to protecting underlying soils. However, it is noted that the P&SBNP does not make provisions in relation to water quality. As the area is at risk of surface water flooding, it is possible that

materials, pollutants and waste could enter the water system. As such, **minor negative effects** are anticipated in relation to land, soil and water resources.

Minor positive effects are concluded in relation to landscape, relating to the focus on design within the P&SBNP policy framework, which will support the resilience and quality of local villagescape character and distinctiveness. However, a level of uncertainty is concluded with respect to the sites in Pilning, which are all located within the Green Belt, though it is recognised that their allocation is an ongoing discussion between the P&SBNP Steering Group and Local Authority.

Minor positive effects are concluded for transportation and movement through the policy provision of the P&SBNP. This is due to the proactive approach the policies take with regards to managing congestion and traffic issues identified in the neighbourhood area. It also reflects the design stipulations embedded in the site allocation policies, which encourage active and sustainable travel.

Recommendations for the P&SBNP

The SEA puts forward the following recommendations for plan makers:

- It is recommended that Policy H3 is revised to acknowledge the importance of the site to social, amenity or community value land in the neighbourhood area. It is suggested that provisions are added to the policy to ensure its value is upheld as far as possible, or a replacement site is sourced to contribute new social, amenity or community value land, which would help mitigate against the loss of land under Policy H3.
- It is recommended that policies H1, H2, H3, H4 and H6 are updated to add specific stipulations linked to protecting the water environment, given that these allocated sites are adjacent to The Pill watercourse. Furthermore, it is recommended that natural drainage solutions (i.e., SuDS) are incorporated within the design of new development areas, or a strategy to minimise disturbances to the Chestle Pill Water Body catchment during the construction and operational phases of development.

Next steps

This Environmental Report accompanies the P&SBNP at Regulation 14 consultation.

Following consultation, any representations made will be considered by the P&SBNP Steering Group, and the P&SBNP and Environmental Report will be updated as necessary. The updated Environmental Report will then accompany the P&SBNP for submission to the Local Planning Authority, South Gloucestershire Council, for subsequent Independent Examination. At Independent Examination, the P&SBNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.

Assuming that the examination leads to a favourable outcome, the P&SBNP will then be subject to a referendum, organised by South Gloucestershire Council. If more than 50% of those who vote agree with the P&SBNP, then it will be 'made'. Once 'made', the P&SBNP will become part of the Development Plan for South Gloucestershire Council, covering the defined neighbourhood area.

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1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Pilning & Severn Beach Neighbourhood Plan (P&SBNP).
- 1.2 The P&SBNP is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The P&SBNP is being prepared in the context of the Local Development Framework of South Gloucestershire Council.
- 1.3 The neighbourhood area covers the civil parish of Pilning & Severn Beach in South Gloucestershire, and it located to the north-west of Bristol.

SEA explained

- 1.4 SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and the potential alternatives in terms of key environmental issues. SEA of the P&SBNP is a legal requirement⁸. The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating potential negative impacts and maximising the potential for positive effects. Through this approach, the SEA for the P&SBNP seeks to maximise the emerging plan's contribution to sustainable development.
- 1.5 Two key procedural requirements of the SEA Regulations are that:
 - When deciding on 'the scope and level of detail of the information' which must be included in the Environmental Report there is a consultation with nationally designated authorities concerned with environmental issues; and
 - A report (the 'Environmental Report') is published for consultation alongside the draft plan (i.e., the draft P&SBNP) that presents outcomes from the environmental assessment (i.e., discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.
- 1.6 This Environmental Report is concerned with item 'ii' above.

Structure of this Environmental Report

- 1.7 This document is the SEA Environmental Report for the P&SBNP and hence needs to answer all four of the questions listed below with a view to providing the information required by the SEA Regulations. Each of the four questions is answered in turn within this report, as follows:

⁸ Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations ('the SEA Regulations').

Table 1.1: Questions that must be answered by the SEA Environmental Report to meet the regulatory⁹ requirements

Environmental Report question	In line with the SEA Regulations, the report must include... ¹⁰
What is the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents and main objectives of the plan.
What is the sustainability 'context'?	<ul style="list-style-type: none"> Relationship with other relevant plans and programmes. The relevant environmental protection objectives, established at international or national level. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What's the scope of the SEA?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. The environmental characteristics of areas likely to be significantly affected. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What is the sustainability 'baseline'?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. The environmental characteristics of areas likely to be significantly affected. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
What are the key issues and objectives?	<ul style="list-style-type: none"> Key problems/issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment.
What has plan-making/SEA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with. The likely significant effects associated with alternatives. Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan.
What are the assessment findings at this stage?	<ul style="list-style-type: none"> The likely significant effects associated with the Regulation 14 version of the plan. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the Regulation 14 version of the plan.
What happens next?	<ul style="list-style-type: none"> The next steps for the plan making / SEA process.

⁹ Environmental Assessment of Plans and Programmes Regulations 2004

¹⁰ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

2. Local Plan context and vision for the P&SBNP

Introduction

2.1 This section considers the strategic planning policy context provided by South Gloucestershire's Local Development Framework¹¹ and then presents the vision and objectives of the P&SBNP.

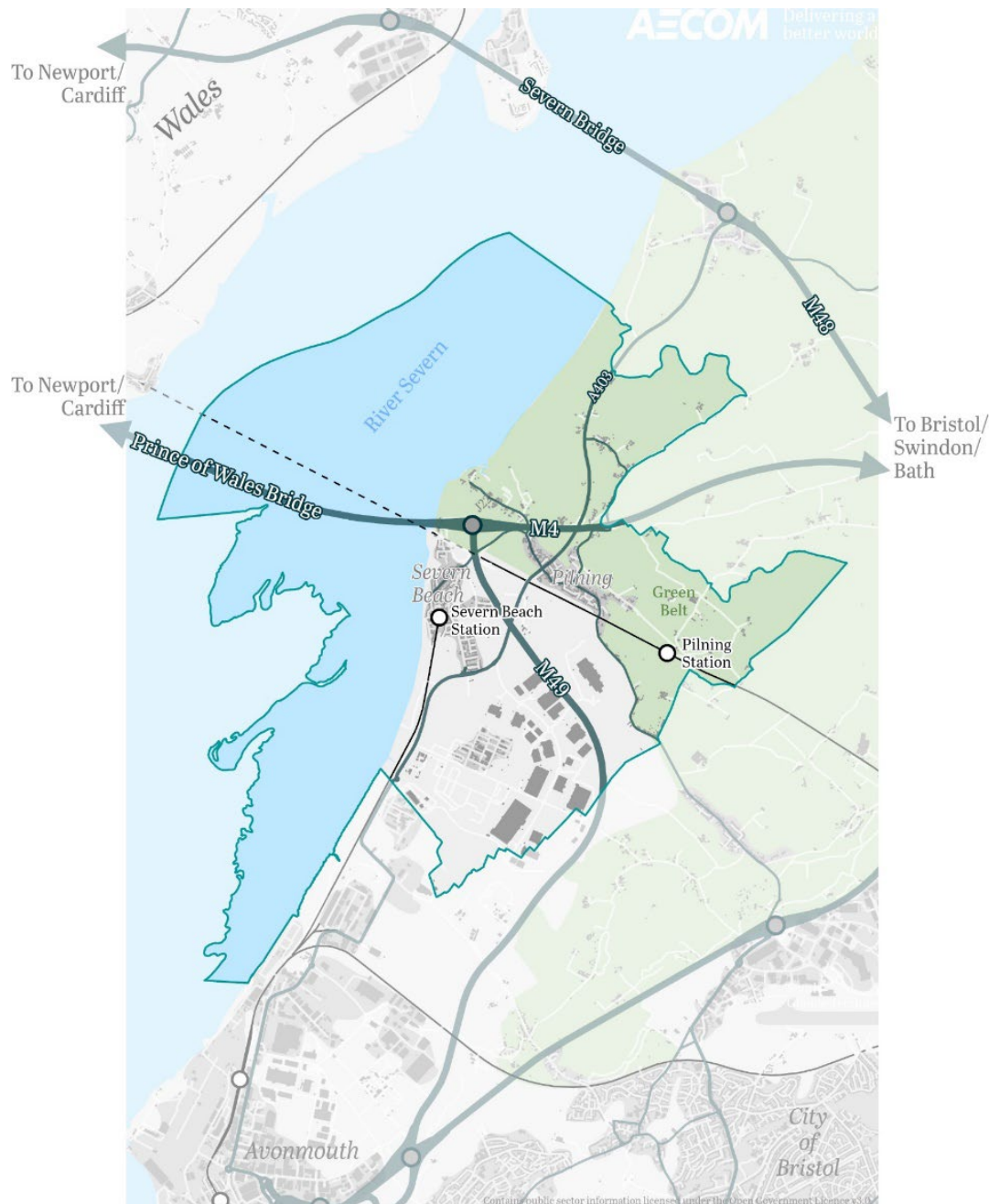


Figure 2.1: Pilning & Severn Beach neighbourhood area

¹¹ South Gloucestershire Council (2025): [Planning policy - Adopted plans](#)

Strategic planning context

- 2.2 In May 2022, the West of England Combined Authority (WECA) made the decision to stop all work on the emerging Spatial Development Strategy (SDS), instead committing to supporting constituent councils to deliver their individual local plans¹². A new SDS is being developed, to consider how and where homes and supporting infrastructure are delivered, as well as how to support local jobs and businesses, and how to protect nature and prepare for climate change¹³. Whilst the SDS is still emerging, the strategic planning framework for South Gloucestershire is provided through its Local Plan. The Local Plan consists of the following Local Plan documents:
- The Core Strategy (adopted December 2013).
 - The Policies, Sites and Places (PSP) Plan (adopted November 2017); and
 - The Joint Waste Core Strategy (adopted March 2011).
- 2.3 The Core Strategy document sets out a vision for future development in South Gloucestershire to 2027¹⁴. It covers the general location, type and scale of development as well as protecting what is valued about the area.
- 2.4 The Policies, Sites and Places (PSP) Plan is in two parts¹⁵. Part One covers policies for managing new development. These policies have been drawn up in accordance with the National Planning Policy Framework and National Planning Practice Guidance. Part Two covers the allocation and protecting of sites and places within South Gloucestershire. This includes details of town centres and site allocations. There are also links to local green spaces and heritage sites at risk.
- 2.5 The Joint Waste Core Strategy guides decisions about where waste management facilities should be located within the West of England¹⁶.

South Gloucestershire New Local Plan

- 2.6 Since work stopped on the WECA SDS in 2022, South Gloucestershire Council have reconfirmed its commitment to prepare the South Gloucestershire New Local Plan (SGLP). The New SGLP will be a Development Plan Document (DPD) for the district covering the plan period 2025 to 2042. The Plan will include a new strategy and policies to guide and manage growth and change in our area over at least the next 15 years. The Plan will therefore replace the Core Strategy and the Policies, Sites and Places Plan.
- 2.7 The New SGLP has recently undertaken Regulation 19 consultation, which closed on the 11th of April 2025. According to the most recent Local Plan Delivery Programme, published in 2022 and updated in February 2025¹⁷, the new SGLP will be submitted to the Secretary of State (Regulation 22) in September 2025, and it is envisioned that the new SGLP will be adopted in December 2026. This latest version of the New SGLP does not include the

¹² West of England Combined Authority (2025): [20-22 Archived Spatial Development Strategy](#)

¹³ West of England Combined Authority (2025): [Spatial Development Strategy](#)

¹⁴ South Gloucestershire Council (2013): [Core Strategy 2006-2027](#)

¹⁵ South Gloucestershire Council (2017): [Policies, Sites and Places plan \(PSP\)](#)

¹⁶ South Gloucestershire Council (2011): [Joint Waste Core Strategy](#)

¹⁷ South Gloucestershire Council (2022): [South Gloucestershire Local Plan Delivery Programme 2025-2028 February 2025 Update](#)

villages of Pilning or Severn Beach within the locational strategy, nor does it provide a specific housing number for the neighbourhood area.

P&SBNP vision and objectives

2.8 The vision for the P&SBNP is as follows:

“In 2035, the Parish of Pilning & Severn Beach will have retained its rural character and its sense of village communities. It will have preserved its green spaces, and improved access to countryside and the Severn estuary.

Some small-scale new development will have occurred to meet local needs. This development will have provided new market and affordable homes enabling young adults to remain, and some accommodation for older people to enable local residents to age in place.

These new developments, and the homes within them, will be well designed, attractive, and efficient places which build upon the existing sense of community. Important local community facilities and services, pubs and shops will have been protected, and in some cases new facilities will have been provided. All will support the sustainability of our community to the benefit of the wellbeing of residents.

Local public transport services and cycling and walking networks will have been improved. Visitors to the area will be encouraged and better accommodated.

The impacts of the Severnside industrial area on local communities will have been reduced and mitigated to enhance the environment for all.”

2.9 The vision is supported by the following objectives:

New Housing Objectives

- To meet identified local needs for housing up to 2035, including market housing, affordable housing, and housing for older people.
- To provide well integrated and appropriately located developments, which enhance the character of our communities by a combination of small allocation sites and “windfall” (infill) sites.
- To ensure housing developments deliver the infrastructure for which they generate a need, and are well planned, attractively designed and of appropriate quality.
- To seek to ensure that new homes make the best use of the latest sustainable design and technology, to minimise the use of environmental resources, and achieve carbon neutrality.
- To ensure that new homes are resilient to the impact of climate change and are safe from flood risk, and that these new developments do not increase the risk of flooding elsewhere.
- To seek to ensure new housing is designed to include an appropriate quantity of off-road parking to avoid congestion on surrounding roads.

Travel, Transport and Parking Objectives

- To seek to ensure necessary improvements in the highway network (roads, footpaths, and cycle ways) are in place ahead of new development to promote safety and ease of access, especially for public transport.
- To deliver a new transport hub at Severn Beach Railway Station to provide car and cycle parking, drop off / pick up and improved bus / train interchange.
- To seek to improve service levels and reliability of public transport.
- To support the delivery of improvements to the walking and cycle network throughout the Parish, to allow people to reach destinations efficiently and safely in the community.
- To seek to provide adequate parking for the central parts of the villages, for visitors to the sea wall and coastal path and to improve connections with public transport.
- To seek to ensure that new public and commercial parking areas make adequate provision for electric vehicle charging.

Community Facilities Objectives

- To maintain, protect and enhance existing community facilities, especially schools, local businesses, village halls and open spaces.
- To seek to develop Pilning & Severn Beach Village Halls to meet a wider scope of needs, providing more space and better provision. Extension, rebuild or relocation all potential considerations.
- To seek to maximise the delivery of and contributions towards new community facilities through Core Strategy policy CS6, i.e., funding from new developments.
- To seek to improve and diversify existing recreational spaces / playing fields to encourage sports or exercise activities and provide additional biodiversity.
- To identify sites in Severn Beach where new retail facilities could be developed, including a public house and a takeaway outlet.
- To resist the loss of existing retail facilities e.g., pubs, shops, to non-retail use.
- To provide additional allotments for Pilning by identifying a new site or investing in the existing site to make more land available.

Large Commercial Developments Objectives

- To protect the Parish's existing communities from the impacts resulting from existing and proposed commercial development in the Severnside Enterprise Zone.
- To establish a green buffer zone between residential properties and industrial development. A requirement would be placed on all new development sites that face outwards from the Severnside industrial parks towards the residential areas of Pilning & Severn Beach to include a buffer zone on that side of their sites. In the form of a raised bund and planting,

the buffer zone would be designed to provide visual screening, attenuation of noise and light pollution and ecological enhancements.

- To ensure new planning applications for large commercial developments shall consider orientation of the sites to minimise impact of noise and light pollution to neighbouring residential areas.
- To reduce the harmful impact of large commercial developments on the environment and local residents' wellbeing through new planning applications, by encouraging the inclusion of measures to address; the reduction of carbon emissions, improvement of energy security and flood mitigation.
- To ensure that adverse flooding impacts on the residential dwellings within the Parish are presented in planning applications and appropriately considered prior or to planning approval.

The Environment, Countryside and Green Belt Objectives

- To protect and preserve the countryside, to improve and maintain access to it.
- To enhance and encourage access to the waterfront and wetlands for residents and visitors.
- To preserve existing public green spaces at:
 - Severn Beach Playing Field.
 - Adjacent to the sea wall in Severn Beach.
 - Gorse Cover Road, Severn Beach.
 - Pilning Playing Field.
 - Cranmoor Green Pilning.
- To include provision for an appropriate level of green infrastructure in proposals for new housing other than small infill or windfall sites.
- To ensure that new housing is sustainably located throughout the Parish in each of the larger settlements, the Green Belt boundaries shall be reviewed, and by working with SGC, altered to remove some land adjacent to settlement boundaries from the Green Belt.
- To review Green Belt boundaries within the Parish with the aim of removing some areas of land adjacent to existing settlement boundaries from the Green Belt where otherwise no appropriate sites for needed development can come forward.

3. What is the scope of the SEA?

Introduction

- 3.1 The aim here is to introduce the reader to the scope of the SEA, i.e., the sustainability themes and objectives that should be a focus of the assessment of the plan and reasonable alternatives. Further information is presented in **Appendix A**.

Consultation

- 3.2 The SEA Regulations require that “when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England. As such, these authorities were consulted in October 2022. Scoping responses are presented in **Appendix A**.

The SEA framework

- 3.3 The SEA scope is summarised in a list of themes and objectives, known as the SEA framework. The full SEA Framework is provided in **Appendix A** and Table 3.1 below presents a summary version.

Table 3.1 Summary SEA Framework

SEA theme	SEA objective
Biodiversity	Protect and enhance biodiversity and geodiversity.
Climate change and flood risk	Reduce the contribution to climate change made by activities within the neighbourhood area and increase resilience to the potential effects of climate change, including flooding.
Community wellbeing	Ensure growth in the neighbourhood area is aligned with the needs of all residents, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.
Historic environment	Protect, conserve, and enhance the historic environment within and surrounding the neighbourhood area.
Land, soil, and water resources	Ensure the efficient and effective use of land, protect and enhance water quality, and use and manage water resources in a sustainable manner.
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape.
Transportation and movement	Promote sustainable transport use and reduce the need to travel.

4. Consideration of reasonable alternatives for the P&SBNP

Introduction

- 4.1 In accordance with the SEA Regulations, an Environmental Report must include:
- An outline of the reasons for selecting the alternatives dealt with; and
 - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of the alternatives appraised.
- 4.2 The ‘narrative’ of plan-making / SEA up to this point is told within this part of the SEA Environmental Report. Specifically, how the SEA process to date has informed the consideration of different approaches for key elements of the P&SBNP.
- 4.3 The following sections therefore describe how the SEA process to date has informed the preferred strategy for the neighbourhood area and potential locations for development.

Top-down considerations (e.g., strategic factors)

Adopted Local Plan

- 4.4 As noted in Chapter 2, the strategic policy context is set by the adopted South Gloucestershire Local Plan. This Local Plan does not identify a housing number for the Pilning & Severn Beach neighbourhood area, nor does it include a settlement hierarchy to help guide appropriate levels of development across the South Gloucestershire area.

Emerging Local Plan

- 4.5 The Regulation 19 version of the new South Gloucestershire Local Plan is the latest iteration of the emerging local plan. This plan does not provide a specific housing number for the Pilning & Severn Beach neighbourhood area, nor does it feature either Pilning or Severn Beach within Policy LPS2 – Locational Strategy for South Gloucestershire. As such, there is no allocated housing need in the emerging Local Plan for the neighbourhood area.
- 4.6 It is recognised that there are significant environmental constraints within the Pilning & Severn Beach neighbourhood area, which are likely to have informed South Gloucestershire Council’s decision to not provide a specific housing target for the area. In addition, the emerging Local Plan does not provide numbers to smaller communities across the district. However, the Steering Group have sought to establish locally specific needs via a Housing Needs Assessment (HNA)¹⁸. Reflecting the HNA conclusions, the local identified need is a minimum of 246 dwellings across the plan period – with between an

¹⁸ AECOM (2021): [Pilning & Severn Beach Housing Needs Assessment \(HNA\)](#)

additional 31 and 41 extra care units. This number has been confirmed by the local planning authority as an acceptable amount of growth.

Green Belt context

- 4.7 The delivery of anything more than a small handful of new dwellings at Pilning will require a site, or a combination of sites, larger than any outside the Green Belt. This has the potential to adversely change the settlement character and pattern of development, and as such there is a need to review sites within the Green Belt. A Green Belt Review has been undertaken by Vision Planning (November 2023, accompanying the P&SBNP at Regulation 14 consultation)¹⁹, alongside an ‘exceptional circumstances’ case setting out why additional homes are needed at Pilning, and why the delivery of these homes requires land to be released from the Green Belt. This evidence has identified that there are only three infill sites of limited capacity within the Pilning settlement area that are not located in the Green Belt. Providing that these sites remain deliverable, they could accommodate up to 27 new homes across the P&SBNP period. The P&SBNP Steering Group states that “none of the sites outside the Green Belt are large enough to meet the Parish’s housing needs in any meaningful way.”
- 4.8 The emerging Local Plan accepts that exceptional circumstances warrant alterations to the Green Belt to enable the delivery of additional homes. The WECA Green Belt Assessment, which forms a background paper to the emerging Local Plan, notes that: “... the area contained between Pilning, Bank Road, the B4055 and the A403 to the north of Pilning, has some urbanising development which would limit harm if land in that area were released, even though a mature, well-treed hedgerow creates relatively strong separation from the inset settlement.”
- 4.9 Furthermore, an update to Green Belt guidance (February 2025) has triggered a Green Belt review, which could lead to the identification of ‘grey belt’ land within the neighbourhood area. South Gloucestershire Council (along with four other authority areas) are currently undertaking a joint Green Belt review.
- 4.10 Reflecting on the above, the P&SBNP Steering Group has obtained some assurance from South Gloucestershire Council that the emerging South Gloucestershire Local Plan will include a policy hook enabling the P&SBNP to propose Green Belt changes at Pilning. However, it is noted that the P&SBNP could be made before the Local Plan is adopted, and all other examples of neighbourhood plans that have successfully amended Green Belt boundaries have been adopted after the corresponding Local Plan.
- 4.11 If the emerging Local Plan does not include the necessary strategic policy supporting Green Belt release within Neighbourhood Plans, an immediate review of the P&SBNP will be undertaken to determine how any shortfall in housing needs can be met.

Flooding context

- 4.12 Flood risk is also a significant constraint in the Pilning & Severn Beach neighbourhood area. In recognition of this, the P&SBNP Steering Group engaged with South Gloucestershire and the Environment Agency and agreed

¹⁹ Vision Planning (2023): Pilning & Severn Beach Neighbourhood Plan Green Belt Review

a specification to complete a Level 2 SFRA²⁰ and a Statement of Common Ground (February 2025)²¹ with respect to how flood risk issues should be dealt with through the preparation of the P&SBNP. Specifically, applying the provisions within the NPPF relating to flooding (Para 170 to 182)²².

- 4.13 The conclusions within the initial draft of the Level 2 SFRA confirm that development in the neighbourhood area will be appropriate subject to the mitigation measures provided.
- 4.14 Sequential testing has been undertaken to assess potential flooding solutions in the neighbourhood area. It has identified that the suitable and available site options within the neighbourhood area (sites close to the village centres and / or adjacent to settlement boundaries) all have a similar flood risk and are all within Flood Zone 3. The test has also demonstrated that development in these locations will provide sustainability benefits that outweigh the risk of flooding, and that development will be safe for its lifetime.

Bottom-up considerations (e.g., site availability)

- 4.15 With a view to meeting the identified local need within the neighbourhood area, the P&SBNP Steering Group were keen to consider how and where growth might come forward.
- 4.16 A Site Options and Assessment (SOA)²³ process was completed in August 2025. The SOA assessed sites to establish which are suitable, available and likely to be viable for development, taking into consideration the policies of the adopted South Gloucestershire Local Plan and national policy provisions. A total of 20 sites were taken forward for an assessment of their suitability for a potential allocation within the emerging P&SBNP. These are split into sites within the Green Belt, and sites outside of the Green Belt.
- 4.17 The assessment concluded that seven of the sites outside of the Green Belt are potentially appropriate for allocation, subject to the mitigation of identified constraints. These are:
- CfS1: 19 Vicarage Road, Pilning.
 - CfS9: 21 Cross Hands Road, Pilning.
 - CfS10: 23 Cross Hands Road, Pilning.
 - CfS13: Land at Pilning Forge, Pilning.
 - NP26: Land around Just As You Are Tea Cottage, Severn Beach.
 - NP29: Land beside the allotments, Severn Beach.
 - SG135: Land to the west of, Ableton Lane, Severn Beach.
 - SG778: Land at Station Rd, BS35 4PL.

²⁰ JBA Consulting (2025): Pilning & Severn Beach Neighbourhood Plan – Level 2 Strategic Flood Risk Assessment

²¹ South Gloucestershire Council, Environment Agency, and P&SBNP Steering Group (2025): Pilning & Severn Beach Neighbourhood Plan Statement of Common Ground between Pilning & Severn Beach Neighbourhood Plan Steering Group, The Environment Agency, and South Gloucestershire Council

²² Ministry of Housing, Communities, and Local Government (2024): [National Planning Policy Framework \(NPPF\)](#)

²³ AECOM (2025): Site Options and Assessment. The SOA accompanies the P&SBNP at Regulation 14 consultation.

4.18 Additionally, five sites within the Green Belt were found to be potentially suitable for future allocation, subject to alterations to the Green Belt and the mitigation of identified constraints. These are:

- CfS2: North side of Green Lane.
- NP27: Land at Shaft Road, Severn Beach.
- NP28: Land adjacent to Severn Lodge Farm.
- SG136: Land on south side at Bank Road west of school, between school and travellers' site.
- SG808: Pilning end of Northwick Road incl Surgery & Telecom. Old rail line & traveller site on Bank Road and allotments.

4.19 Detailed assessment findings are presented in the SOA report.

Options for the focus of growth in the neighbourhood area

4.20 As outlined above, the Pilning & Severn Beach neighbourhood area is constrained by significant flood risk and designated Green Belt land, which have led to challenges in unlocking growth in the area. Furthermore, the P&SBNP Steering Group have evidence to demonstrate the significance of these constraints, which justifies that there are no suitable alternative locations for growth in the neighbourhood area to those which are being considered for a potential allocation within the P&SBNP. Therefore, the SEA of the P&SBNP has not explored options for alternative sites. Instead, the SEA has focused on factors which the P&SBNP has the potential to influence, notably with respect to the broad locations of potential growth. Taking this into consideration, the SEA has considered the following options with respect to the focus of growth:

- **Option A:** Deliver growth within / adjacent to Severn Beach.
- **Option B:** Deliver growth within / adjacent to Pilning.
- **Option C:** Deliver growth within / adjacent to Severn Beach and Pilning.

4.21 The appraisal considers the relative sustainability merits of the three growth distribution options, as shown in **Table 4.1** and **Table 4.2**. Findings are presented as a commentary on effects. To support the appraisal findings, the options have been ranked in terms of their performance against the relevant SEA theme. It is anticipated that this will provide the reader with a likely indication of the relative performance of the options to each theme considered.

Table 4.1: Summary of assessment findings for the distribution of growth

SEA Theme		Option A	Option B	Option C
Biodiversity	Rank	3	1	2
	Significant effect?	Yes - negative	No	No
Climate change and flood risk	Rank	3	2	1
	Significant effect?	Yes - negative	Yes - negative	Yes - negative
Community wellbeing	Rank	3	2	1
	Significant effect?	Yes - mixed	Yes - mixed	Yes - positive
Historic environment	Rank	1	3	2
	Significant effect?	No	No	No
Land, soil, and water resources	Rank	1	3	2
	Significant effect?	No	Yes - negative	No
Landscape	Rank	1	3	2
	Significant effect?	No	Yes - negative	No
Transportation	Rank	1	3	2
	Significant effect?	Yes - mixed	Yes - negative	Yes - mixed

Table 4.2: Relative sustainability merits of the growth distribution options

SEA Theme	Commentary
Biodiversity	<p>Significant negative effects are concluded under Option A, and negative effects are considered likely for Option B and Option C. In terms of ranking, Option B is ranked the most favourably, as concentrating growth within Pilning will avoid greater levels of development coming forward within the more ecologically sensitive Severn Beach, which is in close proximity to the Severn Estuary Ramsar, SPA, SAC, and SSSI. Growth through Option B is likely to reduce the potential for development to result in the loss of important habitats, given that BAP Priority Habitat is limited to coastal and floodplain grazing marsh in Pilning.</p> <p>Following this is Option C, given that it will distribute growth across the settlements of Pilning & Severn Beach. This is due to its likelihood to reduce impacts to biodiversity in</p>

SEA Theme

Commentary

Climate change and flood risk

Severn Beach linked to the potential pressures on concentrating growth in one location (i.e., Option A), which might also increase recreational pressures to European designated sites.

In terms of climate change adaptation, the majority of the neighbourhood area overlaps with fluvial Flood Zone 3 – reflecting the close proximity of the Severn Estuary. Based on fluvial flood risk, development focused on the settlement of Pilning would likely be more favourable, given that the settlement is further from the estuary than Severn Beach. It is noted that surface water flood risk is more limited in the neighbourhood area; whilst both the settlements of Pilning & Severn Beach are likely to be impacted, the effects are anticipated to be reduced when compared to the effects linked to fluvial flooding.

In terms of climate change mitigation, the neighbourhood area has opportunities to engage with sustainable transportation. Whilst there is a reduced bus service provision in the villages of Pilning & Severn Beach, sustainable travel could be accommodated for via train travel. Both villages have train stations, however it is noted that the train station in Pilning operates limited services on the weekend. As such, residents are likely to travel to Severn Beach, to access more regular services (typically hourly services).

Considering the above, it is considered that growth through Option C would be the more favourable option, reflecting its reduced potential to exacerbate flood risk concerns in Severn Beach and its potential to support a reduction in transport related emissions. This is followed by Option B, and Option A is found to be the least favourable option.

Significant negative effects are concluded under all three options, reflecting the high risk of fluvial flooding in the Pilning & Severn Beach neighbourhood area.

Community wellbeing

When considering the rankings of the options, growth through Option C would be the most favourable. This is due to facilitating a dispersed level of growth across Pilning & Severn Beach. Whilst it is recognised that the Pilning settlement has a greater level of community infrastructure provision than Severn Beach (including a local store, a GP surgery, and a pharmacy), development focused solely on this settlement would likely require greater levels of Green Belt land to be released. As such, focusing growth across both settlements would allow for a good level of access to community infrastructure whilst reducing the impact on Green Belt land, which serves to keep distinct settlements and communities separate.

SEA Theme

Commentary

Furthermore, dispersed growth across both villages will reduce the potential to over-deliver homes in one location. This is anticipated to reduce impacts linked to additional pressure on services and infrastructure in one village or the other and will help ensure housing requirements in both villages is met. This contributes to promoting sustainable growth in the neighbourhood area.

Based on the above, Option B is ranked second most favourably, given that growth would be located within close proximity to a greater range of community infrastructure in comparison to growth focused within and adjacent to Severn Beach. Finally, Option A is ranked third, given it would bring forward greater growth in Severn Beach, which has a lower level of community infrastructure provision than Pilning.

Significant positive effects are considered likely for Option C, reflecting that it will deliver additional housing dispersed across the two settlements, to meet the identified local need in the neighbourhood area. Significant mixed effects are considered likely for both Option A and Option B, reflecting that both options would deliver homes to meet the identified housing need, but could result in over-delivery in one village or the other. This would not facilitate sustainable growth patterns and balanced communities across the neighbourhood area.

Historic environment

Uncertain effects are anticipated under Option B and Option C, and neutral effects are considered likely for Option A, as the significance of effects are influenced by design considerations for new development areas. Whilst Severn Beach has one heritage designation, the Grade II* Severn Tunnel East Portal (BSW1101), it is located on the outskirts of the settlement to the east of the M49 and associated with the railway line. As such, it is unlikely development in the village would impact upon this listed heritage asset. Comparatively, Pilning has four Grade II listed buildings within the settlement. As such, development involving growth in Pilning has the potential to impact upon the setting of these designated heritage assets, depending on the development scheme taken forward.

In terms of ranking the options, Option A is ranked most favourably, reflecting the absence of any significant concentrations of designated heritage assets and areas in Severn Beach. Following this is Option C – growth spread across both settlements could limit the potential for more concentrated growth in Pilning and potential negative impacts to the historic environment in the settlement. Option B is ranked least favourably.

SEA Theme

Commentary

Land, soil, and water resources

In terms of ranking the options, all three would bring forward development on land of lower agricultural quality – Severn Beach within an area of urban / non-agricultural / exclusion land, and Pilning within an area of provisional Grade 3 agricultural land. However, despite having a higher agricultural land classification grade, both settlements are located in an area with low potential to be best and most versatile land suitable for supporting agricultural activity. As such, impacts to land and soil resources are not anticipated to be significant.

Additionally, growth through any of the three options would not result in development coming forward within a nitrate vulnerable zone, within drinking water safeguarding zones, or within source protection zones.

However, it is noted that focusing growth within Pilning would bring forward growth within the Chestle Pill Water Body catchment, and development could come forward within proximity to this watercourse, which runs through the settlement. As such, development focused within Pilning has the potential to bring forward adverse effects on water quality.

Based on the above, Option A is found to be the most favourable, reflecting the distance between Severn Beach and important water designations. Significant negative effects would be anticipated for Option B, due to delivering all growth within the Chestle Pill waterbody catchment. This option is ranked the least favourable.

Landscape

Whilst none of the options would impact upon a nationally designated landscape, it is noted that growth in Pilning would likely require Green Belt land being released. This could have an impact on the open landscape in this part of the neighbourhood area. Furthermore, it is recognised that there is concern that development could result in the further loss of the landscape and surrounding countryside around the settlements of Pilning & Severn Beach.

Based on the above, Option A is the most favourable option, as development would be focused within Severn Beach and away from the open countryside within the Green Belt area. Option C is the second most favourable option, due to it facilitating dispersed growth across the two settlements – thus reducing the potential for significant adverse impacts to landscape and settlement character and quality, as well as important views, at each individual settlement. Option C might also help to support a natural expansion of the two villages which is more sympathetic to their character and helping to retain their distinctiveness. Significant negative effects would be anticipated for Option

SEA Theme

Commentary

Transportation

B due to the potential impacts to Green Belt land and areas of open countryside.

Growth is anticipated to increase the number of vehicles on the local road network and exacerbate existing congestion and pedestrian and cyclist safety concerns. In this respect, options which would facilitate opportunities to engage with active travel and public transport networks will perform more favourably with respect to the Transportation theme. This is considered below.

Bus transportation opportunities are limited across the neighbourhood area, and whilst both Pilning & Severn Beach have train stations, the services provided by the Pilning station are limited to Saturdays and in an eastward direction only. Services from Severn Beach are hourly and allow for rail travel to Bristol Temple Meads and additional locations to the south and west. It is recognised that the Severn Beach station offers a greater number of journeys than the Pilning station.

In terms of ranking the options, Option A is found to be the most favourable given the regularity of services from Severn Beach train station. Following this is Option C, given that it would facilitate growth distributed across the two settlements. This would likely allow for a level of engagement with sustainable transportation modes. Option B, growth focused within and adjacent to Pilning alone, is found to be the least favourable option.

Options to inform policy approaches for the P&SBNP

- 4.22 The neighbourhood area has a strong visitor economy, supported by its access to the coastline and key open areas (notably around Severn Beach). Initiatives such as 'A Forgotten Landscape'²⁴ has supported opportunities to improve community access to and engagement with the Lower Severn Vale Levels in order to improve the recreational offer for both residents and visitors. Additionally, strategic employment land at Severnside Enterprise Area is likely to expand during the emerging Local Plan period. Residents have observed an increase in parking and traffic through the neighbourhood area linked to employment uses, including HGVs increasing congestion, and commuters parking in residential areas.
- 4.23 With a view to improving traffic management within the neighbourhood area, the SEA has explored the relative sustainability merits of the following options:
- **Option A:** Do not allocate sites for parking in the neighbourhood area
 - **Option B:** Allocate sites for parking in the neighbourhood area.
- 4.24 Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the appraisals have been presented as a commentary of effects for the seven SEA themes which have been scoped into the assessment, as follows:
- Biodiversity.
 - Climate change and flood risk.
 - Community wellbeing.
 - Historic environment.
 - Land, soil and water resources.
 - Landscape; and
 - Transportation and movement.
- 4.25 The relative sustainability merits of the two options in relation to traffic management are presented in **Table 4.3** and **Table 4.4**. Findings are presented as a commentary on effects. To support the appraisal findings, the options have been ranked in terms of their performance against the relevant SEA theme. It is anticipated that this will provide the reader with a likely indication of the relative performance of the options to each theme considered.

²⁴ Pilning & Severn Beach Parish Council (2025): [A Forgotten Landscape](#)

Table 4.3: Summary of assessment findings for the traffic management options

SEA Theme		Option A	Option B
Biodiversity	Rank	2	1
	Significant effect?	Yes - negative	No
Climate change and flood risk	Rank	2	1
	Significant effect?	No	No
Community wellbeing	Rank	2	1
	Significant effect?	Yes - negative	Yes - positive
Historic environment	Rank	2	1
	Significant effect?	No	No
Land, soil, and water resources	Rank	=	=
	Significant effect?	No	No
Landscape	Rank	2	1
	Significant effect?	No	No
Transportation	Rank	2	1
	Significant effect?	Yes - negative	Yes - positive

Table 4.4: Relative sustainability merits of traffic management options

SEA Theme	Commentary
Biodiversity	<p>The approach under Option A is anticipated to retain existing access points to the Severn Estuary designations and important habitats within the Pilning & Severn Beach neighbourhood area. However, it is noted that an increase in vehicles on the roads could lead to an intensification of use at these access points. This could result in impacts to biodiversity quality and connectivity, for example through increased noise and light pollution from vehicles, as well as connectivity impacts associated with parking in inappropriate locations. Furthermore, an increase in parking within or in proximity to European designated sites could directly damage habitats, for example through trampling or disturbance. As such, significant negative effects would be likely under Option A.</p> <p>The approach under Option B could encourage a greater level of traffic in the neighbourhood area, as an increase in parking provision could attract more visitors to the Severn Estuary. This would likely lead to impacts to biodiversity, for example through increased disturbances to habitat areas and species. However, by allocating land for car parking facilities, it is likely the P&SBNP could focus sites away from the more biodiversity sensitive areas by having a</p>

SEA Theme

Commentary

greater control on tackling traffic management. This could help to limit disturbances to sensitive ecological areas. Additionally, it is noted that impacts associated with additional parked vehicles on these sites would not be constant, as the car parking sites are unlikely to be in constant use. As such, uncertain effects are considered likely for Option B.

Overall, Option B is found to be the most favourable option, given its potential to deliver additional car parking facilities in areas that are less sensitive in relation to biodiversity.

Climate change and flood risk

Regardless of whether car parking facilities are provided or not, it is likely transport related emissions in the Pilning & Severn Beach neighbourhood area will increase. This is largely linked to greater levels of visitor and industrial activity associated with the emerging South Gloucestershire Local Plan. As such, neither option is likely to perform favourably in relation to climate change mitigation.

In relation to climate change adaptation, the approach through Option A could result in an increase in parking in inappropriate areas. This could include additional parking in areas that are more susceptible to flooding, or areas where greater activity could exacerbate flood risk and effects elsewhere. Comparatively, taking forward the approach under Option B could result in increased flood risk and / or effects, as increasing the level of developed land reduces the capacity of the ground to absorb water. However, it is also noted that by allocating specific sites for car parking facilities, the P&SBNP could ensure selected sites are focused in areas with lower risk of flooding, or lower potential to exacerbate flood effects elsewhere in the neighbourhood area.

Overall, uncertain effects are considered likely for both Option A and Option B. Option B is concluded to be the more favourable option, as it could allow for additional parking infrastructure to come forward in areas with a reduced risk of flooding.

Community wellbeing

It is anticipated that visitor numbers in the neighbourhood area will increase, as will industrial activity linked to strategic allocations included under the emerging South Gloucestershire Local Plan. As such, approaching parking through Option A could result in inappropriate parking occurring in the neighbourhood area, linked to not having sufficient space for the likely increase in vehicles. Without sufficient space, additional vehicles may park along roads – which has the potential to impact upon access to important infrastructure and road safety. This in turn could negatively impact upon the health and wellbeing of residents and visitors alike, for example through decreasing the ease of

SEA Theme

Commentary

access to community facilities, and parked cars along roads making it more dangerous to engage with physical activity. This could also lead to overcrowding and impacts to noise / tranquillity, which could further impact upon the wellbeing of residents.

Comparatively, by allocating sites for parking within the settlements of Pilning & Severn Beach, the P&SBNP would help to support the health and wellbeing of residents and visitors. Access to important infrastructure would be maintained and potentially improved (depending on the location of car parking sites in relation to key infrastructure). Additionally, the health of pedestrians and cyclists would be supported by helping to keep the roads clear.

Overall, significant negative effects would be anticipated under Option A, and significant positive effects would be anticipated under Option B.

Historic environment

By not allocating sites with a view to tackling traffic management, the neighbourhood area could experience negative effects in relation to the historic environment. For example, increased parking levels on the roadside could impact upon heritage through changes to historic setting. This could alter how historic designations are perceived in the wider historic landscape (including important views to and from heritage designations). Additionally, structures could experience increased vibrations linked to greater traffic movement. However, it is noted that neither village contains significant clusters or concentrations of designated heritage assets or areas.

Allocating sites for parking under Option B could have mixed effects on the historic environment in the neighbourhood area. This is largely dependent on the location of the sites; negative impacts could be anticipated if an allocation were to come forward within proximity to heritage assets, areas or features. However, it is recognised that potential impacts are unlikely to be constant, reflecting that car parking facilities are unlikely to be in continuous use. Additionally, it is also recognised that allocating sites for car parking may bring forward positive effects through reducing the impact of parking along roads. This could result in positive impacts to views and the setting of heritage assets.

As such, uncertainty is concluded for both Option A and Option B, reflecting that neither village has significant clusters of designated heritage assets and areas in the neighbourhood area and the possible effects allocating or not allocating car parking sites would have. Option B is considered more favourable, given that it could bring

SEA Theme

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	forward enhancements depending on where the sites are located.
Land, soil, and water resources	<p>Option A is unlikely to have an impact on land, soil and water resources. Whilst parking would likely increase along roads and streets, this would be focused on existing routes, and as such is unlikely to impact upon resource availability and quality.</p> <p>Approaching parking provision through Option B could have a greater impact on land, soil and water resources, as it will involve allocating sites for car parking development. This could lead to negative impacts on soil quality through erosion of land and / or the compaction of land. However, the permanent loss of agricultural quality soils is not anticipated; due to the low likelihood of underlying soils supporting agricultural activity.</p> <p>Overall, both options are anticipated to have neutral effects on land, soil and water resources. Whilst the development of car parking sites under Option B may result in the loss of land for agricultural purposes, this is not anticipated to have impacts on soil resources given the low agricultural quality of underlying soils in the neighbourhood area.</p>
Landscape	<p>An approach to parking through Option A would likely result in an increase in vehicles parking along roads and streets in the neighbourhood area. This could impact upon landscape and settlement character and quality, for example through changes to important views and vistas, changes to the streetscene, and impacting upon tranquillity levels. However, it is recognised that effects would be temporary and more prevalent at certain times of the day.</p> <p>Comparatively, an approach through Option B is likely to have a lesser impact. Allocating sites for car parking will provide opportunities to control the direction of traffic which might help to reduce potential impacts to village amenity and tranquillity. Whilst it is noted that views could be impacted upon elsewhere, depending on where the sites are located, it is recognised that this will not be a constant impact. This is due to the low likelihood that the car parks will be in use and at capacity at all times.</p> <p>Overall, negative effects are considered likely under Option A, and minor positive effects under Option B. This is due to Option B allowing for control over where additional car parking sites could come forward in the neighbourhood area. Option B is found to be the most favourable option.</p>
Transportation	By not allocating additional car parking sites in the neighbourhood area, residents and visitors could experience increased traffic related issues. This would likely be linked to an increase in vehicles on local roads and

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streets, which could make travelling through the neighbourhood more difficult. Increased vehicles parked along the roads could also reduce the safety of cyclists and pedestrians, for example through reducing visibility or cycle lane and pavement access.

Comparatively, by allocating sites for car parking under Option B, traffic issues and road safety concerns are unlikely to be exacerbated. This is due to people having adequate space to park their vehicles away from roads and streets. This is also anticipated to help maintain safe cyclist and pedestrian activity in the neighbourhood area.

Overall, significant negative effects are considered under Option A, given the potential for transport connectivity issues and road safety concerns. This also reflects the likelihood of cars parking on the roadside, which might increase congestion impacts. Option B is anticipated to have significant positive effects, as road safety and connectivity are likely to be improved if visitor / commuter traffic can be directed and controlled to key sites for parking. Given this, Option B is found to be the most favourable option.

5. Establishing the preferred approach

Options for the focus of growth

- 5.1 In relation to the distribution of growth, the P&SBNP Steering Group have decided to approach growth in the neighbourhood area through **Option C**: delivering growth within and / or adjacent to Severn Beach and Pilning. This option has been chosen as it is best positioned to support the sustainability of both villages, with significant positive effects for community wellbeing. Additionally, growth through Option C is likely to help reduce impacts to the Green Belt, given that development is not solely focused in Pilning.
- 5.2 The allocated sites in the P&SBNP are as follows:
- Pilning
 - **Policy H1:** Site SG807 / NP13 - Land at Pilning Village Hall and Playing Field, for up to 30 dwellings.
 - **Policy H2:** Site SG136 / NP14 - Land west of St Peter's School, Pilning, for up to 25 dwellings.
 - **Policy H3:** Site SG808 / NP15 - Land behind surgery and allotments, Pilning, for up to 41 care units and 30 dwellings.
 - **Policy H4:** Site CFS9 / CFS10 - Rear of 21/23 Cross Hands Road, Pilning, for up to 18 dwellings.
 - **Policy H5:** Site CFS13 - Pilning Forge, Whitehouse Lane, Pilning, for up to 9 dwellings.
 - **Policy H6:** Site CFS1 - Adjacent to 19, Vicarage Road, Pilning, for up to 3 dwellings.
 - Severn Beach
 - **Policy H7:** Site SG778 / SG907 / NP8 - Land at Station Road, Severn Beach, for up to 25 homes.
 - **Policy H8:** Site SG135 / NP1 - Land to the west of Ableton Lane, Severn Beach, for up to 75 homes.
 - **Policy H9:** Site CFS8 / SG33 / NP6 - Land south of Church Road, for up to 80 homes.
- 5.3 It is noted that the Green Belt Study / Exceptional Circumstances case recommends removing areas of the Green Belt (i.e., the areas covering their preferred site options) and establishing new areas of Green Belt land in locations which the P&SBNP Steering Group feel better reflect the purposes of the Green Belt. This is subject to approval from South Gloucestershire Council, and supporting evidence has been prepared on this basis.

Options to inform policy approaches

- 5.4 The P&SBNP Steering Group have decided to take forward **Option B**: allocate sites for parking in the neighbourhood area. This is anticipated to allow for a coordinated approach to managing traffic and congestion impacts linked to visitor and industrial movements.

6. Appraisal of the Regulation 14 version of the P&SBNP

Introduction

6.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current ‘pre-submission’ version of the P&SBNP. This chapter presents:

- An appraisal of the current version of the draft P&SBNP under the seven SEA theme headings; and
- The overall conclusions at this current stage and recommendations for the next stage of plan-making.

P&SBNP policies

6.2 The draft P&SBNP contains 26 policies. These are listed in **Table 6.1** below.

Table 6.1: P&SBNP policies

Policy reference	Policy name
Policy H1	Land at Pilning Village Hall and playing field
Policy H2	Land West of St Peter’s School, Bank Road, Pilning
Policy H3	Land behind surgery and allotments, Pilning
Policy H4	Rear of 21 & 23, Cross Hands Road, Pilning
Policy H5	Pilning Forge, Whitehouse Lane, Pilning
Policy H6	Adjacent to 19, Vicarage Road, Pilning
Policy H7	Land at Station Road, Severn Beach (formerly railway sidings)
Policy H8	Land to the west of Ableton Lane, Severn Beach
Policy H9	Land south of Church Road, west of bridlepath (Gypsies Plat), Severn Beach
Policy H10	Windfall (Infill) Housing Sites
Policy H11	Sheltered Accommodation for the Elderly
Policy D1	Design
Policy F1	Flood Risk
Policy TTP1	Land at Promenade Gardens, Severn Beach

Policy reference	Policy name
Policy TTP2	Land at the allotments, Severn Beach
Policy TTP3	Land at Shaft Road, Severn Beach
Policy TTP4	Land at end of Passage Road, New Passage, Pilning
Policy TTP5	Improvements to Walking and Cycling Network
Policy CF1	Development of Public house / bar and a takeaway shop in Severn Beach
Policy CF2	Retention of existing community facilities
Policy CF3	Investments for outdoor and indoor sporting activities
Policy LCD1	Separation of large commercial development from residential areas
Policy LCD2	Provision of a truck stop for Severnside
Policy ECGB1	Removal of Land from Green Belt
Policy ECGB2	Adding Land to the Green Belt
Policy ECGB3	Settlement Boundaries Policy

Methodology

- 6.3 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see Table 3.1) as a methodological framework.
- 6.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.
- 6.5 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the Neighbourhood Plan to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects. These effect 'characteristics' are described within the assessment as appropriate.

Biodiversity

- 6.6 By focusing on bringing forward dispersed growth between the settlements of Severn Beach and Pilning, impacts to biodiversity are likely to be reduced – as this will help to lower levels of concentrated growth at one settlement. Furthermore, by defining settlement boundaries through Policy ECGB3, the P&SBNP is likely to help direct growth to within and adjacent to existing built up areas. This is considered likely to aid in reducing development in the open countryside, which has a higher likelihood of supporting greater levels of biodiversity; for example, through avoiding disturbances to the European and national biodiversity designations and important habitat areas.
- 6.7 Further to this, the site allocation policies also make provisions for biodiversity. This includes through ensuring development proposals include a comprehensive landscaping scheme, fully consider the impact on biodiversity and wildlife as a whole, and demonstrate that biodiversity net gains are achieved in line with national planning policy (Policy H1, Policy H2, Policy H3, Policy H4, Policy H5, Policy H6, Policy H7, and Policy H9). This is considered a positive impact, given that the sites are all within the Forest of Avon Community Forest, and some sites overlap with Biodiversity Action Plan (BAP) Priority Habitat (Policy H1, Policy H2, Policy H3 and Policy H8). It is also anticipated to help mitigate impacts associated with sites allocated under Policy H3, Policy H7, Policy H8 and Policy H8, which would likely require consultation with Natural England due to overlapping with relevant SSSI Impact Risk Zones. Furthermore, Policy H8 indicates that development will require soft landscape and additional tree planting. It is also recognised that windfall development through Policy H10 is also likely to have a reduced impact on biodiversity, given the focus on unused buildings and structures. However, it is noted that brownfield sites and smaller sites can also be important areas for biodiversity connectivity. Overall, it is anticipated that the housing development policies will work well to ensure priority habitats and ecological corridors within and in proximity to site boundaries will be maintained and enhanced.
- 6.8 With respect to the site allocations for parking, Policy TTP1, Policy TTP2, Policy TTP3, and Policy TTP4 indicate that soft landscaping and additional tree planting will need to be included as part of the development proposals for the sites. Additionally, Policy TTP1, Policy TTP2 and Policy TTP4 further require development proposals to include grass surfacing. It is anticipated that the car parking site allocation policies will deliver positives in relation to biodiversity through ensuring traffic is managed appropriately, in order to accommodate potential increases in visitors to European designated sites (including Severn Beach). As such, this is anticipated to help mitigate impacts from increased recreational uses linked to additional residents and visitors to the area.
- 6.9 More broadly with respect to the policy framework within the P&SBNP, several policies have a strong focus on ensuring that the design of new development areas incorporate green infrastructure solutions to deliver net gains for nature. For example, this includes outlining design stipulations that development should adhere to – for example, retaining existing trees and hedgerows where possible, incorporating tree planting, and external lighting should be designed to reduce light pollution and spill (Policy D1). This is anticipated to be of benefit to biodiversity, by ensuring connectivity is maintained and enhanced, and habitat disruptions are minimised. It is also noted that policies relating to

establishing green buffer zones and adding land to the Green Belt are also anticipated to have a secondary impact on biodiversity through protecting features that have biodiversity value or contribute to connectivity (Policy LCD1, and Policy ECGB2). Similarly, taking land out of the Green Belt could result in impacts to local biodiversity, by potentially bringing forward development within proximity to important habitat areas that have not been previously affected by development (Policy ECGB1). However, this is considered to be partially mitigated through the defining of settlement boundaries under Policy ECGB3.

- 6.10 Contributing to the evidence base for the emerging P&SBNP, the Habitats Regulations Assessment (HRA)²⁵ puts forward the following recommendation for plan makers:

“Regarding impacts on functionally linked land for Severn Estuary SPA / Ramsar it is recommended that wording is included into an appropriate policy of the Neighbourhood Plan that requires applicants for greenfield sites (and particularly grassland sites) to undertake botanical survey to determine whether the site is suitable to support wintering waterfowl and waders. If so, it should be subject to non-breeding bird survey to confirm its significance, followed by any necessary offsetting habitat creation”.

- 6.11 This addition to the P&SBNP will help to ensure that important bird species are safeguarded through development in the neighbourhood area. Providing the HRA recommendations are given due consideration by plan makers, it is concluded that there would be no significant effects to the integrity of European designated sites, either alone or in combination with other plans and programmes.

Climate change and flood risk

- 6.12 The draft P&SBNP provides an opportunity to help reduce carbon emissions created by new development, and to adapt to the impacts of climate change. Whilst it is recognised that there is little value in duplicating planning policies which are already set out in the Local Plan, the draft P&SBNP should focus on what could be strengthened and respond to local considerations. This could include vulnerability to overheating, flooding or water stress impacts, car dependency, opportunities for renewable energy, and sustainable design and construction.

- 6.13 It is noted that South Gloucestershire emits more CO₂ per capita when compared to the South West region and England. Notably, CO₂ emissions associated with transport are high in the area. Whilst the housing site allocation policies do not provide stipulations regarding climate change mitigation, it is considered that developing sites within and adjacent to existing settlement boundaries (in line with Policy ECGB3) will support a limitation of emissions by reducing the need to use private vehicles locally. Additionally, by distributing growth across both Severn Beach and Pilning settlements, emissions are likely to be more dispersed across the neighbourhood area as opposed to concentrated on one village.

- 6.14 Climate mitigation is further considered through Policy D1, which indicates that new development will need to comply with the Pilning & Severn Beach Design

²⁵ REFERENCE – HRA accompanies the P&SBNP at Regulation 14 consultation.

Codes. This includes a focus on ensuring new development is designed and constructed with sustainability and energy efficiency in mind. This is anticipated to have a positive climate change mitigation impact, as it will help to reduce emissions linked to an increase in activity on development sites. Climate change mitigation is also considered through Policy LCD1, which outlines that large commercial development will be supported where applications reduce carbon emissions, improve energy security and reduce the impact of development on climate change. Again, this is anticipated to have a positive impact through encouraging a reduction in emissions beyond existing planning requirements.

- 6.15 In terms of climate change adaptation, the majority of the Pilning & Severn Beach neighbourhood area is within fluvial Flood Zone 3, with small areas of fluvial Flood Zone 1 and fluvial Flood Zone 2 around Pilning train station. This largely reflects the impact of coastal flooding on the area. Additionally, the neighbourhood area does experience surface water flood risk, however this is more limited – and areas at higher risk tend to be isolated and / or separated from one another.
- 6.16 Due to the high risk of flooding in the neighbourhood area, the P&SBNP Steering Group have undertaken a sequential test, which confirms that there are no further sites suitable for a housing allocation outside of those allocated through the P&SBNP. Additionally, a Level 2 SFRA has also been commissioned, which identifies design requirements and measures for the housing site allocations (Policy H1 to Policy H9).
- 6.17 The housing policies appropriately recognise the risk of flooding within their site boundaries – with several allocated sites being within fluvial Flood Zone 3 (Policy H1 to Policy H9). To avoid exacerbating flood risk and associated impacts, the policies require residential development proposals to submit a site-specific flood risk assessment (FRA) to demonstrate that flood risk has been considered through design (Policy H1 to Policy H9). Additionally, the site allocation policies (including Policy H10 and Policy H11) will need to be in line with Policy F1, which indicates that FRAs will need to demonstrate compliance with the recommendations of the Level 2 SFRA, and that development will be safe for its lifetime. This will need to consider the vulnerability of users, without increasing flood risk elsewhere in the neighbourhood area, and work towards reducing overall flood risk in Pilning & Severn Beach.
- 6.18 Similarly, the car park site allocation policies also include provisions in relation to managing flood risk. Like the housing site allocation policies, they will require an FRA to demonstrate that flood risk has been considered through design. Furthermore, car park surfacing will remain as grass with heavy duty matting (Policy TTP1 and Policy TTP3) and be porous (Policy TTP1, Policy TTP2, Policy TTP3, and Policy TTP4). This is anticipated to help reduce surface water flood risk by increasing the potential for the car park surface to absorb excess water.
- 6.19 It is noted that Policy LCD1 also includes specifications relating to flood risk. It indicates that new planning applications for large commercial developments in the neighbourhood area will be supported where they reduce the impacts of flooding beyond existing planning requirements. This is anticipated to help reduce impacts to flooding in the neighbourhood area.

Community wellbeing

- 6.20 The emerging Local Plan does not provide a specific housing requirement for the neighbourhood area, which is likely due to the significant constraints to growth associated with flood risk issues and Green Belt land. Based upon the local need identified in a housing needs assessment (HNA), the Steering Group and South Gloucestershire Council have agreed that a minimum of 246 homes would be appropriate for the P&SBNP with a view to providing a mix of homes for the community (in terms of type, tenure, and affordability). This will be delivered through nine site allocations under policies H1 to H9. Additionally, housing development could also be brought forward through the support of infill development in the neighbourhood area (Policy H10).
- 6.21 The housing site allocation policies work well to deliver positive community wellbeing effects. This is achieved through their focus on providing additional housing that encompasses a mix of housing types and tenures, appropriate affordable housing provision in line with policy at the local and national level (35%), supporting windfall development, and providing sheltered accommodation (Policy H1 to Policy H11). This will contribute to community wellbeing by maintaining and promoting a vibrant community in the neighbourhood area; allowing family units to stay close and connected by providing suitable housing and meeting the housing needs of older people and of younger families. It is noted that development of the sites allocated under Policy H1 and Policy H3 would result in the loss of social, amenity or community value land. Policy H1 recognises this and stipulates that if the associated space will be lost in part to development, growth cannot come forward under replacements have been made available. However, Policy H3 makes no such stipulations. As such, **it is recommended** that this policy is revisited to ensure that stipulations are made to secure important social, amenity or community value land within the site boundaries, or elsewhere in the neighbourhood area if required.
- 6.22 The Pilning & Severn Beach neighbourhood area has a range of community services and facilities, present across its distinct settlements of Pilning, Severn Beach, Redwick, New Passage, and Northwick. This includes (but is not limited to) churches, village halls, playing fields, allotments, primary schools, medical facilities (GP surgery and pharmacy), public houses, cafes, village shops, a post office, and railway stations. A number of these community facilities are considered through the P&SBNP, which seeks to retain valued existing community facilities as far as planning policies allow (Policy CF2). Furthermore, there is a focus on improving the community service and facility provision through the P&SBNP, which also supports the development of a new public house and takeaway in Severn Beach (Policy CF1) and investment into indoor and outdoor sport facilities (Policy CF3). Through these policies the P&SBNP is anticipated to help support an enhancement in community wellbeing, by safeguarding important features that contribute to physical and mental health, and providing new opportunities. It is anticipated that new growth under the housing policies (Policy H1 to Policy H9) will be positioned well to access the existing and new community infrastructure, as they are located within or adjacent to the existing built up areas and settlement boundaries of Pilning & Severn Beach.

- 6.23 Accessibility in the neighbourhood area is a key contributor to the health and wellbeing of visitors and residents alike. The P&SBNP recognises this, and puts forward a number of policies that will help to increase access levels. This includes providing additional car parking facilities, which will allow for vehicular access to key services and facilities (Policy TTP1 to Policy TTP4). It also includes a focus on improving walking and cycling opportunities in the neighbourhood area (Policy TTP5). Enhanced connectivity and access to such opportunities is anticipated to positively contribute towards community wellbeing by promoting engagement with active travel opportunities, which benefits both physical and mental health.
- 6.24 Individual community and settlement identity is recognised as a key factor and contributor to community wellbeing. This is especially important within the neighbourhood area, given there are multiple individual settlements. The P&SBNP recognises this importance and includes provisions to support community identity. This includes supporting amendments to existing settlement boundaries to incorporate new housing developments, allotment space in Severn Beach, and a playing field and village hall in Pilning (Policy ECGB3). It also includes proposed amendments to the Bristol and Bath Green Belt, which is present in the neighbourhood area in the north-eastern area (Policy ECGB1 and Policy ECGB2). These policies work to protect existing community identity by ensuring new development is located within close proximity to existing development, and that the separation of settlements is maintained. Separation is also considered through Policy LCD1, which seeks to ensure large commercial development and residential areas are separated through green buffer zones (Policy LCD1). Again, this is anticipated to have a community wellbeing benefit by ensuring different development types are kept separate from one another, thus reducing the potential for the residential feel of settlements (or parts of settlements) are not impacted upon.

Historic environment

- 6.25 There are 18 listed buildings within the Pilning & Severn Beach neighbourhood area – one Grade II* and 17 Grade II. It is noted that there are a number of SHINE (Selected Heritage Inventory for Natural England) designations in the neighbourhood area, as well as a number of bespoke heritage trails that allow visits to a variety of historically important sites.
- 6.26 Overall, the spatial strategy of the P&SBNP works well towards maintaining the historic environment. This is achieved through distributing growth across the two settlements of Pilning & Severn Beach, which helps to protect historic designations and character by preventing more intense development coming forward in one settlement or the other.
- 6.27 The majority of the site allocations are removed from designated heritage assets, areas and features (and their associated setting); nor would they deliver growth within proximity to non-designated heritage assets and their associated settings. However, it is recognised that growth through Policy H4 would deliver development within close proximity to three Grade II listed assets. Policy H4 requires development proposals to submit a detailed site plan at the planning application stage, requires development to conform with the design codes and guidelines, and includes a comprehensive landscaping scheme. These policy

provisions will help to safeguard the integrity and significance of these listed buildings and will help to reduce the potential for adverse impacts.

- 6.28 It is also noted that Policy H10 could have impacts on the historic environment through its support of windfall development, though effects are likely to be mixed. This is due to windfall development offering the opportunity to repurpose unused buildings and structures, which could enhance the setting of designated and non-designated heritage assets. However, windfall development on small sites between existing development has the potential to impact upon the fabric and setting of designated and non-designated heritage assets – for example, through changes to views. It is recognised that impacts are dependent on the location of potential windfall sites, and the design scheme taken forward.
- 6.29 The design focused policy is anticipated to have positive effects on the historic environment, as it seeks to ensure development complies with the design guidelines set out in the Pilning & Severn Beach Design Codes and Guidelines. This includes ensuring development is sensitively designed; keeping a varied appearance whilst using traditional materials, providing garden space, and softening the lines of development through boundary treatments (Policy D1). Through this policy, the P&SBNP is likely to contribute to the historic environment and specific heritage assets, areas and features, by ensuring visual amenity is maintained and enhanced.

Land, soil, and water resources

- 6.30 With regard to agricultural land classification, the undeveloped parts of Pilning & Severn Beach neighbourhood area are considered to be underlain by Grade 3 agricultural land. Developed areas are classified as urban / non-agricultural / exclusion areas. The residential site allocations under Policy H1 to Policy H9 are located across both developed and undeveloped land, and are a mix of land in current use, greenfield land, and a combination of the two.
- 6.31 None of the housing site allocation policies make specific stipulations relating to land and soil resources and quality, however it is anticipated that by focusing growth within and in proximity to existing development across both Severn Beach and Pilning, the P&SBNP works well to reduce potential impacts on higher quality soils in the undeveloped countryside. Additionally, the focus on supporting windfall development through Policy H10 is likely to reduce impacts on land and soil resources, as it supports the repurposing of previously developed sites. Furthermore, it is noted that development will be required to provide garden space and open public green space where the scale of development is 25 dwellings or more (Policy D1). This has the potential to help safeguard higher quality soils where they are present, by avoiding their development. However, it is noted that the sites allocated under Policy H3, Policy H4 and Policy H9 have utilities infrastructure crossing the associated sites (telephone lines, powerlines and a telephone exchange). It is likely that considerations for utilities infrastructure will form part of the planning applications for the site allocations.
- 6.32 It is noted that the car park site allocations also do not make specific provisions relating to land and soil resources, but similarly they are located within and

adjacent to existing development – and as such the potential impact is considered to be low (Policy TTP1 to Policy TTP4).

- 6.33 Additionally, none of the housing site allocation policies or car parking site allocation policies make provisions for water quality in the Pilning & Severn Beach neighbourhood area. **It is recommended** that policies H1, H2, H3, H4 and H6 are updated to add specific stipulations linked to protecting the water environment, given that these allocated sites are adjacent to The Pill watercourse. Furthermore, **it is recommended** that natural drainage solutions (i.e., SuDS) are incorporated within the design of new development areas, or a strategy to minimise disturbances to the Chestle Pill Water Body catchment during the construction and operational phases of development.

Landscape

- 6.34 The Pilning & Severn Beach neighbourhood area is located within the Severn and Avon Vales National Character Area (NCA). Additionally, the neighbourhood area overlaps with two separate local character areas, according to the South Gloucestershire Landscape Character Assessment. These contribute to a unique landscape character and quality across the neighbourhood area.
- 6.35 With respect to the proposed spatial strategy, distributing growth across the two key villages in the neighbourhood area is likely to support the natural expansion of these locations. The emphasis on design, which is outlined throughout the site allocation and other housing policies (H1 to H11), will ensure that new development areas are accompanied by appropriate landscaping schemes. These provisions will support the resilience of the natural and built environment, whilst also helping to deliver public realm enhancements which will support visual amenity and local distinctiveness.
- 6.36 Similarly, the car parking site allocation policies outline the requirement for development to include soft landscaping and tree planting, to help reduce the visual impact of vehicles being parked (Policy TTP1 to Policy TTP4).
- 6.37 Both the housing site allocation policies and the car parking site allocation policies also require development to conform with design stipulations included under Policy D1 and set out in the Design Codes and Guidance Document. This includes (but is not limited to) ensuring boundary treatments and materials help to soften the lines of buildings and their settings, seeking development that has a varied appearance whilst incorporating traditional materials and features, and maintaining established layouts, building lines and landscaping (Policy D1). This is anticipated to have a landscape benefit by reducing the visual impact of new growth by allowing it to blend well with surrounding structures. Additionally, it is possible that landscape character could be maintained and enhanced in this way, through seeking development that reflects existing building patterns and materials.
- 6.38 Landscape is a focus in the wider P&SBNP policies. This includes seeking the establishment and protection of a green buffer zone between residential areas and large commercial developments (Policy LCD1). This is anticipated to have positive landscape impacts by reducing the visual impacts of development, preventing sprawl like effects and providing a level of screening. The focus is also demonstrated through proposing amendments to the Bristol and Bath

Green Belt, which is present in the neighbourhood area in the north-eastern area (Policy ECGB1 and Policy ECGB2). Again, this is anticipated to contribute towards reducing sprawl like effects between the settlements within the neighbourhood area, and between the neighbourhood area and locations within proximity. Whilst the removal of some land from the Green Belt could result in a level of negative impact, this is undertaken to focus growth in the most sustainable locations within Pilning & Severn Beach.

Transportation and movement

- 6.39 The site allocation policies make provisions for transportation and movement. This is evidenced through the inclusion of parking stipulations and site access stipulations (Policy H1 to Policy H9). The provision of adequate off-road car parking is also addressed through Policy D1. These inclusions are anticipated to have positive effects in relation to transportation and movement, as they are likely to allow for safe and convenient pedestrian, cycle, and vehicular access to new residential sites. However, it is recognised that the housing policies are likely to bring forward a large level of housing growth across the P&SBNP period, and as such it is likely that an increase in dwellings will lead to a great increase in private vehicles on the road network in the neighbourhood area.
- 6.40 It is further noted that by supporting and amending existing settlement boundaries through Policy ECGB3, the P&SBNP could help to reduce the need to rely on private vehicles. This is through ensuring growth, including residential growth through Policy H1 to Policy H11, comes forward within and adjacent to existing development and in the most sustainable locations. By bringing forward growth within closer proximity to services and facilities, the need to rely on private vehicles for access is likely to decrease. Additionally, it is noted that by distributing housing development across the villages of Severn Beach and Pilning, impacts to the local road network are likely to be further reduced - due to less intense development coming forward across the settlements. This is anticipated to lead to a more even distribution of additional cars and journeys in the neighbourhood area.
- 6.41 The P&SBNP includes specific transport policies that are anticipated to contribute towards enhancing transportation and movement in the neighbourhood area. This is largely associated with bringing forward new car parking sites and opportunities, which have the potential to improve road safety by reducing the number of vehicles parked on the local road network (Policy TTP1 to Policy TTP4). There is an additional transport focused policy which seeks to support improvements to the walking and cycling network. This includes completing two segregated cycleways, providing useable and maintainable footpaths and / or pavements, and supporting development that connects to and enhances the existing active travel network in the neighbourhood area (Policy TTP5). Again, this is anticipated to bring forward positive effects by providing increased opportunities to engage with active transportation. This could help to reduce traffic and congestion issues on the local road network, as walking and cycling could become a more viable option for residents and visitors.
- 6.42 Transport considerations are further made through Policy LCD2, which seeks to support applications for a roadside service and lay-over area for HGVs. The policy indicates that support for such developments will be awarded where it is located at the new M49 junction, or in a location within Severnside that can be easily accessed from the M49 junction and does not encourage additional HGV movements on local roads. This is likely to impact upon transportation through ensuring existing travel concerns are not exacerbated (i.e., congestion) – and is likely to make the roads safer by creating adequate space for drivers to take a break.

7. Conclusions and recommendations

Conclusions

- 7.1 The P&SBNP performs positively in terms of supporting priority habitats and ecological networks in the neighbourhood area. This is anticipated to be achieved through design stipulations included in the housing allocations and car parking allocations, which work to ensure biodiversity quality and connectivity are considered through development. Providing the HRA recommendations are given due consideration by plan makers, it is concluded that there would be no significant effects to the integrity of European designated sites, either alone or in combination with other plans and programmes. Overall, **minor positive effects** are concluded.
- 7.2 With respect to climate resilience, it is considered that the P&SBNP policies work well to help reduce negative effects related to climate change and flood risk. This is primarily achieved through supporting sustainable growth that strives to be energy efficient and including appropriate flood risk management techniques. Reflecting this, **minor positive effects** are considered likely. This is due to the P&SBNP policies taking a proactive approach to mitigating and adapting to climate change.
- 7.3 The P&SBNP is considered likely to lead to **significant positive effects** in relation to community wellbeing. The Neighbourhood Plan allocates sites across the two key villages of Severn Beach and Pilning to meet (and exceed) the local housing requirements identified within the HNA. Growth across the two key villages will help to sustain their vitality and encourage balanced and sustainable communities within the neighbourhood area. The wider policy framework has a strong emphasis on design quality, including provisions to improve accessibility, support healthy lifestyles, and enhance the quality of the public realm.
- 7.4 The majority of the site allocations are removed from designated heritage assets, areas and features (and their associated setting); nor would they deliver growth within proximity to non-designated heritage assets and their associated settings. Overall, **minor positive effects** are considered likely in relation to the historic environment. This largely reflects the focus of the plan on design – incorporating provisions which will help safeguard the integrity and historic character of the villages.
- 7.5 Overall, no significant effects to land, soil and water resources are anticipated upon consideration of the policies and proposals in the P&SBNP. This reflects the sites being suitably located in areas with a reduced potential to support agricultural activity. It also reflects the provisions of the P&SBNP on focusing new growth within and adjacent to existing development, which further reduces the potential for productive soil loss, and on measures that could contribute to protecting underlying soils. However, it is noted that the P&SBNP does not make provisions in relation to water quality. As the area is at risk of surface water flooding, it is possible that materials, pollutants and waste could enter the water system. As such, **minor negative effects** are anticipated in relation to land, soil and water resources.

- 7.6 **Minor positive effects** are concluded in relation to landscape, relating to the focus on design within the P&SBNP policy framework, which will support the resilience and quality of local villagescape character and distinctiveness. However, a level of uncertainty is concluded with respect to the sites in Pilning, which are all located within the Green Belt, though it is recognised that their allocation is an ongoing discussion between the P&SBNP Steering Group and South Gloucestershire Council.
- 7.7 **Minor positive effects** are concluded for transportation and movement through the policy provision of the P&SBNP. This is due to the proactive approach the policies take with regards to managing congestion and traffic issues identified in the neighbourhood area. It also reflects the design stipulations embedded in the site allocation policies, which encourage active and sustainable travel within the neighbourhood area.

Recommendations

- 7.8 The SEA puts forward the following recommendations for plan makers:
- It is recommended that Policy H3 is revised to acknowledge the importance of the site to social, amenity or community value land in the neighbourhood area. It is suggested that provisions are added to the policy to ensure its value is upheld as far as possible, or a replacement site is sourced to contribute new social, amenity or community value land, which would help mitigate against the loss of land under Policy H3.
 - It is recommended that policies H1, H2, H3, H4 and H6 are updated to add specific stipulations linked to protecting the water environment, given that these allocated sites are adjacent to The Pill watercourse. Furthermore, it is recommended that natural drainage solutions (i.e., SuDS) are incorporated within the design of new development areas, or a strategy to minimise disturbances to the Chestle Pill Water Body catchment during the construction and operational phases of development.

8. Next steps and monitoring

- 8.1 This part of the report explains the next steps that will be taken as part of plan-making and SEA.

Plan finalisation

- 8.2 Following consultation, any representations made will be considered by the Steering Group, and the draft P&SBNP and Environmental Report will be updated as necessary. The Environmental Report will then accompany the P&SBNP for submission to the Local Planning Authority, South Gloucestershire Council, for subsequent Independent Examination.
- 8.3 At Independent Examination, the P&SBNP will be considered in terms of whether it meets the basic conditions for neighbourhood plans and is in general conformity with local planning policy.
- 8.4 If the Independent Examination is favourable, the P&SBNP will be subject to a referendum, organised by South Gloucestershire Council. If more than 50% of those who vote agree with the P&SBNP, then it will be 'made'. Once made, the P&SBNP will become part of the development plan for the neighbourhood area.

Monitoring

- 8.5 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.
- 8.6 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by South Gloucestershire Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the P&SBNP that would warrant more stringent monitoring over and above that already undertaken by South Gloucestershire Council.

Appendix A Scoping information

Introduction

This appendix presents additional information on the SEA scope, namely key issues under each of the SEA framework headings. As set out in the Scoping Report, these key issues were identified following a review of the context and baseline.

Additionally, this appendix presents a summary of responses received as part of the scoping consultation, followed by the SEA Framework.

Air quality

As a result of large commercial developments within the Neighbourhood Area, traffic (including HGVs) has increased dramatically throughout the parish, which may negatively impact air quality. This includes a development with planning permission, formally owned by ICI Chemical Works for industrial development, which is in danger of raising associated dust and particulate matter (PM) levels due to raising ground levels and is dominating the area south of Severn Beach and east of Severn Road.

Congestion is a particular problem within the NA (particularly noted in Pilning at peak times) with a heavy burden of HGVs on the A403. However, with no exceedances recorded within the Neighbourhood Area, and congestion concerns anticipated to be addressed through the transport SEA theme this theme is SCOPED OUT of the SEA for the PSBNP.

Biodiversity

Existing ecological connections are predominantly found in the east of the NA towards the Severn Estuary. There will be a need to consider avoidance and mitigation for any development with potential ecological impacts in this part of the neighbourhood area given the proximity to the Severn Estuary Ramsar / SPA / SAC / SSSI. Consideration will be given to the findings of the Habitats Regulations Assessment (HRA) at a later stage of plan making.

In particular Network Enhancement Zones 1 are prevalent in the north of the NA around New Passage, with Network Enhancement Zones 2 extending throughout the settlements of Pilning & Severn Beach and large sections of the south of the NA. These Network Enhancement Zones represent land connecting existing patches of primary and associated habitats which is likely to be suitable for creation of the primary habitat. As such, it will be important for the P&SBNP to have a focus on biodiversity restoration and / or enhancement, in line with the NPPF.

Climate change and flood risk

CO₂ emissions associated with transport remain high in South Gloucestershire, highlighting the importance of the delivery of sustainable transport infrastructure. While the PSBNP is limited in the extent to which it can deliver transport improvements; the PSBNP can utilise opportunities to strengthen active travel routes, support active travel uptake and increase self-containment.

As with much of the country, extreme heat events are likely to occur more frequently in the future. In addition to this, drought is likely to become an increasing issue in

summer, whilst surface water/ groundwater flooding is likely to increase during winter months. In this respect, climate change resilience should form an integral part of the PSBNP policy framework. This could include through a focus on green infrastructure and nature-based solutions.

The NA is a complex location, which is part of the Severn Estuary Coastal Zone of South Gloucestershire; an environmentally significant area including the estuary itself, the adjoining low-lying land, and a number of watercourses draining into the estuary. There is a need to consider flood risk, avoiding vulnerable development in areas of high fluvial flood risk, and managing, and where possible, improving drainage rates.

Due to the NA's coastal location, there is significant risk of flooding, and the ASEA Ecology Mitigation and Flood Defence Scheme is key to managing and reducing future flood risk and unlocking local development potential. There is on-going work to raise sea defences, and a re-evaluation of the flood risk may be needed either as part of the Neighbourhood Plan, emerging Local Plan and / or separate process.

Community wellbeing

The land to the north of Pilning village (principally north of Pill) and Severn Beach is categorised as Green Belt, which represents a significant constraint to development in the NA. Due to the southern boundary provided by the railway line, the Green Belt presents greater difficulty for any growth in Pilning than for Severn Beach. It is recognised that Green Belt land in the neighbourhood area could be utilised to provide enhanced green infrastructure enhancements, to the benefit of community wellbeing – for example, through improving people's access to nature.

It is anticipated that a significant proportion of the NA will continue to age until the employability options at Severnside attract more working age residents and families. The NP should recognise that as residents age, they sometimes seek housing options better suited to their evolving needs and better access to services and amenities.

A large proportion of the northeast of the NA is considered deprived with regards to the 'access to housing and services' domain. As such, the PSBNP represents an opportunity to provide both affordable housing and improved local services.

The AECOM HNA found that affordability is a serious and worsening challenge in the NA. While the provision of affordable housing (subsidised tenure products) is one way to combat this, another is to ensure that homes come forward which are of an appropriate size, type and density for local residents' budgets.

Historic environment

The dense concentration of listed buildings in Pilning village in particular presents a constraint to future development within the neighbourhood area. The PSBNP can help overcome this by ensuring that any development that comes forward during the plan period is appropriately located and sensitive to the historic setting of the village in terms of design and layout.

Land, soil and water resources

The Chestle Pill River failed its most recent chemical assessment in 2019. As such, it will be important that future development within the NA does not lead to further deterioration of the waterbody in Pilning – which is directly linked to the Severn Estuary. The water quality of the Severn Estuary is an important indicator of the overall health of the Estuary's ecosystem. Keeping the water free of pollutants, contaminants and rubbish all acts to increase water quality.

Development in Pilning has the potential to lead to the loss of productive agricultural land, although this is largely unavoidable given the rural nature of the parish and the green belt designation which restricts development in the north of the NA. However, it is recognised that the neighbourhood area has a low likelihood of being best and most versatile agricultural land, and as such the potential for impacts is anticipated to be reduced.

Landscape

The Residents' Survey strongly identified the rural environment and countryside as being very important and a reason they have chosen to live in the Parish. However, over the last 20 years, with large commercial developments and the huge increases in associated traffic, there has been significant change to the environmental loss of open countryside natural habitats.

It will be important that the PSBNA seeks to protect and enhance the local landscape in future development, including its coherence and characteristics. This is likely to be delivered through an appropriate spatial strategy and requirement for suitable design and layout in line with higher level policy.

Transport and movement

Due to the removal of the Pilning station footbridge in 2016, only eastbound trains can currently use the station. There is currently a campaign to reinstate the footbridge. The next station to the east is Patchway, located outside the NA approximately three miles away. Most trains through Pilning do not stop there.

A key issue for the draft PSBNP is therefore limited sustainable transport opportunities. Improvements required in the longer term include the provision of public transport (rail), in addition to supporting electric vehicle access and additional cycle routes.

Congestion is a particular problem within the NA (particularly noted in Pilning during the school run) with a heavy burden of HGVs on the A403. The A403 serves as the only arterial route, accompanied by a series of smaller, rural roads. The small, rural roads struggle to facilitate job related traffic. Severn Road is particularly narrow and considered unsuitable for heavy traffic. The PSBNP should therefore support the use of active travel schemes such as the Severn Ride and Stride project, in order to reduce congestion and enable safer transport within the NA.

SEA Framework

SEA theme	SEA objective	Supporting assessment questions (will the option / proposal...)
Biodiversity	Protect and enhance biodiversity and geodiversity.	<ul style="list-style-type: none"> • Protect and enhance internationally, nationally, and locally designated sites, including supporting habitats and mobile species that are important to the integrity of these sites including SACs, SPAs, and RAMSAR? • Protect and enhance semi-natural habitats as well as priority habitats and species, including ancient woodland? • Achieve biodiversity and environmental net gains and support the delivery of ecosystem services such as the protection of Network Enhancement Zones and provision of multifunctional green infrastructure networks? • Ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks? • Support access to, interpretation and understanding of biodiversity and geodiversity?
Climate change and flood risk	Reduce the contribution to climate change made by activities within the neighbourhood area and increase resilience to the potential effects of climate change, including flooding.	<ul style="list-style-type: none"> • Reduce the number of journeys made and reduce the need to travel? • Promote the use of more sustainable modes of transport, including walking, cycling, public transport, and EV infrastructure? • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources, or reduce energy consumption from non-renewable resources? • Ensure that development considers the higher risk of flooding in the NA area, including supporting opportunities for the provision of flood defences? • Utilise opportunities to improve and extend green infrastructure networks in the neighbourhood area?

SEA theme	SEA objective	Supporting assessment questions (will the option / proposal...)
		<ul style="list-style-type: none"> • Sustainably manage water run-off, reducing runoff where possible? • Increase the use of nature-based solutions to mitigate the effects of climate change? • Prohibit land raising for low vulnerability development (as land raising increases flood risk to existing and new communities)? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?
Community wellbeing	Ensure growth in the neighbourhood area is aligned with the needs of all residents, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.	<ul style="list-style-type: none"> • Provide everyone with the opportunity to live in good quality, affordable housing? • Support the provision of a range of house types and sizes? • Meet the needs of all sectors of the community? • Provide flexible and adaptable homes that meet people's needs, particularly the needs of an ageing population? • Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people? • Encourage and promote social cohesion and active involvement of local people in community activities? • Facilitate green infrastructure enhancements and expansions, including improved access to open space, and avoid impacts on the quality and extent of existing green infrastructure assets, including formal and informal footpaths? • Maintain or enhance the quality of life of existing residents?
Historic environment	Protect, conserve, and enhance the historic environment within and surrounding the Neighbourhood Area.	<ul style="list-style-type: none"> • Conserve and enhance buildings and structures of architectural or historic interest, both designated and non-designated, and their settings? • Protect the integrity of the historic setting of key monuments of cultural heritage interest including SHINE assets? • Support the undertaking of early archaeological investigations and, where appropriate, recommend mitigation strategies?

SEA theme	SEA objective	Supporting assessment questions (will the option / proposal...)
		<ul style="list-style-type: none"> • Support access to, interpretation and understanding of the historic evolution and character of the Neighbourhood Area?
Land, soil, and water resources	Ensure the efficient and effective use of land, protect, and enhance water quality, and use and manage water resources in a sustainable manner.	<ul style="list-style-type: none"> • Avoid the loss of high-quality agricultural land resources, including best and most versatile land where it is present? • Support the continued operation of waste infrastructure (waste operation/ facilities, waste collection, recycling, etc.) within and surrounding the Plan area? • Promote any opportunities for the use of previously developed land, or vacant/ underutilised land? • Avoid impacts on water quality? • Support improvements to water quality? • Ensure appropriate drainage and mitigation is delivered alongside development? • Protect waterbodies from pollution? • Maximise water efficiency and opportunities for water harvesting and/ or water recycling? • Improve the resilience of water supplies?
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape.	<ul style="list-style-type: none"> • Protect and/ or enhance local landscape character and quality of place? • Conserve and enhance local identity, diversity, and settlement character? • Identify and protect locally important viewpoints which contribute to character and sense of place? • Retain and enhance landscape features that contribute to the water setting, or rural setting, including trees and hedgerows?
Transportation and movement	Promote sustainable transport use and reduce the need to travel.	<ul style="list-style-type: none"> • Encourage a modal shift to more sustainable forms of travel and enable active travel enhancements? • Improve local connectivity and pedestrian and cyclist movement? • Facilitate working from home where appropriate, to support reduced use of the private vehicle? • Improve road safety, particularly through measures to reduce speeding and facilitate safer crossings on key roads?

Scoping consultation responses

Consultation response	How the response was considered and addressed
<hr/> Historic England, response received 7 th February 2023	
<p>Thank you for your consultation on the SEA Scoping Report associated with the emerging Pilning & Severn Beach Neighbourhood Plan.</p> <p>Having checked our records this would seem to be our first involvement with this Plan. We note that the SEA Screening determined that a full SEA was required due to the likelihood of significant environmental effects arising from the Plan's intention to allocate sites for development.</p> <p>It will be important that the assessment of the sites being considered takes appropriate account of the significance of relevant heritage assets and seeks to avoid, or if unavoidable minimise, harm to those selected with tailored and meaningful mitigation in accordance with the National Planning Policy Framework (NPPF) and Local Plan. This will require an informed approach in terms of ensuring an understanding of that significance and the potential for impact upon it which might arise from the allocation of any site in principle as well as from the specific nature of any development proposed.</p> <p>We are therefore pleased to see in the Scoping Report the inclusion and proposed application of our advice and guidance notes on Conservation Areas, Setting, SEAs, Climate Change, Significance, and Conservation Principles. To these we would recommend the inclusion and use of our guidance on Site Allocations, which is applicable to Neighbourhood Plans as much as the Local Plan process. This can be found at https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</p>	<p>Commented noted. The linked guidance has been helpful through the SEA process.</p>

Consultation response

How the response was considered and addressed

Natural England, response received 23rd February 2023

Thank you for your consultation on the above dated and received by Natural England on 19 January 2023.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Comment noted. Where identified, additional plans, policies and programmes have been considered through the SEA.

Plans, policies, and programmes relevant to NDP production

Natural England has not reviewed the plans listed. However, we advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area;

- Green infrastructure strategies
- Biodiversity plans
- Rights of Way Improvement Plans
- Shoreline management plans
- Coastal access plans
- River basin management plans
- Relevant landscape plans and strategies.

Consultation response

How the response was considered and addressed

Baseline information and evidence sources

Biodiversity

The Scoping Report has made reference to the condition of SSSIs in the plan area. Please note that this condition of the SSSIs have not been monitored in some time and it is possible that this information may no longer be representative of the condition of the SSSIs.

We would recommend that the high tide roost studies undertaken of the Severn Estuary SPA/Ramsar are included in the evidence sources:

- [Identification of wintering waterfowl high tide roosts on the Severn Estuary SSSI/SPA \(Brean Down to Clevedon\) 2015 - RP02262](#)
- [Identification of wintering waterfowl roosts in the Severn Estuary SPA/SAC and Ramsar site; Phases 2 and 3 - RP02366](#)
- [Identification Of Wintering Waterfowl High Tide Roosts On The Severn Estuary SSSI/Spa Phase 4 \(Gloucestershire, With Part Of South Gloucestershire\) - RP02966](#)

Community Wellbeing

We note that the residents of the NA saw ecological improvements being the most important need for change of greenspaces, parks and greenspace can be used as habitat banks for biodiversity units for Biodiversity Net Gain requirements for developments.

We would recommend that the [Natural England Green Infrastructure Map](#) and the [Natural England Green Infrastructure Network](#) are included in the evidence sources for this section. The map shows that there is currently a lack of greenspace for all of the ANGSt greenspaces standards in the NA.

Comment noted. The linked guidance has been referred to through the SEA.

Consultation response

How the response was considered and addressed

Key Issues

Biodiversity

We welcome the recognition of the need to consider avoidance and mitigation for development in the NA in proximity to the Severn Estuary, we would recommend specific reference is made to the Severn Estuary SPA/SAC/Ramsar/SSSI.

Consideration of avoidance and mitigation will be required for any development with potential ecological impacts.

We note the references made to the Network Enhancement Zones. We recommend that specific reference to the restoration or enhancement of biodiversity is included in line with the National Planning Policy Framework.

Climate Change

We note the intent to include climate change resilience to form an integral part of the P&SBNP policy framework and wish to highlight the role that green infrastructure and nature-based solutions can play in this.

Community Wellbeing

We note that the Green Belt has been highlighted as a significant constraint to development, this area could be utilised to provide enhanced green infrastructure and biodiversity enhancements.

We note that there is no reference to improving people's access to nature (be that to linear routes or open space). This should be included as a key issue.

Land, Soil and Water Resources

We note that there is no specific reference to the loss of Best and Most Versatile agricultural land.

Comment noted. These factors have been considered and discussed within the assessment of reasonable alternatives (Chapter 4) and plan appraisal (Chapter 5) within the main body of the Environmental Report.

SEA Objectives and Supporting assessment questions

Biodiversity

There is a risk that in some situations, development on land of limited biodiversity value in its own right can lead to the creation of islands of biodiversity, permanently severed from other areas. We thus suggest adding “Ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced?”

Climate Change

We welcome that the proposed questions include increasing resilience of biodiversity to climate change and utilising opportunities to improve and extend GI networks. A further objective could be included to assess whether options/proposals increase the use of nature-based solutions to mitigate the effects of climate change such measures to deliver urban cooling or improved flood risk management.

Community Wellbeing

We welcome the question relating to facilitating GI enhancements due to the benefits that access to GI can have to people’s health and wellbeing. However, this question does not consider impacts to existing GI assets (quality and or extent). We suggest adding to the 7th question “...and avoids impacts on the quality and extent of existing GI assets, including formal or informal footpaths?”. We recommend that this question is also revised to make specific reference to the expansion of the GI network in addition to enhancements.

We welcome that the proposed questions include reference to encouraging and promoting social cohesion, well designed GI can support community cohesion.

Land, Soil and Water Resources

Comment noted. The SEA Framework has been revised as appropriate upon consideration of these recommendations.

Consultation response

How the response was considered and addressed

We would recommend that the first bullet point makes specific reference to best and most versatile agricultural land.

Monitoring Indicators

The natural environment baseline information is largely driven by factors other than the plan's performance and is therefore likely to be of little value in monitoring the performance of the Plan. It is important that any monitoring indicators relate to the effects of the plan itself, not wider changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions.

Whilst it is not Natural England's role to prescribe what indicators should be adopted, the following indicators may be appropriate.

Biodiversity:

- Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance.
- Percentage of major developments generating overall biodiversity enhancement.
- Hectares of biodiversity habitat delivered through strategic site allocations.

Landscape

- Amount of new development in AONB/National Park/Heritage Coast with commentary on likely impact.

Green infrastructure

- Percentage of the city's population having access to a natural greenspace within 400 metres of their home.
- Length of greenways constructed.
- Hectares of accessible open space per 1000 population.

These monitoring indicators are helpful and will be useful for monitoring purposes.

It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by South Gloucestershire Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the P&SBNP that would warrant more stringent monitoring over and above that already undertaken by South Gloucestershire Council.

Consultation response

How the response was considered and addressed

Environment Agency, response received
23rd February 2023

Future baseline

2.10 In accordance with the requirements of the National Planning Policy Framework (NPPF), we strongly advocate embedding the flood risk sequential approach within your emerging Neighbourhood Plan from the outset. New development within Flood Zones 2 and 3 puts people and property at increased flood risk and may result in increased flood mitigation costs and economic impacts, as well as potential loss of life. This risk is likely to increase further when consideration is given to the predicted impacts of climate change.

It is important to note even with potential future flood risk infrastructure improvements, considerable residual flood risk will remain in the event of breach or overtopping. This risk is likely to increase significantly when considering the predicted impacts of climate change. It is for this reason the Environment Agency continues to strongly advise against promoting new residential development in this area. It is unlikely such development will meet the requirements of the Sequential Test detailed in the NPPF.

2.11 We welcome and encourage the principles of Net Gain, (as well Community Infrastructure Levy and Section 106), and its contributions towards environmental gains both on and off-site. This is detailed in the NPPF and is further supported by the 25 Year Environment Plan. This sets an expectation for development and infrastructure, by all organisations and individuals, to deliver net gains for nature. We support a minimum 10% Biodiversity Net Gain (BNG) and encourage higher exemplar target if practicable.

Comment noted. The future baseline is helpful and has been considered through the Environmental Report.

Consultation response

How the response was considered and addressed

Biodiversity

We support the objective to enhance biodiversity and geodiversity.

It is imperative consideration is given to Blue / Green Infrastructure as this provides an opportunity to link with and deliver against Carbon Net Zero targets. The opportunity for carbon sequestration through wetlands, improved floodplain connection, wet woodlands, etc. should be considered within the approach for carbon net zero development. Our soils are one of the biggest carbon sinks available to reduce climate change therefore we suggest the concept of building soil depth and quality could be included. The prevention of further soil depletion through runoff, at the very least, should be included. Sustainable land management practices will play a large role in this.

Consideration should also be given to Green Infrastructure opportunities connected with the South Gloucestershire Coast. This would create multiple benefits such as reducing flood risk pressures on existing hard defences, increasing rare salt marsh habitat, reduction in expensive maintenance requirements for defences and an area for recreation. Saltmarsh habitats are a valuable carbon sink. The Shoreline Management Plan (SMP) sets out locations where there may be opportunities to create important habitat.

We support the protection of the Severn Estuary Special Area of Conservation (SAC) and Special Protection Area (SPA).

Comment noted. The SEA Framework has been updated to include the importance of nature-based solutions to managing flood risk and flooding impacts.

Climate change and flood risk

We welcome the SEA objective of resilience to climate change and flooding.

The Severn Estuary has one of the highest tidal ranges in the world, posing a significant flood risk to the area. As you are aware, the Environment Agency is working in partnership with Bristol City Council (BCC) and South Gloucestershire Council (SGC) to deliver 17km of improved flood defences as part of the Avonmouth Severnside Enterprise Area (ASEA) Ecology Mitigation and Flood Defence Project. These defences, once delivered, will reduce flood risk to 2,500 homes and businesses, however they will not provide a sufficient standard of protection to facilitate new ‘more vulnerable’ residential development in this area.

The ASEA scheme provides a standard of protection to 2098, facilitating new “less vulnerable” development in the Enterprise Area and better protecting existing communities. It does not provide a standard of protection to facilitate “more vulnerable” residential development (100 years).

Where “less vulnerable” development is appropriate, there may still be a need for land raising to mitigate residual flood risk. This should be considered in the SEA. As a general approach land raising within the tidal floodplain is acceptable, however any land raising within fluvial floodplain may require appropriate floodplain compensation storage. We advise the Internal Drainage Board and Lead Local Flood Authority should be consulted in this regard. We advise the approach to land raising established by the extant 1957 Consent should be considered.

5.7 The scoping report discusses ‘areas benefitting from flood defences. We recommend replacing this term with

Comment noted. The ASEA scheme has been considered through the Environmental Report.

Consultation response

How the response was considered and addressed

areas assessed as having a “reduction in risk of flooding from Rivers and the Sea.”

Community wellbeing

Comment noted.

We welcome the protection of greenbelt and recommend enhancement of blue/green infrastructure as discussed above.

Land, soil and water resources

Comment noted.

We welcome the SEA objective to protect and enhance water quality and use and manage water resources in a sustainable manner.

Landscape

Comment noted.

Any use of industrial land use may be a potential source of contamination; therefore, any new development should investigate the risk of contamination and if found a remediation strategy provided.

Transport

Comment noted.

We encourage all means of reducing the effects of climate change and carbon neutral aspirations, including the promotion of sustainable transport.

