

**Pilning & Severn Beach Neighbourhood Plan Steering Group (P&SB NPSG)**

**Green Belt Exceptional Circumstances Case**

**Issue: 1. 29/11/2023**

## **1. Introduction**

The National Planning Policy Framework (NPPF), last updated 5<sup>th</sup> September 2023, is the national planning policy; with regard to Green Belt, paragraph 140. states:

‘Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.’

This document has been prepared by P&SB NPSG to identify those ‘exceptional circumstances’ that exist in the Parish to justify the removal of an area of land in Pilning from the Green Belt. This document should be read in conjunction with the Green Belt Review produced by Vision Planning, which evaluates the potential sites for development identified in the Neighbourhood Plan (NP), and makes the case and describes the methodology for the removal of an area of Green Belt land by the NP in alignment with the Local Plan. This document is referenced as Appendix E of the Green Belt Review by Vision Planning. Both documents conclude by identifying the sites that cause least harm to the Green Belt, whose removal would not diminish the effectiveness of the remaining Green Belt.

With the agreement of South Gloucestershire Council (SGC) the conclusions would be consolidated into the policies of the NP and the necessary ‘hook’ would be included in the Local Plan to enable the removal to happen.

## **2. Exceptional Circumstances**

### **2.1 General**

Sections 2.2 to 2.8 below identify the exceptional circumstances that exist in the Parish that necessitate the removal on an area of land from the Green Belt in Pilning to allow some new build housing. Without release of Green Belt land, the housing needs of the community cannot be achieved. The P&SB NPSG undertook a survey of residents at the end of 2021 (the ‘Residents’ Survey’), the results of which are published on the NP website and are referenced as appropriate in this document.

### **2.2 Housing Needs**

According to the current Register of Electors, the Parish of Pilning & Severn Beach has 1,538 dwellings of which 949 are located in Severn Beach and 481 are in Pilning. There has been no significant new build in either village for 25 years.

A Housing Needs Assessment (HNA) performed by Locality for the Neighbourhood Plan, identified a parish-wide need for 246 new dwellings through to 2035. Additionally, there was an identified need for 30 to 41 extra care units for the elderly.

Due to issues around sustainability (see section 2.3 below), some of this new development needs to be in Pilning. The responses to the Residents' Survey supported the findings of the Housing Needs Assessment including the need for 35% of housing to be affordable as well as a high proportion of small family homes. They also identified in responses to questions 12 and 54 of the Residents' Survey, both villages wanted to maintain their village character and semi-rural identity. Therefore, to minimise the effect of new build on character, growth needs to be proportional to the existing village sizes and to be organic from the village centres outwards. From the responses at public presentations, opinion has been strong that it would be unacceptable to be unbalanced in delivery and provide all the required housing in one village with nothing in the other. Although Severn Beach may have adequate land available to accommodate 250 new dwellings, building everything there would not address the sustainability of Pilning and would go against public opinion. Furthermore, there are greater flood risk implications for Severn Beach compared to Pilning (described in section 2.7), which also need to be considered.

To meet a balanced proportional approach between the villages, it would be necessary to build approximately 100 new dwellings in Pilning and 150 in Severn Beach.

The last significant plot of non-green belt land in Pilning was developed in 1997 when 65 dwellings were built at Cranmore Green. There are only a few small infill sites within the village settlement boundary that could be developed, therefore the release of some land from the Green Belt is necessary to meet the objectives of the NP.

For provision of extra care accommodation for the elderly, although there may be land available in Severn Beach for the required 30 to 41 units, is not considered to be suitable due to the higher flood risks there (see section 2.7) and the mitigation needed in designing new residential buildings with living space above ground floor level. Pilning is therefore seen as the appropriate location for this extra care accommodation being of much lower flood risk and close to the Parish's medical and pharmacy facilities.

## **2.3 Sustainability of Pilning**

The P&SB NPSG believes the sustainability of our village communities is the most important aspect for the NP to consider. As stated above, Pilning has seen no development of new housing since 1997 when 65 dwellings were built at Cranmore Green, which was the last remaining plot of any significant size within the village not located in the green belt. Since then, without the availability of new and affordable housing, young people have been unable to stay in the village they grew up in, with 'wanting to live independently' being the biggest reason for needing to move to question 9 in the Residents' Survey. Additionally, young families are unable to find houses or get onto the property ladder as evidenced in the Housing Needs Assessment completed by Locality in 2021. People enjoy living in the Parish, and once here, they generally stay here, with the survey identifying more than 72% of residents have lived here for more than ten years. This is resulting in an aging population.

St Peter's Primary School in Pilning newly built in 2007, is significantly undersubscribed. When the school was surveyed by the NP in 2022, it showed there were 165 pupils on the register whilst the total capacity was 210 places. Severn Beach Primary has a very similar undersubscription of 135 on

the register with a capacity of 180, however St Peter's school is different in that, given its excellent modern facilities, 40% of those children attending travel from outside of the Parish (for Severn Beach less than 8% come from outside of the village). There are therefore, potentially 111 spaces available for local children. Considering this in isolation there is an argument that Pilning should have more new homes than Severn Beach, simply to keep the school open. Additionally, building more homes at Pilning is likely to lead to less overall distance travelled per pupil than building more homes at Severn Beach. The Headmaster identified low pupil numbers as the biggest risk to the school's future.

The Pilning Nursery located in the village hall, also surveyed in 2022, has since closed as it was unsustainable with the numbers attending and was also struggling with the poor conditions of the hall. More housing in Pilning for young families and re-developed community facilities would encourage the operator to reopen the nursery. Release of Green Belt land would allow the Parish to invest in improving facilities.

The village hall is in the Green Belt, so release of this site from the Green Belt will enable it to be redeveloped which will enable the village hall to be improved and potentially relocated. It would therefore be better equipped to accommodate a nursery and potentially more centrally located if it moves.

Both the school and village hall are located in the area of Green Belt land that the NP would want to remove from the Green Belt. New housing in this area would not only allow children to attend the school and a nursery, but it would allow them, with their families, to walk there and to other community amenities including the shop, doctors' surgery, pharmacy and church. The numbers of cars parking outside the school at drop-off and pick-up times would be reduced.

Without exception, all local businesses, groups and organisations surveyed in 2022 recognised the need for new housing to support their own sustainability and viability. The Cross Hands pub and the village Post Office both located in the centre of the village, have closed in recent years. With Covid having been a contributing factor, opportunities for these to re-open would be boosted by some new houses located on what is currently Green Belt land within easy walking distance of the village centre.

The latest draft of the SGC Local Plan identifies GP services at Thornbury, Almondsbury and Pilning as in need of increased levels of health services. The management of the doctors' surgery and pharmacy in Pilning, when interviewed by the NPSG in 2022, expressed its desire to expand its level and range of services, e.g. more doctors and nurses and adding dentistry. Additionally, the pharmacy now has needs for delivering additional patient consultations. In both circumstances, each identified that an increase in patient numbers was needed in order to make such expansion viable. Both recognised that an increase in housing brought about by the Neighbourhood Plan, would increase patient numbers and therefore improve the economics for employing more staff and extending services. Release of green belt land for housing in Pilning in particular would increase the number of patients able to walk to the practice and the release of the land would allow the surgery and pharmacy to physically expand their premises.

Public transport services in Pilning are limited to buses which currently are under-utilised and unreliable. Additional housing close to the village centre will encourage residents to walk to bus stops to use public transport resulting in improvements to services and reliability.

## **2.4 Land Constraints Around Pilning**

Whilst recognising the sustainability needs of Pilning, given in 2.3 above, defining why new housing should be located in the village, further consideration is needed of the special circumstances of land availability and why it will be necessary to remove land from the Green Belt.

There are only a three identified infill sites of limited capacity within the Pilning settlement area that are not located in the Green Belt. At best, providing they remain deliverable, these infill sites could only accommodate 27 new dwellings.

The constraints to new development in the village of Pilning are unique due to the layout of railways and roads and the location of the Green Belt.

The main Paddington to Swansea railway line runs east to west in a deep cutting for the Severn Tunnel immediately to the south of the existing settlement area of Pilning. New housing to the south of the railway line would be totally inappropriate due to the complete isolation from the village and anyway that land is already designated for employment purposes as extension to the expanding Severnside Industrial area. The railway line also stops expansion to the east where the line is crossed by a single road bridge exiting the village. The A403 trunk road, which is dual carriage way, constrains the village to the west. This only leaves the land to the north which is designated as Green Belt.

The start of the Green Belt in Pilning is along the north side of the Pill water course. This is only 40m away from the war memorial at the junction of Cross Hands Road, Redwick Road and Northwick Road, which is the centre of the village. This has led to the limited growth of the village on its north side, resulting in just a ribbon development along that side of Cross Hands Road. The Green Belt is therefore actually strangling any future expansion opportunities for the village.

These constraints are special to the village of Pilning and do not allow for the identified level of new housing required for the sustainability of the village and extra care accommodation needed, without release of some land from the Green Belt.

The Green Belt Review by Vision Planning goes further in identifying why non-Green Belt land will not meet this need.

## **2.5 Nature of Green Belt and Impact of any Loss**

The Green Belt Review by Vision Planning has identified which land should be released from the Green Belt based on an assessment of the contribution of each of the available sites in Pilning to the Green Belt.

The five purposes of the Green Belt identified in the NPPF have been fully recognised and understood. However, it is considered by the P&SB NPSG, that should the area of land adjacent to the settlement boundary near the centre of Pilning identified for removal from the Green Belt be removed, the ability of the remaining Green Belt land to serve its purpose would not be affected. E.g.:

- 1 – To check the unrestricted sprawl of large built-up areas
- 2 – To prevent neighbouring towns from merging into one another
- 3 – To assist in safeguarding the countryside from encroachment

- 4 – To preserve the setting of historic towns
- 5 – To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The P&SB NPSG believes the exceptional circumstances identified in relation to the land proposed for removal are:

The land is adjacent to the existing settlement boundary, and although Green Belt, already includes the following developments which are seen as fundamental parts of the village:

- Doctors' surgery
- Pharmacy
- Telephone exchange
- Allotments
- A travellers' site
- Residential properties (10 off)
- Cemetery
- St Peter's Primary School
- Playing field
- Village hall
- A former railway line

Therefore, the land sought to be released from the Green Belt along the south side of Bank Road can be considered to be for use in infilling between these existing developments and in the village, adjacent to the existing settlement boundary. Loss of this land would not be harmful to the effectiveness of the Green Belt.

Although the playing field site may not be considered as conventional linear infill along a roadside, it provides infill between residential properties along Cross Hands Road to the south and Bank Road to the north (see figure 1). The western side is bordered by the primary school, whilst the eastern side would be bordered by existing Green Belt land and open countryside.

The existing open outlook over the countryside across Bank Road to the north would not be affected. The land along the south side of Bank Road has been overgrown and unmaintained for many years and has not contributed to the open outlook. Moving the border of the Green Belt to Bank Road, where to the north there is relatively open farmland, would provide a clearer demarcation and a greater contrast to the village built up area.

It should be noted in the case of the surgery and the school, these were consented at these locations by SGC, simply because there were no alternative sites that could accommodate these in the neighbourhood.

## **2.6 Green Buffers and Adding Land to the Green Belt**

Although it is realised that the NP is not the conduit for making any exchange of land into and out of the Green Belt, it should be recognised that the developing policies of the NP are to support the provision of a green buffer zone between the industrial developments on Severnside and the residential areas. Furthermore, the Parish Council intends to apply for adding land at Seven Beach into the Green Belt, but has agreed to hold off progressing that work until after the NP is made. Therefore, any loss of area of the Green Belt north of Pilning will in time be adequately compensated by the provision of a green buffer zone and addition of land to the Green Belt at Severn Beach by the Parish Council.

The P&SB NPSG considers these objectives to stop the spread of industrial development into residential areas and to maintain a separation provide an exceptional circumstance in allowing some areas of Green Belt in Pilning to be removed.

## **2.7 Flood Risk**

Although both Pilning and Severn Beach are identified as being almost entirely within flood zone 3, there are significant differences between the villages in the flood risks and necessary mitigations against flooding.

The detail of this is provided in the review of flood risk being undertaken by consultants on behalf of the P&SB NPSG at the same time as this Green Belt work. The output of that work will be to provide a parish based Sequential Test, and to perform the necessary level 2 flood risk assessment to allow the mitigations against flooding for the Exception Tests to be prepared for the proposed sites. This will be presented to SGC and the other appropriate authorities, e.g., the Environment Agency (EA), for their acceptance prior to being embedded into the NP.

Although this work is yet to be completed, the differences in flood risk of the two villages is already understood by the P&SB NPSG from the site screening appendix of SGC's SFRA 1 which is already in the public domain and the Product 4 and 6 site information which has been received following a request to the EA in October 2023.

Although both the 2076 and 2098 data provided by the EA in the 1 in 200 annual exceedance probability scenarios shows there is no flooding to any of the potential sites for development in either village, this is not the case for 1 in 1000 scenarios. The 1 in 1000 annual exceedance probability shows flood depths for Pilning Playing Field of 59.6cm in 2076 and 108.3cm in 2098. Whilst at Severn Beach Playing Field the depths are significantly greater at 133.8cm in 2076 and 246.2cm in 2098.

These figures therefore illustrate why flood risk is another exceptional circumstance for why land should be released from the Green Belt in Pilning to allow new build rather than Severn Beach as will be evident in the Parish bounded Sequential Test. The case has already been made (section 2.2 above) for extra care accommodation for the elderly to be located in Pilning due to the higher flood risk in Severn Beach as well as its position close to medical facilities. A similar case can be made for new housing where some of the burdens of cost and design considerations can be reduced by locating some new housing in the lower flood risk area of Pilning rather than Severn Beach.

Viewed in isolation, it could be concluded, on the basis of flood risk, all new housing should be located in Pilning. However, based on Green Belt alone, the opposite conclusion could be that all new housing should be in Severn Beach with none in Pilning. Clearly for the benefit of the required sustainability of both villages a reasonable balance between flooding and Green Belt needs to be struck.

## **2.8 Release of Land Allowing Improved Community Amenities**

The allotments, playing field and village hall in Pilning are all located within Green Belt and are owned by the Parish Council. The Parish Council has put these sites forward in the SGC Call for Sites for development purposes and have been considered in the evaluation of sites in the NP. They are included in the sites being put forward for removal from the Green Belt from the Green Belt Review produced by Vision Planning. The Parish Council agreed at their June 2023 meeting the Pilning

Playing Field (including hall) and Pilning allotments be left in the Neighbourhood Plan as sites for potential development.

The P&SB NPSG recognises the strategic policies of SGC in protecting village halls (CS23) and playing fields (PSP44). The draft policies of the NP therefore are quite clear, that should these community facilities in Pilning be developed, work shall not commence until an appropriate and suitable replacement available are delivered.

For the allotments, a new site will need to be purchased. Similarly for the playing field, new improved sporting and recreational facilities shall be made available, and should it be necessary to lose the existing outdated village hall an appropriate replacement suitable for the village's current needs shall be provided prior to its loss. The P&SB NPSG has identified there are viable sites to facilitate the relocation of such amenities.

There are exceptional circumstances which will benefit the community should this land be released from Green Belt and developed:

- Due to its location and lack of use, the playing field is subject to anti-social behaviour and vandalism. Removal from Green Belt and provision of some new housing on the site would increase use and provide an 'eyes on' element to reduce the behavioural problems.
- The existing Pilning Village Hall was identified in the Residents' Survey to be in poor condition, providing inadequate provision and poorly located. Without release of land from the Green Belt for development it is difficult to see how the Parish Council could invest in better provision.
- The existing location for Pilning allotments is poor. The site is surrounded by trees, has the remains of a rail track running through and has a shortfall of some six plots as evidenced by the Parish Council's waiting list. Its development would allow the Parish Council to purchase an alternative larger site in the village on Green Belt land, but separate from the settlement boundary.
- Provision of sporting and recreational amenities within Pilning are poor, e.g. the playing field has no prepared football pitch and only one set of goalposts. Development of some of the playing field would allow the Parish Council to purchase land elsewhere in the Parish on Green Belt land, but separate from the settlement boundary, to provide dedicated adequate sports pitches and changing rooms.

These identified benefits are seen as exceptional circumstances for allowing removal of land from the Green Belt for development, allowing the Parish Council to make better provision. It will not be possible within the timing of the development of the NP to secure alternative sites. This will remain the responsibility of the Parish Council under the NP policy that development cannot commence without adequate alternative provision.

### **3. Conclusion**

The conclusions of this report are aligned with the conclusions made in the Green Belt Review produced by Vision Planning. This report has identified and justified the exceptional circumstances for the removal of an areas of land to the north of Pilning from the Green Belt.

The issues of sustainability affect both Pilning and Severn Beach and it would not be appropriate or balanced, if development was restricted in Pilning due to the existing Green Belt boundary. The

NPSG believes that this report and the supporting evidence provides undeniable justification for the exceptional circumstances to allow the removal of land from the Green Belt in Pilning for the benefit and sustainability of the community including the allocation of affordable housing and extra care accommodation.

Figure 1. 'Map of Potential Sites in Pilning', shows the sites SG808, SG136 and SG807 which have least impact on the Green Belt and meet the objectives of the Neighbourhood Plan. It is concluded that these sites should be removed from the Green Belt.

**Figure 1. Map of Potential Sites in Pilning**

