

PILNING & SEVERN BEACH NEIGHBOURHOOD PLAN

REGULATION 14 CONSULTATION SUMMARY REPORT

Ref: P&SBNP-R14CSR-05022026. Issue 1.

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1. INTRODUCTION

The Draft Pilning & Severn Beach Neighbourhood Plan has been developed by the Pilning & Severn Beach Neighbourhood Plan Steering Group (NPSG) on behalf of the Parish Council (PC). The resulting Draft Neighbourhood Development Plan (NDP) is based on evidence provided by the community on the future development of the Parish and from the evidence of technical support work delivered by Locality. The Regulation 14 Consultation was undertaken for the required 6-week period between 15th September and 26th October 2025.

The consultation was publicised widely through a wide variety of methods including:

- The In View parish magazine (see Appendix E5)
- The PC's website where the NDP and all supporting documents were made available
- Reports at PC meetings
- Thornbury Gazette and The Bristol Post
- Postings on the local community groups on social media
- Emails to the list of Statutory Consultees supplied by South Gloucestershire Council SGC and recommended by Locality's Neighbourhood Planning Road Map (see Appendix E1)
- Emails to landowners (see Appendix E3)
- Emails or letters to local businesses, groups and organisations (see Appendix E2)
- Emails to the NPSG's 300+ mailing list (see Appendix E4)
- Presentation and emails to industrial businesses via SevernNet
- Leaflets, feedback forms and maps were prepared ready for the two public drop-in events, at the Emmaus Church, Severn Beach on 18th September and at Mafeking Hall, Pilning on 20th September.
- Hard copies of the NDP, leaflets and feedback forms were made available at the library.

The primary route for receipt of feedback from the consultation was on-line via a feedback form on the website. Additionally, paper feedback forms were available at the drop-in events and at the library in Severn Beach, emails directly to the NPSG's email address and by post.

Responders were encouraged to provide constructive feedback, either positive or negative, on the NDP for consideration by the NPSG.

2. METHODOLOGY FOR PROCESSING FEEDBACK

This report summarises the feedback received, and responses made by the NPSG. In particular it highlights areas where modifications to the NDP have been considered and applied by the NPSG.

Many of the comments made by individuals to support their feedback, whilst valid and important, cannot be followed through to modifications of the NDP for reasons including:

- Beyond the remit of planning,
- Outside the scope of the Neighbourhood Plan,
- Discussing issues beyond the physical boundary of the Neighbourhood Plan and therefore not within its jurisdiction,
- Contrary to higher level policy,

- Undeliverable within the Neighbourhood Plan period, or
- Requesting a negative policy, which is not permissible within the Neighbourhood Plan

The following sections of this report summarise the feedback provided.

Section 3 - Statutory Consultees

Section 4 - Parish Residents

Section 5 - Businesses, groups and organisations

Section 6 - Landowner/developers

Detail of feedback received, any meetings held, responses by the NPSG and the amendments to be considered for the NDP (identified in tables of **green** text) are provided in Appendices A to D.

Whilst organisations and individuals within those organisations for Statutory Consultees, businesses, groups and organisations, and landowner/developers within this report may have been identified, the anonymity of parish residents submitting feedback has been maintained.

Amendments to the NDP as well as in response to the feedback received, will include a general up-date to reflect the Regulation 14 consultation has been completed.

3. STATUTORY CONSULTEES

3.1 Consultation General

The Statutory Consultees approached were in accordance with the guidance provided in the Locality Neighbourhood Planning Road Map, with the specific organisations contacted, provided by SGC Strategic Planning. Email contacts for each organisation was also supplied by SGC. Each organisation was emailed to inform them of the Regulation 14 Consultation using the letter in Appendix E. Organisations marked * submitted feedback.

Pilning & Severn Beach Parish Council*

South Gloucestershire Council*

Bristol City Council

Almondsbury Parish Council*

Aust Parish Council

Olveston Parish Council

Mining Remediation

Homes and Communities

Homes England

Natural England

The Environment Agency*

Historic England*

Network Rail

Highways England*

Marine Management Organisation

Openreach

Wessex Water

Bristol Water
Stagecoach Group
National Grid
Centrica

Email contacts were supplied for each organisation by SGC. See Appendix A for the detail of the feedback and the response by the Steering Group.

3.2 Feedback Received and NPSG Response

3.2.1 Pilning & Severn Beach Parish Council

The Parish Council held an open public meeting on 6th October 2025 with, other than ‘Public participation’, one agenda item; ‘To decide on a response to the NP consultation’. The NPSG was invited to attend to answer questions, however during the Councillors’ discussion to agree their feedback there was no consultation with the NPSG members. The PC’s feedback was first sent on 10th October to the NPSG Chair by email as a draft of the notes from the meeting of 6th October. These were revised and formally sent to the NPSG via the website feedback portal on 23rd October 2025, still essentially as meeting notes (see Appendix A1a).

The Parish Council was invited to a NPSG working group meeting for developing responses to the Regulation 14 consultation feedback on 28th October. The NPSG’s responses to all items of feedback from point 3 in the notes ‘Council Resolutions and Amendments to the Draft Plan’ were presented and discussed to provide clarification and background. Draft notes from the working group meeting of 28th October were sent to the Parish Council on 31st October 2025 (see Appendix A1b).

A summary of resulting amendments to the NDP considered by the NPSP is provided in Appendix A1c.

3.2.2 South Gloucestershire Council

Two feedback responses were received from SGC.

SGC Biodiversity Officer Feedback

The first was from Sally Pattinson, Biodiversity Officer, South Gloucestershire Council, Climate and Nature Emergency, received through the website feedback portal on 20th October 2025.

The NPSG consider that the issues are already addressed in the NDP and no additional amendments are needed. However, the feedback from SGC Strategic Planning, does result separately, in changes being considered in the areas of; landscape and environment, further investigations of the SEA and HRA, and landscape and visual impact assessment. See appendix A2a for the detail of the feedback received and the NPSG’s response.

SGC Strategic Planning Feedback

The second response was received directly by email from SGC on 24th October 2025 from Stuart Todd on behalf of Strategic Planning (see Appendix A2b).

A meeting was arranged at the Yate Offices on 24th November with Strategic Planning to discuss the feedback. The NPSG response, the notes of the meeting and a summary of resulting amendments to the NDP considered by the NPSP is provided in Appendices A2c to A2e.

3.2.3 Environment Agency

A feedback response was received by email on 23rd October 2025 from Briony Waterman, Planning Specialist, Sustainable Places Team – Wessex Area.

The feedback and the NPSG's response is provided in Appendix A3a and A3b. No amendments to the NDP are proposed.

3.2.4 Almondsbury Parish Council

A feedback response was received via the website portal on 21st October 2025. The feedback was positive and brief. See Appendix 4 for detail. The NPSG concluded that the feedback was noted and welcomed. The NPSG will acknowledge receipt, but no amendments to the NDP are required.

3.2.5 Historic England

A feedback response was received by email on 15th October 2025 from David Stuart, Historic Places Adviser. See appendix A5a to A5c for the detail of the feedback, the NPSG's response and amendments to be considered to the NDP.

3.2.6 National Highways

A feedback response was received by email on 16th October 2025 from Sally Parish, Spatial Planning, South West Operations. See appendix A6a to A6c for the detail of the feedback, the NPSG's response and amendments to be considered to the NDP

4. PARISH RESIDENTS

4.1 Submission of Feedback from Residents

Responses from residents were received as follows:

Website Portal

Feedback was received from 187 residents submitted through the website portal.

A further 31 feedback responses were sent from outside of the Parish from non-residents, with all but one on the final day of the consultation, all objecting on the same topic. These 31 feedback submissions are not included in this report or in the analysis.

Of the resident responses, the timing of receipt showed that xxx were received in the final 24 hours, many through the early hours of the morning and on the same topic. Most of these were raising a basic 'objection' without justification. However, despite any concerns over their validity, providing they came from a named individual with a recognised address from within the Parish, all have been included in the analysis.

Drop-in Events and Library

Nine paper forms were submitted at the drop-in events and 1 was received via the library.

Email

One response was emailed directly to the Steering Group

Post

Two responses were posted.

4.2 Analysis and Responses to Resident Feedback

The detail of the feedback received is provided in Appendix B1. This is listed, essentially in chronological order of all submissions made via the website portal, followed by submissions made by other means. Where more than one submission has been made by the same person these have been put together. The anonymity of those submitting feedback has been retained in this report with just an ID number provided in the left margin.

For the purpose of consistency in the way the feedback is analysed, addressed and responses provided, the feedback has been identified with one or more of the topic headings 'A' to 'T' as identified below and marked in the right margin of Appendix B1. Where feedback addresses more than one top, multiple topic codes may appear in Appendix B1

- A Policy H1: Land at Pilning Village Hall and playing field.
- B Policy H2: Land West of St Peter's School, Bank Road, Pilning.
- C Policy H3: Land behind surgery and allotments, Pilning.
- D Policy H4: Rear of 22 & 23, Cross Hands Road, Pilning
- E Policy H5: Pilning Forge, Whitehouse Lane, Pilning.
- F Policy H7: Land at Station Road, Severn Beach.
- G Policy H8: Land to the west of Ableton Lane, Severn Beach.
- H Policy H9: Land south of Church Road, west of bridle path, Severn Beach.
- I Policy FR1: Flood Risk
- J Policy TTP1: Land at Promenade Gardens, Severn Beach.
- K Policy TTP2: Land at the allotments, Severn Beach.
- L Policy TTP3: Land at Shaft Road, Severn Beach.
- M Policy TTP4: Land at end of Passage Road, New Passage, Pilning
- N Policy CF4: Preservation of existing public green spaces.
- O Policy LCD1: Separation of large commercial developments from residential areas.
- P Policy LCD2: Provision of a truck stop for Severnside.
- Q General Observations and Comments opposing development
- R General observations and warehousing.
- S General observations on public transport including rail stations
- T General Support

Appendix B2 provides under each of the topic headings above, the common response prepared for the topic and references to relevant evidence sources and the corresponding changes to be considered for the NDP.

A response has been sent to each resident that had submitted feedback, providing the common responses for the topics raised, addressing any individual comments and identifying any changes to the NDP being considered. The anonymity of individuals submitting feedback has been maintained in this report.

5. BUSINESSES, GROUPS AND ORGANISATIONS

5.1 Consultation General

The list below identifies the businesses, groups and organisations contacted directly by the NPSG by email or letter where no email address was available to inform them of the Regulation 14 Consultation. Additionally, Severnside businesses were approached on behalf of the NPSG by SevernNet to their full distribution list. A copy of the letters used is given in Appendix E

St Peters School Pilning*

Severn Beach Primary
Sure Start Centre, SB School
Marlwood School
Castle School
Pilning Surgery
Pilning Pharmacy
Severnside Estate Agents

Rachel Gardiner Estate Agents*

Pilning Convenience Store
Morrisons
Downs Bakery
All-sorts Severn Beach
Pilning Village Hall
Severn Beach Village Hall
Mafeking Hall Pilning
Kings Arms
Plough
The Cross Hands
Shirley's Café
Just as You Are Tea Cottage
Central Pook
The Old Piggery/Avon Cobblestones
St Peter's Church, Pilning
Emmaus Church, Severn Beach
St Mary's Indian Orthodox Church, Pilning
Pilning Allotments
Severn Beach Allotments
1st Severn Beach Scouts
Rainbows, Pilning
Brownies, Pilning
Pilning Flower Show
P&SB History Group
P&SB Gardeners' Club
Pilning Garage
Jump Start Mobile Mechanic (Pilning Forge)
John Hathway, Northwick Road
New Images, SB
Barbers SB
Tanktec Ltd, Redham Lane
Elm Tree (Torr Farm)
Motion Printing Ltd*

Kennels Queens Lodge New Passage
Avon Commercial Recovery, Osbourne Road
Salthouse Farm
Faith House
Washingpool Farm Shop
The Way Gym
The Wave
Wildplace
SevernNet
In View
We are EV
Four Towns & Vale Link Transport

Feedback was received from the organisations marked *. Feedback was received from an additional two organisations; the Chair of The Pilning Station Group and Halcyon Hounds.

5.2 Feedback Received and NPSG Response

5.2.1 St Peter's School

Feedback was received through the feedback portal on the website and is detailed in Appendix C1. The NPSG has concluded that the feedback is noted and welcomed. The NPSG will acknowledge receipt, but no amendments to the NDP are required.

5.2.2 Motion Printing Ltd (note: replied as a resident)

Feedback was received through the feedback portal on the website and is detailed in Appendix C2.

Although, identified as a response from Motion Printing, the NPSG considers this to be a personal comment rather than a business comment, and relates to the site of policy H9 in Severn Beach. The feedback is addressed as a Parish resident's submission under the topic of Policy H9.

5.2.3 Rachel Gardiner Estate Agents Ltd

Feedback was received through the feedback portal on the website and is detailed in Appendix C3. Although submitted as feedback on the NDP, this feedback related to awareness of the construction of a very large and high warehouse on the south side of Marsh Common Road just outside of the settlement boundary of Pilning. Whilst the NPSG agrees with the sentiments, it is not directly related to the content of the NDP. However, the NPSG will consider amending policy LCD 1 to specifically identify building height as an issue to be taken into account on the edges of industrial areas (See Appendix C3).

5.2.4 Chair of Pilning Station Group

Feedback was received through the feedback portal on the website and is detailed in Appendix C2.

During the course of the consultation period there were various direct email communication from the Chair of the Pilning Station Group with individual members of the NPSG. The topic was raised by the Chair of the Pilning Station Group, who is also a Parish Councillor, at the Parish Council Meeting on 6th October 2025 and included in the feedback received from the PC (see Appendix A1a). The matter was addressed and minuted in the NPSG Working Group Meeting of 28th October 2025 (See appendix A1b). A further email on the topic, repeating much of the above, was received by the NPSG from the Councillor on 7th November.

The minutes of the NPSG Working Group Meeting of 28th October 2025 (See appendix A1b) form part of the NPSG's response which includes: There is no land allocation in the NP for Pilning Station and guidance informs that NPs cannot include policies relating to service levels of public transport, therefore it is concluded a policy for the station cannot be added. The NPSG strongly supports the station and can strengthen the wording, particularly in the area of the Aspirations Document. The NDP needs to be amended to reflect there are currently 2 trains per week. The suggested policy TTP6 would be a Strategic Policy which is inappropriate for a NP policy. A direct response to the feedback submitted through the Regulation 14 consultation portal, repeating the above will be made to the Chair of the Pilning Station Group.

5.2.5 Halcyon Hounds

Feedback was received through the feedback portal on the website and is detailed in Appendix C5. The NPSG is pleased to know that Halcyon Hounds is a regular hirer of Pilning Village Hall and hopes that will long continue. Please refer to Appendix D topic Policy H1 for the detail the response provided by the Steering Group.

6. LANDOWNERS/DEVELOPERS

6.1 Consultation General

The owners/developers of all sites identified in policies H1 to H9 and TTP1 to TTP4 were contacted directly by the NPSG by email to inform them of the Regulation 14 Consultation. A copy of the communication sent is included at Appendix E3.

Feedback was received from three of the site owners/agents detailed in 5.2 below. Additional responses were received from three other landowners/developers, detailed in 5.3 below.

6.2 Feedback Received and NPSG Response

6.2.1 Policy H3 Land behind Surgery and Allotments, Pilning

A letter was received by post from the agents for one of the landowners. A meeting was held between the landowners, the agent and representatives of the NPSG on 12th November 2025.

See Appendix D1 for the content of that letter and the NPSG response provided at the meeting, the points of discussion and amendments to be considered for the NDP.

6.2.2 Policy H6 19 Vicarage Road, Pilning.

A feedback response was received via the website feedback portal and by email via the Parish Council on 24th October 2025 from the agent acting on behalf of the landowner in relation to site H6 19 Vicarage Road. See Appendix D2 for the detail of the feedback.

The NPSG notes the feedback received and is pleased to be advised that the site remains available and deliverable. The NPSG concluded there was no current requirement for further discussion or amendments needed to be considered for the NDP.

6.2.3 H7 Land at Station Road, Severn Beach.

A feedback response was received directly by email on 19th September 2025 from the owner of site H7 Land at Station Road, Severn Beach. The NPSG responded to this by email on 19th September 2025. A further email from the landowner was received on 23rd September 2025.

Refer to Appendix D3 for details of the correspondence and amendments to be considered for the NDP.

6.3 Feedback from Other Landowners/Developers

6.3.1 Stantec UK Limited on behalf of Robert Hitchins

A feedback response was received by email via the Parish Council on 23rd October 2025 from Stantec UK Ltd instructed by their client Robert Hitchins Limited. The feedback was made in respect of the employment development potential of land between the B4055 and Pilning Station, known by them as Pilning Green Park.

The feedback was received in the form of a 12 page report, with the first 6 pages relating to the employment site. For conciseness, the content of the report from page 7 (Section 4) onwards is included in Appendix D4.1 together with the detailed NPSG response and amendments to be considered for the NDP.

Savills/Stonegate - the Kings Arms Public House

A feedback response was received by email via the Parish Council on 24th October 2025 from Savills on behalf of their client Stonegate in relation to the Kings Arms Public House. The feedback was received in the form of a 14 page report included in Appendix D4.2 together with the detailed NPSG response and amendments to be considered for the NDP.

7. CONCLUSIONS

The NPSG has received feedback from a number of sources in the Regulation 14 consultation process. This summary report has identified all feedback received and any follow up meetings or communications, e.g. with statutory consultees and landowners.

All feedback has now been considered conscientiously by the NPSG. The feedback has included views that arise from personal opinion and matters that just affect small numbers of residents. Additionally different representations have demonstrated opposing views. It has therefore been legitimate for the NPSG to try to find common ground in the best interests of the Parish and to take different views. Ultimately, planning judgements needed to be taken.

All parties submitting feedback will receive a response from the NPSG and will be advised of any changes to the NDP and its supporting documents to be considered by the NPSG. Again, all of these responses and considered changes are detailed in this summary report.

The NPSG will not be requesting replies to their responses. Instead, they will amend the NDP and supporting documents and when finalised submit the NDP to the Parish Council. The Parish Council will decide whether to accept the modified documents and submit the resulting draft NDP to SGC for its Regulation 16 publication and independent examination.

It is for the Independent Examiner to determine whether the neighbourhood plan meets the basic conditions and other legal requirements, and whether the responses to feedback from the Regulation 14 consultation have been appropriate.

The NPSG would again like to thank all parties for their contributions to the Regulation 14 consultation.

APPENDIX A STATUTORY BODY FEEDBACK AND RESPONSES

A1a. P&SB PARISH COUNCIL FEEDBACK

1. Introduction

Pilning & Severn Beach Parish Council held a public meeting on 6 October 2025 to formally consider its response to the Regulation 14 consultation on the draft Neighbourhood Development Plan (NDP). The meeting was attended by councillors, members of the Neighbourhood Plan Steering Group (NPSG), District Councillor Simon Johnson, and approximately 45 members of the public.

The Council acknowledges that while the meeting was held in public, it was not a public meeting in the statutory sense. Public contributions were invited and considered prior to councillor deliberations.

2. Summary of Public Concerns

The following key themes emerged from public participation:

- Transparency & Engagement: Calls for improved public notification and consultation, especially regarding warehousing, Gypsy sites, and youth facilities.
- Policy H1 (Pilning Playing Field): Strong opposition to development on charitable trust land; concerns over legality and community impact.
- Pilning Station: Advocacy for strategic enhancement and inclusion in the NDP (see Policy TTP6).
- Housing & Land Use: Objections to Policies H1 and H3; concerns were noted over lack of evidence for housing need and threats to green space.
- Flood Risk & Environmental Integrity: Criticism of development proposals in flood zones and inconsistencies with national planning policy.
- Governance & Legal Compliance: Alleged failure to consult statutory bodies and community stakeholders under Regulation 14.

3. Council Resolutions and Amendments to the Draft Plan

Policy and Council Resolution

H1 – Pilning Village Hall Playing Field

Remove from the NDP due to legal ambiguity and community opposition. Vote: 4 in favour, 1 against, 1 abstention.

H3 – Pilning Allotments Concerns noted regarding contradiction with green space commitments.

H4 – Rear of 21 & 23 Cross Hands Road

Support development to enable adjacent plots.

H7 – Station Road, Severn Beach

Support mixed-use design with retail below and flats above; reinforce need for one-bedroom units.

H8 – West of Ableton Lane | Recommend inclusion of one-bedroom units and phased construction.

H9 – Church Road (Gypsies Plat)

Remove due to SNCI designation and community petition. Vote: 5 in favour, 1 abstention.

Transport & Infrastructure

- Policy TTP6 – Pilning Station Strategic Enhancement

Adopt proposed policy to safeguard and promote Pilning Station as a regional transport asset.

TTP3 & TTP4 – Car Parks at Shaft Road and Passage Road

Support provision with caveats regarding overnight parking

Truck Stop (LCD2): Support conditional on:

- No use of green buffer land.

- With no cost to the local community.

Environment & Green Belt

Policy ECGB2: Correct text to reflect ‘wash-over’ boundary alignment with the Enterprise Area.

Policy CF4: Add subheading CF4(ii) to identify incidental green spaces and landscape context.

Figure 24 – Settlement Boundary: Amend to exclude H9.

Evidence Base & Mapping

Resolutions

18 Replace ICI 1957 map with Avonmouth Severnside Enterprise Area and Western Approach maps. Update Figure 3 explanation.

22 Address lack of one-bedroom housing for non-sheltered demographics. Expand KCFH7 proposal.

26 Strengthen Vision statement.

27 Define ‘unique qualities’ in section 7.1.3.

29 Clarify Figure 6 to include Govier Way open space and land between A403 and railway.

30 Include Cresswell Report as appendix or link.

37–38 Confirm link to “Record of Identified Sites Initial Assessment Decisions.”

64 Expand aspirations for Pilning Station.

65 No further action; masterplan link confirmed.

79–80 Update CF4 to reflect removal of H1.

81 Reference 1957 consent in LCD1–LCD2 policies.

83 Support truck stop with conditions (see above).

88–91 Correct ECGB2 text and align with item 8.7.20.

93 Remove H9 from the settlement boundary map.

95 Add references to:

- 1957–58 ICI consent

- 1995 Western Approach consents

- Cresswell Report

- Linking the Levels Project

- Infrastructure-Led Masterplan

- SevernNet Transport Strategy

A1b. NPSG RESPONSE TO P&SBPC

Notes from Working Group Meeting of Neighbourhood Plan Steering Group

Discussions with Parish Council on Regulation 14 Consultation Feedback

28th October 2025 7pm at Emmaus Church Severn Beach

1. Present

NPSG: Richard Edwards (RE), John Miller (JM), Robert Goard (RG), Gary Sheppard (GS), Nick Davies (ND), Mike Harrison (MH), Gill Cox (GC).

PC: Peter Tyzack (PT), Graham Crane (GCr), Stephanie Rutherford (SR), Ian Roberts (IR), Stephen Graham (SG), Victoria Bywater (VB).

2. Introduction

RE conveyed the Group's disappointment in the PC's engagement with the Steering Group, before, during and after their meeting on 6th October to agree feedback to the Regulation 14 consultation. However, it was now important to move on positively this evening and discuss the feedback points submitted by the PC on 23rd October. The response had included sections 1 and 2 which summarised the meeting, therefore discussion at this meeting would commence at section 3. Council Resolutions and Amendments to the Draft Plan.

3. Review of Parish Council's Feedback

The text in this section 3 of these notes is presented as follows. *Black italic text is the feedback submitted to the NPSG by the PC. Blue text is the NPSG response to the received feedback read out by the NPSG prior to its discussion at the meeting.* The discussions that ensued and conclusions are identified in black text under the appropriate headings of **Discussion** and **Conclusion**.

H1 – Pilning Village Hall Playing Field

Remove from the NDP due to legal ambiguity and community opposition. Vote: 4 in favour, 1 against, 1 abstention.

NPSG Response: Any legal ambiguity of this site is not something the NPSG would be able to resolve and is the same with every other site put forward in the plan. The same applies with possible sales of land that may have occurred since the evaluation of sites. Should the NP be made only the rightful owners can decide whether to develop their sites, to submit an application and achieve planning permission, and take development forward. The NPSG recognises that there has been some community opposition to build on the site. However, numbers have been relatively small approx. 100 out of a population of 3,609, but many of those have been encouraged in a campaign by a small number of people on Facebook, continually posting new messages and spreading misinformation that the playing field and village hall will be 'built over' and lost to the community. In policy H1 this is clearly not the case. The policy will need to be modified to limit the number of dwellings to a maximum of 30 and the words strengthened to clarify that a recreation area for children to play and for dog walking must be retained.

Removal of this policy as put forward by the Parish Council would stop future Parish Councils from having the option to take this forward and to be able to invest in improvements to recreational and amenity provision across the Parish. How would the PC plan to make such investments going forward without the opportunity? Having put forward the site, it is the PC's option to withdraw the site, rather than the policy. However, should the site be withdrawn by

the PC, it would be for the PC to identify where a new building could be located instead in Pilning to meet the required housing need? Even if a decision is made by the PC to remove the site is made, it is considered that the Green Belt and settlement boundary proposals are not changed.

Discussions

A lengthy discussion ensued: VB clarified the latest position by investigating 'legal ambiguity'. SR identified the PC's Community & Green Spaces working group was investigating grant funding. VB highlighted that grants would not be given to the village hall if it was not financially viable, as seemed to be the case. Others identified past surveys and estimates for re-developing the hall to bring it up to modern standards. Cost for a new village hall were understood to be significantly beyond grant funding possibilities, therefore the answer to the question relating to how investment can otherwise be made was unclear. Similarly, alternative suitable sites for meeting the housing needs could not be identified. SR would welcome the creation of more traveller sites, warehousing, and similar developments along Bank Road in preference to H1 being developed in any form. The SG reminded the PC that with the current Government withdrawal of support for NP's the P&SB NP may be a once and only opportunity to fund community amenities. The SG clarified the need for the development of a new village hall and better recreational facilities was confirmed by the residents' survey and whilst the subjective views of some councillors and village residents were welcome, the SG must base decisions on objective information received.

The SG considered it would be counterproductive to withdraw the site, as the parish should seek to deliver the wider enhancements to leisure and recreational facilities that were requested by the public. The development of part of the site would provide the source of funding to achieve the enhancements.

Conclusion

The PC will reconsider its position in a decision on whether to withdraw the H1 site or not, as it falls outside of the remit or control of the PC to require the policy H1 to be removed from the NP. Otherwise, should the outcome be that the site continues to be available, the policy will be modified to limit the number of dwellings to a maximum of 30 and the words strengthened to clarify that a recreation area for children to play and for dog walking must be retained, thereby satisfying the vocal demands of some residents objecting to the H1 policy. Should a decision be made to withdraw the site, then the PC should identify how the housing need can otherwise be met in Pilning and adequate funding for investment in community facilities can be achieved.

H3 – Pilning Allotments Concerns noted regarding contradiction with green space commitments.

NPSG Response: Comment not understood. If the allotments are to be developed then they must be replaced by a larger area of allotments elsewhere, which would secure that land from possible residential, industrial or traveller development. Please can the PC confirm that the land is not reserved for further future extension of the cemetery? The plan protects allotments they cannot just be sold off.

Discussions

Still unclear just what this feedback meant. Land on the Green Belt can be used for community use as allotments, playing fields, etc. and there would be a big difference in value of the existing allotments sold off for development and a new larger site for allotments. The SG clarified, for this and other sites it is not appropriate to speculate on potential alternative sites in the plan. These can only come forward if the NP is made and are anyway sensitive commercial decisions

between landowners that could not be declared until a later planning stage. The need of the land for cemetery extension was not recognised in the meeting.

Conclusion

The PC will confirm the understanding on cemetery extension requirements. Otherwise, no change to be made.

H4 – Rear of 21 & 23 Cross Hands Road

Support development to enable adjacent plots.

NPSG Response: A note could be added to the policy that the layout shall take into consideration the access to adjacent plots for possible future development. However, this has to be a commercial agreement with landowners and developers, although this can be prone to ransom strip situations. Access may need to come from land at the rear (currently green belt) if highways object to staggered junctions on Cross Hands Road.

Conclusion

The NPSG will consider modifying the wording to identify potential connectivity to the rear and or sides.

H7 – Station Road, Severn Beach

Support mixed-use design with retail below and flats above; reinforce need for one-bedroom units.

NPSG Response: Where is the PC's evidence of this requirement? Could consider adding one-bedroom units as an option into above retail dwelling opportunities for this site?

Discussions

The need identified by the PC was not evidence based but more a case of hearsay. The need for providing homes for young families was understood. The SG reinforced that the plan was not aimed at making housing provision for workers on Severnside. However, it was recognised that the Housing Needs Assessment report does identify a shortfall in 1 bedroom supply.

Conclusion

This policy H7 will be modified to include provision of some 1-bedroom apartments.

H8 – West of Ableton Lane | Recommend inclusion of one-bedroom units and phased construction. NPSG Response: One-bedroom accommodation to be addressed in H7. Any development to be phased from North to South.

Discussions

SG concluded if 1-bedroom apartment provision was made in H7, they would not be required on further sites.

Conclusion

The policy will be amended to reflect the need for phasing from north to south, should the site be delivered under phased build.

H9 – Church Road (Gypsies Plat)

Remove due to SNCI designation and community petition. Vote: 5 in favour, 1 abstention.

NPSG Response: SNCI designation has not arisen in the NP development including the SEA, HRA and the draft Site Evaluation reports. Retention of PROWs, tree preservation, BNG and green buffer at the southern end of the site are all elements of the policy to be complied with at planning application stage. Opposition to this site has in the main been by owners of property in

the neighbouring streets, who don't want new development adjacent to them. The land is privately owned and is not a public green space. Periodic maintenance and clearance of undergrowth has been undertaken by the owner. The Steering Group has received no evidence of a petition. The PC has no powers to remove from the NP, privately owned land that has gone through the evaluation process. The Steering Group and developer will need to consider SGC Regulation 14 feedback now and ultimately in planning.

Discussions

PT elaborated on the origins of SNCI (Site of Nature Conservation Interest) status for this site. The landowner is aware of this possibility and in discussion with the SG believes SNCI status can be addressed in planning by additional environmental studies.

Conclusion

The NPSG will investigate the position of, and implications for, SNCI for the site and as appropriate identify it in the policy. The PC should identify the primary protections the SNCI aims to achieve...

Transport & Infrastructure

- Policy TTP6 – Pilning Station Strategic Enhancement. Adopt proposed policy to safeguard and promote Pilning Station as a regional transport asset.

NPSG Response: There is no land allocation in the NP for Pilning Station and therefore together with the guidance followed that NPs cannot include policies relating to service levels of public transport, a policy for the station cannot be added. The NPSG strongly supports the station and can strengthen the wording, particularly in the area of the Aspirations Document. The NDP needs to be amended to reflect that there are currently 2 trains per week. The suggested policy TTP6 would be a Strategic Policy rather than a NP policy. Policy CF2: Retention of existing community facilities through assets of community value are not appropriate for railway stations. For clarity, the policy proposed in encouraging links to new industrial development & conflicts with the PC's opposition to that development

Discussions

Discussions considered the conflict of encouraging connectivity with industrial developments and the opposition to those by the PC. The NPSG is happy to receive any proposals for specific wording to bolster the case in either the NDP or the aspirations document.

Conclusion

The NPSG will amend the wording in the NDP and Aspirations Document to better recognise the support for Pilning Station, however this must be aspirational rather than a policy.

TTP3 & TTP4 – Car Parks at Shaft Road and Passage Road

Support provision with caveats regarding overnight parking

NPSG Response: The policies already specify access through a lockable metal gate. Additional content can be added to recommend locking at night. Low bars etc.

Discussions

These car parks would not be taken forward by landowners and would need procurement of lease probably by either SGC or the PC. It would be for them to specify issues such as operating hours which residents can subsequently agree with or object to if and when planning applications are submitted.

Conclusion

Wording of policy to be modified to address options such as locking at night or low entry bars. However, details such as hours would not be specified

Truck Stop (LCD2): Support conditional on:

- *No use of green buffer land.*

NPSG Response: *Can add 'outside of land recommended as green buffer zones'*

- *With no cost to the local community.*

NPSG Response: *This needs explaining what the concern may be, it can't be provided by the Parish – if it were SGC there is a potential cost to all its communities*

Discussions

‘Cost’ could mean a number of things as well as monetary and ultimately this would likely to be borne by the taxpayer. Location including that of the site currently in a planning application on Govier Way (considered to be both too small and in the wrong place) was discussed.

Conclusion

‘Outside of land recommended as green buffer zones’ will be added. Attribution of cost to communities will not be added.

Environment & Green Belt

Policy ECGB2: Correct text to reflect ‘wash-over’ boundary alignment with the Enterprise Area.

NPSG Response: *Not understood. Explain and propose text to be considered for inclusion.*

Discussions

PT explained the background. SG made the point that any allocation of new Green Belt in Severn Beach should be taken forward once the NP is made.

Conclusion

PT to provide any relevant content for consideration

Policy CF4: Add subheading CF4(ii) to identify incidental green spaces and landscape context.

NPSG Response: *Incidental green spaces not understood – explain and provide list. Note this cannot include privately owned land. Landscape context, explain and propose text to be considered for inclusion*

Conclusion

PT to identify any such areas not yet included in CF4 (including a map), but any must be public green spaces and would not be identified as incidental.

Figure 24 – Settlement Boundary: Amend to exclude H9.

NPSG Response: *As things stand, based on the available evidence, this site will not be withdrawn. It would therefore continue to be included in the revised settlement boundary map. Exclusion could lead to it being developed for other uses e.g. industrial, solar.*

Conclusion

No action required

Evidence Base & Mapping

Resolutions

18 Replace ICI 1957 map with Avonmouth Severnside Enterprise Area and Western Approach maps. Update Figure 3 explanation.

NPSG Response: This was the clearest map the Steering Group could find to show the extant planning consent. Do the proposed maps clearly show that? If so please provide copies. The SG proposes instead to modify the figures title.

Conclusion

To modify the title to say the figure ‘includes’ the extant. Additionally in the document consider an improvement to what the extant planning means.

22 Address lack of one-bedroom housing for non-sheltered demographics.

NPSG Response: These demographics are from the census; please identify the specific available census data you want to be considered.

Conclusion

Believed no action is required here.

Expand KCFH7 proposal.

NPSG Response: Do you mean Policy H7? If so, what are you proposing?

Conclusion

Unclear what was required here. Check with Clerk what information may have been meant by this.

26 Strengthen Vision statement.

NPSG Response: The Vision statement has been available since objectives were first produced and has undergone the scrutiny of town planning consultants and SGC without need for amendment. The Steering Group does not consider changes which would need to be proposed anyway, are merited.

Discussions

Agreed that the vision is determined at the start of the process and should not be amended virtually at the end.

Conclusion

No action required.

27 Define ‘unique qualities’ in section 7.1.3.

NPSG Response: These would have come out in the residents’ survey amongst why people like to live in the area, the unique qualities are probably the estuary environment and its views.

Conclusion

Unclear whether this needs to be defined but text could be modified to say ‘such as estuary environment and its views’. Other suggestions welcomed.

29 Clarify Figure 6 to include Govier Way open space and land between A403 and railway.

NPSG Response: This map is showing a green buffer zone between residential and industrial developments. A green buffer is shown on either side of Govier Way, if the comment is to include the ponds area then this is difficult as Plot 9000 has planning consent and what is shown on the map is already contentious. Land between A403 and railway does not serve as a

buffer from industrial but from the A403 and may weaken the case for keeping the buffering on the south side of the A403.

Discussions

Some discussion as to whether the newly identified areas constituted a buffer between industrial and residential areas. Also what is the definition of a green buffer.

Conclusion

It was concluded that the new areas provided by PT in a map could be included , but the title of figure 6 will need to be changed as it no longer is a zone between residential and industrial developments. The definition in the policy also needs amending to better describe the height requirements of buffering, especially in light of the recent mega-shed.

30 *Include Cresswell Report as appendix or link.*

NPSG Response: The Cresswell Report is not mentioned in the NDP therefore it cannot be included as a link and certainly wouldn't be an appendix. What is the relevant evidence from it to support green buffers?

Discussions

Discussion identified that there could be some helpful content in the Cresswell Report.

Conclusion

PT to supply the relevant content for consideration.

37–38 *Confirm link to “Record of Identified Sites Initial Assessment Decisions.”*

NPSG Response: The link is already provided at the top of page 38. It is item n) in appendix A

Conclusion

No further action required.

64 *Expand aspirations for Pilning Station.*

NPSG Response: Suggest in 8.4.11 change existing service levels to 2 trains per week and include a reference to the Aspirations document. Need content for aspirations. Some suggestions were previously made to Olga for this.

Conclusion

Addressed already under *Transport & Infrastructure*

65 *No further action; masterplan link confirmed.*

NPSG Response: N/A

79–80 *Update CF4 to reflect removal of H1.*

NPSG Response: Only if H1 is to be removed from the NP then the bracketed text would need to be removed

Conclusion

Await PC to decide whether they now intend to withdraw, putting the playing field forward for any development. Should the withdrawal decision be made then NP then the bracketed text would need to be removed.

81 *Reference 1957 consent in LCD1–LCD2 policies.*

NPSG Response: Not understood why this is required or where it would go?

Discussions

It was considered that the need is to make clearer the position of the 1957 consent being the root of the industrial development and limits what the NP can affect.

Conclusion

A reference/link to the 1957 consent would be made in 8.6.1 (document available on SGC website) and in other places considered to be appropriate.

83 *Support truck stop with conditions (see above).*

NPSG Response: No action required?

Conclusion

Already addressed above.

88–91 *Correct ECGB2 text and align with item 8.7.20.*

NPSG Response: Correction and alignment not understood – needs to be proposed for consideration

Discussions

Still unclear what alignment is required.

Conclusion

PT to review and provide detail for consideration.

93 *Remove H9 from settlement boundary map.*

NPSG Response: Only if H9 were to be removed from NP.

Discussions

As discussed earlier, there are potential advantages in protection from other uses, in this case industrial or solar for land included in settlement boundaries.

Conclusion

Even if site H9 was removed from the NP for development, it is still beneficial to include in the map.

95 *Add references to:*

- 1957–58 ICI consent

NPSG Response: Not aware of a document or link to reference or the particular content

Discussions

This consent establishes the original buffers.

Conclusion

ND/PT to provide the particular link to the SGC website and relevant content to be inserted.

- 1995 Western Approach consents

NPSG Response: Not aware of a document or link to reference

Discussions

This consent establishes the original buffers.

Conclusion

ND/PT to provide the particular link to the SGC website and relevant content to be inserted.

- *Cresswell Report*

NPSG Response: Not identified in content of NP

Conclusion

Addressed earlier

- *Linking the Levels Project*

NPSG Response: Not identified in content of NP

Discussions

PT explained some of the background to this project. Reference suggested to demonstrate the NP is aware/cognisant of the project.

Conclusion

PT to provide link to SGC website

- *Infrastructure-Led Masterplan*

NPSG Response: Do you mean SGC's Strategic Infrastructure-led Masterplan for Severnside? If so see 3.1.3 and Appendix F.

Conclusion

This is the Strategic Infrastructure-led Masterplan for Severnside and is already addressed in the NDP. Need to consider whether the new WECA strategic document should be referenced.

- *SevernNet Transport Strategy*

NPSG Response: See 8.4.1.2 and Appendix F.

Conclusion

This is already addressed in the NDP.

4. Governance and Legal Notes

The Council acknowledges the need for legal interpretation regarding land ownership and charitable trust status (Policy H1). Legal advice has been commissioned.

NPSG Response: The PC must resolve this as with any other arising land ownership issues in the NP. None of the proposed developments will happen without the rightful landowner wanting to take it forwards.

Conclusion

This was addressed earlier, with work ongoing in relation to H1.

The Council also notes concerns regarding Regulation 14 compliance and urges the NPSG to ensure all statutory consultees and stakeholders are properly engaged.

NPSG Response: See Appendix B. SGC has supplied the list of statutory consultees. All known local businesses groups and organisations have been contacted. Our 300+ registered mailing

list has been contacted. The whole community is notified via In View. Whose concerns are you noting and what is the detail?

Discussions

Having followed the process and guidance from authorities the SG was concerned that this was raised. Asked for evidence of any omissions, the only potential one raised by GCr was the MoD, but this had not been put forward by SGC and other than potentially a connection to housing in Jackson Close there was no known MoD association with the Parish or proposed sites.

Conclusion

No action required.

5. Conclusion and Next Steps

The Parish Council formally submits this Regulation 14 response to the Neighbourhood Plan Steering Group and South Gloucestershire Council.

NPSG Response: SGC does not receive or act on responses to the consultation. Appendix B details the Regulation 14 process.

Conclusion

Clarification of the process, no action required.

The Council supports the progression of the NDP subject to the above amendments and looks forward to its independent examination and subsequent referendum in early 2026.

4. Meeting Summary

The process of the referendum, (a conventional poll organised by SGC) was discussed, with the need for appropriate communication and publicity at the time recognised.

RE stated that the NPSG's plan had been to process the feedback received from all parties and re-draft the NDP for independent examination in early November. However, with the amount of work to be done, that would not be possible. The PC asked about anticipated timescales for that and the remainder of the process. 3 to 6 weeks was estimated for processing the Regulation 14 feedback, but beyond that it would be down to SGC.

RE thanked all for attending and for their positive contributions. The NPSG would prepare notes of the meeting and share and agree them with the attendees from the PC.

This part of the working group meeting closed at approximately 22:00 with members of the PC leaving.

The NPSG members then continued with a working group meeting to consider priorities and methodology for addressing the other sources of feedback, concluding that responses to mandatory consultees would be the priority.

Meeting closed at 22:40.

A1c SUMMARY OF AMENDMENTS CONSIDERED FOR THE NDP

Policy H1. The NPSG awaited a decision by the PC whether it will continue to make the site available or to withdraw it. The Parish Council took legal advice on ownership of the playing field and village hall and has not made a decision to withdraw the land from being available. Therefore, it is considered to be available and the policy H1 has been retained.

Policy H1 shall be modified to state a 'maximum' of 30 dwellings. The wording shall be strengthened to clarify that a recreation area for children to play and for dog walking must be retained and the proposed minimum size of that area, which would be one third of the existing field.

Policy H3 (also applicable to Policy H1). Whilst it is not possible due to commercial sensitivity and landowner decisions to identify replacement sites for community facilities such as allotments, words will be added to the NDP to provide indicative locations to support the potential deliverability of replacement facilities. A statement will be included to say there is no evidence of the allotments land being required in the future for cemetery extension.

Policy H4. The NPSG will modify the wording to identify the consideration in design for potential connectivity to other sites at the rear or to the sides. This realistically would only come about if there are established agreements between landowners at the time of development.

Policy H7 will be modified to include provision of some 1-bedroom apartments.

Policy H8. The policy will be amended to reflect the need for phasing from north to south, should the site be delivered under phased build.

Policy H9. See feedback from SGC and follow up correspondence and changes to H9 in relation to SNCI. AECOM has revisited the SEA to reflect SNCI status of H9 and the NDP amended to reference the revision to the SEA.

Transport & Infrastructure: Amend the wording in the NDP and Aspirations Document to better recognise the support for Pilning Station. 8.4.11 change existing service levels to 2 trains per week and include a reference to the Aspirations Document.

TTP1 to TTP4: Wording of policy to be modified to address options such as locking at night and low entry bars.

Truck Stop (LCD2):

Add to policy 'Outside of land recommended as green buffer zones' Note: this has been ignored in a passed planning application of December 2025.

Policy ECGB2: Consider modify text to reflect 'wash-over' boundary alignment with the Enterprise Area. Modified to say 'to coincide with the northern edge of the Severnside Enterprise Area, i.e. the northern edge of the Western Approach Distribution Park'. Added

that future residential development in Severn Beach would come through amendments to the settlement boundary.

Policy CF4: Consider whether there are additional public green spaces to be included and a revised map to go with the policy. Redwick Common was identified by the PC and has been added to policy CF4.

Extant Planning Map – Figure 3: Modify the figure's title to say the figure 'includes' the extant. Additionally, in the document (4.3.1) consider an improved description of what the extant planning means.

7.1.3: Consider better defining 'unique qualities' by including 'such as estuary environment and its views'.

Figure F6: Consider adding new buffer zone areas to figure. If new areas discussed are added, the title of Figure 6 should be changed as it would no longer be a zone between residential and industrial developments. The area to the north of the A403 between site H8 and the coast has been added to the map, but the title does not require changing. Consider amending policy LCD1 to better describe the height requirements of buffering, especially in light of the recent mega-shed.

7.6.1 To consider including relevant content and a reference/link to the Cresswell Report. It was concluded that the reference would be better suited on the policy background (8.7.3) rather than in the objective. This has been added together with a reference to the correctly titled document.

Policy CF4: Had the PC decided to withdraw the availability of the land for H1 from the NP, then the bracketed text would have needed to be removed. This amendment is therefore no longer required.

8.6.1: Consider adding a reference/link to the 1957 document SG 4244 (available on SGC website) and at any other places considered to be appropriate in the NDP. This has been identified and referenced at 4.3.1 and 8.6.2 and added to the list of references.

Policy ECGB2: Consider the text and its alignment with 8.7.20. Addressed above.

References: Include reference to the 1957 ICI consent, which establishes the original buffers. This reference has been added, although the document SG.4244 does not identify the buffer zones.

References: Include reference to the 1995 Western Approach consent which establishes the original buffers. The reference has been made to the SGC planning portal reference P94/0400/8 and included in 8.6.6 Policy LCD1 and the references.

Linking the Levels Project: Consider including reference to demonstrate the NP is aware/cognisant of the project. Identified at 8.7.1 and linked to the SGC website.

References: Need to consider whether the new WECA strategic document which is intended to overarch the Strategic Infrastructure-led Masterplan for Severnside should now be referenced. Both the West of England Growth Strategy and their future Spatial Development Strategy have been identified in 3.1.3, but have not been included as references.

A2. SOUTH GLOUCESTER COUNCIL

A2a SOUTH GLOS COUNCIL BIODIVERSITY OFFICER FEEDBACK

The first feedback response received from SGC was from Sally Pattinson, Biodiversity Officer, South Gloucestershire Council, Climate and Nature Emergency, received through the website feedback portal on 20th October 2025 stating:

This information has been provided in response to me forwarding the neighbourhood plan and should be included in the consultation feedback.

The data refers to site H8 and is provided as evidence that the land is an important site used by curlew (aka Functionally Linked Land – Natural England classification).

NPSG Response

In the policy, vii) requires a comprehensive landscaping scheme demonstrating that biodiversity and wildlife as a whole have been considered, which would include curlew. Furthermore, in viii) the HRA has identified that the site could be suitable to support wintering waterfowl and waders and requires for this site a botanical survey to be undertaken and as appropriate a non-breeding bird survey. The NPSG considers that the issue is already addressed in the NDP and no additional amendments are necessary in relation to this feedback. However, appendix A2b below, which addresses the feedback from SGC Strategic Planning, does result in changes being considered in the areas of; landscape and environment, further investigations of the SEA and HRA, and planning application proposals needing to demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning Levels Character Area has been understood and how the development will respond to this through design, layout, materials etc.

A2b SOUTH GLOS COUNCIL STRATEGIC PLANNING FEEDBACK

This second response was received directly by email from SGC on 24th October 2025 from Stuart Todd on behalf of Strategic Planning (see Appendix A2b):

South Gloucestershire Council Response

FAO Pilning and Severn Beach Neighbourhood Plan Steering Group (and Parish Council as Qualifying Body)

Thank you for sending the Regulation 14 consultation Neighbourhood Development Plan (also known as the Neighbourhood Plan) for comment. It is good to see the Plan reach this stage after the hard work that the Neighbourhood Plan Steering Group (NPSG) has undoubtedly put into its development, especially considering the ambitions of the Plan within an area of the district which is heavily constrained. South Gloucestershire Council (SGC) will continue to support the NPSG, and Parish Council as the Qualifying Body, to progress the Plan to submission, examination and referendum whilst providing advice on the basic conditions.

The comments which follow form the SGC Regulation 14 draft Plan response. We have presented the comments between:

- i) main “strategic” comments which could give rise to general conformity issues (particularly with regard to alignment with the current strategic policies in the development plan (adopted Core Strategy and People, Spaces and Places Development Plan Document (PSP DPD); and,
- ii) other comments which the NPSG should consider and which we suggest will help to “tighten-up” the content of the Plan for its use as part of the development plan if it is “made” (adopted) if the Plan passes referendum.

With regard to i) above, and by way of brief summary and overview, the main “strategic” comments centre around the following issues:

- Concerns about general conformity of policies with the current adopted Local Plan (Core Strategy and PSP) - Policies H1 to H3 inclusive, in relation to Greenbelt changes, and to related policies where changes to Greenbelt are proposed;
- Concerns about allocation of housing on sites with known environmental value - Policies H1, H8 and H9; and,
- Concerns about allocation of sites H1 and H9 with regard to the recreational and / or education value of the sites.

As a preface to the comments made with regard to general conformity, as you may already be aware, if the Neighbourhood Plan is examined prior to the new emerging Local Plan is adopted, the Neighbourhood Plan will be tested (as part of the Basic Conditions tests applied by the Examiner) for general conformity with the strategic policies of the adopted Core Strategy and PSP DPD). There are currently several areas where we have raised general conformity issues.

If these concerns can be overcome, we have made suggestions about how that could be achieved and we can follow-up these suggestions with further discussion if the NPSG and Parish Council would find this helpful.

Where relevant, we have referred to comments previously made during meetings with the NPSG in recent years as matters of process and content have been discussed. In the interests of transparency and to help the Qualifying Body demonstrate, at Submission stage, that the NPSG has engaged SGC officers during the Plan-making process, the main meetings held, principally to discuss flood risk and greenbelt matters were held on 13th March 2023, 6th July 2023 and 2nd February 2024 (all referred to in the comments which follow). As the Parish Council and NPSG will recall, a Service Level Agreement was agreed by both SGC and the Parish Council in April 2021, at the outset of the Plan making process. It is understood that the NPSG was also in contact with various other officers from departments outside of Planning in recent years to discuss other matters of relevance.

It is perhaps worth reminding the NPSG and Parish Council that the Neighbourhood Development Plan is formally the Qualifying Body’s document. The Parish Council, as the Qualifying Body, should formally approve the Plan prior to submission to SGC at the next stage of the process. The Plan’s content should also have majority support of the community, particularly bearing in mind that the last part of the process is a referendum of members of the community resident in the parish and on the electoral register.

We are happy to discuss any of our comments after the consultation if this would be beneficial in understanding how best to progress the Plan to submission.

South Gloucestershire Council

24th October 2025

Main “strategic” points and issues relating to general conformity with the strategic policies of the Local Plan	
Section / topic / policy	Comments
Greenbelt and Site Allocations	<p>Our comments on greenbelt content and site allocations at this stage focus on alignment between the way that allocation sites in the greenbelt have been proposed in the Plan and the advice previously given to the Steering Group on such matters, including:</p> <ul style="list-style-type: none"> • A note of the meeting held between SGC officers and the Steering Group on 13th March 2024 (and “final note of issues discussed dated 27th March 2023) (attached for ease of reference as appendix 1); • A note of the meeting held between SGC officers and the Steering Group on 6th July 2023 (attached for ease of reference as appendix 2); • A meeting between the Steering Group and Patrick Conroy on 2nd February 2024 to discuss greenbelt (and other) matters. <p>The comments which follow are consistent with this previous advice given.</p> <p>Paragraph 7.6.1 of the P&SBNDP and objective f) which follows state the desire to amend Greenbelt boundaries to remove some land adjacent to settlement boundaries in Pilning from the Greenbelt to allow new housing development. This follows through to policies H1, H2 and H3 which seek to allocate housing within the Greenbelt, adjusting the Greenbelt boundary to accommodate the sites.</p> <p>As previously discussed, there is no policy in the current Core Strategy or Policies, Sites and Places (PSP) Development Plan Document which provides a “policy hook” to enable the Greenbelt changes to be made. While it is the intention for the emerging new Local Plan to have such a policy (as recognised in paragraphs 3.1.9 and 8.7.17 of the NDP), the P&SBNDP will be tested, at Examination, against the adopted Local Plan which is in place at the time of the Examination. Subject to the Group confirming the NDP timetable, the adopted Local Plan at the time of NDP Examination is likely to still be the Core Strategy and PSP. If this is the case, proposals and any policies which remove land from the Greenbelt in the NDP will not be in general conformity with the adopted Local Plan (i.e. the Core Strategy and PSP).</p> <p>The NPSG’s commissioned consultant’s report of the Greenbelt Review recognises the challenges placed upon allocation in the Greenbelt and cites examples of where Neighbourhood Plans have successfully allocated housing sites in the Greenbelt elsewhere in the country. The report does state correctly, that: “However, all the Neighbourhood Plans that have successfully amended Green Belt boundaries themselves have been adopted after the corresponding Local Plan, and the Local Plan then includes a policy “hook” which enables Neighbourhood Plans to amend the Green Belt.” (Paragraph 2.5/3). The report goes on to say that “We understand that the Neighbourhood Plan Steering Group has obtained some assurance from South Gloucestershire Council that the emerging South Gloucestershire Local</p>

Main “strategic” points and issues relating to general conformity with the strategic policies of the Local Plan	
Section / topic / policy	Comments
	<p>Plan will include a policy hook enabling the Neighbourhood Plan to propose Green Belt changes at Pilning. However, we also understand that the Neighbourhood Plan could well be made before the Local Plan is adopted. On this basis, to meet the Basic Conditions, the Neighbourhood Plan is likely to need to explain how the hiatus between the Neighbourhood Plan being made and the Local Plan being adopted will be managed. This could include a need to explain how planning applications will be considered in a range of scenarios.” While the Neighbourhood Plan attempts to respond positively to this, we do not consider that the Plan adequately conveys this and do not agree that the approach suggested will ensure general conformity tests are satisfied. Other Neighbourhood Plan experiences cited in the report and elsewhere would suggest that an approach compliant with policy in place now is the process most likely to result in a successful outcome. In other words, setting out options of “if this happens” or “if that happens”, even with assurances (which are not guarantees) about the potential for policy to be introduced into an adopted Plan, cannot be considered robust, as there will be plenty of examples of where assumptions have been made about Local Plan policies passing through Examination, only to find that the process requires either amendment or removal. Should a planning application be submitted for a site allocated under a presumption that a policy will be introduced, until the new emerging Local Plan is adopted, this could place the local planning authority in a difficult position with regard to the “weight” attached to emerging policies.</p> <p>Policies in an NDP cannot assume that an emerging new strategic policy will be put in place or adopted with certainty before the event. On the current timeline, it is understood that the P&SBNDP Examination will take place prior to anticipated adoption of the new Local Plan. With this being the case, there is no certainty that the policy proposed in the new Local Plan which provides the “hook” for minor changes to the Greenbelt in a NDP will remain in the Local Plan. It is likely, in our view, that a P&SBNDP Examiner, although they may give some weight to an emerging Local Plan policy, will default to using the adopted Local Plan’s policies (i.e. the adopted Core Strategy and PSP) against which to apply the Basic Conditions and test the general conformity of the NDP. This would likely mean that the proposed allocated sites in the Greenbelt and proposed changes to the Greenbelt boundary in policy ECGB1 will fail at Examination and be removed.</p> <p>From the policy wording for H1-H3, it is assumed that the sites will not be rural exceptions sites. As previously raised with the SG, an alternative approach if the affected sites as proposed are to remain in the NDP, will be for site allocations to be made in the NDP for rural exceptions housing (see Core Strategy Rural Housing Exceptions Policy CS19). Experience with the Oldbury Neighbourhood Plan demonstrates that this is possible within the context of the adopted Core Strategy. This would also mean retaining the existing boundary of the Greenbelt and therefore ECGB1 could be removed from the NDP.</p>

Main “strategic” points and issues relating to general conformity with the strategic policies of the Local Plan	
Section / topic / policy	Comments
	<p>If these sites are not to be allocated in the NDP as exceptions sites and the Steering Group chooses to remove them from the Plan this would also mean that related amendments to other policies should be made, for example, to policy ECGB3: Settlement Boundaries Policy.</p> <p>However, if, after the Regulation 14 consultation, the Plan is amended to remove the Greenbelt sites and it remains the intention to introduce them in the future, it will be important to state the intent of the Plan that these sites should, in the Parish Council’s view, form part of the preferred strategy for the parish during the plan period to deliver local needs housing (assuming this remains the intent of the Parish Council), and that in order to bring them forward as allocations, a partial review of the NDP will be necessary after the new emerging Local Plan has been adopted to seek to bring them forward as additional allocations and amend the Greenbelt boundary accordingly (assuming a policy “hook” in the new Local Plan remains to do so).</p> <p>The partial review would very likely mean that the starting point for that review would be the Regulation 14 stage with the Plan needing then to pass through subsequent required processes including Examination and possibly referendum.</p> <p>Practically speaking, the delay to allocation of the sites within the Greenbelt is unlikely to disrupt the NDP’s delivery of local needs housing, given that the NDP is seeking to allocate several other sites for housing to come forward.</p> <p>The same principle, of a new Local Plan policy “hook” being required to allocate in the Greenbelt, applies to policy ECGB1, to the proposed parking area allocations in the Greenbelt in NDP policies TTP3 and TTP4, and to policy ECGB2 which seeks to introduce additional Greenbelt land.</p> <p><u>Summary</u></p> <p>In summary, based on likely examination and testing of the basic conditions against the current adopted Local Plan (Core Strategy and PSP), with no policy “hook” in these documents to enable the Neighbourhood Plan to amend the Greenbelt boundary, greenbelt allocations and adjustments proposed in the Regulation 14 version of the Plan cannot be supported. The NPSG and Parish Council’s options moving forward can be summarised as:</p> <ul style="list-style-type: none"> i) Retain the current proposed allocations through to submission and examination. If proposals remain as they are in the Regulation 14 version of the Plan, SGC will have no choice but continue to object to their inclusion as they are not considered to be in general

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	<p>conformity with the current Local Plan strategic policies. There is a risk that the Examiner will concur and remove the sites and Greenbelt proposals from the Plan.</p> <ul style="list-style-type: none"> ii) Retain the current proposed allocations through to submission and examination, but adjusting them as exceptions housing sites. If this is considered as an alternative approach, appropriate policy wording for their inclusion can be discussed with SGC prior to submission. iii) Remove the Greenbelt proposed sites and policies which propose or make changes to the Greenbelt boundary. Some sites will remain in the Plan and therefore still enable the Plan to move towards meeting the local needs target identified in the Housing Needs Assessment. This approach seems likely to make the path of the Plan through submission and examination much clearer with regard to meeting the basic conditions. Should the sites be removed from the Plan there are then other options moving forward: <ul style="list-style-type: none"> a. The remaining non-Greenbelt proposed sites, if they meet the basic conditions and subject to other comments made, could be left as the Plan’s only allocations until the next full review of the Plan, with no further additional allocations made. The planning system will then be the main vehicle through which any additional sites are delivered, potentially on those sites removed from the Plan if they are demonstrated as being Greybelt, or potentially in other locations, but guided by the technical work that the NPSG has undertaken during the Plan’s development. b. Assuming that the Plan passes referendum with the Greenbelt proposed sites removed, after adoption of the new emerging Local Plan and if the Local Plan includes the necessary policy “hook” to enable Greenbelt boundary review as part of a Neighbourhood Plan process (including consideration of potential sites as Greybelt), review the technical work done and, through a partial review of the made Neighbourhood Plan, seek to allocate the sites through the partial review process. This “two-stage” approach to allocating sites means that the Plan can be in general conformity with the adopted Local Plan with regard to Greenbelt policy while still seeking to deliver the scale of local needs housing suggested in the Housing Needs Assessment. It seems unlikely that all sites allocated in the Regulation 14 version of the Plan would all come forward in the first few years of the Plan period anyway if they did remain in this Plan and so taking a two-stage approach seems unlikely to slow delivery of the overall number. <p>Comments on individual policies relating to the Greenbelt, and others, follow.</p>

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Policy H1	<p>Greenbelt</p> <p>Policy H1 allocates a site for housing. Allocation is intended to give certainty, and criteria which provide details in terms of requirements or tests to make proposals acceptable should not introduce uncertainty with regard to the deliverability of sites. Criteria i) suggests that the site is only allocated / proposals supported <i>if</i> the removal of Greenbelt is completed through ECGB1. For a site to be allocated in the Greenbelt, this removal must already have been done. In other words, the allocation of a site explicitly means that the site <i>has</i> been removed from the Greenbelt, and so allocation and delivery only <i>if</i> that happens cannot be a policy requirement. Secondly, the rest of the criteria suggests “or” land is justified as being Greybelt. Again, allocation assumes that Greenbelt removal has taken place in order for the site to be allocated. If this had been done, Greybelt does not apply. Equally, the same principle applies for a site to be allocated if identified as a possible Greybelt site – in other words, it should already be established that the site is Greybelt rather than Greenbelt for the site to be allocated in the NDP and any alteration of the Greenbelt still needs a policy “hook” in the adopted Local Plan, which is not currently in place. Alternatively, potential Greybelt sites can come forward in the planning application process, and should this site be appropriately considered as Greybelt by a developer, the planning application process could be used to bring the site forward if the site is removed from the NDP as an allocation.</p> <p>As noted above, there is no policy in the current Core Strategy or Policies, Sites and Places (PSP) Development Plan Document which provides a “policy hook” to enable the Greenbelt changes to be made in an NDP, including removal of Greenbelt for housing allocations. The NDP is likely to be tested at Examination against the current adopted Local Plan (Core Strategy and PSP) and so needs to be in general conformity with these documents, and not the new emerging Local Plan. While the new emerging Local Plan seems likely to have a policy “hook” to enable Greenbelt changes to be considered in NDPs, this policy does not carry any weight in the planning system at this time and will not do so until adopted, if it remains in the emerging Local Plan. Within the current strategic policy framework, therefore, policy H1 allocation is not in general conformity with the strategic policies of the current adopted Local Plan and should be removed from the NDP. For this and other Greenbelt allocations in the NDP, if they are removed from the Plan, a partial review of the NDP following adoption of the new emerging Local Plan could seek to reintroduce this allocated site if its inclusion can be justified under the new policy “hook” if it remains in the new emerging Local Plan at adoption.</p> <p><u>Landscape, Environment, Open Space and Recreation</u></p> <p>Considering landscape, the site is within a strategic blue / green infrastructure corridor (Corridor A), is a public open space, and is characterised as including dense native hedgerows and trees to boundaries and being within a coastal and floodplain grazing marsh</p>

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	<p>(sitting within Landscape Character Area 20 “Pilning Levels”). While we are clear that we object to the inclusion of this site in the Plan for the reasons set out in this response, should the site remain in the Plan moving forward, the policy should include reference for the need for proposals to demonstrate that they have taken into account the value of the landscape. For example, wording could be added as follows, that proposals should: “demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning Levels Character Area has been understood and how development will respond to this through design, layout, materials etc.”</p> <p>The site proposed to be allocated includes a playing field. Criteria vii) of the policy requires a “good area” of public green space to be retained. This is not clear enough and would need to be better defined if the policy is to be retained. Notwithstanding this however, the policy and proposal will need to demonstrate certainty that the playing field area lost to development can be replaced elsewhere unless an assessment has been carried out which demonstrates that it is surplus to demand / need. Passing that requirement on to an applicant is not sufficient. Relevant policy with regard to this is NPPF paragraph 104 which states “Existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.” SGC Policy PSP44 – Open Space, Sport and Recreation also conveys the same position and states that “1) Development proposal(s) on land and buildings in existing use, last used for, or proposed for use for sport and recreation, including open space and playing fields, will not be acceptable unless: a. an assessment has been undertaken which clearly shows the land and/or the buildings are surplus to requirements; or b. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location, and the replacement provision is available for use before the existing provision and its use is lost; or c. the development is for alternative sport and recreation provision, the need for which clearly outweighs the loss.” The SGC Playing Pitch Strategy (2024) also aims to protect and enhance the playing field (see p.91 here https://beta.southglos.gov.uk/static/0a26e6a3adcac7626579b509d56c9c47/Playing-Pitch-Strategy.pdf). For any development proposal on this site, if Sport England is consulted as a part of the application process, Sport England’s Playing Field Policy is also likely to be relevant – see https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport/playing-fields-policy.</p> <p>This site is important for wider recreation. If the area were lost it would impact on recreation pressure on the estuary as it is a current SANGs (suitable alternative natural green space) and will continue to be important for the wider area, forming part of a mitigation strategy</p>

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	<p>for habitat proposed in the emerging new Local Plan. If lost to development, therefore, a replacement SANGs of the same value and with equal potential should be identified in the policy.</p> <p><u>Summary</u></p> <p>SGC objects to inclusion of this policy in the NDP. It has both environmental and recreational value which would need to have demonstrable mitigation if lost and with regard to the site being removed from the Greenbelt the policy is not in general conformity with the strategic policies of the current adopted Local Plan (Core Strategy and PSP). If the policy is removed from the Plan, reference in policy CF4 will also need to be removed. However, should the NPSG and Parish Council decide to retain the site in the Plan, despite objections due to general conformity, additional wording should be introduced to address concerns raised.</p>
Policy H2	<p><u>Greenbelt</u></p> <p>Policy H1 allocates a site for housing. Allocation is intended to give certainty, and criteria which provide details in terms of requirements or tests to make proposals acceptable should not introduce uncertainty with regard to the deliverability of sites. Criteria i) suggests that the site is only allocated / proposals supported <i>if</i> the removal of Greenbelt is completed through ECGB1. For a site to be allocated in the Greenbelt, this removal must already have been done. In other words, the allocation of a site explicitly means that the site <i>has been</i> removed from the Greenbelt, and so allocation and delivery only <i>if</i> that happens cannot be a policy requirement. Secondly, the rest of the criteria suggests “or” land is justified as being Greybelt. Again, allocation assumes that Greenbelt removal has taken place in order for the site to be allocated. If this had been done, Greybelt does not apply. Equally, the same principle applies for a site to be allocated if identified as a possible Greybelt site – in other words, it should already be established that the site is Greybelt rather than Greenbelt for the site to be allocated in the NDP and any alteration of the Greenbelt still needs a policy “hook” in the adopted Local Plan, which is not currently in place. Alternatively, potential Greybelt sites can come forward in the planning application process, and should this site be appropriately considered as Greybelt by a developer, the planning application process could be used to bring the site forward if the site is removed from the NDP as an allocation.</p> <p>As noted above, there is no policy in the current Core Strategy or Policies, Sites and Places (PSP) Development Plan Document which provides a “policy hook” to enable the Greenbelt changes to be made in an NDP, including removal of Greenbelt for housing allocations. The NDP is likely to be tested at Examination against the current adopted Local Plan (Core Strategy and PSP) and so needs to be in general conformity with these documents, and not the new emerging Local Plan. While the new emerging Local Plan seems likely to have a policy</p>

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	<p>“hook” to enable Greenbelt changes to be considered in NDPs, this policy does not carry any weight in the planning system at this time and will not do so until adopted, if it remains in the emerging Local Plan. Within the current strategic policy framework, therefore, policy H1 allocation is not in general conformity with the strategic policies of the current adopted Local Plan and should be removed from the NDP. For this and other Greenbelt allocations in the NDP, if they are removed from the Plan, a partial review of the NDP following adoption of the new emerging Local Plan could seek to reintroduce this allocated site if its inclusion can be justified under the new policy “hook” if it remains in the new emerging Local Plan at adoption.</p> <p><u>Landscape and Environment</u> Considering landscape, the site is within a strategic blue / green infrastructure corridor (Corridor A), and is characterised as including dense native hedgerows, trees to boundaries and scrub within site and being within a coastal and floodplain grazing marsh (sitting within Landscape Character Area 20 “Pilning Levels”). The western portion of site lies within a Local Nature Reserve Sensitivity Focus Area. While we are clear that we object to the inclusion of this site in the Plan for the reasons set out in this response, should the site remain in the Plan moving forward, the policy should include reference for the need for proposals to demonstrate that they have taken into account the value of the landscape. For example, wording could be added as follows, that proposals should: “demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning Levels Character Area has been understood and how development will respond to this through design, layout, materials etc.”</p> <p><u>Heritage</u> Exclusive to the comments made on Greenbelt above, the policy does not adequately consider heritage issues in relation to the site. Earlier in the Plan, at paragraph 8.1.36, text states that “Other assessment criteria in evaluation of sites have included environmental, ecology and habitat issues as addressed by SEA and HRA. Additionally, heritage issues were considered, although there are relatively few listed buildings in the Parish, <i>none of which are affected by the proposed sites.</i>” (<i>our emphasis added</i>). However, this is not strictly correct in relation to this policy and the site it allocates. The site lies within the setting of listed buildings and the impact of development on the setting of those assets will need to be factored into the design process, especially where open land/fields are being lost to urban development. This is in particular in relation to Cranmore Villa and St Peter’s Church in Pilning and the fields to the rear which are intervisible to varying degrees (and season dependent) with the designated assets and where new development is likely to be noticeable from them, and from the footpath to the cemetery that runs between them. While the assets are experienced in the context of a mix-character settlement, it is the potential adverse impacts resulting from the loss of openness, the encroachment of built form in key views</p>

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	<p>from the road, and the visual impacts associated with the quantum/scale/height/form of development in what is currently an open, green backdrop to the buildings along the Cross Hands Road, which is a concern. As the site lies in Flood Zone 3, design-related measures to overcome / mitigate this risk (for example, 3/3.5 storey development) could also result in an incongruous and potentially visually intrusive form of development. There is no mention in the policy to these heritage assets and at the very least, there should be reference to them and the need for development proposals to respond to potential impact. This could be done by introducing wording to the policy such as: “Development must respect the wider setting of nearby heritage assets, particularly where flood-resilient design may introduce scale or form that is out of keeping with the local character. Proposals must demonstrate how cumulative impacts—especially in relation to allocations H2, H3 and H4—have been considered and mitigated to preserve the significance and setting of designated assets.”</p> <p>Summary</p> <p>SGC objects to inclusion of this policy in the NDP with regard to the site being removed from the Greenbelt as it is not considered to be in general conformity with the strategic policies of the current adopted Local Plan (Core Strategy and PSP). However, should the NPSG and Parish Council decide to retain the site in the Plan, despite objections due to general conformity, additional wording should be introduced to address concerns raised.</p>
Policy H3	<p>Greenbelt</p> <p>Policy H1 allocates a site for housing. Allocation is intended to give certainty, and criteria which provide details in terms of requirements or tests to make proposals acceptable should not introduce uncertainty with regard to the deliverability of sites. Criteria i) suggests that the site is only allocated / proposals supported <i>if</i> the removal of Greenbelt is completed through ECGB1. For a site to be allocated in the Greenbelt, this removal must already have been done. In other words, the allocation of a site explicitly means that the site <i>has</i> been removed from the Greenbelt, and so allocation and delivery only <i>if</i> that happens cannot be a policy requirement. Secondly, the rest of the criteria suggests “or” land is justified as being Greybelt. Again, allocation assumes that Greenbelt removal has taken place in order for the site to be allocated. If this had been done, Greybelt does not apply. Equally, the same principle applies for a site to be allocated if identified as a possible Greybelt site – in other words, it should already be established that the site is Greybelt rather than Greenbelt for the site to be allocated in the NDP and any alteration of the Greenbelt still needs a policy “hook” in the adopted Local Plan, which is not currently in place. Alternatively, potential Greybelt sites can come forward in the planning application process, and should this site be appropriately considered as Greybelt by a developer, the planning application process could be used to bring the site forward if the site is removed from the NDP as an allocation.</p>

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	<p>As noted above, there is no policy in the current Core Strategy or Policies, Sites and Places (PSP) Development Plan Document which provides a “policy hook” to enable the Greenbelt changes to be made in an NDP, including removal of Greenbelt for housing allocations. The NDP is likely to be tested at Examination against the current adopted Local Plan (Core Strategy and PSP) and so needs to be in general conformity with these documents, and not the new emerging Local Plan. While the new emerging Local Plan seems likely to have a policy “hook” to enable Greenbelt changes to be considered in NDPs, this policy does not carry any weight in the planning system at this time and will not do so until adopted, if it remains in the emerging Local Plan. Within the current strategic policy framework, therefore, policy H1 allocation is not in general conformity with the strategic policies of the current adopted Local Plan and should be removed from the NDP. For this and other Greenbelt allocations in the NDP, if they are removed from the Plan, a partial review of the NDP following adoption of the new emerging Local Plan could seek to reintroduce this allocated site if its inclusion can be justified under the new policy “hook” if it remains in the new emerging Local Plan at adoption.</p> <p><u>Landscape and Environment</u></p> <p>Considering landscape, the site is within a strategic blue / green infrastructure corridor (Corridor A), and is characterised as including dense native hedgerows, trees to boundaries and woodland within northwestern portion of the site and scrub within site and being within a coastal and floodplain grazing marsh (sitting within Landscape Character Area 20 “Pilning Levels”). The hedgerow network through the centre of the site is an Local Nature Reserve Sensitivity Focus Area. While we are clear that we object to the inclusion of this site in the Plan for the reasons set out in this response, should the site remain in the Plan moving forward, the policy should include reference for the need for proposals to demonstrate that they have taken into account the value of the landscape. For example, wording could be added as follows, that proposals should: “demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning Levels Character Area has been understood and how development will respond to this through design, layout, materials etc.”</p> <p><u>Heritage</u></p> <p>Exclusive to the comments made on Greenbelt above, the policy does not adequately consider heritage issues in relation to the site. Earlier in the Plan, at paragraph 8.1.36, text states that “Other assessment criteria in evaluation of sites have included environmental, ecology and habitat issues as addressed by SEA and HRA. Additionally, heritage issues were considered, although there are relatively few listed buildings in the Parish, <u>none of which are affected by the proposed sites.</u>” (<u>our emphasis added</u>). However, this is not strictly correct in relation to this policy and the site it allocates. The site lies within the setting of listed buildings and the impact of development on the</p>

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	<p>setting of those assets will need to be factored into the design process, especially where open land/fields are being lost to urban development. This is in particular in relation to Cranmore Villa and St Peter’s Church in Pilning and the fields to the rear which are intervisible to varying degrees (and season dependent) with the designated assets and where new development is likely to be noticeable from them, and from the footpath to the cemetery that runs between them. While the assets are experienced in the context of a mix-character settlement, it is the potential adverse impacts resulting from the loss of openness, the encroachment of built form in key views from the road, and the visual impacts associated with the quantum/scale/height/form of development in what is currently an open, green backdrop to the buildings along the Cross Hands Road, which is a concern. As the site lies in Flood Zone 3, design-related measures to overcome / mitigate this risk (for example, 3/3.5 storey development) could also result in an incongruous and potentially visually intrusive form of development. There is no mention in the policy to these heritage assets and at the very least, there should be reference to them and the need for development proposals to respond to potential impact. This could be done by introducing wording to the policy such as: “Development must respect the wider setting of nearby heritage assets, particularly where flood-resilient design may introduce scale or form that is out of keeping with the local character. Proposals must demonstrate how cumulative impacts—especially in relation to allocations H2, H3 and H4—have been considered and mitigated to preserve the significance and setting of designated assets.”</p> <p><u>Summary</u></p> <p>SGC objects to inclusion of this policy in the NDP with regard to the site being removed from the Greenbelt as it is not considered to be in general conformity with the strategic policies of the current adopted Local Plan (Core Strategy and PSP). However, should the NPSG and Parish Council decide to retain the site in the Plan, despite objections due to general conformity, additional wording should be introduced to address concerns raised.</p>
Policy H4	<p><u>Heritage</u></p> <p>The policy does not adequately consider heritage issues in relation to the site. Earlier in the Plan, at paragraph 8.1.36, text states that “Other assessment criteria in evaluation of sites have included environmental, ecology and habitat issues as addressed by SEA and HRA. Additionally, heritage issues were considered, although there are relatively few listed buildings in the Parish, <u>none of which are affected by the proposed sites.</u>” (<u>our emphasis added</u>). However, this is not strictly correct in relation to this policy and the site it allocates. Grade II listed St Peter’s Church and the Grade II listed Cranmore Villa lie c40m to the east and south of the site. The site therefore lies within the setting of listed buildings and the impact of development on the setting of those assets will need to be factored into the design process, especially where open land/fields are being lost to urban development. This is in particular in relation to Cranmore</p>

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	<p>Villa and St Peter’s Church in Pilning and the fields to the rear which are intervisible to varying degrees (and season dependent) with the designated assets and where new development is likely to be noticeable from them, and from the footpath to the cemetery that runs between them. While the assets are experienced in the context of a mix-character settlement, it is the potential adverse impacts resulting from the loss of openness, the encroachment of built form in key views from the road, and the visual impacts associated with the quantum/scale/height/form of development in what is currently an open, green backdrop to the buildings along the Cross Hands Road, which is a concern. As the site lies in Flood Zone 3, design-related measures to overcome / mitigate this risk (for example, 3/3.5 storey development) could also result in an incongruous and potentially visually intrusive form of development. Depending on quantum, layout, scale, height, form etc of development, there may be adverse impact on the openness of the land to the rear of the buildings as a result of incongruous back-land development. Views from the rear of the listed buildings, and views as experienced along the footpath between them may be affected by encroachment of urban development and loss of the sense of openness.</p> <p>Reference to H4 is made in the SEA report which recognises the proximity to 3no. Grade II assets (Church, Gates, Cranmore Villa) and suggests that a detailed site plan, compliance with design codes and a landscaping scheme may be sufficient to safeguard the integrity and significance of the assets and reduce potential for adverse effects. These are certainly helpful but are not the same as a heritage statement which assesses the significance of the asset(s) and any contribution made by its (their) setting. The heritage statement should then feed into the design process from the outset, rather than being used as a tool to justify pre-determined layouts/designs. The supporting text suggests up to 18no. dwellings on the site, including a new two-way access with footpaths. Allowing for the loss of land for the road/path, the quantum proposed does not appear particularly in-keeping with the grain and density of development on the northern side of Cross Hands Road and could equate to a cramped or overly contrived development. Given the need to take fully into account the potential for adverse impact on the setting of the listed buildings, the site seems unlikely to be able to suitably accommodate the proposed maximum number of dwellings (although it is recognised that the policy does reference “maximum”), especially in the absence of any evidence to demonstrate that it is capable of accommodating this quantum without harm to the setting of the designated heritage assets. There is no mention in the policy to the heritage assets and at the very least, there should be reference to them and the need for development proposals to respond to potential impact. This could be done by introducing wording to the policy such as: “Development proposals must carefully consider the site's proximity (approx. 40m) to Grade II listed St Peter’s Church, its gates, and Cranmore Villa. The layout, scale, height, and form of development should:</p> <ul style="list-style-type: none"> a) Avoid harm to the openness of land to the rear of these assets. b) Preserve key views from the listed buildings and along the footpath between them. c) Reflect the established grain and density of surrounding development to prevent a cramped or incongruous appearance.

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	<p>A heritage statement must be submitted to assess the significance of the assets and the contribution of their setting, and should inform the design from the outset. Proposals must demonstrate how cumulative impacts—especially in relation to allocations H2, H3 and H4—have been considered and mitigated to preserve the significance and setting of designated assets.”</p> <p><u>Landscape and Environment</u> Considering landscape, the site is within a strategic blue / green infrastructure corridor (Corridor A), and is characterised as including dense native hedgerows, trees to boundaries and woodland and scrub within the site and being within a coastal and floodplain grazing marsh (sitting within Landscape Character Area 20 “Pilning Levels”). The hedgerow network through the northern section of the site is a Local Nature Reserve Sensitivity Focus Area. The policy should include reference for the need for proposals to demonstrate that they have taken into account the value of the landscape. For example, wording could be added as follows, that proposals should: “demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning Levels Character Area has been understood and how development will respond to this through design, layout, materials etc.”</p> <p><u>Summary</u> The policy should recognise the importance of heritage assets and landscape in relation to proposals for development on the site.</p>
Policy H5	<p><u>Flood Risk</u> While policies H1 to H4 and H6 include criteria relating to drainage and Sustainable Drainage Systems (SuDS), there is no such reference to SuDS in policy H5. SGC, as the Lead Local Flood Authority, recommends that this policy includes similar requirements.</p> <p><u>Heritage</u> Part of this allocated site appears to be on the Medieval settlement and a building is shown on the Tithe Map which may date to the Medieval period. As such, there is a heritage issue on the site and so it would be prudent to add a criteria to the policy such as: “The site has the potential to include heritage assets with archaeological interest, and therefore a desk-based assessment will be required and, where necessary, a field evaluation.”</p> <p><u>Landscape and Environment</u></p>

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	<p>Considering landscape, the site is within a strategic blue / green infrastructure corridor (Corridor A), and is characterised as including dense native hedgerows, trees to boundaries and woodland and scrub within the site and being within a coastal and floodplain grazing marsh (sitting within Landscape Character Area 20 “Pilning Levels”). The hedgerow network through the northern section of the site is a Local Nature Reserve Sensitivity Focus Area. The policy should include reference for the need for proposals to demonstrate that they have taken into account the value of the landscape. For example, wording could be added as follows, that proposals should: “demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning Levels Character Area has been understood and how development will respond to this through design, layout, materials etc.”</p> <p><u>Summary</u></p> <p>The policy should recognise the importance of heritage assets and landscape in relation to proposals for development on the site.</p>
Policy H6	<p><u>Landscape and Environment</u></p> <p>Considering landscape, the site is within a strategic blue / green infrastructure corridor (Corridor A), and is characterised as including dense native hedgerows, trees to boundaries and woodland and scrub within the site and being within a coastal and floodplain grazing marsh to the north-eastern section (sitting within Landscape Character Area 20 “Pilning Levels”). The majority of the site is a Local Nature Reserve Sensitivity Focus Area. The policy should include reference for the need for proposals to demonstrate that they have taken into account the value of the landscape. For example, wording could be added as follows, that proposals should: “demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning Levels Character Area has been understood and how development will respond to this through design, layout, materials etc.”</p> <p><u>Summary</u></p> <p>The policy should recognise the importance of landscape in relation to proposals for development on the site.</p>
Policy H7	<p><u>Flood Risk</u></p> <p>While policies H1 to H4 and H6 include criteria relating to drainage and Sustainable Drainage Systems (SuDS), there is no such reference to SuDS in policy H7. SGC, as the Lead Local Flood Authority, recommends that this policy includes similar requirements.</p> <p><u>Parking at the Station</u></p>

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	<p>Policy H7 seeks the delivery of a minimum 30 space public car park in the north of the site. The village of Severn Beach and the surrounding area would benefit from car parking provided in the site to serve the station. Parking at the station would increase the attractiveness of train travel, a sustainable form of transport thus reducing overall car mileage, and it would help to resolve on-street parking pressures in Severn Beach associated with station users. The former sidings land is the only suitable location for car parking to serve the station, with all other potential sites in the village being outside of an accessible walking distance, particularly for disabled drivers. SGC is supportive that the parking should be in the north end of the site as this will maximise accessibility between the station entrance and the parking. Technical work undertaken by SGC in 2023 indicated that from 57 to 62 spaces would be needed to meet predicted future station demand, including an element of use for local leisure visits. Upon further review and being mindful of the need to balance the needs of the station with a viable development of the former sidings land site, SGC can agree that the provision of a minimum of a 30 space public car park is sufficient. This quantum of spaces is broadly consistent with some other train stations coming forward in South Gloucestershire (e.g. Henbury Station and North Filton Station).</p> <p><u>Safeguarding Area for a Second Track</u></p> <p>The commitment at clause ix) to safeguarding an area for a second track is welcomed. However, clause ix) is caveated by the statement “In the event a potential need to run a 3 train per hour service comes into fruition...” which may be problematic as confirmation of an increased train frequency coming forward may not align with the timescales for development proposals on the site coming forward. SGC would recommend that this caveat be removed so that the land for a second track is safeguarded in any event. SGC officers have made the West of England Mayoral Combined Authority aware of the NDP consultation so that they may respond as the Transport Authority for the area.</p> <p><u>Parking Standards</u></p> <p>There is no parking standard indicated for dwellings with 5 or more bedrooms. If any such dwellings were to be proposed on the site then the number of spaces should be a minimum of 3 per dwelling in line with the adopted SGC Policies, Sites & Places Plan.</p> <p>There is no parking standard indicated for dwellings with 1 bedroom. This should be a minimum of one space per dwelling in accordance with the adopted SGC Policies, Sites & Places Plan.</p> <p>There is no parking standard for visitor spaces indicated – this should accord with the SGC Policies, Sites & Places Plan of 0.2 spaces per dwelling.</p>

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	<p>Parking for dwellings and dwelling visitors should not be met from within the minimum 30 space public car parking, so that spaces available for station users are not reduced.</p> <p><u>Other Transport Issues</u> Clause vii) requires off-road stopping points for buses and taxis. It is not clear whether ‘off road’ could entail a lay-by adjacent to the highway, or whether the NDP would require buses and taxis to be able to pull into the site to drop-off / pick-up / wait. If the latter, then this expectation may be unrealistic for buses given the extent of other features that the NDP is requiring and the relatively narrow width of the site. However, this is a matter that could only be confirmed through design work being undertaken.</p> <p>Clause vi) should recognise that Stride Close is not adopted highway. This issue may preclude access to the site from that location unless Stride Close were to be adopted by SGC.</p> <p><u>Dwellings</u> The quantum of dwellings proposed for the site is not clear. The policy states: “Up to a maximum of 25 dwellings”, but the policy goes on to state “and a quantity of 1st and 2nd floor apartments above retail units.” The policy should clarify whether the apartments are in addition to the 25 dwellings.</p> <p><u>Landscape and Environment</u> Considering landscape, the site is within a strategic blue / green infrastructure corridor (Corridor A), and is characterised as including extensive dense native trees and scrub within the site and being close to the Severn Estuary SPA / RAMSAR / SSSI (sitting within Landscape Character Area 20 “Pilning Levels”). The policy should include reference for the need for proposals to demonstrate that they have taken into account the value of the landscape. For example, wording could be added as follows, that proposals should: “demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning Levels Character Area has been understood and how development will respond to this through design, layout, materials etc.”</p> <p><u>Summary</u> The policy is supported subject to suggested amendments being made to the policy wording to satisfy comments made above.</p>

Main “strategic” points and issues relating to general conformity with the strategic policies of the Local Plan	
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Policy H8	<p><u>Flood Risk</u> While policies H1 to H4 and H6 include criteria relating to drainage and Sustainable Drainage Systems (SuDS), there is no such reference to SuDS in policy H8. SGC, as the Lead Local Flood Authority, recommends that this policy includes similar requirements.</p> <p><u>Landscape and Environment</u> Considering landscape, the site is within a strategic blue / green infrastructure corridor (Corridor A), and is characterised as a series of small fields divided by dense native hedgerows and hedgerow trees, plus scattered areas of scrub within the site (sitting within Landscape Character Area 20 “Pilning Levels”). The whole site is designated as a Local Nature Reserve Sensitivity Focus Area. Coastal and floodplain grazing marsh applies to the whole site. The SEA (2023) Report Strategic Environmental Assessment (SEA) for the Pilning and Severn Beach Neighbourhood Development Plan 2022-11-15, policy / site H8 is shown as priority habitat (p.16) which suggests that the site is unsuitable for development. The site is also shown as Priority 1 Habitat Network (Figure 4.4, p.11 (p.17) which again suggests that the site is not suitable for development. It should be noted that 6.6 and 6.7 in the SEA report are factually incorrect.</p> <ul style="list-style-type: none"> • Natural England <u>has</u> identified H8 in their Functionally Linked Land survey. • A botanical survey is <u>not</u> a suitable methodology for identifying Functionally Linked Land. The site already has lots of data to show that <u>is</u> Functioning Linked Land. <p>This site is a proposed SNCI and is identified as Functionally Linked Land by Natural England, as the important estuary birds of the SPA designation use the H8 fields (phase 6 of surveying). There is much data re curlew use from a number of bird watchers. Curlew are identified by RSPB as the UK’s most at risk bird species (red list). Curlew have site specificity and can not be mitigated for. Thus, if this field is lost the birds are unlikely to find a replacement site. With regard to the following part of the policy: “viii) The site, in accordance with the HRA report, is considered to be a greenfield, grassland site which could be suitable to support wintering waterfowl and waders. Therefore, a botanical survey shall be undertaken to determine whether the site is suitable to support wintering waterfowl and waders and if so, it should be subject to a non-breeding bird survey to confirm its significance, followed by any necessary offsetting habitat creation.”, this is not a scientifically accurate comment. Wintering wader sites cannot be identified with a botanical survey. Off-setting habitat creation is not possible for curlew due to site specificity. There are very poor successful rates for mitigation for curlew.</p>

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	<p><u>Deliverability of the Site</u> This site’s new landowner has contacted SGC and has indicated that they no longer wish their site to be brought forward for development. The Parish Council should check that this and other sites proposed in the Plan remain available and deliverable for development.</p> <p><u>Summary</u> The proposed allocation of this site is not supported, given its value in environmental and ecological terms. If the site’s new owners do not support its allocation the site and policy will not be deliverable and should be removed from the NDP. However, should the NPSG and Parish Council decide to retain the site in the Plan, despite objections, additional wording should be introduced to address concerns raised.</p>
Policy H9	<p><u>Flood Risk</u> While policies H1 to H4 and H6 include criteria relating to drainage and Sustainable Drainage Systems (SuDS), there is no such reference to SuDS in policy H9. SGC, as the Lead Local Flood Authority, recommends that this policy includes similar requirements.</p> <p><u>Heritage</u> The Historic Environment Record suggests that the southern part of site may comprise part of a deserted medieval settlement of Ableton. This should be recognised by adding policy wording such as the following: “The site has the potential to include, heritage assets with archaeological interest, and therefore a desk-based assessment will be required and, where necessary, a field evaluation.”</p> <p><u>Transport and Access</u> No access point or route is shown on the allocated area map and so access to the site is questionable and should be resolved to ensure that the site and therefore the policy itself is deliverable. (Please also see Education comments below.)</p> <p><u>Education / School Site</u> The Education School Place Planning team have provided commentary on the Pupil projections for our Primary Schools which cover five years, looking at the period to 2028. We look at the whole planning area which includes Severn Beach and Pilning, and within this area (which includes a second neighbouring school) there is plenty of spare capacity in all year groups. Current projections (as at September 2023) show that Severn Beach Primary is likely to be full or there abouts in the reception year of entry, over the next few years. These</p>

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	<p>projections suggested an initial 28 intake (actual is 22) for September 2024 and then as each new intake group at or near 30 capacity rolls forward through the school, this will begin to impact overall numbers. Severn Beach Primary school is anticipated to grow from 141 on roll at October 2023 census, to 198 by 2028. This model includes some element of parental preference, showing that the school is popular. There has been no new development in Severn Beach for a long time, so these numbers are not being driven by additional housing. In South Gloucestershire as well as across the country we are still looking at declining birth rates for the foreseeable future.</p> <p>It should be noted that the school funding agreement (Dec 2012) states the planned capacity is 150 in the age range 4-11, however Severn Beach has a PAN of 30, representing a 1FE school with 210 places. The net capacity assessment suggests that in theory the school has capacity for 210, but not as it is currently set up.</p> <p>Either way, it appears that demand for places at the school is increasing and should the development of the Plan’s total of 245 homes proceed, this further could yield in the region of 80-90 more children. SGC would where possible seek to place pupils in existing schools, filling up any spare capacity.</p> <p>In general, the default position is to retain school playing fields whenever possible and this is in line with the Secretary of State’s policy to protect this land. The Department for Education will usually only agree to the sale of school playing fields if the sports and curriculum needs of schools and their neighbouring schools can continue to be met. Sale proceeds must be used to improve sports or education facilities and any new sports facilities must be sustainable for at least 10 years. In this case, there are further drivers which support this position:</p> <ul style="list-style-type: none"> • Should the school capacity need to increase in the future, as current projections suggest, it makes sense to retain the full area to allow full flexibility in use and layout of the site. • Whilst the available playing field size seems generous currently for the pupils on roll, the margins produced by the playing area calculation become increasingly less pronounced as the school reaches capacity and beyond. This makes it difficult to support an application for disposal of school land. • If the school wished to dispose of land to provide an access road, then permission would need to be sought from the Secretary of State for disposal under Schedule 1 of the Academies Act 2010. The field land is protected as playing field land and a consultation would need to be carried out in line with requirements for disposal of playing field land.

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	<ul style="list-style-type: none"> • In common with many authorities across the South West, it is increasingly difficult to gain approval for land disposal. Even where the case is strong and the land is surplus, alternative avenues often need to be explored, such as transfer of the land to neighbouring educational facilities, in place of the proposed disposal. <p>Therefore, in summary and taking the above under consideration, it is unlikely that SGC can support or gain permission to dispose of playing field land in this case if it is needed to access the H9 site.</p> <p><u>Landscape, Environment, Open Space and Recreation</u></p> <p>Considering landscape, the site is within a strategic blue / green infrastructure corridor (Corridor A), and is characterised as grassland with scattered areas of dense trees and scrub and the site has a Tree Preservation Order (TPO) tree (Oak) in the centre of the site. Coastal and floodplain grazing marsh applies to the whole site. The site is known as Gypsies Plat SNCI; designated for its neutral grassland and species rich hedgerows.</p> <p>The SEA (2023) Report Strategic Environmental Assessment (SEA) for the Pilning and Severn Beach Neighbourhood Development Plan 2022-11-15, policy / site H9 is shown as Priority 1 Habitat Network (Figure 4.4, p.11 (p.17) which suggests that the site is not suitable for development.</p> <p>The site’s status as an SNCI is identified in the SEA screening report. The site has been subject to a detailed ecological survey (undertaken in April 2025). While the Steering Group may not have had sight of this report, we are concerned that the site’s quality has either been overlooked, not previously identified and / or criteria required for mitigation not suggested by the SEA environmental report / Appropriate Assessment. Recent 2025 bird surveys include conservation red list species (mistle thrush, house sparrow, starling, greenfinch) and amber species (dunnock, rook, song thrush, bullfinch, wren, stock dove nest, possible tawny owl nest) and the SGC Biodiversity Action Plan lists bullfinch and song thrush. As a result of the sensitivities of the site, it seems unlikely that any Biodiversity Net Gain (BNG) required as part of the development will be deliverable on the site or affordable / viable off-site. As the site is a designated SNCI (SG38), and alongside recent survey data, it is considered unsuitable for development.</p> <p>Should the proposal require access across the school playing field, as alluded to above, the policy and proposal will need to demonstrate certainty that the playing field area lost to development can be replaced elsewhere unless an assessment has been carried out which</p>

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	<p>demonstrates that it is surplus to demand / need. Passing that requirement on to an applicant is not sufficient. Relevant policy with regard to this is NPPF paragraph 104 which states “Existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.” SGC Policy PSP44 – Open Space, Sport and Recreation also conveys the same position and states that “1) Development proposal(s) on land and buildings in existing use, last used for, or proposed for use for sport and recreation, including open space and playing fields, will not be acceptable unless: a. an assessment has been undertaken which clearly shows the land and/or the buildings are surplus to requirements; or b. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location, and the replacement provision is available for use before the existing provision and its use is lost; or c. the development is for alternative sport and recreation provision, the need for which clearly outweighs the loss.” For any development proposal involving use of the school playing field land as access to the allocated site, if Sport England is consulted as a part of the application process, Sport England’s Playing Field Policy is also likely to be relevant – see https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport/playing-fields-policy.</p> <p>While we are clear that we object to the inclusion of this site in the Plan for the reasons set out in this response, should the site remain in the Plan moving forward, the policy should include reference for the need for proposals to demonstrate that they have taken into account the value of the landscape and environmental value of the site. For example, wording could be added as follows, that proposals should: “demonstrate through ecological, landscape and visual impact assessments that the importance of the site within the Pilning Levels Character Area has been understood and how development will respond to this through design, layout, materials and mitigation etc.”</p> <p><u>Summary</u></p> <p>Based on comments made on the environmental value of the site, SGC objects to its inclusion as a site for housing. However, should the NPSG and Parish Council decide to retain the site in the Plan, additional wording should be introduced to address concerns raised.</p>
Policy TTP1	Parking

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	<p>No standards are mentioned in the policy for the provision of EV charge points (for example, how EVCP many per site). The NPSG may wish to consider whether it wishes to introduce such requirements and if so include justification for them.</p> <p>It is not clear who will have responsibility for developing the car park sites (funding etc). Therefore, the deliverability of the sites is questionable. Allocation policies need to be able to demonstrate deliverability and it would be helpful for the justification text supporting the policy to explain that the site can be delivered.</p> <p>For information, the design requirements (such as flood-compatible surfaces (e.g., porous grass with embedded matting, landscaping and biodiversity improvements) will add to the cost of land purchase. Use of CIL may make these achievable.</p> <p>Notwithstanding these comments, the policy is not considered to be in general conformity with the adopted Local Plan, in particular Core Strategy Policy CS5 “Location of Development” and it cannot therefore be supported by SGC as currently worded as an allocation site.</p> <p><u>Alternative policy suggestion to overcome concerns</u></p> <p>An alternative worded policy which provides support to proposal for car parks to serve visitors in appropriate locations where they demonstrate compliance with Policy CS5 of the Core Strategy and, where relevant, can demonstrate no harm to the Greenbelt would be a more appropriate approach and could replace policies TTP1 to TTP4 inclusive, with identification of preferred locations as a guide in the justification / supporting text for the policy. Clauses / criteria referring to the need to meet biodiversity, access, SuDS and flood risk requirements can remain in a single supporting policy. Policy wording should note the need to be of a scale acceptable within the context of Local Plan policies such as CS5.</p> <p>Reference to the need to take into account heritage assets would also need to be included and could read as follows: “Proposals which have or potentially could cause significant harm to heritage assets and their setting should minimise physical intervention, avoid materials or surfacing that would alter the character, and demonstrate how historic landscape features will be retained or respected. Long-term impacts on setting must be considered, including the potential for incremental change through material upgrades or intensification.”</p> <p><u>Summary</u></p>

Main “strategic” points and issues relating to general conformity with the strategic policies of the Local Plan	
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	<p>The policy is not considered to be in general conformity with the adopted Local Plan as currently worded but alternative wording could be introduced to help reduce conflict.</p>
Policy TTP2	<p><u>Parking</u> Location of 75 parking spaces at the allotments could cause localised problems on Beach Road. Proposals should demonstrate that they will not cause adverse impact on the local road network.</p> <p>No standards are mentioned in the policy for the provision of EV charge points (for example, how EVCP many per site). The NPSG may wish to consider whether it wishes to introduce such requirements and if so include justification for them.</p> <p>It is not clear who will have responsibility for developing the car park sites (funding etc). Therefore, the deliverability of the sites is questionable. Allocation policies need to be able to demonstrate deliverability and it would be helpful for the justification text supporting the policy to explain that the site can be delivered.</p> <p>For information, the design requirements (such as flood-compatible surfaces (e.g., porous grass with embedded matting, landscaping and biodiversity improvements) will add to the cost of land purchase. Use of CIL may make these achievable.</p> <p>Notwithstanding these comments, the policy is not considered to be in general conformity with the adopted Local Plan, in particular Core Strategy Policy CS5 “Location of Development” and it cannot therefore be supported by SGC as currently worded and as an allocation site.</p> <p><u>Alternative policy suggestion to overcome concerns</u> An alternative worded policy which provides support to proposal for car parks to serve visitors in appropriate locations where they demonstrate compliance with Policy CS5 of the Core Strategy and, where relevant, can demonstrate no harm to the Greenbelt would be a more appropriate approach and could replace policies TTP1 to TTP4 inclusive, with identification of preferred locations as a guide in the justification / supporting text for the policy. Clauses / criteria referring to the need to avoid adverse impact / harm and meet biodiversity, access, heritage, SuDS and flood risk requirements can remain in a single supporting policy. Policy wording should note the need to be of a scale acceptable within the context of Local Plan policies such as CS5.</p>

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Section / topic / policy	Comments
	<p>Reference to the need to take into account heritage assets would also need to be included and could read as follows: “Proposals which have or potentially could cause significant harm to heritage assets and their setting should minimise physical intervention, avoid materials or surfacing that would alter the character, and demonstrate how historic landscape features will be retained or respected. Long-term impacts on setting must be considered, including the potential for incremental change through material upgrades or intensification.”</p> <p><u>Summary</u></p> <p>The policy is not considered to be in general conformity with the Local Plan as currently worded but alternative wording could be introduced to help reduce conflict.</p>
Policy TTP3	<p><u>Parking</u></p> <p>No standards are mentioned in the policy for the provision of EV charge points (for example, how many EVCP per site). The NPSG may wish to consider whether it wishes to introduce such requirements and if so include justification for them.</p> <p>It is not clear who will have responsibility for developing the car park sites (funding etc). Therefore, the deliverability of the sites is questionable. Allocation policies need to be able to demonstrate deliverability and it would be helpful for the justification text supporting the policy to explain that the site can be delivered.</p> <p>For information, the design requirements (such as flood-compatible surfaces (e.g., porous grass with embedded matting, landscaping and biodiversity improvements) will add to the cost of land purchase. Use of CIL may make these achievable.</p> <p><u>Greenbelt</u></p> <p>For the allocation to be retained in the NDP as an allocated site, as per the NPPF, it needs to demonstrate that very special circumstances can outweigh the harm to the Greenbelt. Harm would include the loss of openness and visual amenity, and proposals must be balanced against the benefits of the proposed development. This demonstration cannot be left to the applicant if the policy is to remain as an allocation in the Plan as allocated sites are meant to provide certainty that they are deliverable.</p> <p><u>Alternative policy suggestion to overcome concerns</u></p>

Main “strategic” points and issues relating to general conformity with the strategic policies of the Local Plan	
Section / topic / policy	Comments
	<p>An alternative worded policy which provides support to proposal for car parks to serve visitors in appropriate locations where they demonstrate compliance with Policy CS5 of the Core Strategy and, where relevant, can demonstrate no harm to the Greenbelt would be a more appropriate approach and could replace policies TTP1 to TTP4 inclusive, with identification of preferred locations as a guide in the justification / supporting text for the policy. Clauses / criteria referring to the need to avoid adverse impact / harm and meet biodiversity, access, heritage, SuDS and flood risk requirements can remain in a single supporting policy. Policy wording should note the need to be of a scale acceptable within the context of Local Plan policies such as CS5.</p> <p>Reference to the need to take into account heritage assets would also need to be included and could read as follows: “Proposals which have or potentially could cause significant harm to heritage assets and their setting should minimise physical intervention, avoid materials or surfacing that would alter the character, and demonstrate how historic landscape features will be retained or respected. Long-term impacts on setting must be considered, including the potential for incremental change through material upgrades or intensification.”</p> <p><u>Summary</u></p> <p>The policy is not considered to be in general conformity with the Local Plan as currently worded but alternative wording and demonstration that the site will not cause harm to the Greenbelt could be introduced to help reduce conflict.</p>
Policy TTP4	<p><u>Parking</u></p> <p>Location of 75 parking spaces at the allotments could cause localised problems on Beach Road. Proposals should demonstrate that they will not cause adverse impact on the local road network.</p> <p>No standards are mentioned in the policy for the provision of EV charge points (for example, how many EVCP per site). The NPSG may wish to consider whether it wishes to introduce such requirements and if so include justification for them.</p> <p>It is not clear who will have responsibility for developing the car park sites (funding etc). Therefore, the deliverability of the sites is questionable. Allocation policies need to be able to demonstrate deliverability and it would be helpful for the justification text supporting the policy to explain that the site can be delivered.</p>

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	<p>For information, the design requirements (such as flood-compatible surfaces (e.g., porous grass with embedded matting, landscaping and biodiversity improvements) will add to the cost of land purchase. Use of CIL may make these achievable.</p> <p><u>Heritage</u> The proposed parking area lies adjacent to the Grade II listed Severn Lodge Farm and courtyard outbuildings (converted). The field also has remnants of ridge and furrow, and a bank appears on LiDAR which, according to the Historic Environment Record, is the former railway line. The site currently affords an open setting to the farmhouse and outbuildings on its south / east side, and at the minimum reference should be made to protecting the setting of the listed building through minimal intervention – will matting provide a resilient long-term solution for a car-park? Will there be pressure for other materials to be introduced, with the result being a change to the character of the field and setting of the listed building in the medium-long term?</p> <p><u>Greenbelt</u> For the allocation to be retained in the NDP as an allocated site, as per the NPPF, it needs to demonstrate that very special circumstances can outweigh the harm to the Greenbelt. Harm would include the loss of openness and visual amenity, and proposals must be balanced against the benefits of the proposed development. This demonstration cannot be left to the applicant if the policy is to remain as an allocation in the Plan as allocated sites are meant to provide certainty that they are deliverable.</p> <p><u>Alternative policy suggestion to overcome concerns</u> An alternative worded policy which provides support to proposal for car parks to serve visitors in appropriate locations where they demonstrate compliance with Policy CS5 of the Core Strategy and, where relevant, can demonstrate no harm to the Greenbelt would be a more appropriate approach and could replace policies TTP1 to TTP4 inclusive, with identification of preferred locations as a guide in the justification / supporting text for the policy. Clauses / criteria referring to the need to avoid adverse impact / harm and meet biodiversity, access, heritage, SuDS and flood risk requirements can remain in a single supporting policy. Policy wording should note the need to be of a scale acceptable within the context of Local Plan policies such as CS5.</p> <p>Reference to the need to take into account heritage assets would also need to be included and could read as follows: “Proposals which have or potentially could cause significant harm to heritage assets and their setting should minimise physical intervention, avoid materials</p>

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	<p>or surfacing that would alter the character, and demonstrate how historic landscape features will be retained or respected. Long-term impacts on setting must be considered, including the potential for incremental change through material upgrades or intensification.”</p> <p><u>Summary</u></p> <p>The policy is not considered to be in general conformity with the Local Plan as currently worded but alternative wording and demonstration that the site will not cause harm to the Greenbelt could be introduced to help reduce conflict.</p>
Policy ECGB1	<p><u>Greenbelt</u></p> <p>As written, the wording is simply a statement, rather than a policy. A policy needs to protect something or be able to be used to help determine the appropriateness or not of development proposals. A policy cannot propose that something is removed from policy or designation – the NDP either needs to do that based on evidence, or not. A planning policy can also not introduce suppositions and assumptions that a future Local Plan policy will be adopted. It has to be based on the adopted Local Plan policy framework currently adopted to pass the Basic Conditions tests.</p> <p>As the policy proposes removal of land from the Greenbelt, this cannot be supported without an adopted strategic policy enabling it and the policy is not in general conformity with the adopted Local Plan (Core Strategy and PSP).</p>
Policy ECGB2	<p><u>Greenbelt</u></p> <p>As written, the wording is simply a statement, rather than a policy. A policy needs to protect something or be able to be used to help determine the appropriateness or not of development proposals.</p> <p>As the policy proposes additional Greenbelt land, this cannot be supported without an adopted strategic policy enabling it and the policy is not in general conformity with the adopted Local Plan (Core Strategy and PSP).</p>
Policy ECGB3	<p><u>Settlement Boundary</u></p> <p>Based on the comments made about the inappropriate allocation of H1, H2 and H3 due to Greenbelt general conformity issues, and objection to the inclusion of sites H8 and H9 as allocations, the proposed amendments the settlement boundary required as a result of</p>

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	these allocations and encapsulated in policy ECGB3 should be removed. As a result, Figures 23 and 24 should be amended / removed as necessary.

Other comments / observations	
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Flood risk	We recognise the extensive work that the Steering Group has done on flood risk issues and the dialogue held with ourselves and the Environment Agency to help ensure that national policy requirements and tests have been carried out, in addition to the engagement by the Steering Group of specialist consultants to assist with the technical requirements of the process. Policies in the Plan adequately deal with the need to test further and find solutions to addressing flood risk as part of the planning application process in relation to each proposed housing site. Appendix 3 reproduces the Statement of Common Ground agreed between SGC and the NPSG which clearly sets out the reasoning, process and requirements of technical evidence base material that had to be undertaken. It is helpful that the NPSG has published this alongside the Regulation 14 Plan. The Statement sets out the important differences in approach which enable the Neighbourhood Plan to consider development potential in Flood Zones 2 and 3, while the Local Plan has “discounted” the Pilning and Severn Beach area through its own flood risk assessments. In short, the SGC Local Plan process has to consider the whole of the district in terms of risk from flooding and, naturally, has the ability to identify other parts of the district outside of Pilning and Severn Beach at lower risk from flooding to consider for “strategic” housing development. The Pilning and Severn Beach neighbourhood area, however, being wholly within Flood Zones 2 and 3 can only consider its own area and within the context of seeking to address the local needs housing identified in its Housing Needs Assessment. Paragraph 4.1 of the Statement states:

Other comments / observations	
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	<p>4.1 P&SBNPSG has evidenced a need for a number of new dwellings in the Parish of Pilning & Severn Beach through Housing Needs Assessment and its surveys of residents and businesses. Agreement was also reached regarding SGC's approach to housing within the Neighbourhood Plan Area in the Local Plan which does not seek to allocate housing due to being able to demonstrate lower flood risk areas across the district. SGC does however support the approach taken by the NPG to apply the Sequential Test to the Neighbourhood Plan Area (NPA). The argument for this presented by the group is that the Housing Needs Assessment outlines a need arising within the NPA and therefore the Sequential Test should be applied to the same area.</p>
Deliverability and viability of sites	Planning policies should be deliverable. For allocated housing sites this means that there should be a reasonable degree of certainty that they can be developed. With regard to the proposed sites in the Plan, given that additional flood protection / mitigation engineering solutions could add cost to development of a site, the NPSG should consider, if it has not done so already, whether the sites proposed can be delivered with the scales of housing and other measures proposed.
Policy TPP5	<p>The NP seeks to support improvements to the walking and cycling networks within and out of the Parish. This is commendable. However, it should be noted that:</p> <ul style="list-style-type: none"> • The proposed A403 routes are not on the Local Cycling and Walking Infrastructure Plan (LCWIP). This will mean they are quite far down the funding priority list for SGC. • Relatively sparse population could make the business case challenging. <p>However, if the Parish Council is in receipt of CIL, such projects could be infrastructure that is prioritised and funded in whole or in part through CIL if receipts provide sufficient funds.</p>
Policy CF2	Support from loss of local facilities is commendable in the NDP. However, while iii) states that 'existing facilities shall be protected from loss' and there may be a presumption in favour of their retention, as has been found elsewhere, demolition is permitted development in the absence of a statutory designation to protect them. Therefore, this policy could be challenging to see work fully in practice and

Other comments / observations	
Section / topic / policy	Comments
	expectations should be managed. It is also worth noting other limitations of this type of policy, with some changes of use under the General Permitted Development Order not requiring planning permission.
Policy LCD1 and Figure 6	LCD1 proposes separation of employment areas and dwellings. These are not considered as necessary to the proposed extent given other existing policy protections such as Core Strategy CS5 and Settlement Boundaries are in place to help ensure that inappropriate development does not take place in such areas. An alternative approach could be to amend the policy to become an anti-coalescence or local gap policy, amending the current LCD1 wording and Figure 6 map to defend the critical and narrowest part of the existing gap between the employment areas (from the northern boundary of the Safeguarded Area for Economic Development, see Core Strategy Policy CS12) and the existing built extent of Severn Beach adjacent to the A403 Severn Road and bound on the eastern side by Govier Way.
Figure 1, p.10	The whole of the formally agreed Plan Area must be shown and preferably on an Ordnance Survey (OS) map base with relevant PGSA licence number obtained from Ordnance Survey direct. For example, as shown in the Plan Area approval notice here https://beta.southglos.gov.uk/static/75c3f0fd469dad97ea48572f5f00cf09/PSB-Neighbourhood-Area-Notice-1.pdf The licence number and the appropriate copyright wording (sourced from OS) should appear below the map or at the start of the Plan to cover all OS base maps used in the Plan. Should the parish council not have a PGSA number already, please see the following link to obtain one. https://www.ordnancesurvey.co.uk/customers/public-sector/public-sector-geospatial-agreement
CIL 123 list	Reference to SGC's Regulation 123 list is no longer valid. This has been replaced by the Infrastructure Funding Statement and wording in the NDP should be amended accordingly.
Map below paragraph 4.1.8	Assuming the map has a copyright statement within its box / boundary, it is not legible and should be so on this map and any others in the Plan.
Figure 2	Figure 2 does not cover the extent of the entire Parish.

Other comments / observations	
Section / topic / policy	Comments
Paragraph 8.4.7	With regard to the text in paragraph 8.4.7 which states that SGC has provided assurances that the spine road extension will be included in the new Local Plan, SGC has included a commitment in the new Local Plan of <i>continued joint working with partners to consider the spine road</i> .
Paragraphs 8.62 – 8.65	The wording of paragraph 8.6.2 (and subsequent paragraphs) is a little misleading. The wording in 8.6.2 implies that any perceived lack of infrastructure or investment in the local community is the fault of SGC. As the NPSG may be aware, SGC has previously attempted to review the consent, but as local planning authority SGC has little choice other than to follow the 1957/58 consents.
Paragraph 8.7.18	Paragraph 8.7.17 refers to a Statement of Common Ground relating to Greenbelt. We do not consider that such a Statement is necessary, particularly in light of the work already done by the Steering Group and comments provided in this response. SGC are unable to sign-up to the current version of the draft Statement.
Policy LCD2	LCD2 states that there is support for creation of a truck stop near the M49 junction, away from residential areas, with proper amenities. Such a roadside service and lay-over area will be supported in the Parish if it is located at the new M49 junction, or in a location within Severnside, which can be easily accessed from the M49 junction without affecting existing residential communities and without encouraging additional HGV movements on local roads.
Emerging Local Plan terminology	<p>It is important to get terminology relating to the Local Plan correct.</p> <p>We suggest that terminology referring to the emerging new Local Plan is consistent throughout the Plan. For example, paragraphs 3.1.9 and 3.1.11 both refer to the emerging new Local Plan but 3.1.9 uses the term “emerging Local Plan”, whereas 3.1.11 uses the term “NEW Local Plan”. It would probably be most appropriate to use the consistent term “emerging new Local Plan” here and elsewhere where relevant.</p> <p>Paragraph 3.1.15 states that the “SGC Local Plan” is the starting point for the P&SB NP. This is correct, but it is important that the NPSG, Qualifying Body and readers of the Plan are clear that the current Local Plan comprises the adopted Core Strategy and PSP. The following wording might better describe the policy context that the paragraph is looking to convey. The suggested wording also leads into and replaces some of the wording of paragraph 3.1.16 (the first sentence). “The strategic policies of the “development plan” form the</p>

Other comments / observations	
Section / topic / policy	Comments
	<p>strategic policy framework and context within which the Neighbourhood Plan and its policies must be developed. In the P&SB area, the development plan currently comprises the adopted SGC Core Strategy and PSP. Should this Neighbourhood Plan be made (adopted) following the examination and referendum, it will also become part of the development plan in the P&SB area. The development plan provides the policy framework which informs planning decisions made by SGC as the Local Planning Authority, alongside other material considerations. Other material considerations which must be considered include (but are not limited to) national planning policy....”.</p>

A2c NPSG RESPONSE SOUTH GLOS COUNCIL FEEDBACK

At the meeting arranged between the NPSG and SCC Strategic Planning at their Yate Offices on 24th November to discuss SGC's feedback, the NPSG verbally gave the following responses (blue text) to the points raised in A2a above (black text)

A meeting was held

P3. Need to establish the timing of the LP against that of the NP. **Prior to the meeting Patrick Conroy had estimated this to be around the end of 2026**

P4 Green Belt and Site Allocations

On this basis, to meet the Basic Conditions, the Neighbourhood Plan is likely to need to explain how the hiatus between the Neighbourhood Plan being made and the Local Plan being adopted will be managed. **I thought we'd done this.** SGC: we do not consider that the Plan adequately conveys this. **Can we agree to what this needs to say do we need to explain exactly what the review would comprise of**

From the policy wording for H1-H3, it is assumed that the sites will not be rural exceptions sites. if the affected sites as proposed are to remain in the NDP, will be for site allocations to be made in the NDP for rural exceptions housing (see Core Strategy Rural Housing Exceptions Policy CS19). This would also mean retaining the existing boundary of the Greenbelt and therefore ECGB1 could be removed from the NDP. **Why? The NPPF allows NPs to make changes to the green belt?**

Our options are as alternatives to the existing approach, to:

1. Stick with plan A and get the necessary content in.
2. What is the strength of the argument to leave the three sites out of the plan and allow them to be considered as Grey Belt in the planning process as established in the NPPF. If we were to leave the sites out but describe the future intent to revise the NP after the local plan is made, do we need to go through Reg 14 again or just examination? And is another referendum needed?
3. Delay the NP until the local plan is made – after 2026 – this is too far away
4. Declare the sites as rural exception housing sites and retain the existing boundaries. If we take this option, can we include an option that'll allow the Parish to change the GB boundaries and settlement boundaries once the LP is made? However, for rural exception housing sites the expectation is that most of the housing must be affordable. – we need market housing for the sites to be viable

We don't believe the car parks are needed to come out of green belt, or the hook affects ECGB2 adding land

Policy H1 Page 7

How can it be determined if land is Grey Belt. Who can do this and when?

The Green Belt arguments are the same as before.

If we modify the content of the NDP in areas suggested by SGC e.g. Landscape, Environment, Open Space and Recreation, and separately the Green Belt can be addressed by 1 to 4 above,

would the SGC objection for this site fall away. H2 and H3 don't have the same environmental and recreational value argument.

Landscape, Environment, Open Space and Recreation

Considering landscape, the site is within a strategic blue / green infrastructure corridor (Corridor A), is a public open space, and is characterised as including dense native hedgerows and trees to boundaries and being within a coastal and floodplain grazing marsh (sitting within Landscape Character Area 20 "Pilning Levels"). [Ensure we identify these](#)

The policy should include reference for the need for proposals to demonstrate that they have taken into account the value of the landscape. For example, wording could be added as follows, that proposals should: ["demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning Levels Character Area has been understood and how development will respond to this through design, layout, materials etc."](#)

a "good area" of public green space. [This needs to be better defined e.g. specify an area.](#)

In regard to replacement – [need to quote NPPF paragraph 104 which says 'b\) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.'](#) SGC Policy PSP44 says similar. if Sport England is consulted as a part of the application process, Sport England's Playing Field Policy is also likely to be relevant.

Passing that requirement on to an applicant is not sufficient. [But the applicant is the Parish Council who would need to follow the process. The NP cannot negotiate land deals](#)

This site is important for wider recreation. If the area were lost it would impact on recreation pressure on the estuary as it is a current SANGs (suitable alternative natural green space) and will continue to be important for the wider area, forming part of a mitigation strategy for habitat proposed in the emerging new Local Plan. If lost to development, therefore, a replacement SANGs of the same value and with equal potential should be identified in the policy. [The NDP can include this requirement but cannot specify the site, that will be down to the PC and they will need to make alternative provision.](#)

Policy H2

Green Belt same as H1 above.

Landscape and Environment same as H1

Heritage need to identify heritage sites related to this site e.g. St Peters Church and Cranmoor Villa. Although this is more relevant for the allotment parts of H3.

8.1.36 of the NDP [need to amend to reflect where heritage sites are potentially affected these have been addressed in the policy](#)

Introduce wording to the policy to say: "Development must respect the wider setting of nearby heritage assets, particularly where flood-resilient design may introduce scale or form that is out of keeping with the local character. Proposals must demonstrate how cumulative impacts—especially in relation to allocations H2, H3 and H4—have been considered and mitigated to preserve the significance and setting of designated assets."

Policy H3

Green Belt same as H1 above.

Landscape and Environment same as H1

Heritage same as H2

Policy H4

Heritage this is considered to be more significant than H2 and H3. It suggests an inclusion stating:

“Development proposals must carefully consider the site's proximity (approx. 40m) to Grade II listed St Peter's Church, its gates, and Cranmore Villa. The layout, scale, height, and form of development should: a) Avoid harm to the openness of land to the rear of these assets. b) Preserve key views from the listed buildings and along the footpath between them. c) Reflect the established grain and density of surrounding development to prevent a cramped or incongruous appearance. A heritage statement must be submitted to assess the significance of the assets and the contribution of their setting, and should inform the design from the outset. Proposals must demonstrate how cumulative impacts—especially in relation to allocations H2, H3 and H4—have been considered and mitigated to preserve the significance and setting of designated assets.”

Landscape and Environment same as H1

Policy H5

Flood Risk While policies H1 to H4 and H6 include criteria relating to drainage and Sustainable Drainage Systems (SuDS), there is no such reference to SuDS in policy H5. SGC, as the Lead Local Flood Authority, recommends that this policy includes similar requirements. Include similar requirements

Heritage Part of this allocated site appears to be on the Medieval settlement and a building is shown on the Tithe Map which may date to the Medieval period. As such, there is a heritage issue on the site and so it would be prudent to add a criteria to the policy such as: “The site has the potential to include heritage assets with archaeological interest, and therefore a desk-based assessment will be required and, where necessary, a field evaluation.”

Landscape and Environment same as H1

Policy H6

Landscape and Environment same as H1

Policy H7

Flood Risk as H5

Safeguarding Area for a Second Track

“In the event a potential need to run a 3 train per hour service comes into fruition...” which may be problematic as confirmation of an increased train frequency coming forward may not align with the timescales for development proposals on the site coming forward. SGC would recommend that this caveat be removed so that the land for a second track is safeguarded in any event. [We propose to remove this caveat.](#)

[Parking Standards](#) we will clarify throughout NDP

[Dwellings](#) [The apartments are additional to the 25](#)

[Landscape and Environment](#). [As before](#)

Policy H8

[Flood Risk as H5](#)

[Landscape and Environment](#) We will investigate challenges to SEA and HRA via the consultants AECOM.

[Land ownership](#). The extent and completion of any sale is not clear, the NP cannot get involved in land change of ownership or disputes particularly at this late stage.

Policy H9

[Flood Risk as H5](#)

[Heritage as per H5](#)

[Transport and Access](#) No access point or route is shown on the allocated area map and so access to the site is questionable and should be resolved to ensure that the site and therefore the policy itself is deliverable. [There are access options available through Abbott Road, Denny Isle Drive and Church Road, the access points chosen will be defined in the detailed plans at the planning stage.](#)

[Education / School Site](#) This is not in the NDP and is not part of the consideration got this site. [Needs to be removed from the submission](#)

[Landscape, Environment, Open Space and Recreation](#) Open space and recreation should not be included here.

To address SNCI, etc we propose to include “demonstrate through ecological, landscape and visual impact assessments that the importance of the site within the Pilning Levels Character Area has been understood and how development will respond to this through design, layout, materials and mitigation etc.” Does this allow the objection to fall away?

Policy TTP1

[Parking](#). [We don't propose EV charging at this location.](#)

We propose to modify the wording in the policy to:

- Provide justification text supporting the policy to explain that the site can be delivered.

- To demonstrate compliance with Policy CS5 of the Core Strategy and, where relevant, demonstrate no harm to the Greenbelt.
- need to take into account heritage assets

Will these modifications allow SGC to consider it is in general conformity with the Local Plan and the objection will therefore fall away.

Policy TTP2

Parking We don't propose EV charging at this location.

Location of 75 parking spaces at the allotments could cause localised problems on Beach Road. Proposals should demonstrate that they will not cause adverse impact on the local road network. **The car park is intended to relieve issues on Beach Road, justification has been provided by the PC in a current planning application.**

We propose to modify the wording in the policy to:

- Provide justification text supporting the policy to explain that the site can be delivered.
- To demonstrate compliance with Policy CS5 of the Core Strategy and, where relevant, demonstrate no harm to the Greenbelt.
- need to take into account heritage assets

Will these modifications allow SGC to consider it is in general conformity with the Local Plan and the objection will therefore fall away.

Policy TTP3

Parking We don't propose EV charging at this location.

Greenbelt

For the allocation to be retained in the NDP as an allocated site, as per the NPPF, it needs to demonstrate that very special circumstances can outweigh the harm to the Greenbelt. Harm would include the loss of openness and visual amenity, and proposals must be balanced against the benefits of the proposed development. This demonstration cannot be left to the applicant if the policy is to remain as an allocation in the Plan as allocated sites are meant to provide certainty that they are deliverable. **We propose to make clear in the policy the benefits and the limited harm to the green belt and use the wording suggested.**

We propose to modify the wording in the policy to:

- Provide justification text supporting the policy to explain that the site can be delivered.
- To demonstrate compliance with Policy CS5 of the Core Strategy and, where relevant, demonstrate no harm to the Greenbelt.
- need to take into account heritage assets

Will these modifications allow SGC to consider it is in general conformity with the Local Plan and the objection will therefore fall away.

Policy TTP4

Parking We don't propose EV charging at this location.

Location of 75 parking spaces..... This is a cut and paste error from TTP2 and does not apply to this policy.

We propose to modify the wording in the policy to:

- Provide justification text supporting the policy to explain that the site can be delivered.
- To demonstrate compliance with Policy CS5 of the Core Strategy and, where relevant, demonstrate no harm to the Greenbelt.
- need to take into account heritage assets (identifying Severn Lodge Farm and courtyard outbuildings (converted). The field also has remnants of ridge and furrow, using the suggested wording)

Policies ECGB1 to ECGB3

These all relate to issues in the previous policies (mainly green belt) which if addressed may remove these comments?

Other comments / observations

These will be considered individually and amendments made to the NDP as appropriate. Clarification needed on LCD2 policy intent?

A2d NOTES FROM SOUTH GLOS COUNCIL/NPSG MEETING

Below are the notes taken and agreed from the meeting of 24th November 2025.

Note of meeting held on 24th November 2025 between South Gloucestershire Council and Pilning and Severn Beach Neighbourhood Plan Group

Attendees:

Patrick Conroy – South Gloucestershire Council

Danny Dixon – South Gloucestershire Council

Stuart Todd – Stuart Todd Associates obo South Gloucestershire Council

Richard Edwards – Pilning and Severn Beach Neighbourhood Plan Steering Group

Gary Sheppard – Pilning and Severn Beach Neighbourhood Plan Steering Group

Nick Davies - Pilning and Severn Beach Neighbourhood Plan Steering Group

Notes of Meeting

The meeting covered the SGC Reg 14 response. The NPSG gave a verbal reply to each point raised and identified how these were being considered and the likely resulting changes to be made to the NDP. Further discussion ensued around the following:

1. Green Belt approach

- a. Discussed the options available to the group depending on whether the NP progresses ahead of the new LP being adopted i.e. the NP has to demonstrate conformity with the adopted Core Strategy and PSP DPD.
- b. If NP seeks to retain all the proposed allocations and is presented for examination ahead of the new LP this could require the group to think about the need for Grey Belt evidence. Without funding available, the Grey Belt reviews will likely need to be delivered by the relevant developers. SGC does not have a methodology, but can investigate the availability of one from WECA.
- c. Alternatively, if the NP examination follows the adoption of the new LP this will allow the group to use the LP Policy hook to amend GB.
- d. Discussed the option of a pause however this also presented issues as the situation outside of the NP may change, evidence becomes increasingly out of date, and the LP as adopted may differ from the submission version
- e. Agree for Stuart/Danny to work with the group on Policy wording for Reg 15 draft depending on the route the group chose to take
- f. Understood that site allocations, policies map, settlement boundary and Green Belt policy will likely need amending depending on the approach taken.
- g. Using rural exceptions was not considered appropriate due to the need for it to deliver near 100% affordable housing and its application could be seen as bending the guidance of the NPPF.
- h. Any need to revise the NP or its policy after the making of the LP is likely to require repeat of the Reg 14 consultation.

2. Site allocations

- a. Suggested wording from SGC Reg 14 response welcomed and will be considered and added to the plan.
- b. **H1**
 - i. Stuart/Danny to support the group with Reg 15 policy wording to reflect playing pitches on site so in conformity with NPPF and PSP44. To take into consideration the usability of existing assets, e.g. tennis court and sports pitches
 - ii. SGC advised the group to review NPPF and PSP44.
 - iii. The above is subject of course and will depend on the approach taken to the Green Belt.
 - iv. Although for this site and H3 allotments, it was acknowledged that alternative sites could not be specified for commercially sensitive reasons, an indicative view of site options could be included in order to support deliverability.
- c. **H8**
 - i. Discussed approach to landownership – suggest the group try and contact the landowner. Although, at this late stage of the process it is not appropriate for the NPSG to resolve land ownership disputes or manage changes in ownership of land that has already gone through the evaluation process, The group may wish to consider how changes of landownership may impact deliverability of sites
 - ii. SGC Officers noted that the site is a proposed SNCL.
- d. **H9**

- i. Briefly discussed transport access and revised wording to the policy to make it more clear where indicative access points are.
- ii. Advised that the site is 94% covered by an SNCI designation.
- iii. Danny to share the Ecological Survey undertaken by colleagues in April 2025 which indicates where the site still has a high ecological value or where value is eroded. Also to locate and share the report that made the original designation with a map of location.
- iv. P&SBNPG understand that the landowner is undertaking their own survey – it was suggested that the group get in contact once the results of this survey are available.
- v. With the current evidence presented it is SGC advice that the site should still be removed from the plan.

e. H7

- i. The group are happy to remove caveat as recommended in Reg 14 SGC comments
- ii. The group will consider by discussing with the owner/developer, setting minimum/maximum dwelling capacity figures to cover both housing and apartments on site.

3. Car Parking policies

- a. The group discussed their proposed approach in response to SGC comments
- b. SGC asked the group to consider how these will be delivered and managed and whether any mechanisms were in place – SGC Policy Officers understanding is that these are not currently on the SGC Capital programme and no plans in place for SGC to deliver or run these. The NPSG agreed as things currently stood, they would likely need to be delivered by the Parish as is occurring already at TTP2.

4. LCD2 (page 32)

- a. The NPSG was unsure what this comment was related to. Danny was to check this with Simon Guy.
- b. Post-meeting, Danny has spoken to transport colleagues who confirmed that no objection exists to the policy and that the comments outlined a preference for its location to be in proximity to the motorway network at J49 or within the Severnside employment area.
- c. It was acknowledged that a current application (P24/01832/F) is being determined by the council however the comments are only reflective of the Reg 14 plan and the application is dealt with separately.
- d. To confirm the planning application P24/01832/F does not fall within the SNCI designation.

5. SEA and HRA

- a. SGC advised the group to get in contact with AECOM/Locality to enquire as to whether an update is covered under the previous package considering the SEA and HRA are ongoing processes that should reflect updates to the NP.
- b. SGC raised that there were no references to H9 being an SNCI within the SEA and HRA. The NPSG commented that no SNCI reports had been seen or were

publicly available (see 2diii). The NPSG will investigate whether these can/should be updated to reflect this.

SGC Officers have added the following to outline the next steps and process:

- Post Reg 14 review of the plan
 - SGC officers with Stuart as our point of contact for the group are happy to support the group with any redrafting of policies. Based on the discussion we believe the following may be of particular interest:
 - Green Belt Policy and supporting text
 - Site Allocation H1 – Recreation use (NPPF para 104 and Policy PSP44
- Reg 15 - Submission of the plan and evidence base
 - The revised Plan
 - Basic Conditions Statement
 - Consultation Statement which will include SGC's Reg 14 comments and the NPSG's response/conclusions
 - Updated (if appropriate) SEA and HRA (as well as the SEA Screening and Statement of Determination – to be provided by SGC)
 - This will require sign off by the Parish Council as the Qualifying Body.
- Reg 15 – SGC undertakes a Legal Compliance check of information submitted.
- Reg 16 –minimum of 6 week consultation
 - Organised and run by SGC on behalf of the examiner.
 - As explained yesterday this is where we would formally update our Reg 14 position and outline where issues previously raised have been resolved and where any outstanding objections remain.
 - SGC would expect the statutory bodies to do the same.
 - During this consultation SGC appoints an examiner.
- Reg 17 – Examination of the plan
 - This is usually a written only examination however the examiner can request oral sessions.
- Reg 18 – Examiners Report
 - This will likely conclude that modifications are required and the justification for them
 - The Group and SGC will need to decide whether to proceed with the Plan inc. modifications or not.
 - This will also outline the extent of the referendum area – this is likely to be the parish area but in some cases the examiner with justification may outline that a wider area be used.
 - SGC publish 'the decision statement'
 - SGC sets a date for the referendum
- Reg 19 – The NP is 'made'
 - This happens after the referendum and requires a full council decision.

A2e SUMMARY OF AMENDMENTS CONSIDERED FOR THE NDP

Grey Belt:

Due to the change in the NPPF with regard to Grey Belt opportunities, Policies H1 to H3 will be modified to make the case for them to be considered as such. This will be presented as a Grey Belt review for the sites which will consider them against the Grey Belt criteria in the NPPF. The NPSG will consider agents/landowners in making the review and they shall have the opportunity to provide supporting information to the review at planning stage. Grey Belt approach will become the first consideration in each of these site allocation policies, before options to remove land from Green Belt. The Grey Belt content will support the case for when its consideration will be made at the planning application stage. Below is the relevant content from the NPPF, which will be addressed for Policies H1 to H3. The content can be assisted by use of examples of recent local planning applications where grey belt status has been accepted.

Grey belt: For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.

143. Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to preserve the setting and special character of historic towns; and

7 The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.

Green Belt:

Policies H1 to H3 will be modified to explain in greater detail how the hiatus between the Neighbourhood Plan being made and the Local Plan being adopted will be managed. The intention is to get the NP to pass examination and be made and to avoid a situation of a later revision and reissue of the NP. No development of these sites would commence until the Local Plan is made and delivers the policy hook. If the policy hook does not materialise, then these sites cannot be delivered on the basis of their removal from the Green Belt alone.

Policy H1

Green Belt and Grey Belt amendments as detailed above.

Include content which states ‘At planning application, proposals should demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning

Levels Character Area has been understood and how the development will respond to this through design, layout, materials etc.’.

Replace ‘the development retains a good area of public green space’ with ‘the development retains a minimum of one third of the existing green space’

Regarding replacement change wording to say. ‘Unless an assessment is carried out which demonstrates that it is surplus to demand / need, the loss resulting from the proposed development shall be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. Although unable to disclose alternative sites within the plan for reasons of commercial confidentiality, the NPSG has assurances of land availability at other Green Belt land locations in the Parish’.

Policy H2

Green Belt and Grey Belt amendments as detailed above.

Include content which states ‘At planning application, proposals should demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning Levels Character Area has been understood and how the development will respond to this through design, layout, materials etc.’.

Add to policy. “Development must respect the wider setting of nearby heritage assets of St Peter’s Church, its gates and Cranmoor Villa, particularly if flood-resilient design may introduce scale or form that is out of keeping with the local character. Proposals must demonstrate how cumulative impacts—especially in relation to this allocation, and H3 and H4 have been considered and mitigated to preserve the significance and setting of designated assets.”

Policy H3

Green Belt and Grey Belt amendments as detailed above.

Include content which states ‘At planning application, proposals should demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning Levels Character Area has been understood and how the development will respond to this through design, layout, materials etc.’.

Add to policy. “Development of the part of the site occupied by the allotments must respect the wider setting of nearby heritage assets of St Peter’s Church, its gates and Cranmoor Villa, particularly if flood-resilient design may introduce scale or form that is out of keeping with the local character. Proposals must demonstrate how cumulative impacts—especially in relation to this allocation, and H2 and H4—have been considered and mitigated to preserve the significance and setting of designated assets.”

Amend wording of vii) to include: ‘For the allotments part of the site, unless an assessment has been carried out which demonstrates that they are surplus to demand / need, the loss resulting from the proposed development shall be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. Although unable to disclose alternative sites within the plan for reasons of commercial confidentiality, the NPSG has assurances of land availability at other Green Belt land locations in the Parish’.

Policy H4

Amend to include: ‘Development proposals must carefully consider the site's proximity (approx. 40m) to Grade II listed St Peter's Church, its gates, and Cranmore Villa. The layout, scale, height, and form of development should: a) Avoid harm to the openness of land to the rear of these assets. b) Preserve key views from the listed buildings and along the footpath between them. c) Reflect the established grain and density of surrounding development to prevent a cramped or incongruous appearance. A heritage statement must be submitted to assess the significance of the assets and the contribution of their setting, and should inform the design from the outset. Proposals must demonstrate how cumulative impacts—especially in relation to allocations H2, H3 and H4—have been considered and mitigated to preserve the significance and setting of designated assets.’

Include content which states ‘At planning application, proposals should demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning Levels Character Area has been understood and how the development will respond to this through design, layout, materials etc.’.

Policy H5

Include content which states ‘At planning application, proposals should demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning Levels Character Area has been understood and how the development will respond to this through design, layout, materials etc.’.

Add the following heritage related content: “The site has the potential to include heritage assets with archaeological interest (appears to be on a medieval settlement with a building shown on a Tithe map), therefore a desk-based assessment will be required and, where necessary, a field evaluation.”

Add following text to align with other site policies: ‘Plans are provided with details of natural drainage solutions (i.e., SuDS) within the design.

Policy H6

Include content which states ‘At planning application, proposals should demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning Levels Character Area has been understood and how the development will respond to this through design, layout, materials etc.’.

Policy H7

Add following text at xii) to align with other site policies: ‘Plans are provided with details of natural drainage solutions (i.e., SuDS) within the design’.

Amend ix) from 'In the event a potential need to run a 3 train per hour service comes into fruition...' to read 'The potential need to run a 3 train per hour service is recognised, where development....'

To provide general content on Parking Standards to the NDP, add to 8.1.30 'Parking Standards should align with those identified in the adopted SGC Policies, Sites & Places Plan. Parking requirements are stated in the policies as 2 spaces per dwelling sized at 2 to 4-bedroom'. In the event that 1-bedroom or 5-bedroom dwellings are accommodated, these should have respectively 1 and 3 parking spaces. Visitor parking spaces should accord with the SGC Policies, Sites & Places Plan of 0.2 spaces per dwelling.'

Add to iv) ', 1 parking space is required for dwellings of 1-bedroom. Parking for dwellings and dwelling visitors should not be met from within the minimum 30 space public car parking'

For clarity on dwelling numbers amend the first sentence of policy H7 to read 'up to a maximum of 25 dwellings, plus an additional quantity of up to 40 apartments above retail units and parking areas'.

Include content which states 'At planning application, proposals should demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning Levels Character Area has been understood and how the development will respond to this through design, layout, materials etc.'

Policy H8

Add following text at ix) to align with other site policies: 'Plans are provided with details of natural drainage solutions (i.e., SuDS) within the design'.

Landscape and Environment: We will investigate challenges to SEA and HRA via the consultants AECOM. AECOM considers that the HRA is not affected by SNCI but the SEA can be amended. The SEA was amended and reissued to reflect the SNCI designation on 2nd February 2026.

Include content which states 'At planning application, proposals should demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning Levels Character Area has been understood and how the development will respond to this through design, layout, materials etc.'

Policy H9

Add following text at ix) to align with other site policies: 'Plans are provided with details of natural drainage solutions (i.e., SuDS) within the design'.

Add the following heritage related content: "The site has the potential to include heritage assets with archaeological interest (the southern part of site may comprise part of a deserted medieval settlement of Ableton), therefore a desk-based assessment will be required and, where necessary, a field evaluation."

Replace the last sentence of v) with: 'Access options from existing roads are known to be available from Abbott Road, Prospect Road, Denny Isle Drive and Church Road. The selected access points shall be shown in a detailed plan at the planning stage.'

To address SNCI, etc we propose to include “At planning application, proposals should demonstrate through ecological, landscape and visual impact assessments that the importance of the site within the Pilning Levels Character Area has been understood and how development will respond to this through design, layout, materials and mitigation etc.”

Add following text to address SNCI. Part of the site has been identified as a Site of Nature Conservation Interest (SNCI). The content of the survey from the original SNCI designation from 1985 and a survey of 22nd and 27th April 2025 shall be considered in the above measures.

Policy TTP1

To address both the need and deliverability of the four proposed visitor parking sites it is proposed that 8.4.13 is amended to add:

After ‘resident’s properties’. ‘In 2025, the NPSG undertook parking surveys in Severn Beach and at New Passage which provided evidence of the need for visitor parking solutions in those areas’.

After ‘Shaft Road’ add ‘Approaches to SGC for support in delivering these car parks has to-date been fruitless as they are not identified in the SGC Capital programme. Therefore, delivery will need to come via the Parish Council and with use of CIL money. The Parish Council has already commenced work in bringing forward TTP2 in this way.’

Add to the policy:

viii) The design and the materials used in the construction of the car park present no visual harm to the area and therefore limits the impact on neighbouring properties, where there are no identified heritage assets. There is no recognised need for electric vehicle charging points, which are addressed elsewhere in policy H7.

Amend ii) replacing ‘one way road’ with ‘single lane gated entrance’

Policy TTP2

Amend iv) replacing ‘one way road’ with ‘single lane gated entrance’. Also add ‘Impact on residents and road users of Beach Road have been considered, with the Parish Council having consulted residents and gained their support for making Beach Road one-way.’

Add vii) There is no recognised need for electric vehicle charging points which are addressed elsewhere in policy H7.

Policy TTP3

Add vii) The design and the materials used in the construction of the car park present no visual harm to the area and therefore limits the impact on neighbouring properties, where there are no identified heritage assets. Additionally, the proposal shall demonstrate no harm to the Green Belt.

Add viii) There is no recognised need for electric vehicle charging points which are addressed elsewhere in policy H7.

Policy TTP4

Add vi) The design and the materials used in the construction of the car park present no visual harm to the area and therefore limits the impact on neighbouring properties.

Add vii) The site maintains and protects the open setting to the Grade II listed Severn Lodge Farm and courtyard outbuildings (converted) on its south / east side. Additionally, there shall

be no impact on the remnants of ridge and furrow in the adjacent field. Additionally, the proposal shall demonstrate no harm to the Green Belt.

Add viii) There is no recognised need for electric vehicle charging points which are addressed elsewhere in policy H7.

A3 THE ENVIRONMENT AGENCY

A3a THE ENVIRONMENT AGENCY FEEDBACK

Thank you for consulting us on the above neighbourhood plan, we would like to make the following comments.

Flood risk

We note the challenges faced within the Neighbourhood Plan area with the allocation of sites due to the large areas within flood zones 2 and 3. It should be noted that the Environment Agency would object to any “more vulnerable” use or intensification of vulnerable uses within the flood zones unless it can be proven that the development would be safe for its lifetime without increasing flood risk elsewhere.

We welcome the approach identified within the site allocation policies outlining that development would need to follow both the Sequential test and Exception test.

We would appreciate to be involved in any future consultations or discussions relating to development within this area.

If you have any queries or wish to discuss anything further please do not hesitate to contact me.

Please note this opinion is not binding should new information come to light and does not preclude the Environment Agency from making further comments or representations at a later date.

Post-Regulation 14 Consultation, on 22nd December 2025, the EA emailed the NPSG to ask, regarding the Level 2 Strategic Flood Risk Assessment (SFRA) prepared by JBA, what model files were produced and for clarification of the Sea Level Rise (SLR) allowances used in the tidal data.

A3b NPSG RESPONSE

The NPSG thanks the EA for their feedback and notes the challenges faced by the allocation of sites within flood zones 2 and 3. The NPSG would like to reassure the EA that the NP will continue to demonstrate that the developments in these flood zones will be safe for their lifetime without increasing flood risk elsewhere. Developments will need to follow both the Sequential test and Exception test and at planning application stage must provide an appropriate and conforming site specific flood risk assessment.

The NPSG will, as necessary, continue to involve the EA in any future consultations in the development of the Neighbourhood Plan and understands that once the plan is made consultation with the EA will be necessary at planning application stages.

With regard to the EA's request of 22nd December 2025 concerning modelling, the NPSG provides the following statement of clarification:

Para 4.3.2 of the Level 2 SFRA identifies that the modelling is based on the ASEA modelling undertaken by Mott MacDonald. Mott MacDonald's "ASEA Tidal Inundation Modelling Hydraulic Modelling Report - December 2024" advises that the modelling assumes 70th percentile (higher central) SLR allowances. Planning guidance states "for flood risk assessments and strategic flood risk assessments, assess both the higher central and upper end allowances." For reasons that have not been divulged to the NPSG the ASEA modelling did not consider the upper end allowance. The funding from Locality for Neighbourhood Plans is no longer available for a re-run of flood modelling for the purpose of FRAs and SFRAs. Accordingly, JBA's Level 2 SFRA included 1 in 1000 (0.1%AEP) modelling as this assumed additional SLR over the 1 in 200 (0.5% AEP) scenario of between 350mm and 360mm by 2123. This served to provide a comparable scenario to the difference between higher central and upper end climate change allowance which provides for increased SLR of 410mm from a total SLR increase of 1620mm. The difference between the upper end allowance and the alternative 1 in 1000 scenario is c3.5% and thus not scientifically significant.

JBA has now been requested to amend their report to clarify the data used but this statement of clarification is intended to illustrate that the additional flooding that may be caused by additional climate change allowance has already been adequately considered.

Potential developers of sites will be required to submit a site-specific flood risk assessment. In order to comply with guidance, this should include an assessment of impact in both higher central and upper end scenarios. Unless the EA update their "ASEA Overtopping Technical Note (ENVIMSW002194-BMM-XX-Z00-TN-C-0213274-S3-P07)" developers can only rely on the 1 in 1000 alternative data set. If updated overtopping data is provided developers may commission additional modelling to directly reflect upper end allowance. To this end, the NPSG advises that it holds the names and contact details for the key engineers at Mott MacDonald who handled the ASEA modelling.

A3c SUMMARY OF AMENDMENTS CONSIDERED FOR THE NDP

JBA has been requested to amend and re-issue the Level 2 SFRA to clarify the data used for the modelling or alternatively provide a statement from JBA for inclusion in this Regulation 14 Summary Report.

A4 ALMONDSBURY PARISH COUNCIL

A4a ALMONDSBURY PARISH COUNCIL FEEDBACK

A feedback response was received via the website portal on 21st October 2025. The feedback was positive and short, stating:

Almondsbury Parish Council Fully Support Pilning and Severn Beach's Neighbourhood Plan, and congratulate them on their progress.

The NPSG has concluded that the feedback is noted and welcomed. The NPSG will acknowledge receipt, but no amendments to the NDP are required.

A5 HISTORIC ENGLAND

A5a HISTORIC ENGLAND FEEDBACK

Thank you for your Regulation 14 consultation on the pre-submission version of the Pilning and Severn Beach Neighbourhood Plan.

Our only prior involvement in the preparation of the Plan was a consultation on the SEA Scoping in early 2023. It had been determined previously that a full SEA was required due, inter alia, to the Plan's ambition to allocate sites for development.

We note now that the Plan includes the allocation of a number of sites for development and that these are reflected in policies H1 to H9.

Our interest in Neighbourhood Plans focuses on policies which propose to allocate sites for development as experience has shown that these have the greatest potential to generate impacts on heritage assets. It is therefore important that the evidence base supporting such proposals demonstrates that the intended development can be delivered in conformity with overarching national and local policy for the protection and enhancement of the historic environment.

We were therefore heartened to observe that the SEA Scoping Report proposed using appropriate Historic England guidance to which we recommended adding our guidance on site allocations (see attached). This would allow for the identification of relevant heritage assets, the determination of their significance, and whether sites could be allocated and if so on what basis to ensure harm to those assets would not ensue.

While the Plan area is not rich in heritage assets some do exist. However, there does not appear to be any substantive evidence supporting the Plan to detail that relevant heritage assets have been identified or how their significance has influenced policies H1 – 9. The SEA Environmental Report states that there is little potential for impact on heritage assets generally due to their location relative to the distribution of proposed site allocations, and the policies themselves and their supporting text do not refer to any heritage considerations or issues.

But the Environmental Report does refer to housing allocation policy H4 and states that development of this site will be in close proximity to three Grade II Listed assets (presumably Buildings) (para 6.27, p31). These heritage assets are not identified, nor is there any supporting information to show where they are relative to the site graphically or information on their heritage significance so that this can inform the suitability of the site as an allocation in principle or the specific heritage considerations which development should take account of.

It would therefore be desirable for this policy to demonstrate with evidence that it can be delivered without causing harm to these heritage assets, and possibly even make provision within it for the safeguarding of their setting(s). It might also make sense to review the other site allocation policies and their heritage evidence base to demonstrate the efficacy of their deliverability relative to any heritage assets which might be relevant.

We would therefore encourage your community to address the points made above. We should highlight at the same time that our advice does not automatically imply that heritage asset considerations will apply or prevail in any policy scenario and we are conscious that your community has reached an advanced stage in the preparation of its Plan.

A simple expedient can therefore be to liaise with the conservation officers at South Gloucestershire Council. They will be able to utilise their local knowledge to verify the appropriateness or otherwise of the proposed site allocations from a heritage perspective and their advice in writing can constitute legitimate evidence to which we would be happy to defer.

There are no matters relating to the other policies in the Plan upon which we would wish to comment other than to applaud the range of provisions made for protecting and enhancing the distinctive character of the area.

Our congratulations to your community on its progress to date and our best wishes for the eventual making of its Plan.

A5b NPSG RESPONSE

The NPSG thanks Historic England for its feedback submission.

As identified in the SEA Scoping Report, the SEA Environmental Report_v3.0_has used the Historic England guidance for the site allocations and notes that the linked guidance has been helpful through the SEA process. This has allowed for the identification of relevant heritage assets, the determination of their significance, and whether sites could be allocated and if so on what basis to ensure harm to those assets would not ensue. The draft NDP in section 8.1.36 reflects the heritage findings of the SEA, e.g. that there are few heritage sites, such as listed buildings in the Parish and none are affected by the proposed sites. However, whilst that may be the appropriate conclusion, from the feedback provided by Historic England, the NPSG now recognises that the draft NDP does not go far enough in identifying the heritage sites and demonstrating how it is ensured proposed sites in the vicinity will not impact harm to those assets.

The NPSG therefore proposes to enhance section 8.1.36 to identify any heritage assets near to proposed sites and to review any related policies to reflect how they will not impact harm to

those assets. Policy H4 is an example of where it is appropriate for this to be addressed. The Historic England guidance shall also be referenced.

Additionally, the NPSG will continue to liaise with the conservation officers at South Gloucestershire Council and can confirm that the same heritage issues were identified by SGC during the Regulation 14 consultation. The NPSG has responded to their feedback and identified how matters will be addressed within the NDP.

A5c SUMMARY OF AMENDMENTS CONSIDERED FOR THE NDP

Section 8.1.36 to be modified to include a reference to the Historic England guidance. Additionally, it shall be modified to identify any heritage assets near to proposed sites and to review any related policies to reflect how they will not impact harm to those assets. In particular, Policy H4 shall be modified.

A6 NATIONAL HIGHWAYS

A6a NATIONAL HIGHWAYS FEEDBACK

National Highways is responsible for operating, maintaining, and improving England's Strategic Road Network (SRN), which in this area includes the M4, M5, and M49 motorways. We welcome the opportunity to comment on the draft Pilning & Severn Beach Neighbourhood Plan 2024–2035 Regulation 14 Consultation.

The Neighbourhood Plan area lies within South Gloucestershire and its policies are therefore required to align with both the adopted and emerging South Gloucestershire Local Plan 2025–2041, which provides the strategic planning framework for the area. The Severnside Enterprise Area (SEA) is located within the Neighbourhood Plan boundary and benefits from an extant planning consent for large-scale industrial and warehousing development. National Highways recognises that further development or intensification under this consent could, in combination with new proposals, have implications for traffic generation and the operation of the SRN. National Highways and South Gloucestershire Council have engaged proactively to develop and agree the transport evidence base underpinning the emerging Local Plan, with consideration to the implications of the SEA.

We are satisfied that the proposed policies within the draft Neighbourhood Plan align well with the wider objectives of the emerging South Gloucestershire Local Plan, and we therefore have no specific comments to make. However, we recommend that the Neighbourhood Plan's supporting text and policies continue to acknowledge the importance of coordinated transport planning and infrastructure delivery - particularly where proposals could cumulatively impact traffic conditions on the SRN.

This does not, however, prejudice any future responses National Highways may make on site-specific planning applications as they come forward through the planning process. Such applications will be considered on their individual merits and in accordance with prevailing policy at the time.

A6b NPSG RESPONSE

National Highways was thanked for their submission. Their comment ‘recommend that the Neighbourhood Plan’s supporting text and policies continue to acknowledge the importance of coordinated transport planning and infrastructure delivery - particularly where proposals could cumulatively impact traffic conditions on the SRN’ was noted. The NPSG considers that the NDP already acknowledges the importance of coordinated transport planning and infrastructure delivery within its policies. But will identify any areas where this may be strengthened.

A6c SUMMARY OF AMENDMENTS CONSIDERED FOR THE NDP

None required.

APPENDIX B RESIDENTS FEEDBACK AND RESPONSES

APPENDIX B1 DETAILED FEEDBACK RECEIVED FROM RESIDENTS

This Appendix details the feedback received from residents listed, essentially, in chronological order of all submissions made via the website portal. Added to that are submissions made by other means, e.g. paper copy at drop-in events, post and email. Where more than one submission has been made by the same person these have been put together. The anonymity of those submitting feedback has been retained in this report with just an ID number provided in the left margin.

For the purpose of consistency in the way the feedback is analysed, addressed and responses provided, the feedback has been identified with one or more of the topic headings 'A' to 'T' as identified in Section 4.2 and appear in the right margin. Where feedback addresses more than one top, multiple topic codes may appear in the right margin.

ID	Feedback Detail	Topic
1	<p>There is no real issue of parking in NP road. Any issues are sporadic and caused by hedges not being trimmed and lack of double yellow lines (where there could be blockages because of parking). The car park proposal is a hammer to crack a nut and will bring many more issues to New Passage road than it will resolve. We already have issue of drug taking in cars, dogging sites will move from Aust to NP road and likely, the car park will fill with campers and caravans (as is already the case with Aust road) The issue has limited metric basis, with only a few residents perceiving it is an issue.</p>	M
2	<p>With reference to ,Site reference NP28 land at the end of New Passage Rd Pilning between Caroline Cottage and Severn Lodge Farm for proposed car park. This land is not suitable for a car park as the land cannot be accessed from the public highway. The access point is within a private road. This area is totally unsuitable for a car park. New Passage Rd is a narrow single track road and will cause untold hazards for the residents along the lane and the general public wishing to access the area let alone the disturbance to the local residents due to the excess vehicle movements. This will not help the parking issues along New Passage Rd as once the car park is full cars will still park along the lane and continue to block gates and driveways this will just exacerbate the issue. Please remove picture 14 from the plan. It was taken outside my house, Caroline Cottage which can be partially seen. It was taken without my knowledge or permission and I do not wish to be associated with the proposal of a car park next to my house as I totally disagree with it.</p>	M
3	<p>The proposed car park at the end of New Passage rd. would create other problems. It would be a dogging area and site for drug taking. Camper vans would be staying overnight with barbecues and rubbish left. Also possible antisocial behaviour. A better idea would be to cut back hedges on New Passage Road and double yellow lines in certain areas to stop inconsiderate parking which blocks emergency vehicles.</p>	M

4	I do not want a car park at New Passage. Car Parks attract all sorts of issues which are unacceptable for those who live next to them, especially at night. If the hedges were maintained, parking would not be an issue. Yes, sometimes there are lots of cars in our street. But they all go home at night.	M
5	I am extremely concerned by the plans for Pilning. I bought my house 2 years ago. Both summers have been miserable due to the noise coming from the building of the warehouse which is an absolute monstrosity. It did NOT need to be 3 stories and so close to a residential area. I understand we have more to come? In addition I understand you will be building houses on greenbelt land where the village green is? I have massive concerns that my house value will diminish. That we will be affected more by noise pollution and light pollution (a Tesco warehouse where lorries are around all hours of the night?) Residents are completely blindsided as the information that is put to us is so complicated and difficult to understand. It works in your favour as it's so difficult to make a complaint as its all set against us. If you REALLY want residents' opinion you need to simply it and tell us EXACTLY what you are planning so that we can give our true feelings. I would like to have some CLEAR understanding of exactly what we can expect as a village in the years to come as would everyone who lives here as its soul destroying at the minute frankly	Q R
6	As someone who uses Pilning Village Hall regularly, both as a business running classes from the hall and as an attendee of other classes I am really saddened by the proposal to put houses on the location. The park is always thriving with children having fun, walkers enjoying daily exercise. The hall offers a large variety of classes and is a real treasure to the local area. Kickboxing and exercise classes. Dog training which means local residents and their dogs can access help and have better behaved dogs which are safer to the general public. Brownies and other activities for the children. As someone who lives in an area where all the amenities like this were shut down I've seen first hand the rise in antisocial behaviour as the children are bored and have nowhere to go. Please reconsider.	A
7	Object to Pilning village hall being turned into housing	A
8	I object to the proposal for a car park at New Passage; There is no requirement for this, from residents or visitors. There are no traffic issues as this is a quiet dead-end destination. 2 metres of overhanging hedges on both sides of the lane are the only cause of parking difficulty. Funding spent on this would be ridiculously extravagant. Also, the site would be at high risk for illicit meetings, drug dealing, campervans etc setting up residence, fly tipping (all witnessed at Aust coastal parking). No one would use it and it would be open to abuse at night. This is a greenbelt and flood risk area and is required to take excess flooding from the lane, which it does. You can see from the plan diagram it's the only absorption area for the entire lane. It is also a field that hosts red list Curlews and Lapwings, which are recorded there regularly. It would be an abomination forced between two very attractive and historic buildings that represent New Passage history so well. I would escalate to my MP if this were pursued. It's an outright misuse of funds, an overindulgence, when hedge cutting is the only solution required.	M
9	I'm not in favour of a car park, because I'm afraid it will lead to other issues and complications; e.g. people using it for inappropriate reasons.	M

10	Please don't use our green space (Pilning Park) for houses. I have 2 foster children that haven't had green space before and absolutely love the park! We are supposed to be encouraging people to be outside but how can they when the green spaces are being destroyed.	A
11	New Passage Road Car Park provision. While I appreciate there may have been an increase in haphazard parking, this is usually for limited periods, sunny days and predominantly weekends. A car park anywhere in and around New Passage, which is essentially a country lane; could increase the traffic volume on a no through road leading to congestion and potentially increase the number of disorderly parked cars. The proposal also does not take into account the undesired effects that a car park may attract such as overnight parking/camping, illegal recreational use, noise and fly tipping. For the above reasons, I am opposed to Policy TTP4 New Passage Road Visitor Car Parking.	M
12	We do not agree with the idea of a car park as it will increase the traffic in the area and encourage more cars to use passage road. People will still park in the turning area outside Caroline Cottage. Also a car park will attract anti-social behaviour.	M
13	The playing fields offer the only space where children and adults can play recreational sports free of charge in Pilning. During my childhood around 30 of us would use the playing fields to play football almost every day. Without this space we would have stayed in doors playing video games or roamed the streets causing trouble no doubt. Travelling to Severn beach park is too far for children to travel. The village hall also provided us with an option for community clubs such as drama and kickboxing. These are key community areas that build relationships.	A
14	<p>Re: Objection to Policy H5 – Pilning Forge, Whitehouse Lane (Site Allocation 8.1.44) I write as a resident of Cross Hands Road to object to the allocation of Pilning Forge (Policy H5) in the draft Site Allocations Plan. The proposal conflicts with both national policy and the locally led Pilning & Severn Beach Neighbourhood Development Plan (NDP). I ask that Policy H5 be deleted or substantially revised to address the points below.</p> <p>1. Conflict with Neighbourhood Plan Vision and Site Allocations The NDP vision for 2035 is to retain rural character, protect green spaces and deliver only small-scale housing to meet proven local needs. The Neighbourhood Plan allocates 246 homes across the parish through a transparent site selection process. Pilning Forge is not one of those sites, demonstrating that the local community did not identify it as suitable or sustainable. Including H5 undermines the statutory weight of the Neighbourhood Plan and bypasses community consensus.</p> <p>2. Infrastructure and Deliverability National policy requires that new allocations be justified and effective, demonstrating realistic delivery of roads, foul and surface water drainage, utilities, schools and healthcare. No evidence has been provided showing how Whitehouse Lane's narrow carriageway can safely accommodate construction traffic, let alone future residents' vehicles. The NDP acknowledges limitations in local transport and sewerage capacity, yet H5 offers no mitigation measures or funding commitments.</p> <p>3. Landscape, Character and Amenity NDP Policy on Environment, Countryside and Green Belt protects local open spaces, landscape quality and tranquillity. Pilning Forge lies at the edge of a valued rural gap between the village and the railway embankment. Development would erode visual separation, privacy and</p>	E

	<p>the sense of openness that residents cherish. The allocation fails to demonstrate how landscaping, building heights or layout would respect neighbouring properties or the wider character.</p> <p>4. Flood Risk and Drainage The site adjoins watercourses known to flood during heavy rainfall. The NDP's Flood Risk policy requires all new development to provide clear, sustainable drainage strategies that do not increase flood risk elsewhere. No site-specific flood modelling or attenuation proposals have been published. Without such detail, granting allocation would be premature.</p> <p>5. Traffic, Transport and Highway Safety The Neighbourhood Plan's transport policies promote sustainable travel, enhancements to cycleways and public transport access, and protection of narrow rural lanes from excessive traffic pressure. Pilning Forge is poorly served by bus routes and lies beyond safe walking distance of Severn Beach station. Increased car dependency will exacerbate congestion on Cross Hands Road and create new highway safety hazards.</p> <p>6. Five-Year Housing Land Supply and Prematurity South Gloucestershire Council must demonstrate a five-year deliverable land supply in line with the NPPF. The NDP's locally agreed allocations already provide a clear pipeline of deliverable sites. Prematurely adding H5 before infrastructure and flood risk tests are satisfied undermines public confidence and risks double-counting land supply. Request Delete Policy H5 (Pilning Forge) from the Site Allocations Plan; or If retained, revise the policy to require: Site-specific traffic and highway improvement works; Detailed flood risk assessment and sustainable drainage design; A landscaping and design brief that protects the rural character, privacy and views of existing residents; Formal alignment with the Pilning & Severn Beach Neighbourhood Development Plan's site selection criteria. Please confirm in writing that my objection has been received and will be fully considered. I trust the Council will uphold the integrity of both national policy and our locally led Neighbourhood Plan.</p>	
15	<p>Planning Policy Team Pilning & Severn Beach Parish Council Dear Sir / Madam, Re: Objection to Policy H5 – Pilning Forge, Whitehouse Lane (Site Allocation 8.1.44) I am writing as a resident of Cross Hands Road to object to the proposed allocation of Pilning Forge (Policy H5) in the draft Site Allocations Plan. I believe this proposal is inconsistent with both national planning policy and the locally adopted Pilning & Severn Beach Neighbourhood Development Plan (NDP). I respectfully request that Policy H5 be deleted or substantially revised to address the concerns outlined below.</p> <p>1. Drainage and Flood Risk The proposed development raises serious concerns regarding drainage and flood resilience. Existing properties in the area rely on soakaways and Sustainable Urban Drainage Systems (SuDS) due to the site's location within Flood Zone 3. These systems already place significant pressure on the River Pill to the north of the site. While recent works on the sea wall have helped mitigate flood risks, further large-scale housing would substantially increase impermeable surfaces, creating much higher levels of surface water run-off. This would heighten the risk of flooding for existing residents and surrounding land, undermining recent investment in flood defence works. Without a comprehensive, site-specific flood risk assessment and robust sustainable drainage design, the proposal is unsound.</p> <p>2. Loss of Green Belt Land The protection of Green Belt land has long been a cornerstone of local planning policy. It preserves the distinct rural character of</p>	E

	<p>our community and prevents the unchecked urban sprawl that neighbouring areas have experienced. This proposal is contingent upon the removal of Green Belt protection, which represents a significant departure from longstanding local policy. I urge the Council to explain what exceptional circumstances justify this reversal, and why the preservation of our community's green spaces and environmental heritage is being compromised. Once lost, this land can never be recovered.</p> <p>3. Community Impact and Alignment with the Neighbourhood Plan The Pilning & Severn Beach Neighbourhood Development Plan sets out locally led principles for sustainable growth, including the importance of protecting rural character, prioritising brownfield sites, and ensuring infrastructure improvements before new housing is approved. Policy H5, as currently drafted, conflicts with these principles. Request In light of the above, I respectfully request that: Policy H5 (Pilning Forge) be deleted from the Site Allocations Plan; or, if retained, It be amended to include requirements for: A detailed, site-specific flood risk assessment and drainage strategy; Necessary traffic and highway improvements to support additional housing; A landscaping and design brief that safeguards the privacy, views, and rural character of existing properties; Full compliance with the site selection and sustainability criteria in the Pilning & Severn Beach Neighbourhood Development Plan. Please confirm in writing that this objection has been received and will be fully considered. I trust the Council will uphold both national planning policy and the integrity of our locally adopted Neighbourhood Development Plan.</p>	
16	<p>Whilst I understand improvements are needed within the village, taking away the only green space is not the answer. Adults, teenagers and children, dog walkers use this green space and it is important this is not removed. It will impact on the ability of the village to get outdoors in a safe environment without car fumes and danger of the roads which has increasing traffic and faster speeds given the amount of building already taken place within the village and surrounding areas. This small community is being dwarfed by massive warehouses and traffic and we need our green space preserved. Severn beach playing fields are not on our doorstep and do not benefit the villagers especially given limited bus services. Do not take away our playing field and village hall which is an asset to the community.</p>	A
17	<p>H1 Pilning playing field for housing is crazy. Access is a real problem, there is no way to create access from bank road. The loss of the field to locals would be immense and deny future generations potential sporting opportunities especially if the village grows.</p>	A
18	<p>I do not agree with the proposed plans to use Pilning playing fields for housing development. This is the only space that young people have to meet and it is the shame of the council not providing better facilities and discouraging groups from using it has become neglected. There has been little money spent on play equipment or anything else for years but a deliberate attempt to run it down ready for selling off. Keep your hands off it.</p> <p>Following viewing the plans of the proposed additional housing in Pilning there is one obvious factor that has been completely overlooked to the detriment of our community which is totally unacceptable and unforgivable. The YOUNG PEOPLE OF THIS</p>	A

	<p>VILLAGE.The proposal to build houses on the playing field without replacing it with another central village location for the purpose of recreation/meeting space changes our title from a village to just another built up area of houses, and yet again treating the youth as unimportant.The suggestion that some of the playing field could be used for housing with the remainder as a playing field is too vague and going on past promises made when asked to accept new development in the area nothing ever comes to fruition and all that will happen once this is agreed is the whole space will become housing and there will be no play area built. Money talks louder than the needs of children.Another suggestion was mentioned as a possible alternative was using a small field beside the coast road or perhaps a field close to the roundabout/motorway going to Severn Beach/New passage neither of which was shown as available? The concern for the safety of children crossing this busy road and being observed by drivers who use this road 24/7 and could take a child and disappear very quickly is madness and no sensible parent would allow their offspring to go there. The children should be in the village where they can be seen and are safe and not pushed to the edges of our community as though they are not welcome, they are our responsibility.We were told that they hope many of the proposed houses would be Affordable which means many more children to fill our school but what else are we offering them to come here. The scout movement is great but only 2 hours a week, its not safe to play in the streets and the existing playing field only has equipment suitable for very small children. If we do not provide a safe space for youngsters to develop and be children we will end up with a problem group who will get into mischief and the consequences will affect the whole community and create many more problems going forward.</p> <p>Now is the time to address the imbalance and neglect of our youngsters that has been going on for far too long. If we are being told to accept more housing and restructure our village that's fine but within this remit the village must also benefit in some way and that has to be a long overdue recreational space within the village and fit for purpose for all ages of young people. This should take priority over any proposed New Village Hall or other random wishes. These children are the future of Pilning and at present we are not providing them with any facilities to grow into well rounded adults which our own children were lucky to have had with the facility of a well used playing field. If you want the playing field for housing you first have to come up with a concrete alternative within the village for an alternative space that can be voted on and agreed on. No lies, no possibilities, no vague promises. We as a community have over many years heard it all before, when Western Approach was being talked about the promise of financial benefit to our villages, listening to our concerns, treated with respect, working with the people etc etc we have heard it all and look at the mess we are in surrounded by huge industrial units, noise, heavy traffic and much much more whilst both District and Parish Council do nothing to protect our community and between them they have and continue to destroy this once pleasant village.</p>	R
19	<p>I understand the need for more housing but I strongly object to H1 for the hall and playing field to be developed. I use this space regularly to walk my dogs and for my mental health I also help run the hall and attend classes and community events there. This is a space held dear to not only myself but the community as a whole not just now but historically. I do not want to lose this space that has been an integral part of our village for a hundred years. I do not believe you can find a better place for a village hall and playing field that is</p>	A

	<p>nearly as good as this one already. It is off the main road and is perfect for the use in which it was intended. It would be a great loss to see it plastered with houses therefore I strongly oppose this as a development plan site.</p> <p>I also oppose the plans for the allotment not only because of those who will lose their allotments but also because of its location for housing it is too near to the grave yard and we need to keep space for more burials in the future.</p> <p>These two plots I strongly oppose but especially the village hall and playing field taking this away or moving it elsewhere will destroy the heart of our village. Can I just add that we don't have the road infrastructure for all the plans you have regarding Bank rd and most days at school time it's almost impossible to drive down Bank rd yet you want to add 70+ houses and have ideas to move the hall to land opposite the school on St Peter's farm, this I feel has not been thought through logically. The pollution and traffic this will cause is not beneficial to our village and are not what we villagers want.</p>	C
20	Building on Pilning playing fields will be a huge blow to the community. I have 2 small children. It is the only area in Pilning where I can take my kids to play safely away from traffic. I agree that more homes should be built in the area as I would like to see more money being put into the area but why take away the one thing that is crucial to members of the community who have small children. Many parents are also unable to drive and with a bus service that runs hourly, this is their only way to get the kids out.	A
21	I have looked at and attended meetings. What you have proposed is very good.	T
22	So your first idea was to remove the playing field in Pilning and put it on the other side of the very busy dual carriageway, now that seems to have disappeared. So now the children will have nowhere else to go. It won't be affordable housing or a small number of homes because I believe once you have your hands on it it will all get built on. I strongly disagree with this is for the community, don't you think that we have enough buildings and traffic around us already. I think the field and village hall have been under funded for a reason to make someone rich. You're proposing to dig up the only green space left.	A
23	I would like to register my objection to the plan to lose the playing fields in Pilning, this is an essential space for the community and once lost will fundamentally change the feel of the village, there is plenty of other space locally for dwellings, perhaps the land that seems to of been appropriated by the traveller community would of been a suitable space without the loss of the playing fields which is used by people of all ages	A
24	We don't need more houses, we need our green space, especially the park for the kids and people to enjoy the space .	A
25	Against building new homes in the H9 area. We need to protect wildlife habitat	H
26	Having read through the plan quite extensively I find it hypocritical and amateurish in the extreme. You can make the figures say whatever you wish but the truth is that the plan is extremely poor. It talks about infill and yet it has completely excluded the infill opportunities in New Passage and instead identified areas in Severn Beach & Pilning that are wholly unacceptable for development. The only areas that appear in my opinion to be suitable are H2 H7 & H8. The plan mentions maintaining the village's character & identity	Q*

	without any consideration for the residents. H1, H3,H4,H5,H6 & H9 having existing uses and developing these are detrimental to both villages. This is a poorly thought out plan with dubious findings made by volunteers with vested interests in getting the plan adopted. It should be rejected in full.	
27	I oppose all the areas stated in the plan. I am always out with the children enjoying the green fields as we walk the dog daily and blackberry pick in the summer in the back fields. I pass many other residents also doing the same. There is too much construction work happening locally so I feel even more houses are changing the atmosphere in our current community. There are lots of other suitable areas that are not listed in the plan in the local area which aren't used by residents such as New Passage. The school my 2 children attend is currently not large enough with classrooms split and no more space that adding more people would be detrimental. I am confused as to why I am stating my objections directly to you guys without any third parties.	Q*
28	I do not agree with building housing at Pilning village hall. I do not agree with parking by tea cottage or Severn Beach allotments I am happy with the development of housing by Severn Beach station. This shouldn't be with retail opportunities - not required. We survive without a pub and take away facilities. The additional shop opened in Severn beach is rarely used I agree with plans to improve cycling and walking routes within the parish. I would support housing developments close to church road. The schools are under utilised (particularly Severn beach primary and Malvern secondary) due to poor standard of education delivered; residents would rather drive further for a decent education for their children.	A F *
29	Totally against any more buildings in the parish of Pilning and Severn Beach to much has been built all ready	Q
30	I object to the planned housing development in Pilning. This involves building over Pilning Park. This is a place I take my children to play, walk my dogs, exercise and generally go throughout the year. Removing this area from the area will cause huge upset throughout the village.	A
31	Severn Beach does not need anymore houses built into it. We need to maintain the green space that we have as it is a village not a town or city that needs to cram in 246'dwellings'. Severn beach is perfect as it is with not having any issues beforehand needing all this planning. The only thing we do need is more available transport to get to neighbouring towns/villages. Thank you!	Q
32	Submission of objection to proposed development in Severn Beach and Pilning	Q
33	This is a really bad idea. The local school can't cope at its current level let alone with a big intake of new students. The current roads will not take the extra traffic and are in need of repair. The only thing that is a good idea is the parking next to the station. As far as extra shops and pubs these were removed years ago along with recent applications for take aways have been denied.	Q*
34	I reject these plans and don't want it to go ahead	Q

35	<p>As a member of the parish since birth, I object to the proposed plan. The loss of our green spaces has allowed industry to creep closer and closer and the addition of more housing will remove some of the remaining buffer zone and nature rich areas that we have left. I agree that there is a need for parking near the station to aid better transport links but I have some serious concerns about the rest of it.</p> <p>impact on peace and quiet - the loss of habitats for flora & fauna - the increased traffic & noise - the loss of areas for walking (esp H9) and the impact on the residents living adjacent to this area</p> <p>I also can't see the local school being able to cope with what could potentially be another 150-200 students, not just the building but the infrastructure to support it eg parking, traffic</p> <p>The local pub was removed years ago in favour of housing and a take away was recently rejected. Maybe focus on fixing the roads; ensuring that what we do have is well maintained. Additional bins for dog mess, better bus service. More houses are NOT required and will further destroy the sense of community that the area has had (albeit this has depleted significantly since the loss of the carnival in Pilning which used to bring local groups together).</p>	Q H * *
36	Whilst I agree that more housing is needed, the fear is that our little quiet patch will become overwhelmed with extra cars not taking into consideration works traffic, we have a nice little buffer between the village and motorway, it feels like we won't be a village much longer with the warehousing getting closer, great for the economy, if they are being used! I guess my feelings on this are entirely dependent on access to Gypsies Platt, the traffic in our quiet corner could potentially force lifetime residents, the NDP has addressed the needs of the community, put the infrastructure in first and everything else will fall in. Including the community, some serious SGC investment would be an absolute win! Please do not share my views publicly, I filled in the NDP questionnaire when it came around. I do feel strongly about the housing in this corner, but I do understand the need. Maybe a closer consultation with those directly affected when and if the time comes.	Q H
37	<p>I am significantly concerned by the plan to develop so much of the green space in Severn Beach. We already lack close amenities and leisure for the families living in the area. Youths with nothing to do leads to anti social behaviour and crime.</p> <p>We lack parking and even a bus service that is frequent enough be useful</p> <p>We have no public house, leisure venue, or evening takeaway. We are not set up to accommodate more houses and our green space is being overshadowed by huge warehouses.</p>	Q * *
38	This will take away the lovely green walking space behind the village hall. And also worried that there is no guarantee this won't be turned into illegal immigrant housing, which is cause for community safety concerns. I do not think Severn beach is big enough to comfortably accommodate all this new infrastructure either. Could have built loads of houses over the road instead of the big warehouses!	H Q
39	Object, local wildlife gone, ecosystems gone. For what more houses that can be built.	Q

40	Object, this is ridiculous. Build houses elsewhere on brown fields and cities this is a village	Q
41	<p>I am strongly objecting due to the lack of thought into the impact on local area and history. This will turn our nice village into the "new avonmouth" which is full of HMO rental properties which are run down. Turning the village from a area all about community and family, to housing for local massive industrial estates which cause various impacts to the community.</p> <p>The proposal will also have a massive impact on the local wildlife that we have in our area. We have already seen many trees being cut down with lack of thought to the wildlife, being cut down during nesting season (property opposite severn beach primary school). If you think that this is only a small local issue on private property then you should think again. I have seen the council themselves green washing our community by using massive wooden bollards (made from far more wood than required) to put a small sign up stating that the area is a no grass cut area for the local wildlife (a good thought however not executed very thoughtfully). However once again the council causes issues by issuing a lane closure permit which has caused this area to be destroyed (B4055 south of pilning). The suitable fix to this is to just sprinkle a little grass seed down and forget about it. This just shows that our council only have interests in money and just thinking we as a community will comply.</p> <p>In severn beach we have a wetland which brings in all kind of wildlife which will definitely use the fields nearby. Severn beach village will be impacted vastly if these are accepted by the council.</p> <p>I think you should be concentrating on managing the current issue we face as a community ,ie the motorway junction to nowhere, where work was "completed" in 2019 rather than introducing more residents and traffic. introducing more residents and traffic. I look forward to this feedback being completed ignore as per all objections showing the true colours of the council and their real objectives.</p>	N
42	I have my concerns about more dwellings being built in Severn Beach. The infrastructure around Severn Beach is already struggling due to warehouses being built all around. The conditions of all of the roads is already abysmal and adding hundreds of houses would make it even worse. There are also no spaces at doctors surgeries and dentists so more homes would therefore make this issue worse. The same applies to schools.	Q R
43	We don't not need or want any development in this area it's a small community and this will spoil Severn beach . We haven't got the schools or physicalities to have more houses !! All of our Greenland is going to houses!! We do not want it !! You will spoil Severn beach	Q
44	Severn Beach has seen significant residential development over years, we are a village not a Town. We need to keep the little green belt land we have. We have a Gp surgery that we can't get appointments for now so with more houses there is going to be no chance. Parking in the village is at its worst and i know as i've lived in the parish my whole life.	Q

45	Absolutely do not support this at all. Please leave our green land alone! The community do not want more buildings or developments.	Q
46	I completely object to this planning application. We have lived here since 2014 and love the small rural village feel. Parking is already a massive problem for the villagers. I really object to having our garden over looked and our sunlight being reduced.	F
47	Severn Beach has already been surrounded by warehouses, the roads Severn Beach has been surrounded by warehouses, parking is a joke, we live on a flood plain, Severn Beach hasn't got the infrastructure for more houses.	Q R
48	We disagree to all of the warehouses being built especially behind cranmoor green.	R
49	<p>My wife and I would strongly object to the development plans for the area h9 we have just purchased a detached bungalow on Churh road. Our back garden currently looks out on the woodland behind the playing fields. We chose this house because of its lovely position and the fact that is not overlooked. My wife suffers from terrible anxiety and this was a major factor in our moving. In the four months we have lived here my wife's health has improved massively. This land being developed would not only devalue our house i fear it would have a very negative effect on my wife's health. We bought this as our forever home and did not plan to move again. We have already spent a large sum of money improving this house and are devastated at the thought of being stuck back in the middle of a housing estate. I really cant believe this is happening our dream future is about to come crashing down. Surely there should be some way of retaining an area of woodland between our houses and the new development.</p> <p>I have already objected to this development for personal reasons. I would also like to Object on the development for the sake of the wildlife in the area.we like to sit in our garden on an evening and listen to the owls in the wooded area behind our house and also to see the bats that pass through our garden on a regular basis. My fear is that our neighbourhood would loose these animals if the area is developed. This simply isn't fair on the wildlife and the decent tax paying people who enjoy it. What consideration has been made for the wildlife in the area?</p>	H
50	<p>Formal Objection to Proposed Development in Severn Beach Areas H7, H8, and H9 I write to formally object to the proposed development outlined in the Neighbourhood Plan for Severn Beach, specifically in areas H7, H8, and H9. These sites are already boxed in by a dense and expanding industrial landscape, flanked by distribution parks, arterial roads, and heavy freight corridors. The cumulative impact of these “industrial monstrosities” has left the area with insufficient infrastructure, poor connectivity, and a growing sense of isolation from the wider community. Before any further residential development is considered, priority must be given to addressing the glaring infrastructural deficits that continue to undermine both quality of life and economic potential. Chief among these is the long-delayed and still inaccessible M49 junction—an asset that remains a ghost feature of regional planning. Despite significant investment, the junction remains unusable, and the promised link road connecting Goldcrest Way to the motorway is not expected to be completed until at least mid-2026. The current road conditions are inadequate for existing traffic, let alone the additional strain that new housing would introduce. Local amenities are stretched, pedestrian and cycling routes are fragmented, and public transport options remain limited.</p>	Q

	To build in H7, H8, and H9 without first resolving these foundational issues would be short-sighted and detrimental to both new and existing residents. Loss of Green Space and Community Use The slow eradication of green space in Severn Beach is already having a visible impact on local wildlife and community wellbeing. Area H9, in particular, serves as a vital informal recreational space—used daily by residents for walking, exercise, and safe cycling for children. It offers a rare pocket of tranquillity in an otherwise industrialised setting, supporting biodiversity and providing a buffer against the encroaching concrete. To sacrifice this space for further development would not only diminish the environmental character of the area but also strip the community of one of its few remaining accessible green corridors. Once lost, these spaces cannot be reclaimed. Their value to both wildlife and local families far outweighs the short-term gains of additional housing stock. I urge the planning authority to reconsider these allocations and instead focus on delivering the long-promised infrastructure improvements, including full access to the M49 junction, enhanced local transport links, and meaningful integration of industrial and residential zones. Until these priorities are addressed, development in H7, H8, and H9 should be paused.	FGH
51	I object to all the housing proposals on greenfield sites in Severn Beach. And the car park. There is precious little land for nature and wildlife already. It is disgraceful to try and fill in all the remaining green land with housing and car parks. It will ruin the village and leave nothing for nature. This plan is shameful. All this housing should be on brownfield sites in Avonmouth, not here. Those green fields sites are essential for birds. SGCC counts on those sites are very high for birds. I object to the loss of this green space.	Q *
52	Please don't get rid of the wonderful green spaces we have in our local Pilning community. The allotments are part of our (and many others) walk to school and after school the children love to go over and help and learn about the foods growing there, and the animals that live there like slow worms. The park is also a lovely hub after school on weekends and during the holidays to meet friends, learn to ride a bike, play some football and all are accessible on foot. These places kept many of us sane during Covid and the thought of them being destroyed to provide room for too many houses to be squashed into and the disruption and disappointment it will cause our children and generations to come is mountainous. We already have the eyesore of a warehouse that is going up and impacting the quiet and the views within the village. Please please don't develop on our green areas in Pilning!	C A R
53	Generations of our family have lived here for decades and whilst covid and some recent attractions have enticed visitors back to severn beach, we live here because of its rural feel and small community. We strongly opposed any development of land and additional houses and retail development. If we wanted that we would of moved somewhere with more amenities. Please leave severn beach as it is. We do not need nor want some extra 1000 people living here.	Q
54	I object to the building of the houses in these areas I understand the need for housing but these areas should not be considered	Q
55	I am concerned on the building works H9. Due to living on Abbott road which is a small tight culdesac to get access they would have to make our road a access road to this site. We have young children who at the moment can access the road and play in the streets	H

	which if used to access a quote sizeable housing estate would not longer be safe to do so. This was proven when previous access problems when the bramble were cut down previously and access was taken through Abbott road.	
56	It is a disgrace that the council is considering building on Pilning Playing Fields. I have lived in Pilning my whole life and it has always been very mistreated in terms of public amenities. The fact that the council is considering selling off one of the only places children can safely play is awful and you should be ashamed. I take my severely autistic son to play in the park very frequently, it is one of his favourite places. I will fight these plans tooth and nail and I will not be alone!	A
57	<p>I wish to formally object to the plans comprised in the proposed Pilning & Severn Beach Neighbourhood Development Plan (2024–2035). Whilst the plan is intended to reflect community needs and preserve local character, in reality it demonstrates a lack of transparency, flawed consultation, contradictions in policy, and serious risks to our limited green spaces and community facilities. The Neighbourhood Plan is presented as the product of wide community engagement, however, it is clear that inadequate community consultation took place. Only 412 residents responded to the survey, out of a population of 3,609 in 2021 (ONS Census), which constitutes just 11%. Further to this, there has only been one survey conducted over the period of 4.5 years. It is also clear that offers to attend meetings in the local In View magazine are insufficient for meaningful community engagement. The conduct of the Steering Group therefore falls far short of genuine community consultation, raising serious concerns about transparency and legitimacy. The plan claims that “new housing is essential”, however, the population of the Parish has remained stable: 3,442 (2001), 3,647 (2011), and 3,609 (2021). The notable population decline between 2011–2021 contradicts any claim of housing shortage. The “aging population” argument is also misleading. A major cause of housing pressure is older residents occupying large homes without downsizing. The plan does not address this issue, nor does it justify why significant new housing is “essential.” The issue of “diverse housing options” are mentioned without explanation, and no evidence is provided to define what this means in practice. Further, the plan’s Executive Summary argues that new housing is needed because without it “there is no CIL”, however, this highlights that development is motivated by financial gain, not planning justification, and is therefore improper reasoning under planning law. There is also the matter of the plan indicating that schools are currently “undersubscribed”, however, population decline already indicates fewer children are being born nationally, and building more housing won’t guarantee increased school intakes.</p> <p>Despite aspirations to “preserve green spaces,” the plan identifies key community assets for development. Policy H1 proposes 30 dwellings on the Pilning Village Hall and playing fields, however, this is land held in charitable trust (Charity No. 301605) for community benefit. Neither trustees, the Charity Commission, nor the wider community have given consent for the land to be proposed for development, and it has caused anger amongst the community that the Parish Council not only sanctioned, but actively proposed its inclusion without consultation or engagement. This also directly contradicts the plan’s proposal to invest in sporting facilities, because it has proposed playing fields for development. The two allotments in the Parish are also simultaneously earmarked for housing and car parking respectively; contradicting promises to invest in</p>	Q * A *

sporting/exercise and wellbeing activities. The visitor car parks (TTP2, TTP3, TTP4) are proposed on allotments, green belt, and open land, which constitutes unnecessary destruction of green space for the sake of outsiders, not residents. These proposals directly undermine the Parish's only existing public open spaces, and seems to advocate a net loss of of Green Space and Community Facilities in favour of more residents and/or visitors. Where will these residents go to preserve their physical and mental wellbeing when all the community green spaces are occupied by housing estates, and the green belt is eroded to just a tiny fraction of its current state by development? The plan is also riddled with contradictions. It pledges to "protect green belt" while simultaneously proposing removal of land from the green belt (ECGB1) to facilitate housing. It demands flood mitigation in new developments, yet the Parish Council's own recent planning applications (Miniature Railway and Community Hub) ignored Environment Agency flood objections. The plan even acknowledges that the Parish is "almost entirely within high flood risk zones", yet it still pushes for development in those areas, which is inconsistent with NPPF flood resilience policies. The plan also claims to preserve community facilities, yet past applications (a fish and chip shop) were rejected due to resident complaints, making promises of new facilities such as a pub or takeaway implausible and inconsistent.

The plan also highlights flawed Transport and Infrastructure assumptions. Car ownership is already high (92.4% of households). Instead of encouraging sustainable alternatives (public transport, cycling, walking), the plan proposes increased parking provision that will only worsen congestion and parking issues. The NPPF requires modal shift to sustainable transport, not more car parks as proposed in TTP2, TTP3 and TTP4, nor increasing household parking provision. The plan also suggests the installation of a "truck stop" facility which would bring harmful fume-emitting vehicles to the Parish and duplicate existing services in Avonmouth and Severn View, both of which are just a few miles away. This notion is both unnecessary and harmful to the village environment. In relation to Governance, and Legal Concerns about the actions of the Steering Group and subsequent plan, it must be reiterated that Pilning Village Hall and Playing Fields are held by a charitable trust. Decisions about their use therefore rests with the trustees under charity law, not the Parish Council. Allocating this land for housing without trustee and Charity Commission approval is unlawful, and the Parish Council, and by association the Steering Group, have acted unlawfully both in proposing it, and further including it in the plan. Furthermore, the Steering Group has failed in its duties to properly carry out its consultation functions. According to the Service Level Agreement, (signed by Parish Council Chairman Peter Tyzack on the 19th April 2021), which formalised the obligations of South Gloucestershire Council and the Pilning and Severn Beach Neighbourhood Plan Steering Group (NPSG), it was agreed that the NPSG would undertake the following: Under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012, the NPSG will "consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests [they] consider may be affected by the proposals for [the] neighbourhood plan." The Regulations confirm that a "consultation body" means – (m) voluntary bodies some or all of whose activities benefit all or any part of the neighbourhood area. It is clear that the Management Committee of Pilning Village Hall and playing field would fall into this definition as their activities clearly "benefit the neighbourhood area".

	<p>Allotment holders are also organised through the Parish Council and represent a community group whose interests are directly affected by land allocation for car parks or development. They too meet the criteria as a voluntary body benefiting part of the neighbourhood. When asked at the recent Plan open day why this obligation had not been met, the Steering Group Chairperson stated “They should come and talk to us, we don’t need to go to them”, thus demonstrating his lack of consideration for correct legal process, and community obligation. It must also be raised that the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) were only completed in mid-2025, which was after most of the plan was drafted. That suggests the plan was in its advanced stages before statutory environmental safeguards were in place, and these policies have therefore not been considered or applied to most aspects of the plan, highlighting further failues of the Neighbourhood Plan Steering Group. Overall, the Neighbourhood Development Plan (2024–2035) suffers from woefully inadequate and unrepresentative consultation, makes unjustified housing assumptions contradicted by census data, contradicts itself between stated aims (green space protection) and proposed actions (loss of green belt, playing fields, and allotments). It has also failed to cogently and comprehensively consult the public by publishing its plans on a regular basis, and has failed in its Service Level Agreement to actively consult with organisations it was obliged to. The Plan has failed in its endeavours because it has divided and enraged the community it purports to advocate for, and its net impact is to negatively impact community facilities, infrastructure, and environment. The NPSG continues to include Pilning Village Hall and playing field and allotment land for development. However, by doing so without consultation with these bodies, it has breached both the spirit and letter of Regulation 14. This should render the consultation process legally flawed and open to challenge, since omission of statutory consultees is a procedural failure.</p> <p>For these reasons, I urge the Parish Council to reject the current draft plan and require a comprehensive redrafting with: 1. Genuine, wide-reaching community consultation. 2. Evidence-based housing need assessments. 3. Protection of existing green spaces and community assets. 4. Full compliance with Charity Commission requirements where charitable land is concerned. 5. Compliance with legal obligations regarding consultation with groups identified through governing statute, in particular Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.</p>	
58	I think the amount of building around Pilning, Easter Compton and Almondsbury is awful! The amount of greenbelt be lost to houses when over 38000 house are empty in and around Bristol/South Glos. The plans for more warehouses to be erected next to housing has no consideration to noise and light pollution for those living next to it. There are empty warehouses and employment offices all over Bristol and South Glos. Why build more? Everywhere you go in Aztec West, Avonmouth etc are To Let signs.	Q R
59	H8 & h9 development Objection	G H
60	Wildlife and the local environment have been significantly impacted. Cutting down trees which provide the area which a barrier for noise pollution and light pollution, let alone the significant impact it has on the local wildlife such as newts, hedgehogs, birds etc, I have 0 trust that construction companies will even consider the wildlife. South	Q

	Gloucestershire council continue to GREENWASH whilst allowing huge warehouses to be developed on green belt, the traffic for these warehouses then has NO WHERE to go, because the M49 motorway junction is STILL NOT COMPLETE, despite being completed in 2019. This would never ever happen in yate or thornbury, but we in severn beach and surrounding areas have all of our green belt built on. Stop green washing, stop building on flood plains, stop cutting down trees which are perfectly healthy - and then telling residents to take part in recycling programmes which have 0 impact on the environment. Think of the mental health and well-being of residents who have had to endure months of piling noise from new warehouses, the light pollution from western approach. If these houses are built (which I'm sure they will be as money matters, not the earth) then the proper infrastructure needs to be put into place to support the amount of people coming in, such as: parking needed, shops? A better range doctors service, dentist, more policing in the area (as we seem to be left out!)	
61	Flood plain & drainage problems make the field totally unsuitable for development.	I*
62	I am writing to formally object to the proposed development of 80 dwellings on the field adjacent to [H9]. My objections are based on the following material planning grounds: 1. Highways & Traffic Safety: The proposed access point is unsuitable for the volume of traffic expected, raising concerns about road safety and congestion on [road name]. 2. Infrastructure Capacity: Local schools, GP surgeries, and utilities are already under strain. The addition of 80 dwellings would worsen this situation. 3. Flood Risk & Drainage: The field is prone to surface water pooling, and the proposed drainage strategy does not appear sufficient to prevent flooding risks to neighbouring properties. 4. Loss of Green Space & Biodiversity: The field supports wildlife . Its loss would negatively impact biodiversity and the rural character of the area. 5. Impact on Local Character: The proposed density and design are out of keeping with the existing community. For these reasons, I respectfully request that the council refuses this application.	H
63	I object to the development of the sites H9 and H7 and understand that site H8 is no longer available. The village would not have the infrastructure to support what would be hundreds of new residents, the school wouldn't be big enough and the Doctors surgery certainly couldn't cope. I regularly use the public rights of way around the village and enjoy the wildlife and scenery it would be a tragedy to loose this amenity.	F H Q
64	I object to the plan as detailed below: Pilning village hall and playing fields are well used all year round by dog walkers, residents and children. They have an open safe space to enjoy activities and a meeting place for the village and various groups. Take is away and where do we all go? Do not build more housing in this village please.	A
65	I don't agree with any more houses going up in Severn beach. You have built on every bit of grass we have in seven beach. It's a small village and I would like to keep it that way !!	Q
66	I am writing to formally express my concerns regarding the recently approved construction project in Pilning. The proposed development, specifically the large-scale warehouse situated near residential properties and at the entrance to Pilning, raises several significant issues. Residents have endured prolonged disruptions due to construction noise and roadworks. Furthermore, the proximity of this substantial structure to the village, coupled with its impact on natural light for nearby homes, is a matter of concern. I would appreciate clarification on the rationale behind the planning	R Q N

	permission approval for this project. The warehouse expansion is progressing, with the facility's footprint increasing and its proximity to the village becoming more pronounced. The beautiful views are no longer visible due to the size of this building. Our family relocated to Pilning with the intention of enjoying the tranquility of village life, away from the hustle and bustle of urban environments. As residents, we are entitled to a peaceful living environment. The warehouse development presents several concerns, including disturbances to residents, more traffic through the village and obstruction of daylight. I find the local council's approval of this project to be inappropriate for a community of this size and a lack of care towards us residents. Furthermore, the proposed development includes additional housing, encroaching upon existing parklands and green spaces. Such actions would limit safe recreational areas for children. The village currently lacks alternative dog walking routes and accessible green spaces for children and families, with the alternative options being the Avonmouth lakes (inaccessible without a vehicle due to the absence of pedestrian pathways) and Severn Beach front, which also presents accessibility challenges. Despite the neighborhood plan's stated objective of preserving green areas, this appears to be disregarded by the very individuals responsible for its creation. I await confirmation of receipt regarding my submitted complaint and the accompanying details pertaining to my concerns.	
67	Pilning playing field and village hall belong to the community and both are well loved and used by parents, grandparents, dog owners and groups using the hall. It should not be taken away without due consultation.	A
68	I would like to raise a complaint against the proposed development of Pilning Playing Field. This is an important part of the community that should not be taken away.	A
69	<p>I would like to register my opposition to proposed development on Pilning playing field. This is the only green open space available to residents and particularly young people who use the play area and field for outdoor exercise which cannot easily be replicated elsewhere in the immediate vicinity. As the old saying goes "once its gone, its gone forever". There were several suitable location for housing which have been annexed by travellers even where they were part of the plans for the area, sadly that ship has sailed as well</p> <p>I wish to register my objection to the inclusion of H3 (allotments on Bank Road) being offered as a potential development site on the following grounds :- 1. There is no alternative site available adjacent to, or within the village to provide these facilities. 2. The provision of sheltered housing for the elderly seems hardly appropriate given its proximity to the graveyard. 3. Land included in this site is already occupied by travellers, again hardly a suitable place for given the likelihood of disturbance / conflict with the current occupants. 4. Access to this area is constrained by the lack of visibility on this section of Bank Road.</p> <p>Please consider removing the site from the development plans as it is detrimental to the well being of the village.</p>	A C
70	I object to the neighbourhood plan. This group want to destroy our Green Spaces, and in my opinion have a bias towards the Developers. They do not take into account the detrimental affects this would have on individuals. I hope its thrown out.	Q N

71	<p>I fully support the reinstatement of the buffer zone on Marsh Common Road to not only protect residents and villagers from noise/light and operational pollution but also to create a safe multiuser path for pedestrians, equestrians, disabled members of the community and cyclists from Pilning to Station Road and beyond.</p> <p>I am generally in support of the NP, however, I would like to focus on reinstating the buffer zone along Marsh Common Road and have this as an urgent matter given the recent development so close to the village. I would urge the Councils and NP to mark this as a priority to protect the village and surrounding areas. I am on the fence regarding Pilning Playing Fields and the Village Hall, mainly because I fail to see where this green space can be replaced and also a site for the village hall. For that reason alone I cannot at this stage support this proposal in the NP.</p>	T A N
72	I object to the building of houses on Pilning playing fields and demolition of the village hall.	A
73	<p>I think the consideration to get rid of the community playing field is atrocious. As is the plan to remove the allotments which I feel are the heart of the community, many families and their friends use this space to teach kids how to grow food and care for the land. I moved to Pilning in my early 30's because I wanted to raise our children in a small village community with green space to play and a safe route to school. Frankly if you take all these things away I would be looking to leave the community after 8 years. I have big concerns about the water retention in the area. Climate change is bringing more and more rain to the UK and the coastline along the river Severn is already at risk of submersion by 2050. In March of this year we had a prolonged period of rain and for the first time in the time I have been here the flooding on the playing fields spread the whole length of the field and the allotments flooded. I've never seen that before and what had changed? The addition of the 2 traveller sites (paved) and the clearing of the ground for the eyesore that is that warehouse.</p> <p>These developments have removed vital green space from the village and thus removing natural absorption for the rain. Building on these sites (or any other green space in the village) will only increase the amount of surface flooding and put our homes at risk. I could not oppose these plans more and I beg some consideration for the families that have made this place our home.</p>	A I R
74	We have two young children and use the park every weekend and we use the field most days to walk our dog. We would be devastated to see it go as we would have no where within walking distance to spend time together as a family or be in nature. Due to my mental health I desperately need to be surrounded by nature and fresh air, as do most of our community. Getting rid of the field/park/allotments would be a travesty for everyone who lives in Pilning and the surrounding areas.	A C N
75	Im really gutted that the much used playing fields are at risk of development along with the allotments. The village needs its outdoor space!	A K
76	I approve of the plan particularly as the village is distraught at the building of the mega warehouse and our properties are being devalued. We desperately need positive input into the area as we are exceptionally concerned	T

77	I have given the NDP a read and can understand the reasons for development. My concern is about plot H9 We live right next to this field which has provided us with wonderful animals of all types from small birds, hedge hogs, mice and bats. Every night we hear a owl and in summer we have the wood pecker come. Along with the animals the field provides a lovely dog walk which I and others use everyday, I feel so lucky to have this right next door, and when walking the dog, the field also provides blackberries for the community. Every April I watch the bumble bees come out in the morning to heat up in the sun, ready for the summer ahead. Not to mention it also helps make the main road a lot quieter than it currently is, we can still hear it at night and it does keep us awake when there is a lot of traffic but removing the field along with all the trees etc would remove this buffer making it a lot louder. I worry that if the planning goes ahead in H9 we will loose the nature we have, a well used dog walk where we can let our dog off the lead to walk without worry. The NDP talks a fair bit about the aging community and how its outside the averages, but I see that as a good thing. It tells me its a community which is happy, people don't want to leave as it is lovely in Severn beach in summer and winter. Me and my partner are starting a young family and bought our house from a man that went into a retirement home. We made this house our home, and chose Severn beach due to its lack of new builds, and the community was built by the people. These large development companies don't care for the community, they look at land and think whats the max amount of houses I can fit, for the max profit. Please leave H9 as it is. its a wonderful field, which has a lot to offer. Walks for the community, vegetation for all the animals to hide, a buffer to stop the sound of the main road. this field cant go as its got to much to offer. I have also noticed since the development company bought the land they have stopped maintaining it, making it harder to use the footpaths and look more a mess.	H
78	This is a feedback in respect of the proposed car park at New passage TTP4. I believe the car park will create new challenges for the residents of the area, such as unsocial behaviour where it can be used for vans to sleep overnight or a place for youngsters with cars/electric bikes etc. we are already seeing a problem where people come and park in the area and sleep overnight and electric bikes going by the seafront wall. The car park would encourage this even further. Hedges down the Passage road should be trimmed to allow safe parking and double yellow lines introduced in places where the road is too narrow so no parking for visitors and to allow emergency services to come through if needed. Thank you for your consideration.	M
79	I object to the plans H7, H8 and H9. Whilst I agree there is may be a need for affordable housing, the destruction of green areas around the village cannot be allowed to happen.	Q N
80	I am not someone who normally comments about developments . As an estate agent it's what boosts economy and brings people and jobs to the area but the new warehouses being built behind Pilning are an absolute eye sore ! I don't dispute them being built but the height of the current building in construction is the biggest eye sore and a tragedy for the area . South Gloucestershire council you should be ashamed for allowing the height of this building to be approved. Warehouse development is an absolute eyesore for Pilning , NewPassage, Redwick and Severn Beach.	R
81	Whilst I appreciate that some more housing is needed in the Parish, I do have concerns: The Plan says that housing is needed for youngsters wishing to remain in the area. Regarding social housing, is there still a policy that says that local housing is only to be	Q

	for local people? Will this be enforced? I disagree with house building on Pilning Recreation ground and think this should remain for use by local people. I also can't see how this site could be accessed safely. Likewise I disagree with any building of houses on H9 due to access issues which would have a detrimental affect on the local roads with noise issues due to extra traffic and safety issues to children using these roads for access to the local school. I also think that the school shouldn't sell part of the field to provide an access road. The field should be protected for the school. Also the land at H9 has become more of a wildlife habitat for wildlife which had to leave the old Orchard Pools area which was cleared for warehouse building. The trees and hedges on this land provide a buffer zone for Prospect Road, Deny Isle Drive and School Way helping to stop noise from Western Approach and the surrounding motorways. My main concern is the increase risk of flooding from rainwater which will have nowhere to run off. Recent house building at Cribbs Causeway, the building of many more warehouses throughout the area and Climate Change increases the likelihood of flooding in the future. Areas of Yate and Chipping Sodbury were flooded last year by rainwater - this has never happened before! The plan says new properties will be protected from flooding with no ground floor sleeping areas but what about existing properties? There are a high number of bungalows and mobile homes in the area. I am really worried about the risk of flooding. I think it is a good idea to build sheltered housing near the surgery and shop.	A H I
82	I have previously lived in Cranmoor Green Pilning and am horrified the residents there will be overlooked by the monstrous warehouse being built. SGS seem to have little concern for the residents in Pilning, allowing this and other warehouses to spring up in, what is, green belt land. The light and noise pollution in the area coupled with the increase in traffic is already at saturation level. Village life is being annihilated in Pilning.	R
83	I attended the parish council meeting and whilst I can see positives with the wider plan which will benefit the village but agree with the proposal at the meeting that H1 (Pilning playing fields) is removed from the plan prior to submission to south Gloucestershire council. This is the only green space in the village, the field is utilised consistently by dog walkers, families, teenagers and the village hall is used daily by the local community. The wellbeing and mental health of the villagers is paramount and this meeting place allows locals to meet, walk, talk, play etc whilst also gaining fresh air. This is imperative in the modern tech world we live in. Mental health authorities campaign for people using the outdoors, do not take this away.	A
84	There's an awful lot of information provided within the Neighbourhood Plan, and after reading it, I find myself asking more questions rather than finding answers. I have lived here all my life(I'm no longer calling it a village) and am saddened to have seen so much change, especially the loss of our green space.S	Q
85	Please advise how strong the wrapper is around site H1 Pilning playing fields. I fear any future planning application would put forward the minimum amount of alternative space. Therefore If the intent is to really protect the field then the strongest wrapper around the field should be set in the plan. I.e. The alternative space SHALL be of equivalent size to the space lost, along with enhancement statements that compensate the parish with additional facilities (e.g. More play equipment, multi sports court, football pitch, 3G cricket wicket) accessibility features, easy access etc. If the group campaign and offer this clarity then it may help ease the fears of the doubters. Also, please clarify what the	A

	consequence of not voting for the plan is i.e can the owners put in a planning application for the site and do what they like?	
86	<p>Formal Objection to Pilning & Severn Beach Neighbourhood Development Plan (2024-2035) I am writing to formally object to the proposed Neighbourhood Development Plan, particularly regarding Policy H1 which proposes development of Pilning Village Hall and Playing Field. Loss of Essential Green Space The playing field is the only significant public green space in Pilning village that residents can access freely. My family uses this space almost daily – we walk our dog there nearly every morning and evening, and it provides vital outdoor space for exercise and mental wellbeing. Where exactly are we supposed to go if this is built over with houses? The plan speaks about "preserving green spaces" but then proposes to destroy the main one we actually use! This is complete contradiction. The plan mentions "adequate alternative provision" but gives no concrete details about where, when, or how this would happen. Once this land is sold to developers, it will be impossible to get back. We have already lost so much countryside to the warehouses on Severnside - must we now lose our village green space too? I am particularly concerned because the document states this land is held in charitable trust for community benefit. How can the Steering Group propose to develop it without proper consultation with trustees and residents who use these facilities? This seems legally questionable and morally wrong. Neglect of Pilning Railway Station It is absolutely shameful how little attention this plan gives to Pilning Railway Station. The station is mentioned only briefly, despite having enormous potential to reduce car dependency and traffic congestion. Currently, we have two cars in our household, and I am reluctantly considering buying third vehicle because my daughter will soon need to travel to college and / or work. If Pilning Station had proper services, we would not need this expense and environmental burden. The plan focuses heavily on Severn Beach station improvements but almost ignores Pilning Station, even though reopening it properly could serve thousands of commuters and reduce lorry traffic problems that the plan itself identifies as major issues. This is missed opportunity of huge proportions. The Pilning Station Group and ARUP studies are mentioned only in passing (8.4.11), acknowledging the station could "form a hub for the local area" - yet no policies support this! Why not? Transport and Infrastructure Problems The plan criticizes high car dependency (92.4% of households own cars) but then proposes more housing without adequate public transport infrastructure.</p> <p>My family contributes to this statistic because we have no realistic choice. I drive nearly an hour each way to work, and school runs are impossible without car. The lorry traffic situation is already terrible. When heavy lorries drive past our house, we can feel noticeable ground movement which is causing damage to our building. The roads were never designed for this volume and weight of traffic. Building more houses will only make this worse, not better. The plan should prioritise sustainable transport solutions and proper infrastructure improvements before adding more residents who will also need cars. Environmental Concerns I care deeply about environmental protection - we try to reduce our carbon footprint where possible - but this plan makes situation worse. It proposes destroying green spaces, removing land from Green Belt, and increasing car-dependent population, all while claiming environmental benefits. These contradictions are unacceptable. My Objections for This Consultation I strongly urge the Neighbourhood Plan Steering Group to revise this plan before it proceeds further, with: 1. Complete</p>	A N C N S

	protection of Pilning Village Hall and Playing Field for community use 2. Comprehensive policies supporting Pilning Railway Station development 3. Genuine sustainable transport solutions before additional housing 4. Honest consultation with residents about what we actually need and value The current plan appears designed primarily to generate Community Infrastructure Levy funding rather than serve community interests. This is wrong approach entirely. I ask that my objections be fully considered and addressed before this plan moves forward.	
87	This is a disaster all these warehouses we're living in a industrial estate. Object	R
88	Please note that site H8 (land of Ableton lane) now belongs to us and we do not wish it to be considered in 'call for site'. We ask that this is removed asap and that we are kept informed of the neighbourhood plan as it progresses.	G*
89	I object to H1 being submitted into the Neighbourhood Development Plan. It stipulates that an alternative would be used, but there is already the facilities at H1. Why not build the houses on the alternative? We need to keep our green space for everyone's use. Maybe if the hall was made more accessible (as is SB village hall) it would be able to use profit instead of relying on the Parish Council.	A
90	I object to the loss of the hall, and especially the playing field from its current location. No thought seems to be in place for the current residents and effects on them or future residents of the village. Moving the playing fields away from the school to the other side of a major arterial route is nothing short of ridiculous. If the ground allocated for the 'new' facilities is viable, then why not build houses there? We lose green spaces at our peril and these changes are impossible to reverse once carried through.	A
91	<p>We object to further development being allowed to proceed on the Severn floodplain where we live; the construction of huge warehouses increasing flood risk / creating depressive landscapes; the uncontrolled access being allowed to heavy traffic on our insufficient / out-dated roads and such decisions being undertaken by persons who either do not suffer the consequences themselves on a daily basis or who stand to gain personally in some way.</p> <p>Further to the objection to further development on the Severn floodplain that we posted previously on this site:</p> <p>In view of accelerating climate change resulting in increased heavy precipitation and rising sea levels, we would like to see an executive summary covering up to date scientific justification for safely further developing the Severn flood plain (for both domestic and industrial use). Such summary to include proposals for adequate flood prevention and supporting drainage-based mitigation measures (a major concern being the balance between the loss of soft earth to soak up water and the increase of concrete /impermeable surfaces that retain water).</p>	I R
92	object to the proposed H9 development. This piece of land should be protected not built on. The trees should still have their protection orders. We can't afford to lose this precious habitat. My family has walked and played in these fields for over 90 years. I have a photo of my mum aged about 4, about 1940, sitting in the field at the bottom of Abbott Road. I walk through Gypsy Plat on a daily basis, and have done for over 50 years myself. Over the last year I have seen the following butterflies there: Red Admiral, Comma,	H

	Orange Tip, Green veined White, Small Copper, Peacock, Gate Keeper, Speckled Wood, Common Blue, Small White, Brimstone, Cabbage White, Marbled White, Painted Lady, Small Tortoiseshell and Meadow Brown. I have also seen various insects, dragon fly and damselfly. There are various birds in the hedgerow and trees that are in the fields that I have seen and heard too - Black birds, long tailed tits, blue tits, great tits, brown buzzard, jay, chiff chaff, starlings, green woodpecker, great spotted wood pecker, tawny owls, dunnock, song thrush, wren, robin and sparrows. We don't have many rabbits anymore, only seen 3, but I've also seen shrews, mice and a fox. There are several oak trees which are home to so many species which need to be saved. The fields used to be so rich in floral and fauna but the fields were ploughed up to stop a traveller encampment over 20 years ago. Native wild flowers are beginning to come back, like cowslips and cuckoo spit because the pathways are being regularly walked keeping the brambles down. Imagine how many more species we would see if this land was managed as a nature reserve. Keeping this land as a nature reserve would be beneficial to us all, physically and mentally.	
93	Overall the plan provides a good structure for key developments in the Parish which I fully support. In consultation with my neighbours, I know there are reservations about the choice of TTP4 as a car park, and whether this is genuinely viable compared to requiring SGC to maintain the road (or for SGC to get require landowners to fulfil their obligation to prevent overgrowth, which is some 3-4 feet in places). Other concerns include the site's potential for inappropriate use for unauthorised camping, drug use, antisocial behaviour, the viability of the access point, ongoing maintenance, its potential as for fly tipping, the responsibility for opening/closing the gates as parking demands. Also, whether the provision of parking may have the unintended negative impact of encouraging more visitors than the very restricted lane through New Passage can cope with, especially as it is the sole point of entry/egress for residents, services, deliveries, and emergency vehicles. Nevertheless and whilst sympathising with the viewpoints of neighbours, designating site TTP4 as a car park would, hopefully, restrict its use for other developments which would be less desirable. I also declare that I am a member of the Neighbourhood Plan Steering Group. The above comments are made in my capacity as a New Passage resident.	M
94	I think the team have done a very thorough and professional job in preparing the Neighbourhood Plan. It must have been a huge amount of work and they are to be congratulated. As it states in the plan itself, individual developments will still need to go through the planning process, so any controversial proposals will be subject to consultation at that time. However, it is very important to establish a base-level plan to steer developments rather than allow the uncontrolled free-for-all which has been the case in the past. It is very clear that more housing is required in this area (as well as the rest of the country) and having a plan produced by the community is much better than a plan which is forced upon us by developers. As well as providing proposals for housing development, the plan has given a good level of consideration to the requirements for community facilities. This is critical and is an aspect which uncontrolled housing development typically ignores.	T
95	I am against building houses on H9. It is the only true large semi wild green space left in the villages of Pilning and Severn Beach. The villages have over time been surrounded by hideous large warehouses, cut through by two motorways and the upgraded A403. The	H

	<p>volume of traffic has tripled over the last few years causing residents to endure more noise, pollution and damage to all the surrounding minor roads. This green space (H9) has many mature trees and a variety of birds, animals and plants. In this summer gone three foot deep cracks have appeared in the footpaths (Rights of Way). The clay formation is prone to this behaviour and any building work would require additional foundation works usually requiring a concrete raft. This would presumably increase the cost of the works. The access to this site is a problem. The road I live in (Abbott) is totally unsuitable. It was adopted in the seventies. It is not of any great construction and would soon be ruined by heavy lorry movements. As would our drainage, sewerage, trees and curb stones. It is not wide enough and with parked cars usually in the street it certainly would not be suitable for thousands of large lorry movements. Entry to the street is difficult for large vehicles from the main road with cars parked at the top of the road and there is poor sighting to the left when exiting. I would like it to be recorded that the owner/developer has illegally widened the gate into H9 and moved it forwards six feet on property they don't own. Vehicles run over part of the footpath to access the site.</p>	
96	100% against the development allocated H9. Is it a coincidence that you have not specified the access routes into this development ? But logic would denote the use of Denny isle. This would create no end of traffic problems for the existing residents. We chose to live at the end of the a cul de sac for a reason. We have children that play in the street, a Tawny owl that lives in the field, that we hear most nights. As well as residents that park on the road in safety. Allowing access to 80+ houses with circa 160 vehicles going by at all hours absolutely unacceptable. You talk about retaining "village life" on one hand and then remove all the things that makes it a village. Namely a safe place for children to play, a closeness to nature, low traffic volumes, a calm and quiet place to live. All wiped out for money and profit !	H
97	Great piece of work thank you all for the work. We need to grow the village to ensure it stays alive and thrives. Particularly like the attention to adequate parking in relation to the train, it is really needed to maximise that asset.	T
98	Please please don't allow losing the Pilning playing fields to housing. Or anything else. Please keep it as a public green space. It's vital part of dog families lives. I think the pitch could do with some attention to be levelled to make it usable. It does feel tired as a park. It needs preserving not permitting for housing. There are no other family amenities if this goes.	A
99	<p>The 'vision' as written on page 26, does not adequately capture the neighbourhood's aspirations. Herewith my re-write as an attempt to improve an otherwise excellent document.</p> <p>In 2035, the Parish of Pilning & Severn Beach will have retained its rural and coastal character, reflected in the spirit of its village communities. It will have preserved its green spaces, and have improved access between the villages and through to the adjacent countryside and to the Severn Estuary coastline.</p> <p>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, as well as accommodation for older people to enable residents to age in place. New developments will be well designed, attractive</p>	Q *

places, sitting well within the existing settlements, giving a sense of organic growth to the community.

Important local facilities and services, pubs and shops will have been protected and enhanced. In some cases new facilities will have been provided, all supporting the sustainability of our community and the viability of our shops and schools, all to the benefit of residents and the well-being of the neighbourhood as a whole.

Cycling and walking networks will have been improved. The attraction to the area of increasing numbers of visitors will be recognised and better accommodated.

Employment opportunities and the strategic importance of Severnside as a regional growth area, will have brought advantage to residents; the needs of workers and residents being complementary in generating much improved public transport and road/rail infrastructure provision. The impact on local communities will have thus been reduced and mitigated to enhance the environment for all.

This Plan will have been instrumental in ensuring an understanding of this unique neighbourhood and enabling progress towards this vision.

page 29. Designation by the NP of a 'Green Buffer' supports the retention of these areas as 'open countryside'. The map should include other land not highlighted on the map on page 29:- 1. rear of the 'woodyard', Church Lane. The planning consent did not cover the whole of the triangle 2. Govier Way lake and landscaping 3. North and West of A403 and between H8 and the railway Also p29 map shows a strip alongside Marsh Common Rd, but I could not find reference to it in the text. There needs to be a specific sentence added to make clear what is intended.

Page 80 CF4

the policy is titled CF4i so begs for a CF4ii which should include 'areas to be nominated by the community', and could have policy statement of 'to designate the following as areas of community value'.. So designated would then give the Parish Council the option, as and when they come up for sale, to source funding for purchase or to negotiate transfer under BNG to a Trust(such as Avon Wildlife Trust.). I would suggest, for example:-

- a) land to the east and west of Gypsy Plat
- b) woodland to the north of Shaft Rd (owned by National Highways but open access land)
- c) Church Lane
- d) pools and landscaping at Govier Way
- e) Butchers Lane and fields around Whitehouse Farm
- f) coastal lands, west of the railway, to the south of Severn Beach

page 93.. proposed extension of the Settlement Boundary to the east of Prospect Rd needs to be removed.

The area to the east of Gorse Cover Rd(NP02) should be shaded or hatched as being 'appropriate for allocation if land ownership issues can be resolved'.

This would not be over-reaching the remit as SouthGlos has the CPO powers, the receivers would be glad to have it off their hands and the land is crying out for an

	allocation as a village extension, phased to be built over a period of years. In addition the government made funds available for this sort of asset resolution which can be approached by SGC in conjunction with a housebuilder and/or RSL. An indication in our plan, that this would be an appropriate use, would enable that action by SGC.	
100	I object to the proposed construction of 80 dwellings in plots H7, H8 and H9. This area is green space, providing much needed environmental areas for trees, birds and wildlife. They are used daily by members of the village as public rights of way for walking dogs and as areas for locals to enjoy a walk. Furthermore there is no suitable road access to these new developments, all the current roads are narrow access only roads which would not be suitable for accessing the new building development areas. One of the main things that attracted me to the village when I purchased my property was the character and quietness of the village, this would be completely lost with a huge increase in noise pollution and would mean the village will lose its unique identity.	F G H K
101	I object to the proposed construction of 80 dwellings in plots H9. This is a much loved green space, providing essential environmental areas for trees, birds and wildlife. Every day I see members of the village walking their dogs along the public rights of way and as an area for locals to enjoy a walk. There is no suitable road access to the new proposed development, all the current roads are narrow roads which wouldn't be suitable for construction traffic accessing the new building development areas. One of the main things that attracted me and my wife to the village when I purchased my property was the character and quietness of the village and the familial link this would completely change the area with a massive increase in noise pollution and traffic would mean the village will lose its unique identity. I've spoken to many of my neighbors and yet to hear one consenting opinion	G
102	<p>I would like to object to the developments H7, H8 and H9 of the NDP. I believe that all the developments, especially H8 & H9, will cause issues due to the following:</p> <p>Road issues - all of Severn Beach has a road weight limit, this surely could not be followed with so many and such large developments going on</p> <p>Road disruption - Lots of Severn Beach has narrow roads or cul-de-sacs, large heavy vehicles may cause blockages to these roads reducing road safety for residents, drivers and pedestrians.</p> <p>Loss of accessible green/outdoor space - Green space has important benefits for health, wellbeing, mental health and fitness. Losing even more accessible green spaces would be bad for all residents on all of these accounts. This is part of what residents moved here for or remain here for and would force these people to go out of area to reach green space. This would result in people spending less time outside and being forced to travel if they wanted to, this would severely limit access, especially for those reliant on public transport or those who work and do not have time to travel for this.</p> <p>This is especially true given how much green space has already been lost or become inaccessible with so much industry development already happening or planned in the local area.</p> <p>Parking concerns - Despite the promise of parking in these developments there is never enough meaning that local roads would become congested with people parking there. Any equivalent new developments I have seen have difficulty with having enough safe parking. There would also likely not be anywhere available for visitor parking as all</p>	Q F G H N

	<p>available parking would be filled with residents therefore creating further parking issues. Cars parking on the main road already cause a loss of vision currently and reduce safety and parking on my road is already regularly challenging.</p> <p>Loss of biodiversity - Maintaining biodiversity is important for climate, for wildlife, for pollinators, for plants, for animals, for health, for protection of crops, for protection of farming etc. There has already been so much loss of biodiversity everywhere and Severn Beach is so lucky to have what we have left and we cannot afford for more to be lost. The green spaces lost to these plans, especially H9, contain a broad biodiversity that needs to be protected!</p> <p>Destruction of trees - Many of the areas affected have trees subject to tree protection orders that therefore need to be protected and would not be if these developments went ahead. Current services already over subscribed - The current local services including GPs, dentists, schools, pharmacys etc are already stretched and oversubscribed and should not be put under more pressure with an influx of so many extra residents also needing to use them. This would add pressure to already stretched services and reduce access to those who already rely on them. Access routes - Development H9 has no good road access available. Any attempts to fix this would cause chaos and so much disruption to any affected streets including loss of access to dwellings, noise, reduced road safety etc as well as changing the feel environment of those roads which are important to why people chose to live there.</p> <p>We have recently relocated to Abbott Road, Severn Beach. We specifically chose to move here before growing our family as we wanted us and our child(ren) to have access to safe, local, accessible green spaces and outdoor spaces and to have a local village atmosphere. We also moved here for the health (physical and mental) benefits gained from living in a space like this. We also wanted a small cul-de-sac or road with fewer cars that felt safer for a child and quieter for noise and light levels. It is so sad that everything we loved about Severn Beach would be lost if any of these developments, particularly H8 and H9, were to go ahead when that is exactly why we chose to move to this area (waiting until an appropriate pre-existing house came up for sale). Small villages with the community and feel of Severn Beach are already rare and rapidly become rarer and need to be protected.</p>	
103	<p>general: I support: moderate amount of home building (including for elderly) flooding prevention, green buffer zones, limit on large commercial developments, amenities for truck drivers</p> <p>specific comments:</p> <p>H1 I support idea of (less than) 30 dwellings circled round a public green space with seating and play area. Money could rebuild village hall (perhaps elsewhere) and a new playing field.</p> <p>H2 I suggest a buffer zone with neighbouring travellers' site.</p> <p>H3 Some of allotment area to be used one day for burial plots?</p> <p>H7 It is REALLY important to acquire this site for parking and a transport hub. (also, shops, dwellings and provision for additional train track)</p> <p>H9 Gypsy plat is very important for wildlife and humans (dog walkers , blackberry picking, short cuts, accessing work, and children's imaginative play!)</p>	<p>T</p> <p>Q</p> <p>*</p> <p>H</p>
104	I believe that both the playing fields and allotments should be removed from this plan as potential sites to build houses. The playing fields are the only useable green space	A C

	available for the children. Additionally who would want to purchase these properties as there view would be the mega shed.	
105	<p>This doesn't seem to be beneficial to the neighbourhood and local area in the slightest. I object to the removal of open green space to be replaced with car parks. This will not benefit anyone locally. We do not and will not see enough visitors to warranty this many car parks over green space.</p> <p>I object to more housing. I object to getting rid of the village hall and playing field, one of our only fields!</p> <p>We do not want all of these buildings coming up in our green space. Leave it be!! You have basically looked at a map, pointed at green space and gone "let's make some money here" ... think of the community that you supposedly live in.</p>	Q A
106	I would like to put forward my opinion that I believe adding a car park to promenade gardens would detract away from green space that it used throughout the year and would become an detraction from a beautiful spot. Although I agree some parking may be needed in the village I do not believe this is a suitable location and other options that have been discussed such as towards the allotments may be more suitable Thank you for taking the time to read this	J
107	We are writing to strongly oppose the development of a car park on Severn Beach Promenade Gardens, as proposed in the Neighbourhood Plan. This open green space is an invaluable public amenity, completely inappropriate for use as a car park. What, if any, provision would there be for the opening/closing of the car park? Would parking be chargeable & who would police this? As Beach Rd residents we are already troubled by motorists parking at night, with associated music, door banging & the frequent leaving of refuse behind. Would overnight parking be allowed? We already have camper vans overnighting in Beach Rd - this despite there being a covenant on Beach Rd residents prohibiting the parking of caravans or camper vans in their own drives! What about the risk of Travellers overwhelming the site? Will the beautiful trees remain - if some were to be sacrificed, what a terrible waste of money to have nurtured them for all these years. It's bad enough that the Miniature Railway is still under consideration but to have cars parked in our green space completely ruins the outlook.	J
108	<p>Residents and the environment will be the big losers.</p> <p>OBJECTION: detriment to habitat and environment: Large housing sites H8 & H9 and a large car park located on Promenade gardens (1/3 or so of main area next to the "just as you are' café in Severn Beach pages 68 & 69) -all environmentally damaging and detrimental to wildlife and in the case of the proposed car park a total eyesore.</p> <p>OBJECTION to: the Plan's inclusion of new housing sites and the extreme extension proposed to our built environment. South Gloucs have said there is NO Housing Requirement for this parish in the period to 2035. (The affordable housing suggested by our parish council is unlikely to be affordable as the NP has not provided any mechanism to put a ceiling on prices or to restrict 'affordable' houses to locals.)</p>	Q *

	<p>OBJECTION to: Loss of Green Belt: playing field (site H1), H2 & allotments (site H3) are green belt.& OBJECTION to :Failure of the Parish council to recognize that there is statutory protection for our allotments.</p> <p>OBJECTION: as the proposals are Contrary to Neighbourhood plan objectives: notably to "maintain protect and enhance community facilities, especially ... village halls and open spaces." The proposals to build housing on our Open Space DIRECTLY CONFLICT with this objective. The steering group have translated 'protect to 'build over the lot'</p> <p>OBJECTION: to Failure to provide for the interests of residents: 90% of residents make use the Pilning's public green spaces; 55% use the playing field daily or weekly.</p> <p>OBJECTION to: An Unacceptable Loss of Public Open Space / Community Assets: housing on sites H1 & H3 will take away the entirety of Pilning's existing public open space and community assets (playing field, village hall and allotments).</p> <p>Overall, I think this is a terrible idea and massive threat to our green spaces. I regularly use the parks and would hate to see them gone. It is already bad enough with the oversized warehouse being built!</p>	
109	I object to the planning proposals in my village and surrounding areas .. Severn Beach is a Village where I chose to make my home .. all these big ideas for new houses , car parks etc are not wanted here taking up our precious green spaces , noise and air pollution will ruin the village	Q
110	Absolutly awful all the warehouses going in. How i cant get a 1m extension as it might block our neighbours light yet a warehouse as big as a cruise liner can block light from a whole village. Money talks unfortunately and the people accepting the planning have no care on the residents of the area. It seems if you have money then the council will approve anything. Wildlife will suffer, roads will suffer, pollution and eye sore to the whole area.	R
111	<p>I am writing to formally object to the above planning application for several vehicles believed to be 20 or more (car park) to be installed directly outside my address at:- Beach Road, Severn Beach, BS354PE.</p> <p>The proposal for this car park would be located right in front of my property at 91 Beach Road, Severn Beach, BS354PE.</p> <p>I along with my wife's objections is based on the following planning grounds and personnel reasons.</p> <p>Wildlife issues.</p> <p>The proposed car park would be on a piece of land currently containing young trees which had been planted to grow into maturity within the next few years and not only would have major impacts on the wildlife, birds, insects etc objecting against the complete waste of monies in purchasing young trees to plant with rate payers money through our council tax that supported these trees a few years to go a head to be planted.</p>	J

Public Disorder and litter offenses.

The proposed car park at this location within our once quiet village in Severn Beach on Beach Road would most definitely bring with it major long-term issues relating to:-

Public disorder, noise, illegal parking overnight, travellers, drugs offences, damage and litter that I, my wife, family, not forgetting my elderly neighbours who are already involved "daily"

We are already having to put with and dealing with outsiders, troublesome teenagers, youths in their high-powered noisy vehicles and visitors who are not from Severn Beach arriving, visiting, parking up and causing obstructions and all I've mentioned above occurring outside our properties on Beach Road and the public highway.

Over the years gone by at some time I can categorically state we've been involved in leaving our homes each morning and at our own expense having to pick up and place into our black bins, dropped litter, soiled nappies, broken bottles, glasses, sharpened homemade nails dropped deliberately onto the grass verges, kerbs and main road to cause damage, deliberately puncturing are own and visitors tyres.

Drug issues, Beach Road.

Having daily/weekly to pick up hundreds at times: drug paraphernalia, empty cannabis wrappers and sliver cannisters used for "cream chargers" containing "Nitrous Oxide" used by youths in their vehicles using them daily/nightly ,druggies" who sniff the gas through balloon's, getting high, or drunk becoming intoxicated resulting in public disorder and violence, fighting, screaming, playing loud music through opened windows deliberately taunting us to respond and when the police don't respond with local residents in Beach road having to confront these tormenting, drugged up youths, teenagers becoming aggressive against us resulting in assaults with residents requesting police involvement.

Veterinary Bills.

Fishing hooks is also a major problem at Beach road with visiting anglers arriving at Beach Road and having fished packing away their equipment would constantly discard their rusty, sharpened hooks and old fishing lines causing serious harm and injuries to our local residents dogs, and the owners incurring huge vet bills costs to retrieve fish hooks from the throats of these much loved animals.

Residents of Beach road including myself "to date" and I'm at 66 years old, will deal with these issues occurring right in front of our front doors and with the proposed car park on the green space it will exasperate the already ongoing issues, problems me and my elderly neighbours are already having to put up with "weekly".

Increased Noise and pollution.

the introduction of a 20-vehicle car park directly adjacent to residential properties will inevitably lead to a significant increase in noise from vehicles, engine idling, and car doors

	<p>This will also cause a rise in air and light pollution, negatively impacting the quality of life for myself and my elderly neighbour's.</p> <p>Impact on Traffic and Safety:</p> <p>The car park entrance and exit will be positioned directly behind the cafe which increase the already experiences a high volume of traffic, especially during peak hours</p> <p>A 20-vehicle car park will exacerbate congestion, create potential safety hazards for pedestrians, and make it difficult for residents to enter and exit their own driveways along Beach Road.</p> <p>Harm to Neighbourhood Character:</p> <p>This proposed car park is not in keeping with the established character of our residential street in Beach Road, which is dominated by houses and gardens overlooking a beautiful Severn estuary and "Wales"</p> <p>Summary.</p> <p>This proposed car park would create a utilitarian and unsightly area that is incongruous with the surrounding properties, would bring to the village unwelcomed violent, hostile persons resulting to an increase in "Crime and Disorder" and could lead to a devaluation of properties in the area and I, along with my wife and all the residents along Beach Road urge you to refuse this application on the grounds stated above.</p> <p>The proposal represents an overdevelopment of this plot, with a detrimental impact on the quality of life for nearby residents and significant negative impact on the local environment and community.</p> <p>All these problems and more! goes on and occurs weekly it seems behind our own "Parish councillor's backs" we the residents of Beach road feel totally let down, firstly that we the main residents on Beach road haven't been consulted in person and it seems would like/want to push ahead with these car park plans, we can only assume it's because they don't live here on "Beach Road "and don't have to put up with or deal with these matters, or don't seem to know what we the main residents on Beach road have to contend with , weekly or in fact don't wish to hear about our concerns, we're asking, why? is it because it's not their problem?</p> <p>I am available to discuss these concerns further and can provide additional information if required.</p>	
112	<p>Car park proposal at the sea wall end of Shaft Road: Object</p> <p>We would have strong concerns about converting this area to parking for various reasons including:</p> <p>Loss of privacy/security for the small number of residential properties at the top of the lane</p> <p>Additional noise for residents</p>	L

	<p>Anti-social behaviour and overnight camping (from which we already suffer, particularly in the summer)</p> <p>Inadequate access on a single track lane - which is already in very poor condition - for any volume of two-way traffic</p> <p>Safety concerns - the narrow lane is used for walking, cycling, no pavements</p> <p>Potential for traveller encampment</p> <p>We fear that because this site is away from the main village the attitude will be 'out of site, out of mind' and because there are only a small number of properties here, we don't have a loud voice.</p>	
113	<p>I highly object to the playing fields , Plot H1 , being built on for housing .</p> <p>I also do not see the need to concrete over the only green spaces we have left as a village .</p> <p>We are surrounded on all sides by a river , railway and now ware houses .</p> <p>We don't need any more houses as our roads can not cope with the extra traffic from Western Approach as it is , and every road in and out of Pilning is failing apart due to the extra traffic .</p> <p>Your plans do not even mention this over development on our door step which I find strange given its local impact on the village .</p> <p>In fact I suspect the village green will be built on by a housing association in order to supply cheap accommodation for Western approach industry workers and not so local people can stay in the area .</p> <p>The council should compulsory purchase land at the top of bank road and Northwick Road which has temporary structures on it and give this over to being built on .</p> <p>Since this land is near the doctors surgery , shops and bus stops this land would be ideal for older persons housing .</p>	A
114	<p>Thank you to the Neighbourhood Plan Steering Group for all your hard work in producing the Development Plan. This is an impressive piece of work and a testament to your commitment, dedication and resilience over 4 years.</p> <p>I support the Plan.</p> <p>I am aware that there are local concerns, especially regarding Site H1. I am also aware that since the Steering Group embarked on this journey to write the Plan the character of our parish has changed in some ways and ownership of land has transferred to different groups. The arrival of the 'mega-shed' has also provoked justifiable concern amongst us residents. These changes may impact on the Neighbourhood Development Plan and I trust that the Steering Group are both cognisant and sensitive to the concerns. I understand that without the Plan being adopted, our parish will have very little protection from unrestricted development - I believe the Plan will provide a safeguarding element and, hopefully, give us a voice in future decision-making.</p> <p>I hope you receive full support for the Plan.</p>	T
115	<p>I agree with the overall principles of this plan, however, I am concerned with the amount of disruption this will bring especially to the road networks in and out of Severn Beach.</p> <p>How will this be addressed?</p>	T S?
116	<p>I oppose to the selling off of the community green spaces, allotments and playing field of our village because we use them, and they are a vital part of life.</p>	A C

When we moved to this village in 2021 without knowing anything about it, or where it was, we lived on Jackson Close, my husband was finishing his last years with the Army and we needed to think about settling down somewhere. I had always wanted to live in a rural location, but when you're with the military, you can end up anywhere, living in whatever they give you, and you make the best of it. I felt that we had been given a great gift to have a married quarter here, to be surrounded by fields, to hear birdsong every morning, to see wildlife living so close to us. When the time came, we decided that we wanted to stay in this village, we enjoyed the walk down the Church path to the school, we went to the playing field to walk the dog, we used the village shop, the takeaway, the pub. Everything we had wished for in our dreams of building a safe life for our children, was here, so we bought a house, somewhere that we could access all the amenities and green spaces by walking. I grew up in a small village and was connected to the wildlife and green spaces there, and wanted the same for my kids who enjoyed hearing the owls at night (there is one in number 21's orchard), watch bats, see rabbits, foxes, hedgehogs, Green Woodpeckers.

There is a Song Thrush that nests every year in the hedgerow on my allotment (number 9), and I sit in the summer and watch Barn Swallows hunt for food, you might be happy for this to be sold off for housing but I am not, you might want to take away the playing field, where we walk the dog, where a lot of the community walk their dogs, and let their kids play.

We teach our children about nature, about protecting our environment, about preserving and respecting our green spaces - at least I have, with the knowledge that this will be passed onto future generations, but what example is this setting by building on it? Saying that money wins every time?

If you take away the playing field, and you take away the allotment, and you build out the back of my house, and I can tell my kids that nature doesn't matter, money does, because by doing this, you have no connection to this village, I assume you have no first hand contact with the school, the kids, their community, you just see a problem that doesn't exist as there is no plan to build housing in this area according to S Glos.

Is this the sort of attitude where there are complaints that they never see kids playing out anymore, not considering that you were instrumental in selling off all the Green belt? So much research, actual science has gone into proving that green spaces improve kids, and adults mental health, my children are happier when they have been outdoors, my son plays out, my daughter likes to roam around the village and look at the fields, the trees, skateboard in the park, what will they have instead? More concrete, more noise, busier roads, more light pollution. No longer will there be a Song Thrush singing its heart out every from January and throughout the summer, a sound we look forward to hearing every year. No more foxes in the garden, rabbits, bats, hedgehogs, song birds, because their habitats will be taken away, not to mention the abundance of insects and invertebrates living in the allotments and surrounding areas.

Just more traffic noise, more pollution, less trees, less green, more grey, that's the kind of future they have without green spaces. You need to understand the heart of this community, and it isn't grey concrete, it's green trees, fields, spaces, my

	<p>neighbours could turn their orchards into Community Orchards instead of selling off their homes to developers and leaving the village (which in my opinion should be a crime to leave a community with less green space because you're better off), or give it back to parish for them to use in a positive way, somewhere for the future generations to learn about wildlife, and connect, not have to get in a car and drive miles away to somewhere that is the only place left, because everything else has been built upon.</p> <p>I absolutely object to H5 in the plan to sell off the allotments, the playing field and number 21 & 23 selling their houses to built on, it shouldn't be that only privileged children have large gardens and green spaces, all children should have access to these places for free.</p>	D
117	<p>May I take this opportunity to personally thank every one of the NPSG team, I know (much more than most) just how hard you have worked on the Neighbourhood Plan.</p> <p>I trust over the next weeks and months a final NDP will be produced that the Parish will be able to get behind and that the referendum will see the adoption of the Neighbourhood Plan.</p> <p>For myself I will be voting for the plan as the long term benefits are considerably more palatable than the alternative.</p>	T
118	<p>Feedback to the plans of Severn beach.</p> <p>I live in Stride Close so this will effect me hugely. My main concern is the amount of builds in a small space next to the train station, Most of all if access is granted via Stride Close which is a small culdesac of just 4 properties and already provides parking and access for numerous surrounding properties will see a massive increase of traffic, Including access for buses/cars for the train station and a pub.</p> <p>The addition of a pub will only make for more noise later into the evenings and when all other pubs in the area have had to close as not viable.</p>	F
119	<p>Objection to any building development on parish hall and recreation ground, this was paid for and built by the villagers for the villagers, this is a registered charity and well supported by various and the private bookings, in it's central location and off the main road it's an ideal place for the field and hall. I have been on the village hall committee for over 45 years, and it's disgraceful that this has even been suggested to be built on.</p> <p>Regarding the allotments area in pilning between bank rd and present cemetery was bought from British rail by the PC to provide space for further burials when present cemetery is full, so not for housing !</p>	A C
120	<p>Site H1: the recreation ground should be removed from consideration. It is an amenity used by many in the village, has previously hosted a local cricket side which might be re-formed in the future and there is no suitable area of land of similar size to replace it. I have seen the tennis court despite its state of repair being used this summer. Most importantly, the site is held by the Parish Council on behalf of the village and is not therefore available for development.</p> <p>Site H4 requires an access to Cross Hands Road. The current plan shows this just to the west of the Cranmoor Green junction which would cause conflicting traffic movements. To make the access work, it would need a mini roundabout at the</p>	A D

	<p>Cranmoor junction and compulsory purchase of the properties opposite, which is I would suggest a non starter.</p> <p>Site H3 has already been compromised by South Gloucester planning who have allowed the provision of - now 9 - residential mobile home sites for the Travelling Community. Not notwithstanding that, the allotments should be removed from this proposal. Although some are vacant, most are cared for. The area is also held for expansion of the cemetery.</p>	C
121	<p>I fully understand the need to provide more housing, however the proposal to build a maximum of 35 houses on the village playing fields (H1) will have a massive impact on the local community. It is a well used field by local children, walkers, runners, dog walkers. Living so close to the playing field and using it 3/4 times a week. I always see others in the field and it gets a lot of use. It is really the only green space Pilning has.</p> <p>If 35 houses are built in this one area then this will bring lots of families with children who will also have nowhere to play. These would most likely be small affordable housing which would encourage younger families and with no recreational facilities would be in breach of planning laws.</p> <p>As a scout leader in Pilning, we do take the scouts to the playing field for games, pioneering challenges as it is a large area for them to take part in activities. Other sections like Beavers, cubs and explorers use this field too.</p> <p>The village hall also holds local events that bring locals together. Loosing the field and the hall would be detrimental to the village.</p> <p>Access to the field is restricted and would cause a bottle neck of traffic onto the main road in Pilning on a bend, which would become area for accidents.</p> <p>The field does get waterlogged in the winter months and building on this field would mean water tables would rise in the adjacent area that cause possible flooding for existing houses.</p> <p>There are other areas in the village that would be more suitable for houses, for example plots of land on bank road behind the doctors surgery and empty fields near the allotments.</p> <p>There is land near washingpool farm that I understand has been already earmarked for development- is that not enough.</p> <p>Our community village had already been impacted by the erection of a monstrous warehouse that is towering above the village, with more units planned. Building on the playing is not appropriate and just this proposal has caused controversies with in the local parish.</p>	A
122	<p>Hi I would like to raise some basic concerns over the subject of building on Pilning Playing fields H1 , first of all as a builder of over 50years experience in large domestic developments it's obvious that the playing field floods every year , therefore to enable a developer to construct any housing the land levels will need raising and suitable land drainage installed to cope with an area that large, no longer being a flood plain . The</p>	A

	<p>infrastructure of existing drainage systems will need to be upgraded , to make sure the existing neighbouring school and dwellings do not flood .</p> <p>In the event that a total maximum number of 35 dwellings were to built on the playing fields they would more than likely be affordable housing which is great , but affordable housing has an average of 50% occupancy of young families, take into consideration that the recreation facilities have been sold off and that there are no safe options to provide alternative playing fields within the village, this scheme has an incredible amount of unthought planning .</p> <p>That aside it also a condition that all children in a village or town should have access to recreational facilities within a said distance and populous .</p>	
123	<p>I appreciate the amount of time and effort the volunteers have put in to the plan. Unfortunately it seems that most residents have objections. The community is under great threat from development and a plan which the whole village could get behind would be beneficial. It is not surprising that the areas such as Pilning Playing fields and allotments have caused such an upset. The plan states that these amenities should be replaced elsewhere in the village, but I cannot see any viable alternative that residents would accept. The removal of areas of the green belt is wrong, development is closing in around us and we need to keep what we have. This plan should have had more contact with residents to make it a community plan, it seems to be dividing the community.</p>	Q
124	<p>I strongly object to the current NP as it stands, favouring as it does development and the provision of housing over the stated objective of preserving the Public Green Space/Green Belt in both villages, thus risking the loss of a village identity and environment for both Pilning & Severn Beach.</p> <p>The development of Green Belt must be resisted at all costs. The little green space we have in Pilning & Severn Beach at our disposal should be preserved at all costs.</p> <p>In particular I request that, as a minimum, the identified sites H1, H3, H8 and H9 are removed from the NP as potential sites for housing development. These are valuable Green Spaces that should be preserved at all costs. If they are lost to housing they will be lost forever, removing valuable green space, public assets (e.g. village hall, playing field, allotments) and all their associated benefits including the preservation of local wildlife habitats (H9)</p> <p>I also strongly object to the proposal to set aside an area of land on Promenade Gardens for car Parking (Site Policy TTP1). This site is a wholly inappropriate location: it is important public green space & important wildlife habitats. I further request that Site Policies TTP3 & 4 also be removed from the NP as being similarly inappropriate locations.</p> <p>The provision of car parking spaces should be restricted to Site TTP7 and limited in number to promote sustainable transport policies and ultimately prevent a disproportionate number of visitors to a currently peaceful and local space.</p> <p>I also have grave concerns that the consultation feedback process to date has not been transparent as objections are not being made visible to the public as would be the norm for any planning application consultation process. There is no online</p>	<p>Q A C G H</p> <p>J L M</p>

	platform where objections and/or comments to date can be submitted and viewed.	
125	H1 object. Policy TTP3 object. Policy LCD2 object	A L P
126	<p>I request that the Planning Inspector rejects this NP including it's 'aspirations' document in its entirety. Due to :-</p> <p>A) Extent and Scale of Housing Policy Sites</p> <p>i) This Neighbourhood plan has the hallmarks of having been written exclusively for the benefit of Housing Developers and landowners with an eye to making large scale profit out of this community and with disregard for the damage this would cause both to the character of our villages and to the globally important wetland environment.</p> <p>ii) The scale of development would increase the sizes of the 'heart' of the villages by around 75% .(pages 91 & 92 re Pilning and 93 Severn Beach Plus H7 which is undeveloped but not shown) This would hugely impact village character and is directly opposed to SGC's development policies CS5 and CS4 limiting development in this rural parish to infill development ,directly opposed to the stated objective of this NP to maintain, protect and enhance existing community facilities --- including village halls and open space' (NP page 28 para 7.4.1) and directly opposed to the wishes of this community of which 90% of respondents use the green space and those green spaces are highly valued by all. (Housing needs assessment (HNA) page 28 para 7.4.1)</p> <p>iii) Proposed housing sites H7, H8 and H9 and car parking sites TTP1 and TTP2 would also hugely impact on a globally important environment - the Severn Estuary is designated as a Ramsar site, Site of Special Scientific Interest, Special Area of Conservation and Special Protection Area.</p> <p>iv) All the traffic generated by the scale of expansion proposed would generate additional traffic throughout both villages to access shopping at the Mall and J17 M5. This would be additional to traffic generated by the large warehousing etc currently in the pipe line adjacent both villages. The community has identified an existing problem with traffic through the villages and would not want the situation to be made worse.</p> <p>v) I ask for deletion of sites H1, H3, H7, H8 , H9, TTP1 and TTP2 on the above grounds.</p> <p>vi) If the Severn beach sites mentioned are not deleted, then I would like to see the community consulted with visible and transparent consultation on those specific sites with the benefit of views from Natural England, RSPB etc in order that this community can make informed choices on what they want in the NP.</p> <p>Vii) If the Pilning sites are not deleted then I would like to see specific, visible and transparent consultation on those sites.</p> <p>B) Plan Objectives/ Vision statements etc</p>	* Q

i) Most of these appear to be related to the provision of housing. The community has not agreed these objectives. The only objective I would support would be community objectives shown by the HNA show a strong desire to protect green spaces, green belt, wildlife and biodiversity, environment and village character. The HNA did indicate a wish for some affordable housing but during the original survey (on which the HNA was based) the questions were not set in context of SGC having set no housing need for this parish in the current plan period, nor in the context of the adjacent village of Easter Compton increasing considerably in size (as set by SGC) thereby providing local affordable housing.

ii) I believe our community would be horrified at the true nature of this NP, and to see how a few innocent sounding tick boxes in the HNA have been 'converted' to imply this community wants to see this level of extension to our built environment rather than a bit of affordable infill development 'ringfenced' for the benefit of local people. (sheltered housing and starter homes in particular)

iii) The vision statements, Objectives and Aspirations have not been agreed by this community. Many of them are at odds with preserving village identity and permitting appropriate development of a type, location and scale appropriate to village locations.
 Eg attracting more visitors to Severn beach and the wetlands is the last thing I would want to see. (ref page 26 'Visitors to the area will be encouraged and better accommodated' in the vision statement – not an agreed community objective). It would be harmful to a sensitive environment and create more problems than we have already with traffic driving through the villages. There would be benefit for events such as Severnfest but not to the community at large and definitely not in the interests of protecting the wetlands and it's wildlife.

iv) I have serious concern with the body of the report , including visions and objectives statements that even if the NP contained no specific sites there would be sufficient 'hooks' to allow developers the likelihood of obtaining planning consent on almost any site despite of and overriding the expressed wishes of this community.

v) I ask the planning Inspector to delete any comments/ objectives which may allow this to happen and to ensure the report transparently, securely and with no ambiguity protects our village assets and amenities, open space, green belt , wildlife, village identity and harmful generation of additional traffic.

C) Lack of transparency and visibility to the Consultation Process

i) There has been insufficient visibility and transparency to these consultations.

ii) I would expect to have seen an independent planning type portal available which would allow this community to express their support or objection to each specific policy site and comment on the body of the report in a visible and transparent way, then available to the Planning Inspector and to the public.

<p>iii) I would expect the preamble to each site to identify the existing use of each site, whether it is green belt, open space etc and to include comments from Natural England and other bodies consulted in order to assist informed opinions.</p> <p>iv) I would expect the preamble to briefly and clearly include SGC main policies applicable to each site, the fact that there is no housing need allocated by the SGC for this parish and the extent of new housing (including affordable) which will definitely be built in the adjacent village of Easter Compton.</p> <p>v) A planning application for a 3 metre high fence would have more transparency, visibility and data protection than this consultation over this NP which seeks to change the face of our community over the next 10 years. I do not consider that it meets due consultation standards.</p> <p>vi) The Housing needs assessment (HNA) is a misnomer. Views on green spaces and amenities etc were also sought in that survey – those views should be represented in a separately headed document.</p> <p>vii) I would like to see a much shorter main body to the report, written in plain English, clearly identifying relevant information (as above) in respect of each policy site and cross referencing these sites to a policy site specific portal on which the community can confirm a yes or no view.</p> <p>I would like to see all 'hooks' (eg policy H10) within the document to allow additional housing development beyond the policy sites deleted, including the 'Aspirations' document.</p> <p>viii) I have included reference to policy sites H1 playing field at Pilning. The parish council at its meeting on 6th October voted to delete this site (due to level of objections) however, it is not clear whether the vote of the PC or the decision of the steering group will determine the actual removal of H1. If the steering group do not remove H1 this would mean that all those objectors will not have had opportunity to comment to the Planning Inspector by the closing date of 26th October.</p> <p>ix) The same comments apply to policy site H9 which the PC also voted to delete at the same meeting.</p> <p>x) Similar comments apply to planning application P25/00943/F submitted recently by the PC which seeks to provide a 82 space car park on site TTP2 , which if consented, could result in the PC removing TTP2 from the NP and denying opportunity for community comment and Planning Inspector examination.</p> <p>D) Design Standards</p> <p>Policy D1 (i)</p> <p>I) The design standards should be clearly stated and should be transparently of an appearance and at a density appropriate to village locations with no statements in the body of the report which would allow this to be defeated.(eg maximizing income as a main objective) As worded there is clear likelihood of high density / High rise housing (more appropriate to larger settlements) being built.</p> <p>E) Specific Policy Sites</p>	
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a) TTP1 proposed car park on Promenade gardens Severn beach
i) This would be a large car park and detrimental to the use and quiet enjoyment by the public of this lovely area.

ii) It is public open space which the community wish to see protected- see HNA and A(ii) above.

iii) It is on the Severn Estuary - designated as a Ramsar site, Site of Special Scientific Interest, Special Area of Conservation and Special Protection Area.

iv) It is against sustainable transport policies set down by SGC, CS7 Severn Beach has its own railway station and visitors should be encouraged to use this facility, we also have MetroWest on the horizon.
SGC Policy CS7 aims to enhance the strategic transport infrastructure promoted by SGC, focusing on reducing congestion and air pollution. It emphasizes improving accessibility through alternatives to private cars and expanding opportunities for walking, cycling, and public transportation.

I ask for TTP1 to be deleted for the above reasons.

b) TTP2 proposed car park at the allotments Severn Beach
i) Objections to TTP2 for the same reasons set out above. Additionally :

ii) Adverse affect to the use and enjoyment of the allotments, being a totally incompatible use to the production of healthy home grown food.

iii) The access is inadequate and would be unsafe to be shared with allotment holders

iv) Adverse impact on the residents of Salthouse farm

v) PLANNING APPLICATION P25/00943/f has been submitted on the same site by the parish council. This application, if granted, would defeat due and proper community consultation and examination process of the NP.
The application purports to be a men's shed using shipping containers and apparently needing a ridiculously excessive 82 car parking spaces. A men's shed community hub would intrinsically expect the majority of users to arrive by foot as existing allotment holders have done for years.
Since it would provide broadly the same number of car parking spaces as TTP2, I believe this planning app seeks to provide the large TTP2 car park by the 'back door'

I therefore, consider that this policy site TTP2 must remain/ or be reinstated within the consultation document as appropriate in order for it to be considered by the community and the Planning Inspector.

vi) I ask the Planning Inspector to ensure that TTP2 is included and then to reject it on the above grounds.

c) Policy Sites H7, H8 and H9 Severn Beach

	<p>i) Relative to the size of the main built village environment, these are large housing sites and not small 'infill' sites as supported by SGC for this parish.</p> <p>ii) These sites are within a globally important environment - the Severn Estuary is designated as a Ramsar site, Site of Special Scientific Interest, Special Area of Conservation and Special Protection Area.</p> <p>iii) H9 -The parish council at its meeting on 6th October voted to delete this site (due to level of objections) however, it is not clear whether the vote of the PC or the decision of the steering group will determine the actual removal of H9 .If the steering group do not actually remove H9 this would mean that all those objectors will not have had opportunity to comment to the Planning Inspector by the closing date of 26th October.</p> <p>iv) The same comments apply to policy site H1 which the PC also voted to delete at the same meeting.</p> <p>v) For the above reasons I would like to see policy sites H7, H8 and H9 deleted.</p> <p>d) Pilning Village</p> <p>I) Proposed housing sites H1 and H3 would deprive Pilning of All of it's open space and community assets – the playing field, village hall and Allotments. This would be directly opposed to the stated objective of this NP to maintain, protect and enhance existing community facilities --- including village halls and open space' (NP page 28 para 7.4.1) and directly opposed to the wishes of this community of which 90% of respondents use the green space and those green spaces are highly valued by all. (Housing needs assessment (HNA) page 28 para 7.4.1)</p> <p>ii) I totally oppose the steering groups interpretation of the words ' protect and enhance' as meaning build houses over the lot.</p> <p>iii) Existing Playing Field and village Hall policy site H1. I object to the loss of H1 on the grounds the site comprises of;</p> <ul style="list-style-type: none"> (a) Green belt and open space (b) Loss of village amenity/ village hall facility (c) No suitable alternative site has been identified therefore it fails on the availability test. (d) The proposed access onto Cross hands road is unsuitable (you don't need to be a highways engineer to see that) as there is extremely restricted visibility to oncoming traffic leaving the site to turn right and HGV's continue to come over that rail bridge to use Cross Hands road despite this being unlawful and the subject of local concern. <p>iv) Existing Allotments part of policy H3 : I would like to see site H3 Pilning village allotments deleted from the plan on the grounds it comprises:-</p> <ul style="list-style-type: none"> (a) Green belt and open space (b) No suitable alternative site has been identified and additionally they are statutory allotments (no consent has been obtained from the secretary of state to remove them.) H3 therefore, does not meet 'availability' test. 	<p>F</p> <p>G</p> <p>F</p> <p>A</p>
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	<p>(c) The HNA and NP itself identified a need for more allotments. The existing allotments are in a good accessible location which are in character with the village setting around St Peter's church and the Pill.</p> <p>(d) The existing allotments provide beneficial wildlife habitat and the site affords some protection to the wildlife corridor of the Pill. Should the remainder of H3 be removed from green belt then the site of the existing allotments should be extended to provide for need identified by the NP, together with a buffer zone to further protect the Pill and provide a buffer between the allotments and proposed sheltered housing.</p> <p>v) Policy H4: Rear of 21 & 23, Cross Hands Road, Pilning. I would like to see this site removed as inappropriate backland development, the access would be unacceptably close to the road crossing, totally out of character with the village setting of St Peters church and the Pill and hugely detrimental to the poor neighbours.</p> <p>vi) Policy H2: this is in green belt which this community clearly said should be protected. (HNA)</p> <p>vii) I would like to see policy sites H1, H2 ,H3 and H4 deleted from the plan for the above reasons.</p>	C
		D
		B
127	<p>H1 Pilning Playing Field & Village Hall is a great community asset and should deffinately be retained and enhanced for the future generations. Not developed, especially when there are other sites offered, one of which has also offered to significantly contribute towards the regeneration of the existing playing fields and village hall, if there site was successfully developed.</p> <p>The playing field is owned in Trust and has not even been put forward by the correct owners.</p> <p>Further to add if this site and the other sites on Bank Road were re developed this would increase a large amount of additional vehicles of approxiamately 170 minimum and 41 sheltered housing 1 beds - presumably they would also have parking. That is a huge amount of traffic using small coutnry roads ie Bank Road and Northwick Road ontop of the cars daily for the local primary school St Peters. This is not sustainable for and allready over busy country road.</p> <p>If this site and various other sites are to be removed from plan, yet the same anount of new homes required remains the same then surely we need alternative sites and I would urge you to reconsider our offer of our combined sites.</p> <p>I will be in touch with an outline proposal very shortly.</p>	A*
128	H1 - Is my main objection to the Neighbourhood Plan especially when the NP 7.61 C) refers to preserving public spaces.	A

	<p>To develop part of it and retain the village hall would be reducing the actual open green space dramatically with housing, this is a well used open space by the local community.</p> <p>If the other option of using the whole area for housing and relocating the village hall and playing field elsewhere, where would an "adequate suitable alternative" be? as this location has not been given in the NP. We in the local community do see the playing field and village hall as the centre of our village and it is ideally located where it currently is situated, close distance to St Peters primary school and local family houses to use this field.</p> <p>My above comment would also relate to H3 as including the loss of allotments referring to "adequate suitable alternative"</p> <p>The access mentioned is potentially of fBank Road - no exact details given. This brings me onto the added large number of vehicles that would be using Bank Road which is already a busy country road with daily vehicles from St Peters Primary School which would add 60 minimum vehicles using the road along with the potential added vehicles from other sites on the plan.</p> <p>Northwick Road and Bank Road would not be able to support the extra traffic from vehicles that could be 170 as a bare minimum if all sites went ahead with the proposed numbers of minimum parking provided. H2 and H3 sites are sites I am referring to in the last comment.</p>	C
129	I write to confirm my letter of support to NPSG for all their tireless work they have put into developing and securing a balanced future to safeguard our villages against over development whilst ensuring the need for local amenities and green spaces are maintained. Resident of Pilning for 35 years	T
130	<p>I am writing to object to the development of plot H9 in Severn Beach to the East of Ableton lane and Prospect Road.</p> <p>I am concerned as it is good to save green spaces. We hear lots of birds including an owl which we hear most evenings, we see birds in plentiful numbers, including woodpeckers, this would stop with the felling of trees, and bushes.</p> <p>Trees need to be preserved for wildlife also it helps to reduce road noise.</p> <p>Footpaths to the east of prospect road, need to be preserved.</p> <p>I am also concerned about impact of extra traffic into the village of Severn Beach and where the access roads will be if new developments go ahead.</p> <p>If building of houses and homes does go ahead it would be great to have green spaces between existing houses and new houses, maybe to include the footpaths.</p>	H
131	<p>I am writing to object to the development of plot H9 in Severn Beach to the East of Ableton lane, and Prospect Road.</p> <p>I am concerned as it is good to save green spaces. We hear lots of birds including an owl which we hear most evenings, we see birds in plentiful numbers, including woodpeckers, this would stop with the felling of trees, and bushes.</p> <p>Trees need to be preserved for wildlife also it helps to reduce road noise.</p> <p>Footpaths to the east of prospect road, need to be preserved.</p> <p>I am also concerned about impact of extra traffic into the village of Severn Beach and where the access roads will be if new developments go ahead.</p>	H

	If building does go ahead it would be great to have green spaces between existing houses and new houses, maybe to include the footpaths.	
132	<p>I strongly object to any part of site H1 being built on pilning playing field and village hall are well used by the community and have been for over 90 years, it's central location and being off of the main road make it an Ideal location, something that would never be found anywhere else. The neighbourhood plan steering group have never meet to consult with pilning village hall management committee on this matter, something which should of been done. It is a total disgrace that this site was put forward.</p> <p>I also object to building on pilning allotments, my understanding is that this land was purchased by the parish council to be used in the future as an extension to the cemetery, I have put in a freedom of information request to the clerk of the PC for information on this matter, if house's were to be built on this site, where exactly in the future do the PC and neighbourhood plan intend the villagers to bury there dead ! the traffic on bank road is bad enough now never mind if houses were built.</p>	A C
133	<p>I am strongly against the proposed development of Pilning Village Hall and playing fields. I hire the hall for at least 8 hours a week and have done for several years. The hall is a busy community hub used by many groups and individuals. The playing fields are really popular and are used by many people of all ages for activities such as walking, exercising dogs, young children playing, older children and young adults spending time together, older people meeting and sporting activities.</p> <p>Such a space is vital to a community and green space should be cherished and protected, not built upon.</p>	A
134	The proposal to build on the centre of the community is outrageous. I run my self employed business from here 3 times a week, without it I simply wouldn't be able to function as the venue meets mine and my customers needs perfectly. There are numerous traveller sites in the area, build on those and leave the community space alone!	A
135	We have a valuable resource in the playing fields and village hall, it would be devastating to see it built on. The children of the village have only this one safe area to play and it's important to keep it . Many village activities take place in the hall and it's a resource that cannot be lost. The playing field is the o my safe space for children to enjoy quality outdoor time and the hall is a valuable resource for the many groups the use it.	A
136	I use this with my foster children who feel safe there after so much trauma in there lives this would be devastating for them.	A
137	We need space to walk play with animals and children	A
138	I do no support the housing development. Firstly my children love to use the park and the outdoor space. Children need areas to be able to use and play. Another reason is Girlguiding use the hall for unit meetings and other activities. If you take this away there is not an alternative venue for Girlguiding to meet within Pilning. Leaders volunteer to provide girls with opportunities.	A

139	Pilning is a small village, and this space is used every day by the local people, we haven't got much in pilning for locals taking this away will give the locals even less	A
140	Strongly oppose any building on pilning playing feilds or pilning allotments leave them as they are for the community there is plenty of land in thornbury area build there end of	A C
141	I am against the proposal as this space is vital to the community and needs to remain as it is. The surrounding infrastructure does not and would not be able to cope with anymore new build. We need to protect our green spaces.	A
142	Completely oppose the use of the playfields and village hall for the building of new homes, whilst I appreciate growth for the village please do not take away our green spaces, the villiage is tiny as it is with not much there, the playing fields and village hall are used by many and it is outrageous that they are under threat	A
143	This is the only play area for our young people to use. There is nothing else for them in the village. Lots of families as well as older children who have been allowed to probably go out by themselves for the first time as it's a safe place. The other day I saw 6 children playing basketball up there. Where else can they did that? I also use the field daily to walk my dogs where I also see lots of other dog walkers.	A
144	I object to the proposed housing development on the playing fields in Pilning.	A
145	Where are youngsters supposed to play football etc if you take away our playing fields? It hard enough getting children of computer games and socialising by taking their playing fields and village hall what are they to do?	A
146	I strongly oppose inclusion of Pilning Playing fields in the proposed Neighbourhood Plan. The park is used by a large number of local residents and including children and young people. It is used for dog walking, basketball, football and tennis. It is also regularly used by a number of community groups including 1st Severn Beach Beavers, Cubs, Scouts and Explorer scout units. Pilning primary school also utilise this key community facility. This is an essential green space and recreation space which if developed would leave the village without any provision for the community. Large parts of the community including the parish council, the village hall committee and most residents are totally against this proposal. It cannot be allowed to remain included in this plan. I also strongly oppose development of the allotment site. These allotments are all occupied and provide an important source of local produce, they enable residents to engage and interact with others helping to tackle social isolation and loneliness and help support the communities mental health. There are large parts of the proposed neigh ourhood plan which the community are opposed to. Therefore it cannot be submitted in its current form.	A
147	I oppose the plan to build houses on the playing field (H1) This is a community space for villagers to enjoy and giving children Green space which is good for their health and well being seeing that they are surrounded by industry	A
148	I object to this location being used for housing development. This is a community green space for the local children and residents and another location would be better suited for this housing development.	A

149	Against proposal! This is the only park that Pilning has, it's used by many local dog walkers, the village hall hosts many important events for the local community, provides a safe space for children and animals to run free without being near busy roads. We shouldn't need to keep fighting for green space in our area, it's vital for our wellbeing. No wonder children are constantly stuck behind screens when outdoor green space is constantly being under threat and taken away. Our area is constantly under threat of being built and destroyed. Why can't things be left alone?!	A
150	Absolutely disgusted by the plans to turn our green space into flats. We use this park everyday with our children and dogs and the space is a huge part of the community. It would cause loss of privacy to many homes in the area and create more noise pollution and we would lose part of our identity within the village	A*
151	I do not understand why anyone would want to take away a village hall that is used regularly by the community. This space is invaluable for people's wellbeing to be able to meet, exercise and lots use as a way to regulate their mental health. New houses are not required in this tiny little Village but community facilities are.	A
152	I am strongly against this proposal. I have 2 young children and we use the field for outside play, the school have taken my daughter to the park for a treat and we use the hall for birthday parties.	A
153	Stop taking the green spaces away from our children!	A
154	The village hall and playing feilds is highly valued in the village, lots of classes held there and the feild is so well used the play ground and myself and many walk there dogs at the feild. Its a safe place for all. We cant loose this area for the community.	A
155	<p>I kindly object all of the housing plan but strongly object to H1 (pilning park and H3 (pilning allotments). For H3</p> <ol style="list-style-type: none"> 1. the allotments are all used and haе a waiting list. 2. the area is a point of Pilning heritage with the old railway running through, this has a new plinth and wooden arrangement to signify this it would be detrimental to remove this history. 3. The allotments area is limited use due to the location of the cemetery. 4. Parking for St Peters school regulary uses bank road all why to and beyond the allotments which will cause issues for potential home owners and school pickup times. 5. With already limited green areas the allotments shows children as they go to school the growing of fruit and vegetables that they might not see otherwise which can encourage them to garden. 6. I allow school children onto my allotment to take produce water the plants after school, some who do this are SEND and this helps them regulated prior to going home after school. 7. Without a firm place for new allotments I am doubtful of the intent to find a new area, if there was a new area why not build on this instead? For H1 park area <ol style="list-style-type: none"> 1. we have no other access to park land and play area for the children, dog walkers and families of Pilning. 2. The nearest park would be seen beach but this would make it harder to go to the park and less environmental friendly. 	A C Q

	3. I again don't think there is any intention of replacing the park in Pilning if there was why not build one this instead.	
156	I am against the planned proposal for Pilning Village Hall and playing fields	A
157	Strongly opposed this plan, the fields must be kept for the community, who use it regularly. Our green countryside is being stolen, don't further help this. Think of the future generations.	A
158	<p>I do not believe that the proposed building of houses (Policy H9) should be included. Apart from the issue that we don't have the infrastructure (shops, doctors etc) to build more houses in Severn Beach, flooding is a big threat. If you walk in the area that is proposed for houses after/during heavy rain, there are always loads of puddles. Where does this water go when it is built on? Similarly, flooding can be seen on the corners of the spurs in Prospect Road. Currently, it can run off into the field behind which would not be possible if this were houses.</p> <p>I would object to the building of houses on the area described off of Ableton Lane (Policy H8) for the same reasons of infrastructure.</p> <p>I would support the building of some retail units in the area of Station Road (Policy H7) but not the housing.</p> <p>In Pilning I object to the proposal to build on or near the playing field or Village Hall. There should be no attempt to move the Village Hall to an alternative location either.</p>	H I F G
159	This is a vital part of a community, and you keep building in the area there will be nothing left for the next generation to appreciate	A
160	<p>I strongly disagree with proposed house building on this site in Pilning, I have emailed the MP Claire Young and parish council with several of my concerns, especially regarding the negative impacts this level of concrete could potentially cause on soft land, in a vulnerable area.</p> <p>I have emailed the MP Claire Young and the Parish Council with my concerns, regarding proposed house building on soft land. I strongly disagree with the proposed house building on soft land. I strongly disagree with building on this site. No to building on this site.</p>	A
161	This is a vital part of a community, and you keep building in the area there will be nothing left for the next generation to appreciate	Q
162	<p>I think that the Neighbourhood Plan is an excellent idea, for several reasons:</p> <ol style="list-style-type: none"> 1. It has the impeccable pedigree of being conducted by local people whose sole motivation is to help the community. 2. Their bureaucratic struggles have revealed the ineptitude of S. Glos Council, and thus proved why it was necessary. This is proved by both "The Shed" and the other, many unauthorised developments of mobile homes, etc. in Pilning. 3. Instead of merely complaining about the above, they have done their best to come up with viable alternatives. <p>You're never going to please all the people all of the time.</p>	T

	I commend them for "having a go" at safeguarding our community's future. If their efforts have prompted local debate, then that can only be positive.	
163	<p>I support the Neighbourhood Development Plan.</p> <p>My understanding is that the NDP is fundamentally a mechanism whereby the community get to strike a deal with potential developers, for development which is probably inevitable, which influences the character of the development in the community's favour, and also, most importantly, requires the developer to share some of the resources and profits gained from the development in the service of the community.</p> <p>In other words, my understanding is that our local parish will benefit from the NDP being adopted.</p> <p>I am aware of some very strong community feeling about some information and proposals contained in the NDP, especially with regard to site H1, Pilning Village Hall and Playing field.</p> <p>Firstly, I believe some of these objections to this item rest on a misconception about what including the site in the NDP means. If I understand correctly, including site H1 does not condemn the village to accepting the entire loss of the Village Hall or Playing field green space. Instead, it provides a means whereby the community as a whole can negotiate a better deal for residents and businesses, including as stated on page 41 of the NDP (item vii) the provision of adequate alternative provision. To me the spirit here is that nothing changes unless there is an improvement of the facilities for the community as a whole.</p> <p>Secondly, my understanding is that current planning procedure applies in any case, which means that a planning application must be submitted for any changes, and these must take into account local comments. In addition, the existence of a "made" Neighbourhood Plan strengthens the position of the community with regard to any planning decisions, as it must be taken account of.</p> <p>I am aware of some concerns that there was insufficient engagement and consultation with local residents regarding the plan. While it always possible for any endeavour to be improved on (and the Parish Council are very mindful of this) this criticism seems to me unrealistic, and also does not reflect the enormous amount of work conducted by the NP Steering Group over four -plus years.</p> <p>The 1957 Planning consent SG.4244 threatens the entire area with what often appears to be unrestricted development. The NDP offers the community some mitigation and possible protection against unrestricted development.</p> <p>I understand a "made" plan also secures a significantly higher allocation of money (CIL money) for the parish, increasing it from 15% to 25% of the overall contribution.</p> <p>I believe doing nothing is not viable in the current circumstance, and the NDP offers the parish as a whole a way of doing something, however compromised individual elements may need to be.</p>	T

	Overall, I believe the thoughtful, detailed and thoroughly researched information contained in the NDP deserves praise. I support it, in the hope that it is our best hope and practical means to influence in our favour what will otherwise be inevitable commercial development of our area, to the benefit of current and future parishioners, businesses and visitors to the parish.	
164	<p>Killing the village wildlife and the green space for locals to use, to promote a healthy life style, children unable to visit a park because they want to build houses everywhere... leading them to turn to bad behaviour.</p> <p>People unable to walk to enjoy local wildlife in the field because houses will be built - negatively impacting on people's mental health.</p> <p>Why build on all of the green belt around us. No one will listen, killing wildlife, killing the people and the green belt.</p>	Q*
165	I strongly oppose any plans to build on this green space. It's essential for community wellbeing, offering a safe and accessible area for exercise, fresh air, and peace of mind. The very idea that this land is being considered for development is deeply troubling—it's a complete disregard for what local residents value most.	A
166	I am against developing pilning playing field. I use it regularly. With all the surrounding green space begin developed we desperately need to keep hold of this.	A
167	Wholly against building on the playing fields etc. there is too much building work going on especially with the monstrosity of a building behind the village and more being built. The fields are buffers for the rain etc. also there was no buffer with the monster building being built. We need our green space and we need our roads for cars not for bloody great lorries and extra traffic	A R
168	<p>I would like to object to the proposed building of housing estates on the green areas of Severn Beach and Pilning.</p> <p>Although I agree that the villages need some new housing, in order that the local young people do not have to move away to live, I suggest that smaller infill housing projects would be more in keeping with the village environment in which we local residents have all chosen to live.</p> <p>These infill housing projects would then reduce the need to destroy the green areas that are the fabric of our rural environment.</p> <p>My immediate concern is the H9 area proposed in Severn Beach on an area of land we have been assured, over the 35 years I have lived here, by councilors and council staff, on numerous occasions, will never be built on, and is used every day by local nature lovers, dog walkers and bird watchers.</p> <p>Until recently the end of Abbott Road had no access to this area apart from a stile for the footpath.</p> <p>A farm type gate was put in a couple of years ago under great protest from the residents who were assured by the council it was being allowed as 'agricultural access only'. This now looks from the proposal map that it is a possible access road to a housing estate which goes against everything we have ever been told.</p> <p>My other complaint is that this 'Plan' has been presented to us as if it were already agreed on in 2022.</p> <p>I can honestly say that this is the first I've heard of it and have been given no opportunity before this to express my views on any aspect of the proposals. 39</p>	H Q*

	responses out of approx. 6000 residents in 2022 does not, in my opinion, constitute an agreement to anything.	
169	I object to the possible use of Pilning playing field and allotments for purposes other than those that they are currently for. These facilities are an essential part of village life and should not be re-purposed.	A C
170	I am strongly against Pilning village hall and playing fields being developed into new homes. These facilities are used by many local groups which are supported by the people of the local villages.	A
171	This is a vital part of our community and we use this space daily for our daughter and dog also I use it daily for exercise and mental health issues to train on the courts which I class as vital as there are no other green areas with facilities locally. This would be a total disgrace if was built on. I'm already feeling anxious about what they're doing to this little village and the people who live here.	A
172	Ref: 8.4.13 Parking in Severn Beach and New Passage I object to Promenade Gardens as a potential site for a car park on the grounds that this is a valuable amenity for residents and would negatively impact the area. Parking near the station and at the allotments would be a better solution. It would also spoil the outlook from the cafe, which at present overlooks pleasant green space. I also object to creating a car park at the sea wall end of New Passage Road. As a resident of New Passage I feel that creating a car park at this end would only result in more visitors trying to access the area and that the ensuing congestion would be worse than the problems caused by bad parking at the present time. The approach road is too narrow for a larger volume of traffic.	J M
173	Pilning playing fields has been such an important space for my daughter, we have spent most of the summer playing in the tennis courts, playing in the park and learnt how to ride her bike here. It would be devastating to lose this to housing.	A
174	Here are some thoughts on the draft plan: 1. It already seems out of date and South Glos decisions move in the opposite direction and stated pressure to provide housing eg - travellers sites building on green belt (St Martin's Park), which if green belt is an option that would have been a great location for larger and multiple dwellings; - travellers site on corner plot of H3, which the Chair of the NP admitted to the BBC undermined and made unviable the plans to build sheltered accommodation; - the original travellers site next to H2 is now a lot emptier than years ago due to spread to new sites...can the remaining occupants move to the new larger sites and make H2 more viable (would also stop the dumping of effluent into rhine)? - the Forge has approved planning to be demolished losing a large house with no accommodation replacing it. If South Glos is not prioritising residential accommodation why is Parish Council pushing so hard?	Q *

	<p>2. It is unclear what factors determined naming private properties to be replaced with further building eg</p> <ul style="list-style-type: none"> - why is no 31 excluded when that has large paddock adjoining the recommended H4 plot? (noting conflict of interest with registered secretary address for NP) - why is the extra land attached to the Indian church not suggested? - why is possibly the strongest candidate the faux mansion aka Wainbridge Bungalow not suggested, when that has significant land right by shop, pharmacy and Cross Hands dining venue? Furthermore all the equestrian properties on that side should be considered for extending the "boundaries" rather than traipsing down past the village hall! - clearly very few are in favour of village playing fields being set aside, it would be better to get community funding from the warehouse developers to allow the Parish Council / community to secure ownership of the grounds to protect that green space <p>3. It is unclear how much remit the NP has on public transport noting 8.4.3, but that section seems light. Some considerations:</p> <ul style="list-style-type: none"> - The NP or Parish Council should now be advocating for the Henbury railway loop to be invested in to allow more workers to get to St Andrews and connect to Severn Beach for the distribution park - Consideration for a small station by Pannetoni GXO - I now see many workers taking a long walk from Severn Beach and the is already a siding that is used for the incineration deliveries. This may be more adventurous than just having a Henbury Loop connecting via ST Andrews, but with scooter and bike hire from a new station workers will have a easier route to work and relieve pressure on local housing <p>4. The buffer zone line along Marsh Common is clearly far too small to make any real impact considering the behemoth warehouses. We should be pushing for something more substantial and to get the developers to invest in the local community, even if just some extended green space and lakes along Marsh Common post development.</p> <p>5. Unless I imagined it, I am sure I saw plans for development on Marsh Common north of the B-road. Does the NP have any comments or objections to that considering it is green belt or is it a case of seeing how aggressive WECA wants to be expanding north?</p>	S R *
175	Disgusting to build on the playing field.	A
176	The feild and hall are highly regarded by community and are used regularly. By families, dog walkers. The hall has daily events and clubs attending aswell as charity raising events.	A
177	<p>I am truly appalled that there are plans to build houses on Pilning's only green space. Is this true or is it Fake News? Surely no one would be that willing to denigrate the village environment?</p> <p>Personally I use the field for running. I see dog walkers, kids in the play area, people socialising and walking. Of course the village hall would go or be impacted, another asset lost, lord knows, we have few enough in the village.</p>	A

	<p>The benefits are well documented - Good for people's mental and physical health as well as supporting the environment and biodiversity. They also help to mitigate flooding risk - Note! We Are On A Flood Plain! Not that seems to stop planning permission being granted.</p> <p>I have lived in the village for 52 years, happy to discuss the points here.</p> <p>I hope common sense will prevail and the tide of concrete and overpriced, shoddily constructed, built solely for profit houses will not go here!</p>	
178	<p>I would like to register my objection to the planning application to build housing on the H9 and surrounding areas in Severn beach. Firstly I feel that the people of the parish have not been given adequate notice of this project with many people stating, including myself have had minimal or no notice of this development. The space that is being considered is a green space that is used by many people for recreational purposes including myself that use it for dog walking. Wildlife is abundant in this area and it would be a travesty to destroy this beautiful land. This planning is considered by many to be another massive intrusion on our homes that has been happening for a number of years now, including a number of huge warehouses that have become an eyesore on the landscape of Severn beach. How much more and how much longer do we have to put up with large scale development that have put a massive strain on everyday life including intrusive noise and light nuisances as well as a blight on what was once a beautiful landscape. Traffic in our village is at an unsustainable level due to these developments, with 24/7 traffic continuously pouring into our area and causing unbearable issues including congestion, high speeds and even deaths on our local roads. Further vehicles will only add to this continuous ordeal.</p> <p>Furthermore I am very concerned about the extra vehicular access to the site in Abbott road and possibly other roads, that will affect these idyllic roads and homes. These single track roads are not build to take heavy traffic that a housing estate will provide. Myself and Families with kids and grandkids that walk these small roads every day are worried about the volume of traffic this development will bring.</p> <p>We were assured many times by the local government that planning would never be granted to this area, and this may be why there has been so little objection in the past. I believe that the local council has greatly underestimated the deep feeling of objection to not only this development but the tens of other projects going on that it seems the Severn Beach residents have very little say about due to planning permissions made decades ago. Furthermore we live in Severn Beach because we wanted to live in a quiet ,green space not in a built up area which is being forced on local residents.</p>	H
179	Proposal to build houses on Pilning playing field: Object Object on the grounds that the villages need green spaces for sport, children's activities etc. this is one of the few public green spaces in the area.	A
180	We absolutely oppose the loss of the playing fields and village hall. With 4 young children, we use these regularly and see that they are used by many families in the village.	A
181	I object to the proposal to build on the Pilning Playing field. It's unacceptable that the village would lose this last piece of green space.	A

182	<p>Thank you for the enormous amount of time and effort that the steering group have evidently put into developing this plan. While I am supportive of much of what the plan contains, I have some reservations in relation to the suggestions about car parking. In particular, other than new parking at the station, the other proposed sites are of concern. I believe that the suggested sites in Severn Beach at the Promenade Gardens would have a negative impact on the local environment in terms of aesthetics, traffic, noise and safety for parishioners and visitors.</p> <p>As a resident of New Passage, I also have significant concerns about the proposal for a car park between Caroline Cottage and Severn View Farm. We have experienced frustration at times with high numbers of visitors parking along the road and causing potential obstruction for other vehicles (including emergency vehicles) at busy times but a car park does not seem like the appropriate solution to this problem. A car park will encourage more vehicles to come down to New Passage and may result in other problems such as providing a place where vans might stay over night etc. I would argue that alternative solutions to inappropriate and inconsiderate parking such as signage, road markings and maintenance of the lane/hedging should be considered instead.</p> <p>Provision of more housing for local people is a really important issue. I am conscious that it will have been difficult for all the reasons mentioned in the plan to identify suitable sites for building. However, one of my major priorities would be ensuring future building has as limited an impact as possible on current residents and the physical environment. In addition, the re-provisioning of open/recreational spaces in the area is essential and I would like the Neighbourhood plan to require stronger assurance in relation to this in future planning applications.</p>	J K M *
183	<p>Thank you for the opportunity to comment on the draft Pilning and Severn Beach Neighbourhood Plan.</p> <p>I would like to thank the team who produced this comprehensive document. It is obvious that you have put a lot of time, effort and energy in producing the draft document.</p> <p>Overall, I agree that the aim of the vision should be that “the Parish ... will have retained its rural character and its sense of village communities”. To me this is essential. If we lose the character of the Parish this then we will see a rapid spiral down to a transitory dormitory for the sprawl of warehouses in Severnside.</p> <p>Whilst affordable housing is important, I do not believe that the case for additional housing has been made. Figure 4 shows a marginal change between 2011 and 2021. 2021 was in the middle of the Covid pandemic and cannot be considered representative.</p> <p>Whilst a balance of age and other demographics is important, the most active members of the Parish are the recently retired and those without school-aged children. This is the demographic that provide the volunteer hours that makes the Parish a vibrant community.</p> <p>I am also sceptical that affordable housing is the reason that young adults chose not to remain in the Parish. Two out of four local pubs have closed down and one of the remaining two has announced it is closing. Is unrealistic to expect young adults to stay in the parish with Bristol so close.</p> <p>A far more realistic goal is to attract people (back) into the Parish who are looking for an attractive, safe and welcoming community to bring up their children. This</p>	* A B C

	<p>will require investment in green spaces, transport and local facilities rather than additional housing.</p> <p>I support the provision of suitable accommodation for older residents.</p> <p>My detailed suggestions:</p> <ul style="list-style-type: none"> • New housing. I suggest that we remove any aspects of the plan that remove green-belt or green spaces (specifically removing the proposed policies H1, H2, H3 as they remove green belt land). As the plan notes in para 8.5.24, “The Parish has an adequate amount of public green spaces”, removing existing green space will reduce our rural character and sense of community. • I suggest H10 is removed. Repurposing community buildings (pubs, restaurants, shops) into residential, removing small green sites and developing inside the greenbelt will all reduce the sense of village community. • I suggest that any development needs very strong safeguards to stop the accommodation turning into transitory Homes of Multiple Occupancy for Severnside. • Transport. Whilst I understand the wish for increased car-parking, we need to recognise that this will increase the volume of car traffic. • I suggest that we need an increased focus on sustainable transport in addition to TP5, with a focus on better rail and bus routes. • Maintaining reasonable commuting times to high quality employment in North and central Bristol is critical to maintaining the attractiveness of the Parish. • I suggest increased controls and enforcement of through traffic, especially on the B4064. I would also suggest increased controls on the A403 after the M49 access has been opened. • Community Facilities. I suggest that we seek to consider additional policies, in addition to CF1-CF4 that will enhance the Parish to become a place that people want to be their long-term home. • Large Commercial Development. I fully support the proposed separation of the Parish from Large Commercial Development. I fully agree with the measures in LCD1, and would be keen to understand if there are any other means to reduce the impact of Severnside development on the Parish such as banning HGVs travelling through the villages. • I am concerned that, as written, LCD2 could be seen as unconditionally supporting a truck-stop in the Parish. I suggest rewriting it to say “[this plan] ... only supports a truck stop if it is sited well within Severnside” rather than “... supports ...” • Environment, Countryside and Green Belt. I am very concerned about any changes to the current greenbelt. I suggest that ECB1 is removed. <p>Overall, I believe that it is essential that we submit a clear set of proposals to the district council so that future planning decisions are in line with the wishes of the Parish.</p> <p>I would like to thank the team for all of the hard work they have put into getting the plan this far. I am confident with that if we address the issues above we will have an excellent neighbourhood plan.</p> <p>I would be happy to discuss any of the points that I have made.</p>	<p>H10</p> <p>*</p>
184	<p>I love this village of Severn Beach for its friendly residents & its character, but I am rather concerned that these proposed & already implemented changes for both Severn Beach & its neighbour Pilning will not always be in its best interests.</p> <p>I get the argument of what would you prefer, housing or commercial warehousing units, but Pilning is currently being swamped by a Mega Shed of which is affecting</p>	Q R

	<p>the locals who are under its shadow due to its height, size & way too close to residential properties. Which then sets a precedent for even more of these constructions to be classed as being acceptable. It just seems that the people who live here are the ones who end up losing out.</p> <p>I don't want to see the character of our villages being lost & swamped by lots of new housing. H8 & H9 are massive, I agree in principle but disappointed how much of our green space is going to be lost. The wildlife that is going to be lost + their habitat, just walking down Gypsy Plait you can hear the birds & even saw a pair of squirrels happily living in surrounding area of our LITTLE VILLAGE will be lost & cease to be the little village we all live in & love.</p> <p>H7 is needed for transport development along with all the other proposed new parking within the district. We are in need of investment in our local amenities but not at the cost of our local greenspace being bought by developers for over priced & unaffordable housing.</p> <p>I feel that no matter what the opinions are of the people who live here, bigger fish always win as South Glos continue to grant permission & use out dated planning permissions from 1957 (nearly 70 years old) with no expiry date as the reason not to challenge. We are currently challenging the Truck stop & Biomethane Fuelling Station which is planned right on the doorstep of Severnwood Gardens; as this is a prime example of the impact on residents not being taken into consideration. I agree that it is needed but the size of Western Approach surely can be further into this location & nearer the much needed opening of the ghost M49 junction of which is well overdue & been another disaster from start to finish & currently today affects the Coast Road A403 & B4055 being used as cut through to this location.</p> <p>I have loved living here for the past 30 years & appreciate that there is always going to be change but don't want to lose character of where I call my home</p>	G H
185	<p>I get the argument of what would you prefer, housing or commercial warehousing units, but Pilning is currently being swamped by a Mega Shed of which is affecting the locals who are under its shadow due to its height, size & way too close to residential properties. Which then sets a precedent for even more of these constructions to be classed as being acceptable. It just seems that the people who live here are the ones who end up losing out.</p> <p>I love this village of Severn Beach for its friendly residents & its character, but I am rather concerned that these proposed & already implemented changes for both Severn Beach & its neighbour Pilning will not always be in its best interests.</p> <p>The volume of greenbelt that is going to be lost will impact air pollution, light pollution & the local wildlife & environment along with the increased flood risk of which no doubt will affect us all.</p> <p>I don't want to see the character of our villages being lost & swamped by lots of new housing. H8 & H9 are massive, I agree in principle but disappointed how much of our green space is going to be lost. Our LITTLE VILLAGE will be lost & cease to be the little village we all live in & love.</p>	Q R G H

	<p>H7 is needed for transport development along with all the other proposed new parking within the district. We are in need of investment in our local amenities but not at the cost of our local greenspace being bought by developers for over priced & unaffordable housing.</p> <p>South Glos continue to grant permission & use out dated planning permissions from 1957 (nearly 70 years old) with no expiry date as the reason not to challenge. We will continue to challenge the Truck stop & Biomethane Fuelling Station which is planned right on the doorstep of Severnwood Gardens; as this is a prime example of the impact on residents not being taken into consideration. I agree that it is needed but the size of Western Approach surely can be further into this location & nearer the much needed opening of the ghost M49 junction of which is well overdue & been another disaster from start to finish & currently today affects the Coast Road A403 & B4055 being used as cut through to this location.</p> <p>I love living here & appreciate that there is always going to be change but don't want to lose character of where I call my home</p>	
186	<p>I am appreciative of the extensive work put in by others thus far in the Steering Group and other bodies to create this Neighbourhood Plan. It is clear that its goals are to alleviate inadequacies or problems that already exist in the community - and to anticipate and manage upcoming ones. Broadly, I am supportive of the scope and aims of the plan but I have specific objections to some suggested components of the plan. As a resident of New Passage, I will highlight the TTTP4 car park plan first. Like all the residents down this lane, we are aware of and have actively highlighted the issues of increased traffic and poorly parked cars. The issue for me is simple. There is pinch point adjacent to my drive (Puffers End) where cars that are poorly parked prevent large vehicles like ambulances, fire engines, delivery trucks and recycling vehicles. My strong feeling is that a car park in New Passage is not the solution to these problems. There are simpler and cheaper solutions that will be more effective - such as yellow lines, bollards, signs etc. A car park where it is proposed will most likely encourage more traffic and more visitors through the principle of "induced demand". Ie; at present parking is limited and visitors often fail to find somewhere to park. The provision of a car park - through social media communication and word of mouth - will mean more people try to come down the lane and park. A car park here would replace a pleasant area of green field normally occupied by grazing cattle. A car park here could - in itself - become a place to attract undesirable night time activities. I would strongly suggest that the solutions to the parking problems lie in the yellow lines, bollards etc mentioned above.</p> <p>Another parking solution suggested nearby - the one at Promenade Gardens - is something I would also object to. That area has so much potential to be enhanced with wildflower meadows, more trees and other "natural" additions. It's a valuable "green" asset which is enjoyed by Severn Beach visitors and locals alike. Granted, the suggestions elsewhere in the plan to bring much needed community infrastructure are welcomed and important, but the visually "exposed" location proposed seems like extremely poor planning for a village that needs more landscaping and not less.</p> <p>I appreciate that to achieve "new" things (like housing) that are needed, something somewhere has to "give" - but I would like more reassurance that the</p>	M J

	<p>proposed loss of Pilning playing field for housing was actually going to result in a suitable replacement location for a playing area elsewhere. New housing is great; it reinvigorates the community with younger families. But, those younger families will need the playing area that is potentially being lost.</p> <p>Elsewhere, like others in the villages, I have recently "woken up" and seen and been horrified by the massive (tall and wide) warehousing that has sprung up on the edge of Pilning (near Cranmoor Green and the railway line). This seems like an overreach by business developers. The references to buffer zones to keep these back and away from (what used to be) rural villages are welcomed and seem very important to retain the character of the villages, protect the wellbeing and mental health of villagers and to prevent Pilning and Severn Beach from becoming two villages surrounded by an ocean of steel warehousing and truck parks.</p> <p>Again, thank you for the work put in. I wish I have been more aware and engaged with what has been going on since 2021. Better late than never. I think I am one of many people I know who feel the same.</p>	A R
187	<p>Thank you for creating this draft Pilning and Severn Beach Neighbourhood Plan. I agree that a plan that reflects the residents of the community is vital. I appreciate the significant time, effort and energy that the volunteer group provided over a substantial period of time in order to produce the draft document. I agree it is essential that "the Parish ... retain its rural character and its sense of village communities". If we lose our current vibrant population, greenspace, or increase housing density the character and desirability of the Parish will be lost. With recent outsized developments underway, it is essential safeguards are put in place to prevent further sprawl of warehouses in Severnside as well as to prevent the Parish becoming a transitory dormitory for Severnside.</p> <p>I do not believe that the case for additional housing has been made. Figure 4 shows a marginal change between 2011 and 2021. This period is inclusive of the Covid pandemic and cannot be considered representative. Furthermore, for a small rural community, there is not a clear basis for expecting a uniform distribution of ages to be maintained across a 10-year period. The plan housing need survey is flawed in the approach which derived the housing targets in a top-down way from the wider needs of South Gloucestershire. This results in an inflated case for new housing development in the Parish.</p> <p>A diverse balance of demographics creates a vibrant Parish. As noted in the plan, families with school age children can add to the vibrancy of the Parish. However, the plan does not recognise the most active members of the Parish are the recently retired and those without school-aged children. This is the demographic that provides most of the vital volunteer services, such as running the library, the village halls, the parish council etc.</p> <p>The plan does not appear to adequately summarise the results of resident survey. This survey and public discourse strongly suggest investment is needed in green spaces, transport and local facilities rather than additional housing.</p> <p>My detailed suggestions:</p> <ul style="list-style-type: none"> • New housing. I suggest that we remove any aspects of the policies that remove green-belt or green spaces (specifically, recommend removing H1, H2, H3 as they remove green belt land). Removing existing green space will reduce our rural character and is not aligned with the resident survey responses. 	Q A B C

	<ul style="list-style-type: none"> Recommend H10 is removed. Repurposing community buildings (pubs, restaurants, shops) into residential, removing small green sites and developing inside the greenbelt will all reduce the sense of village community. Recommend that all development needs very strong safeguards to stop the accommodation turning into transitory Homes of Multiple Occupancy for Severnside. Transport. Propose a focus on not increasing car traffic. It is noted that as a rural community, additional housing will result in increase cars and therefore traffic. Maintaining reasonable commuting times to North and central Bristol is critical to maintaining the attractiveness of the Parish. Increased controls and enforcement of through traffic, especially on the B4064 is needed including HGVs contravening the 7.5 T restriction. Community Facilities. I suggest that we seek to consider additional policies, in addition to CF1-CF4 that will enhance the Parish to become a place that people want to be their long-term home. Large Commercial Development. I support the proposed separation of the Parish from Large Commercial Development. I fully agree with the measures in LCD1, and would be keen to understand if there are any other means to reduce the impact of Severnside development on the Parish such as banning and enforcement of HGVs travelling through the villages, and reducing the allowable size of developments. I am concerned that, as written, LCD2 could be seen as unconditionally supporting a truck-stop in the Parish. I do not believe a truck stop within the Parish will be in line with the stated Parish needs. Environment, Countryside and Green Belt. I am very concerned about any changes top the current greenbelt. I suggest that ECB1 is removed and that the plan adopt a stronger position to ensure the green belt is not reduced. Overall, I believe that is essential that we submit a clear set of proposals to the district council so that future planning decisions are in line with the wishes of the Parish residents. <p>Again, I would like to thank the team for all the hard work they have put into getting the plan this far.</p> <p>I would be happy to discuss any of the points that I have made.</p>	H10
188	You cannot take away our play area, it is very important to the village. The locals use the green space and the village hall and we NEED it!!	A
189	I fully support the vision, objectives and policies laid out in the Neighbourhood Development Plan. It is important that the Parish has its own plan for the future to allow it to evolve in a positive way for the benefit of the whole community.	T
190	We object to the proposal that land at Shaft Road be used as a car park. The road is narrow. There are no pavements and locals use this road to access the sea wall. Many dog walkers have their dogs off leads while walking shaft road. Families and small children spread themselves right across the roads and walk in the middle of the road. Runners and walkers alike frequently wear headphones and those without headphones quite often do not hear vehicles coming behind them. A car park here is an accident waiting to happen. There is no street lighting. The residents at the sea wall end of shaft road show extreme patience and courtesy to pedestrians and cyclists to ensure their safety. Outside visitors are definitely not as aware and many drive very dangerously and well over the 20mph	L

	<p>speed limit. There has been an increase in vehicles and motorbikes using this road since covid and the Severnside festivals. Outside visitors have become more aware of this quiet little road and even use it to illegally cut chains and padlocks off to access the sea wall in vehicles. This is so dangerous to sea wall pedestrians. This has been reported on many occasions by many of the shaft rd residents but to no avail.</p> <p>Making more people aware of this quiet location will only encourage illegal activities away from prying eyes which will impact the village as a whole. We agree that there is also the huge worry of travellers setting up illegal encampment (recently example is B&Q car park).</p> <p>Not sure removal of biodiversity for a car park can be counteracted in this limited area.</p> <p>There is also the question of noise which travels very easily in shaft road. And the question of light pollution as well. We already have to put up with both these things from the ever expanding highways compound on Shaft Road.</p> <p>The access to and from the land onto shaft road would raise huge safety concerns especially as residents of shaft rd 18-11 cannot see around the corner and are likely to meet vehicles side on accessing the proposed car park.</p> <p>There are no suggestions of how any negative changes in green belt or bio diversity and affect on wildlife etc are going to be counteracted for any of the neighbourhood plan ideas. There is only a suggestion that other green spaces will be provided but no examples or ideas are shown.</p> <p>We feel that a more up to date survey be done to all current residents of Severn beach and pilning. There is only informcurrently collated is out of date. Things have changed and the demograph and needs have also changed. The np should not be submitted to sgc on outdated views and needs and from such a small portion of the population. We would hope you would get a fuller response now that people are definitely more aware. And a more up to date response and idea of current needs as some have improved, changed or disappeared.</p> <p>We understand there is some need for improvements and change to various issues as raised in the np but it needs to be done fairly, with a good listening ear and on current feelings and ideas. Not on outdated ones.</p> <p>Further to our first submission we would also like to add that there is the very serious issue of Japanese Knotweed being present in the proposed land for car park at end of shaft Road, Severn beach. Vehicles driving in and out will cause a spread to adjoining land and under roads.</p> <p>There is also the issue of the road already deteriorating quite badly with cracks appearing and numerous pot holes. Extra traffic would cause even more damage and road subsidence</p>	
191	<p>I am writing to submit my assessment and recommendations regarding several key aspects of the Pilning & Severn Beach Neighbourhood Plan (NDP). These points, I believe, merit further review and strengthening before the Plan proceeds to referendum or submission.</p> <p>1a. Community Green Spaces – Sites H1 and H3</p> <p>My foremost concern is the future of the Pilning Village Playing Field and Hall (H1) and the Pilning Allotments (H3). These are the only significant social and community green spaces within the heart of Pilning. They are vital, multifunctional areas that serve recreation, wellbeing, social interaction, and biodiversity.</p>	A C

While I recognise that both H1 and H3 include provisions requiring “adequate alternative sites” before development proceeds, these safeguards are not, in my view, strong enough to ensure that the community does not permanently lose these essential spaces.

To ensure genuine protection and accountability, I would urge that the following minimum conditions be embedded or clarified in the NDP before it is finalised: No development to commence until a viable replacement site is fully identified and procured.

All details of site procurement and delivery must be set out and publicly available before any planning applications for the original site are accepted.

Replacement sites must be subject to a local community vote to determine whether they are acceptable substitutes.

If approved by vote, the replacement site must be completed before any work begins on the original site.

If rejected, no development consent should be granted until a new proposal is brought forward and agreed.

There should be no limit on the number of proposals or rejections until a truly satisfactory replacement is found.

Both these sites are well located - central, walkable, and adjacent to the school - making them uniquely accessible to all age groups and mobility levels. Relocating them would almost certainly reduce this accessibility and weaken their role in village life.

The clear consensus among residents, expressed in feedback to the NDP that I have read and heard, is that these spaces should be protected and removed entirely from development allocations. If the Plan’s stated aim is to “ensure that future development aligns with residents’ wishes and preserves the qualities that make the parish a great place to live,” then this widespread community sentiment should be respected.

If the Parish wishes to improve the village hall or enhance recreation provision, H1 should instead be prioritised for NDP funding, not redevelopment and displacement. This would allow the playing field, play park, and hall to be upgraded and enjoyed by the widest cross-section of residents due to its accessibility and ‘face-lift’.

1b. The Importance of Retaining Local Green Assets

These spaces are not only recreational; they are integral parts of the parish’s wellbeing, ecological, and educational landscape.

They support a range of wildlife species, including grass snakes, slow worms, newts, frogs, hedgehogs, voles, and bat species. The areas are also home to a variety of birds - such as green and great spotted woodpeckers, sparrowhawks, long-tailed tits, coal tits, blue tits, great tits, goldcrests, redwings, mistle thrushes, and many others - alongside a thriving population of invertebrates that contribute to pollination and soil health.

	<p>For local children, these green spaces provide a living classroom. On their journeys to and from school they can observe the changing seasons, plant growth, and the rich interactions of wildlife in their natural habitats. These experiences nurture environmental awareness and emotional wellbeing, connecting younger generations with nature in a way that cannot be replicated by distant or inaccessible sites.</p> <p>Beyond their ecological and educational value, the playing field and allotments deliver proven health and social benefits. Green social prescribing and ready access to outdoor environments are recognised nationally and locally as key contributors to physical and mental wellbeing. This directly supports:</p> <p>The South Gloucestershire Council Plan (2024–2028) goal to “support wellbeing and independence in our communities”; and</p> <p>The BNSSG Healthier Together Mission, which aims for “people enjoying healthy and productive lives, supported close to home.”</p> <p>The BNSSG “Have Your Say” consultation confirmed that access to nature and outdoor activity ranks among the top five factors keeping residents healthy and well. Protecting Pilning’s existing green assets therefore meets both environmental and public-health objectives while retaining habitats that are increasingly rare in the surrounding developed landscape.</p> <p>2a. SG.4244 (1957 Consent) and the Perimeter Zone</p> <p>I also wish to comment on the ongoing implementation of SG.4244 - the 1957 planning consent - and its impact on the landscape surrounding Pilning, Severn Beach, and Easter Compton and surrounding areas.</p> <p>I acknowledge that a lot has been written into the NDP with respect to the commercial developments creeping closer to our villages and the setting out of a green buffer zone and more consideration to be made by developers to any new sites, but I would insist that it should be restated and highlighted vigorously that the Perimeter Zone described in that consent was specifically intended to form an intermediary landscape buffer between industrial development and the surrounding countryside. Its purpose was to ensure that buildings and infrastructure within the consented area would blend harmoniously with neighbouring settlements through appropriate siting, height control, landscaping, and screening.</p> <p>Unfortunately, this intention has not been upheld in recent developments. The conditions of the Perimeter Zone must therefore be actively enforced by South Gloucestershire Council (SGC) and should be enforced within the Neighbourhood Plan.</p> <p>I respectfully request that the Parish Council press for:</p> <p>Formal enforcement by SGC of the original SG.4244 Perimeter Zone conditions to prevent inappropriate or visually intrusive industrial development.</p> <p>Structured consultation between SGC, developers, the Parish Council, and local residents before any new proposals within the Perimeter Zone are approved.</p> <p>Community participation in design and landscaping plans, including the scale, visual impact, and layout of buildings and associated screening.</p>	R
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	<p>Expansion and strengthening of the Green Buffer Zones described in the NDP (particularly LCD1), with any development set even further back, broader planted bunds, tree belts, and acoustic screening.</p> <p>Restriction on any access to the 'Enterprise Zone' via any other access other than the M49 and current access point off the A403 – no access should be permitted off Marsh Common Road or any other country road unfit for HGV access.</p> <p>And to support this – speed cameras, weight restrictions and number plate identification measures should be set up to ensure commuters respect the villages, and only large vehicles with required access to the area are granted access without fines.</p> <p>These actions would not only restore the spirit of the original 1957 conditions but also ensure a fairer and more collaborative relationship between Severnside industry and surrounding communities.</p> <p>Summary</p> <p>In summary, I urge that the final version of the Neighbourhood Plan should:</p> <ul style="list-style-type: none"> Remove H1 and H3 from housing allocations, or At the very least, incorporate the stronger procedural safeguards described above. <p>Reinforce the Parish's and SGC's duty to protect and invest in community green assets as a source of health, wellbeing, and biodiversity.</p> <p>Strengthen the green buffer and perimeter zone policies, ensuring SGC actively consults local residents and the PC on all relevant development proposals under SG.4244 - and listens and enforces feedback.</p> <p>These steps, in my opinion, would make the Plan more resilient, representative, and aligned with the community's long-term interests.</p> <p>Thank you for your consideration of these points. I trust that, with these refinements, the Neighbourhood Plan can better reflect the wishes of those it seeks to serve, allowing growth without the loss of our amenities and green spaces.</p>	R
192	<p>I strongly object to the change of use and any building in pilning villages has k grounds and playing field. This is essentially park space and local facility within walking distance of many village homes and loss of use will be detrimental to local community and family. not to mention the additional displacement of wildlife and greenary in an area prone to flooding. the area is becoming over populated and there will be insufficient resources if this area is over populated. i already suffer from breathing difficulties due to pollution, as does my husband. please consider the overall effect of mass building already planned in this area. i could go on but please just see sense-the infrastructure can't cope we are on a flood plan already and the roads are flooded every time it rains already . there needs to be green space available in walking distance for local families.</p>	A I
193	<p>Very informative update on the plan and possible developments. Nice to catch up with the committee members.</p>	T
194	<p>A very informative display really helped by a personal explanation by several members. It's really important to know what's going to happen to our area. Thank you.</p>	T
195	<p>Information well laid out. Verbal info very interesting. Must say I do like the 10 year plan keeping our village status which is important to me.</p>	T

196	Apart from the (already) lack of "community spirit" - these plans for H1 playing fields/hall would be a desecration for the village. The two Parishes have had a major influx over the past few years, more than a lot of places, so the suggestion to use village owned property is or should be a NO GO AREA. Also it would be a nightmare for a developer to use this land!	A
197	Good session full of interesting info. Factual & made me feel more informed. Good details on where to look for more info and future plans/decisions.	T
198	Policy H1 & Policy ECGB1 re Pilning playing fields & village hall need to be removed. There is no suitable alternative site available in Pilning so there is no point these options being included in the plan. This feedback was provided 2 years ago. We need to protect our community resources not build over them.	A ECGB1
199	Very good informative event. For the developments in Pilning I would be for H3, H4, H1 and H6 lots if referendum going ahead. Thanks!	T
200	I strongly oppose the proposed developments of the playing fields and allotments in Pilning. These are the only recreational green spaces left & they should certainly not be reduced.	A C

APPENDIX B2 RESPONSES TO RESIDENTS FEEDBACK BY TOPIC

The following tables A to T have been prepared for each topic, in order to provide the content for consistent and common responses to the feedback received from residents. Additionally, the tables include links to the associated evidence source and changes being considered to relevant parts of the Neighbourhood Development Plan.

- A Policy H1: Land at Pilning Village Hall and playing field.
- B Policy H2: Land West of St Peter's School, Bank Road, Pilning.
- C Policy H3: Land behind surgery and allotments, Pilning.
- D Policy H4: Rear of 22 & 23, Cross Hands Road, Pilning.
- E Policy H5: Pilning Forge, Whitehouse Lane, Pilning.
- F Policy H7: Land at Station Road, Severn Beach.
- G Policy H8: Land to the west of Ableton Lane, Severn Beach.
- H Policy H9: Land south of Church Road, west of bridle path, Severn Beach.
- I Policy FR1: Flood Risk
- J Policy TTP1: Land at Promenade Gardens, Severn Beach.
- K Policy TTP2: Land at the allotments, Severn Beach.
- L Policy TTP3: Land at Shaft Road, Severn Beach.
- M Policy TTP4: Land at end of Passage Road, New Passage, Pilning
- N Policy CF4: Preservation of existing public green spaces.
- O Policy LCD1: Separation of large commercial developments from residential areas.
- P Policy LCD2: Provision of a truck stop for Severnside.
- Q General Observations and Comments Opposing Development
- R General observations and warehousing.
- S General observations on public transport including rail stations
- T General Support

Topic A. Policy H1: Land at Pilning Village Hall and playing field.**Common Response:**

The NPSG agrees that a Village Hall and recreational space is required in Pilning. The NDP already states that a good area of public green space on the site must be retained and the hall itself is protected. The Public Survey identified that the playing field was well-used by a number of parishioners but also identified that there needs to be better and improved (particularly sporting) facilities. The same survey also identified the Pilning Village Hall is rarely used by the majority of the Parish, down primarily to the condition, location and access of this facility. Only 15% of respondents believed that there are sufficient activities or facilities for children and young people.

The NDP details in both its Policies H1 and CF4, that if any of Pilning Village Hall and/or playing field is lost due to housing development then an adequate alternative provision shall be made. In response to comments made by parishioners, the NPSG will further enhance this wording to ensure that no development can commence without the alternative already being in place in addition to other safeguarding clauses contained in the NDP. A developer would have to meet the requirements necessary in order to obtain approved planning permission and these would include flood modelling and attenuation (A site specific flood risk assessment is required at planning application stage), access, landscaping and design by example.

Highways, the Parish Council, local residents and others will all have the opportunity to object or support any planning application that may be submitted. The policy will be corrected to state 'a maximum of 30 dwellings'. With just this modest number of dwellings, only part of the field would be required, avoiding, if necessary, the existing village hall. Due to commercial sensitivities, it is not appropriate to identify alternative locations for replacement recreational space or village hall, if needed. However, the Steering Group has made enquiries and has assurances that land for those purposes is or will become available. Should that not be the case then development of the site cannot happen. Developing just a part of the site for housing would allow the funds for investing in improved facilities. Although the site is currently located in Green Belt, from the guidance of the National Planning Policy Framework (NPPF) and the experience of recent local planning applications, the land would be re-categorised as Grey Belt.

Common Response Evidence:

[Public Survey](#).

Additional Specific Responses:

No	
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Related Amendments Considered for the NDP

Policy H1 shall be modified to state a 'maximum' of 30 dwellings. The wording shall be strengthened to clarify that a recreation area for children to play and for dog walking must be retained and the proposed minimum size of that area, which would be one third of the existing field.

Whilst it is not possible due to commercial sensitivity and landowner decisions to identify replacement sites for community facilities such as allotments, words will be added to the NDP to provide indicative locations to support the potential deliverability of replacement facilities.

Due to the change in the NPPF with regard to Grey Belt opportunities, Policies H1 to H3 will be modified to make the case for them to be considered as such. This will be presented as a Grey Belt review for the sites which will consider them against the Grey Belt criteria in the NPPF. The NPSG will consider agents/landowners in making the review and they shall have the opportunity to provide supporting information to the review at the planning stage. Grey Belt approach will become the first consideration in each of these site allocation policies, before options to remove land from Green Belt. The Grey Belt content will support the case for when its consideration will be made at planning application stage. Below is the relevant content from the NPPF, which will be addressed for Policies H1 to H3. The content can be assisted by use of examples of recent local planning applications where grey belt status has been accepted.

Policies H1 to H3 will be modified to explain in greater detail how the hiatus between the Neighbourhood Plan being made and the Local Plan being adopted will be managed. The intention is to get the NP to pass examination and be made and to avoid a situation of a later revision and reissue of the NP. No development of these sites would commence until the Local Plan is made and delivers the policy hook. If the policy hook does not materialise, then these sites cannot be delivered on the basis of their removal from the Green Belt alone.

Include content which states 'At planning application, proposals should demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning

Levels Character Area has been understood and how the development will respond to this through design, layout, materials etc.'

Replace 'the development retains a good area of public green space' with 'the development retains a minimum of one third of the existing green space'

Regarding replacement change wording to say. 'Unless an assessment is carried out which demonstrates that it is surplus to demand / need, the loss resulting from the proposed development shall be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. Although unable to disclose alternative sites within the plan for reasons of commercial confidentiality, the NPSG has assurances of land availability at other Green Belt land locations in the Parish'.

Topic B. Policy H2: Land West of St Peter's School, Bank Road, Pilning.**Common Response:**

This land detailed in the NDP is in private ownership. There is no public access or footpaths on the site. A developer would have to meet the requirements necessary in order to obtain approved planning permission and these would include flood modelling and attenuation (A site specific flood risk assessment is required at planning application stage), access, landscaping and design by example. Highways, the Parish Council, local residents and others will all have the opportunity to object or support any planning application that may be submitted.

Although the site is currently located in Green Belt, from the guidance of the National Planning Policy Framework (NPPF) and the experience of recent local planning applications, the land would be re-categorised as Grey Belt.

The site has St Peter's School on one side and a gypsy and traveller site on the other and therefore does not contribute to Green Belt as identified in the NPPF. At planning application stage the developer will need to address Biodiversity Net Gain and demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning Levels Character Area has been understood and how the development will respond to this through design, layout, materials, etc.

Development of this site next to the school would ease parking issues on Bank Road at school pick-up and drop-off times by more children walking to school and increase in off-Bank Road parking.

Common Response Evidence:

[Public Survey.](#)

Additional Specific Responses:

No	
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Related Amendments Considered for the NDP

Due to the change in the NPPF with regard to Grey Belt opportunities, Policies H1 to H3 will be modified to make the case for them to be considered as such. This will be presented as a Grey Belt review for the sites which will consider them against the Grey Belt criteria in the NPPF. The NPSG will consider agents/landowners in making the review and they shall have the opportunity to provide supporting information to the review at planning stage. Grey Belt approach will become the first consideration in each of these site allocation policies, before options to remove land from Green Belt. The Grey Belt content will support the case for when its consideration will be made at planning application stage. Below is the relevant content from the NPPF, which will be addressed for Policies H1 to H3. The content can be assisted by use of examples of recent local planning applications where grey belt status has been accepted.

Policies H1 to H3 will be modified to explain in greater detail how the hiatus between the Neighbourhood Plan being made and the Local Plan being adopted will be managed. The intention is to get the NP to pass examination and be made and to avoid a situation of a later revision and reissue of the NP. No development of these sites would commence until the Local Plan is made and delivers the policy hook. If the policy hook does not materialise, then these sites cannot be delivered on the basis of their removal from the Green Belt alone.

Include content which states 'At planning application, proposals should demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning

Levels Character Area has been understood and how the development will respond to this through design, layout, materials etc.'

Add to policy. "Development must respect the wider setting of nearby heritage assets of St Peter's Church, its gates and Cranmoor Villa, particularly if flood-resilient design may introduce scale or form that is out of keeping with the local character. Proposals must demonstrate how cumulative impacts—especially in relation to this allocation, and H3 and H4—have been considered and mitigated to preserve the significance and setting of designated assets."

Topic C. Policy H3: Land behind surgery and allotments, Pilning

Common Response:

The site H3 comprises mainly of parcels of land of different private ownership, but includes the allotments owned by the Parish Council. Feedback for this site has mostly been concerning the retention of the allotments.

The NPSG recognises allotments as an important social amenity and supports their community value. It seeks to both preserve the availability and increase the provision of allotments in Pilning. The NDP details that adequate replacement allotments are to be made available prior to any development should a developer propose to develop the existing allotment site. A developer would have to meet the requirements necessary in order to obtain approved planning permission and these would include flood modelling and attenuation (A site specific flood risk assessment is required at planning application stage), access, landscaping and design by example. Highways, the Parish Council, local residents and others will all have the opportunity to object or support any planning application that may be submitted.

Developing houses adjacent to burial grounds is not restricted but developers will have to ensure that they meet any relevant laws and/or adhere to any detailed restrictions. Enquiries through the Parish Council have confirmed there is no identified need for the land to be used for any future extension of the cemetery.

Although the site is currently located in Green Belt, from the guidance of the National Planning Policy Framework (NPPF) and the experience of recent local planning applications, the land would be re-categorised as Grey Belt.

The site has existing development on either side and is considered not to contribute to Green Belt as identified in the NPPF. At planning application stage the developer will need to address Biodiversity Net Gain and demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning Levels Character Area has been understood and how the development will respond to this through design, layout, materials, etc.

Due to commercial sensitivities, it is not appropriate to identify specific alternative locations for replacement allotments, if needed. However, the Steering Group has made enquiries and has assurances that land for that purpose is or would become available. Should that not be the case then development of the site cannot happen.

The NPSG recognises the importance of the wider setting of nearby heritage assets of St Peter's Church, its gates and Cranmoor Villa and the policy will be amended to reflect the need to respect that.

Common Response Evidence:

[Public Survey.](#)

Additional Specific Responses:

No	
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Related Amendments Considered for the NDP

Due to the change in the NPPF with regard to Grey Belt opportunities, Policies H1 to H3 will be modified to make the case for them to be considered as such. This will be presented as a Grey Belt review for the sites which will consider them against the Grey Belt criteria in the NPPF. The NPSG will consider agents/landowners in making the review and they shall have the opportunity to provide supporting information to the review at planning stage. Grey Belt approach will become the first consideration in each of these site allocation policies, before options to remove land from Green Belt. The Grey Belt content will support the case for when its consideration will be made at planning application stage. Below is the relevant content from the NPPF, which will be addressed for Policies H1 to H3. The content can be assisted by use of examples of recent local planning applications where grey belt status has been accepted.

Policies H1 to H3 will be modified to explain in greater detail how the hiatus between the Neighbourhood Plan being made and the Local Plan being adopted will be managed. The intention is to get the NP to pass examination and be made and to avoid a situation of a later revision and reissue of the NP. No development of these sites would commence until the

Local Plan is made and delivers the policy hook. If the policy hook does not materialise, then these sites cannot be delivered on the basis of their removal from the Green Belt alone.

Include content which states 'At planning application, proposals should demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning

Levels Character Area has been understood and how the development will respond to this through design, layout, materials etc.'

Whilst it is not possible due to commercial sensitivity and landowner decisions to identify replacement sites for community facilities such as allotments, words will be added to the NDP to provide indicative locations to support the potential deliverability of replacement facilities.

A statement will be included to say there is no evidence of the allotments land being required in the future for cemetery extension.

Add to policy. "Development of the part of the site occupied by the allotments must respect the wider setting of nearby heritage assets of St Peter's Church, its gates and Cranmoor Villa, particularly if flood-resilient design may introduce scale or form that is out of keeping with the local character. Proposals must demonstrate how cumulative impacts—especially in relation to this allocation, and H2 and H4—have been considered and mitigated to preserve the significance and setting of designated assets."

Amend wording of vii) to include: 'For the allotments part of the site, unless an assessment has been carried out which demonstrates that they are surplus to demand / need, the loss resulting from the proposed development shall be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. Although unable to disclose alternative sites within the plan for reasons of commercial confidentiality, the NPSG has assurances of land availability at other Green Belt land locations in the Parish'.

Topic D. Policy H4: Rear of 22 & 23, Cross Hands Road, Pilning

Common Response:

As with much of the land detailed in the NDP this land is in private ownership. The scope of the land included in H4 is what has been put forward by landowners in the call for sites. This site is part of the existing settlement boundary for Pilning.

A developer will have to meet the requirements necessary in order to obtain planning approval. These would include access arrangements, flood modelling and attenuation (a site specific flood risk assessment is required at planning application stage), landscaping and design. Highways, the Parish Council, local residents and others will all have the opportunity at that time to review then object or support any planning application that may be submitted.

The NPSG recognises the importance of the wider setting of nearby heritage assets of St Peter's Church, its gates and Cranmoor Villa and the policy will be amended to reflect the need to respect that.

Landscaping and design plans will additionally need to respect other neighbouring properties.

Common Response Evidence:

[Public Survey.](#)

Additional Specific Responses:

No	
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Related Amendments Considered for the NDP

Policy H4. The NPSG will modify the wording to identify the consideration in design for potential connectivity to other sites at the rear or to the sides. This realistically would only come about if there are established agreements between landowners at the time of development.

Amend to include: 'Development proposals must carefully consider the site's proximity (approx. 40m) to Grade II listed St Peter's Church, its gates, and Cranmore Villa. The layout, scale, height, and form of development should: a) Avoid harm to the openness of land to the rear of these assets. b) Preserve key views from the listed buildings and along the footpath between them. c) Reflect the established grain and density of surrounding development to prevent a cramped or incongruous appearance. A heritage statement must be submitted to assess the significance of the assets and the contribution of their setting, and should inform the design from the outset. Proposals must demonstrate how cumulative impacts—especially in relation to allocations H2, H3 and H4—have been considered and mitigated to preserve the significance and setting of designated assets."

Section 8.1.36 to be modified to include a reference to the Historic England guidance. Additionally, it shall be modified to identify any heritage assets near to proposed sites and to review any related policies to reflect how they will not impact harm to those assets. In particular Policy H4 shall be modified.

Topic E. Policy H5: Pilning Forge, Whitehouse Lane, Pilning

Common Response:

The land at Pilning Forge already has planning permission for the erection of 9 no. commercial/industrial units (Class B2/B8/E(g)iii) with parking and associated works and refurbishment works to the existing commercial/industrial unit. The NPPF would allow for this site to be reconsidered for housing and meets the criteria set out for inclusion in the Neighbourhood Development Plan. The site does not lie within Green Belt. The site is located in the settlement area of Pilning. The erection of industrial units (as already granted) will not

maintain or enhance the existing rural character and the NPSG believe through its studies, research and professional advice received that the site is better suited to residential development provided such development adheres to the policies defined in the NDP under Policy H5. The Residents' Survey and the Housing Needs Assessments support such development. The Design Codes report details how such housing needs to be designed in order to maintain and enhance the local character. A developer would have to meet the requirements necessary in order to obtain approved planning permission and these would include flood modelling and attenuation (A site specific flood risk assessment is required at planning application stage), access, landscaping and design by example. Highways, the Parish Council, local residents and others will all have the opportunity to object or support any planning application that may be submitted.

The policy will be modified to include originally missing content addressing drainage solutions. Further changes include landscaping and heritage assets.

Common Response Evidence:

[Public Survey.](#)

[Planning Permission.](#)

[Housing Needs](#)

[Assessment.](#)

[Design Codes](#)

[Character Assessment.](#)

Additional Specific Responses:

No	
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Related Amendments Considered for the NDP

Include content which states 'At planning application, proposals should demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning Levels Character Area has been understood and how the development will respond to this through design, layout, materials etc.'

Add the following heritage related content: "The site has the potential to include heritage assets with archaeological interest (appears to be on a medieval settlement with a building shown on a Tithe map), therefore a desk-based assessment will be required and, where necessary, a field evaluation."

Add following text to align with other site policies: 'Plans are provided with details of natural drainage solutions (i.e., SuDS) within the design.'

Topic F. Policy H7: Land at Station Road, Severn Beach**Common Response:**

The land detailed in the NDP is in private ownership. The Public Survey identified the need for additional recreation, social and retail facilities and the owner of this site has been amenable to including such in any development proposal. The owner of the site also recognises the need to accommodate car parking on the site for the railway station. Additionally, the Housing Needs Assessment identified the need for additional homes within the Parish, which was supported by the residents' survey.

All parties including, residents will all have the opportunity to review, then object or support, any related planning applications submitted.

The policy will be modified to include originally missing content addressing drainage solutions. Other changes include extending the scope of apartments to one-bedroom with design considerations for accommodating elderly residents, landscaping and car parking standards.

Common Response Evidence:

[Public Survey](#)

Additional Specific Responses:

No	
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Related Amendments Considered for the NDP

The policy will be modified to include provision of some 1-bedroom apartments with design considerations for accommodating elderly residents. This will need to consider access arrangements for apartments at first floor or above.

Add following text at xii) to align with other site policies: 'Plans are provided with details of natural drainage solutions (i.e., SuDS) within the design'.

Amend ix) from 'In the event a potential need to run a 3 train per hour service comes into fruition...' to read 'The need to run a 3 train per hour service is recognised, where development....'

To provide general content on Parking Standards to the NDP, add to 8.1.30 'Parking Standards should align with those identified in the adopted SGC Policies, Sites & Places Plan. Parking requirements are stated in the policies as 2 spaces per dwelling sized at 2 to 4-bedroom'. In the event that 1-bedroom or 5-bedroom dwellings are accommodated, these should have respectively 1 and 3 parking spaces. Visitor parking spaces should accord with the SGC Policies, Sites & Places Plan of 0.2 spaces per dwelling.'

Add to iv) '1 parking space is required for dwellings of 1-bedroom. Parking for dwellings and dwelling visitors should not be met from within the minimum 30 space public car parking'

For clarity on dwelling numbers amend the first sentence of policy H7 to read 'up to a maximum of 25 dwellings, plus an additional quantity of up to 40 apartments above retail units and parking areas'

Include content which states 'At planning application, proposals should demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning Levels Character Area has been understood and how the development will respond to this through design, layout, materials etc.'

Topic G. Policy H8: Land to the west of Ableton Lane, Severn Beach

Common Response:

The land detailed in the NDP is in private ownership. It is not in Green Belt or is public green space and does not include formal public footpaths. The Housing Needs Assessment identified the need for additional homes within the Parish, which was supported by the residents' survey. Local schools and businesses including doctors, supported the need for additional housing to support their future.

H8 is a large site which on its own could provide the identified requirement for housing in Severn Beach. Instead, the NDP is distributing this between three sites H7, H8 and H9 which supports the principle of keeping development sites small and allows the moderate growth to be outwards from the centre of the village. This is a sustainable approach with amenities such as schools, parks, shops and public transport being in easy walking distance. For H8 the policy will be amended to require phasing of development to be from north to south.

Access to the site will require the creation of new roads which will not adversely impact existing roads. There may be opportunities for improved connectivity of roads, but certainly there will be improvements to pedestrian access and connectivity.

The design of new housing will need to meet modern parking standards and will therefore not impact neighbouring residential areas.

By identifying this land for potential housing development and including it in a redefined settlement boundary for Severn Beach, affords it protection from other forms of development which residents are increasingly concerned by, including the ever-spreading warehousing.

Any housing development must respect biodiversity net gain (BNG). The policy will be strengthened to state clearly at planning application, proposals should demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning

Levels Character Area has been understood and define how the development will respond to this through design, layout, etc.

The policy will be modified to include originally missing content addressing drainage solutions.

In the future, all parties, including residents, will all have the opportunity to review, then raise objections or support, any related planning applications submitted.

Common Response Evidence:

[Public Survey](#)
[Housing Needs Assessment](#).

Additional Specific Responses:

88 Thank you for advising us of a change of ownership of the site. We understand you have asked for it not to be considered in 'call for site' and its removal. Particularly at this late stage of the NP process, the NPSG is unable to get involved in resolving land ownership disputes or resolving the scope and timing of potential ownership changes. Additionally, it would be inappropriate to discard the resources used in the different evaluation and assessments of sites that has been completed. The recommendation to any potential new owner is that, as with any site, it will ultimately be their decision, by at a later stage applying for planning permission and engaging a developer, whether a site can be developed or not. The site remaining in the NDP does not impact such decisions.

Related Amendments Considered for the NDP

Policy H8. The policy will be amended to reflect the need for phasing from north to south, should the site be delivered under phased build.

Add following text at ix) to align with other site policies: 'Plans are provided with details of natural drainage solutions (i.e., SuDS) within the design'.

Landscape and Environment: Challenges to SEA and HRA were investigated via the consultant AECOM. The SEA was amended and re-issued to reflect the SNCI designation of H9, but there were no other changes to H8 or changes to the HRA.

Include content which states 'At planning application, proposals should demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning Levels Character Area has been understood and how the development will respond to this through design, layout, materials etc.'

Topic H. Policy H9: Land south of Church Road, west of bridle path, Severn Beach**Common Response:**

The land detailed in the NDP is in private ownership. It is not in green belt and is immediately adjacent to the existing settlement boundary. Although the site includes public rights of way which have only recently been recognised by SGC, this land is not a public green space or recreational area. The Housing Needs Assessment identified the need for additional homes within the Parish, which was supported by the residents' survey. H9 is, with H7 and H8, proposed to together provide the identified requirement for housing in Severn Beach, supports the principle of keeping development sites relatively small and allows the moderate growth to be outwards from the centre of the village. This is a sustainable approach with amenities such as schools, parks, shops and public transport being in easy walking distance. Local schools and businesses including doctors, supported the need for additional housing to support their future.

The NPSG recognises the importance of biodiversity within all of the Parish and it should be noted that there exists numerous areas with designated protection to nature, biodiversity, scientific interest, conservation, habitat and wetlands. Extensive Habitats Regulations Assessment and a Strategic Environmental Assessment was commissioned and published by the NPSG as part of the site evaluation process.

The policy defined under H9 takes this into consideration (as does the whole of the NDP in general) and details that a comprehensive landscaping scheme demonstrating that biodiversity and wildlife as a whole have been considered and a net gain improvement to biodiversity be achieved. There is also the requirement that the southern end of the area shall not be developed and should be established as a green buffer zone. Tree preservation orders are known to be in place on some specimens, primarily oak trees and located on the perimeter of the site. These must be considered and addressed by the layout, as must the existing identified footpaths.

The developer would have to meet the requirements necessary in order obtain approved planning permission and these would include flood modelling and attenuation (A site specific flood risk assessment is required at planning application stage), access, landscaping and design by example. Highways, the Parish Council, local residents and others will all have the opportunity to object or support any planning application that may be submitted.

The NPSG continues to consider the recent evaluation of the site by SGC to apply the of category of Site of Nature Conservation Interest (SNCI). The developer will be required to consider this and demonstrate through ecological, landscape and visual impact assessments that the importance of the site within the Pilning Levels Character Area has been understood and how development will respond to this through design, layout, materials and mitigation etc.”

The design of new housing will need to meet modern parking standards and will therefore not impact neighbouring residential areas.

There are a number of access options known to be available to the development from existing roads including; Abbott Road, Prospect Road, Denny Isle Drive and Church Road. These have

been added to the policy. However, final options to be taken cannot be defined in the NDP at this stage due to commercial sensitivities. But these will need to be defined and disclosed at future planning application stage.

Identifying this land for potential housing development and including it in a redefined settlement boundary for Severn Beach, affords it protection from other forms of development which residents are increasingly concerned by, including the ever-spreading warehousing.

Any housing development must respect biodiversity net gain (BNG). The policy will be strengthened to state clearly at planning application, proposals should demonstrate through a landscape and visual impact assessment that the importance of the site within the Pilning Levels Character Area has been understood and define how the development will respond to this through design, layout, etc.

The policy will be modified to include originally missing content addressing drainage solutions requirements. Consideration for a potential heritage asset will also be added to the policy.

In the future, all parties, including residents, will all have the opportunity to review, then raise objections or support, any related planning applications submitted.

Common Response Evidence:

[Public Survey](#)

[Strategic Environmental Assessment](#)

[Habitats Regulations Assessment](#)

Additional Specific Responses:

Related Amendments Considered for the NDP

Policy H9. See feedback from SGC and follow up correspondence and changes to H9 in relation to SNCI. [The SEA was amended and re-issued to reflect the SNCI designation of H9.](#)

Add following text at ix) to align with other site policies: ‘Plans are provided with details of natural drainage solutions (i.e., SuDS) within the design’.

Add the following heritage related content: “The site has the potential to include heritage assets with archaeological interest (the southern part of site may comprise part of a deserted medieval settlement of Ableton), therefore a desk-based assessment will be required and, where necessary, a field evaluation.”

Replace the last sentence of v) with: ‘Access options from existing roads are known to be available from Abbott Road, Prospect Road, Denny Isle Drive and Church Road. The selected access points shall be shown in a detailed plan at planning stage.’

To address SNCI, etc we propose to include “demonstrate through ecological, landscape and visual impact assessments that the importance of the site within the Pilning Levels Character Area has been understood and how development will respond to this through design, layout, materials and mitigation etc.”

Add following text at x) to address SNCI. ‘Part of the site has been identified as a Site of Nature Conservation Interest (SNCI). The content of the survey from the original SNCI designation from 1985 and a survey of 22nd and 27th April 2025 shall be considered to demonstrate through ecological, landscape and visual impact assessments that the importance of the site as SNCI within the Pilning Levels Character Area has been understood and how development will respond to this through design, layout, materials and mitigation etc.’

Topic I. Policy FR1: Flood Risk

Common Response:

The NPSG has taken very seriously the issue of flood risk in moving forward any proposals for development in the NP and therefore shares the concerns of residents. However, we have had extensive engagement with South Gloucestershire Council (SGC) and The Environment Agency (EA) on flooding over the last 5 years. In this time the Parish has also seen the completed improvements to the sea defences along our coastline. The EA has also published their latest flood risk guidance and flood mapping for the area which show the associated reduction in flood risk. Following the recommendations of SGC and the EA, the NPSG has completed a Parish wide Sequential Test and commissions a Level 2 Strategic Flood Risk Assessment with specialist consultants JBA for the development sites being put forward. The approach is detailed within the NDP and specifically within the policy FR1 and its supporting text. This has been reviewed SGC and the EA and provides the mitigation needs for developments to be safe during their lifetimes without increasing risk of flooding to neighbouring properties.

Developers are required to produce Site Specific Flood Risk Assessments at Planning Application stage to demonstrate their proposals will pass the Exception Test and must include details of natural drainage solutions (i.e. SuDS). Flood data from the Level 2 SFRA for the sites included in it, can be made available to relevant landowners/developers. The requirement for availability of sustainable drainage strategies and a site specific FRA is at planning applications stage. They are not needed for the publication of the NDP.

For some proposed sites, the requirement for details of natural drainage solutions (i.e. SuDS) had been omitted from the policies in the Regulation 14 publication of the NDP. All such policies shall be amended to provide that content and to be consistent.

All of the above takes into account, concerns raised by some residents, e.g. that much of the Parish is located in flood plain and is categorised as Flood Zone 3, whether Climate Change is adequately considered. The EA’s data takes into account the latest information and calculations for Climate Change. All flooding types have been considered.

A few residents have expressed particular concerns over surface water flooding. Assessment has shown the risk to be low and well handled by the rhine network. Existing instances of lying surface water are usually down to poor land drainage (the responsibility of landowners) where water not getting to the rhines.

The NPSG shares the concerns of residents in the land raising and hard surfacing for warehouse construction on Severnside and its potential impact of flood risk to residential areas. The NPSG confirms that its flood risk mitigation work has not been prepared to address new large commercial developments or their impacts. Policy FR1 will be amended to reflect that.

Policy LCD1 addresses the need for the Parish to continue to perform checks on planning applications for large commercial developments to ensure they have adequately addressed adverse flooding impacts on residential dwellings. Additionally, the NPSG continues dialogue on the subject with the EA, the Parish Council, our Ward Councillor and our Member of Parliament.

Common Response Evidence:

[Public Survey.](#)

Additional Specific Responses:

No	
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Related Amendments Considered for the NDP

The NPSG will consider amending policy FR1 stating that it has not been prepared to address large commercial developments.

Add the following text to policies where it had been omitted to align with other site policies: 'Plans are provided with details of natural drainage solutions (i.e., SuDS) within the design'.

Topic J. Policy TTP1: Land at Promenade Gardens, Severn Beach

Common Response:

Visitor Parking in Severn Beach was raised and confirmed as an issue in the results of the 2022 residents' survey. The issue was also evident in the recent parking surveys by the NPSG carried out in 2025. During public engagement sessions, the issue of parking within the area has been repetitively raised.

Available sites for car parks to relieve visitor parking were therefore sought. This site at the end of Promenade Gardens near the 'Just as You Are Tea Cottage' was proposed and was considered as the most centrally located parking option available.

Given the emerging availability of site TTP2 for parking, the scope of this site has been reduced to a small area of parking for 20 spaces. To allay concerns raised on size, the

wording of the policy will be changed from ‘approximately 20 spaces’ to ‘a maximum of 20 spaces’.

The design of the surface of the small car park area will not impact flood risk or alter the appearance of its grassy nature. Other than when the car park is in use it will not detract from its use as part of the public green space. The opening of the carpark will be limited, e.g. when there are events on or at those times of years when visitor numbers to the area increase. The area has already been trialled successfully for mobility parking at SevernFest. If the car park is to be used on more regular or permanent basis a planning application will be required. Funding and management strategies would be needed prior to any permanent potential development.

The NPSG shares residents’ concerns to avoid any potential for anti-social behaviour and overnight parking on the various car park sites proposed in the NP. Therefore, the related parking policies will be strengthened to describe the need for lockable gates, which should be locked at night, with locked low-level bars over gates to stop the entry of camper vans and caravans, and supported by associated signage.

The NPSG recognises the importance of the Severn Estuary and areas that are designated Ramsar sites, Sites of Special Scientific Interest, etc. However, it considers this use, of a small corner of Promenade Gardens, which is already in use by the public and is close to cafes ,shops and housing will have no significant impact on those designations or wildlife.

The car park proposal will not include EV charging points.

The policy wording will be appropriately amended to describe the access as ‘single lane gated access’ rather than a ‘one way road’.

Common Response Evidence:

[Public Survey](#)

Additional Specific Responses:

2	Photographs have been sourced from the public domain or have been taken from a public highway. The photograph in question only shows a partial piece of the property and demonstrates parking congestion within the location.
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Summary of Amendments Considered for the NDP

Wording of policy to be modified from ‘approximately 20 spaces’ to ‘a maximum of 20 spaces’

Wording of policy to be modified to address options such as locking at night and low entry bars.

[Amend ii\) replacing ‘one way road’ with ‘single lane gated access’](#)

To address both the need and deliverability of the four proposed visitor parking sites it is proposed that 8.4.13 is amended to add:

After 'resident's properties'. 'In 2025, the NPSG undertook, parking surveys in Severn Beach and at New Passage which provided evidence of the need for visitor parking solutions in those areas'.

After 'Shaft Road' add 'Approaches to SGC for support in delivering these car parks has to-date been fruitless as they are not identified in the SGC Capital programme. Therefore, delivery will need to come via the Parish Council and with use of CIL money. The Parish Council has already commenced work in bringing forward TTP2 in this way.'

Add to the policy:

viii) The design and the materials used in the construction of the car park present no visual harm to the area and therefore limits the impact on neighbouring properties, where there are no identified heritage assets. There is no recognised need for electric vehicle charging points which are addressed elsewhere in policy H7.

Topic K. Policy TTP2: Land at the allotments, Severn Beach.

Common Response:

Visitor parking in Severn Beach was raised and confirmed as an issue in the results of the 2022 residents' survey. The issue was also evident in the recent parking surveys by the NPSG carried out in 2025. During public engagement sessions, the issue of parking within the area has been repetitively raised. Available sites for car parks to relieve visitor parking were therefore sought.

This site, the location of the former rugby club carpark, had become largely overgrown and forgotten about. It did not come to the attention of the NPSG until late 2023 when it was added to the evaluation process. The area already had a gravel base and can be considered as 'brown field' as it was previously developed. As well as a solution for visitor parking, it can also be used to the benefit of allotment holders for vehicle parking and for future uses of the community shed project intended to be located at the position of the old concrete base of the former rugby club.

This site therefore suits a local parking need as well as for visitors at those times of year when visitor numbers to the area increase. It will also help support events on Promenade Gardens, such as SevernFest. If the proposal for a car park was not included in the NP, the available land could be identified for alternative uses and the opportunity for it as a parking solution could be lost. The proposal of this area of car park does not impact other sustainable transport options in the NP. Additionally, it will reduce the numbers of vehicles circling the centre of Severn Beach, looking for parking spaces at busy times, and will be helped further by making Beach Road one-way.

No allotment areas will be lost by reinstating the car park. There is no identified need for additional allotments in Severn Beach. Should that need change at some time in the future, there is room for more on the eastern end of the plot.

The porous nature of the surface of the car park will not impact flood risk and as discussed with the Internal Drainage Board, access to the peripheral drainage ditch will be maintained for clearing purposes.

The NPSG shares residents' concerns to avoid any potential for anti-social behaviour and overnight parking on the various car park sites proposed in the NP. Therefore, the related parking policies will be strengthened to describe the need for lockable gates, which should be locked at night, with locked low-level bars over gates to stop the entry of camper vans and caravans, and supported by associated signage. The policy wording will be appropriately amended to describe the access as 'single lane gated access' rather than a 'one way road' (see text to be added in the policy).

The NPSG recognises the importance of the Severn Estuary and areas that are designated Ramsar sites, Sites of Special Scientific Interest, etc. However, it considers this area, adjacent to the allotments, which is already in use by the public will have no significant impact on those designations.

The car park proposal will not include EV charging points which will be catered for within policy H7.

Common Response Evidence:

Public Survey

Additional Specific Responses:

126	Claims that, 'as the PC has already submitted a planning application for this car park, which if consented, could result in the PC removing TTP2 from the NP and denying opportunity for community comment and Planning Inspector examination', are unfounded. It is the case that Policy TTP2 will remain in the NDP, irrespective of what will happen with any planning application. It is at the planning application stage where a Planning Inspector will review and comment, not through the NDP. The community can comment at the planning application stage too, but could also comment through the NP Reg 14 consultation.
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Summary of Amendments Considered for the NDP

TTP2

Amend iv) replacing 'one way road' with 'single lane gated access'.

Also add 'Impact on residents and road users of Beach Road have been considered, with the Parish Council having consulted residents and gained their support for making Beach Road one-way.'

Add vii) There is no recognised need for electric vehicle charging points which are addressed elsewhere in policy H7.

To address both the need and deliverability of the four proposed visitor parking sites it is proposed that 8.4.13 is amended to add:

After 'resident's properties'. 'In 2025, the NPSG undertook, parking surveys in Severn Beach and at New Passage which provided evidence of the need for visitor parking solutions in those areas'.

After 'Shaft Road' add 'Approaches to SGC for support in delivering these car parks has to-date been fruitless as they are not identified in the SGC Capital programme. Therefore, delivery will need to come via the Parish Council and with use of CIL money. The Parish Council has already commenced work in bringing forward TTP2 in this way.'

Topic L. Policy TTP3: Land at Shaft Road, Severn Beach		
Common Response:		
	<p>Visitor parking in Severn Beach was raised and confirmed as an issue in the results of the 2022 residents' survey. The issue was also evident in the recent parking surveys by the NPSG carried out in 2025. During public engagement sessions, the issue of parking within the area has been repetitively raised. Available sites for car parks to relieve visitor parking were therefore sought.</p> <p>Prior to the known availability of TTP2 Land at the allotments, potential sites in Severn Beach to relieve visitor parking were proving hard to find. Land at Shaft Road associated with the former Second Severn Crossing visitor centre was looked but was unavailable. Then this small site at TTP3 was identified as available and was brought into the NP for evaluation. The site suits visitor parking potentially for times of year when visitor numbers to the area increase. However, this site will only be considered in line with Policy TTP3, which details that proposals should include a justification of requirement for the car park, taking into consideration the utilisation of other visitor car parks in Severn Beach and at New Passage (TTP1, TTP2, TTP4) which should be developed first.</p> <p>TTP3 further details that need for this car park should also consider any parking issues particular to Shaft Road. The NPSG is aware that should the proposal for a car park not be included in the NP, the available land may get alternative use and should the parking situation further deteriorate then there would be no solution available.</p> <p>Planning permission, funding and a management strategy would be needed prior to any potential development.</p> <p>The NPSG shares residents' concerns over the potential for anti-social behaviour and overnight parking on the various car park sites proposed in the NP. Therefore, the related parking policies will be strengthened to describe the need for lockable gates which should be locked at night, locked low-level bars over gates to stop the entry of camper vans and caravans and associated signage.</p> <p>The design of the surface of the small car park area will not impact flood risk, nor will it have any impact on Green Belt.</p> <p>The principle of this new car park is to take some of the existing demand for visitor parking at peak times away from the centre of Severn Beach and at the end of New Passage. Hence, removing congestion and inconsiderate parking from those areas. It is not intended to encourage more visitors or negatively impact sustainable transport policies.</p> <p>This car park proposal will not include EV charging points.</p>	

Common Response Evidence:	
Public Survey	
Additional Specific Responses:	

Summary of Amendments Considered for the NDP
<p>Add vii) The design and the materials used in the construction of the car park present no visual harm to the area and therefore limits the impact on neighbouring properties, where there are no identified heritage assets. Additionally, the proposal shall demonstrate no harm to the Green Belt.</p> <p><u>Add viii)</u> There is no recognised need for electric vehicle charging points which are addressed elsewhere in policy H7.</p> <p>Wording of policy to be modified to address options such as locking at night and low entry bars.</p>

Topic M. Policy TTP4: Land at end of Passage Road, New Passage, Pilning
Common Response:
<p>Visitor parking in New Passage was raised and confirmed as an issue in the results of the 2022 residents' survey. The issue also arose in the parking surveys carried out in 2025. Available sites for a small car park had therefore been sought to relieve the situation. In light of comments received, the NPSG will review the Policy detail but is aware that should the proposal for a car park not be included in the NP, the available land may get alternative use and should the parking situation further deteriorate then there would be no solution available. Planning permission, funding and a management strategy would be needed prior to any potential development.</p> <p>The NPSG shares residents' concerns over the potential for anti-social behaviour and overnight parking on the various car park sites proposed in the NP. Therefore the related parking policies will be strengthened to describe the need for lockable gates which should be locked at night, locked low-level bars over gates to stop the entry of camper vans and caravans and associated signage.</p> <p>The NPSG cannot determine Highways issues, but could include a need for parking restriction (yellow lines by example) in the aspirations document, in the event that the car park materialises.</p> <p>The issue of whether or not the proposed access to the car park is by public or private section of road is recognised and will need to be addressed at a later planning application stage.</p>

Currently there is nothing to stop any vehicle driving up to the locked gates through which access to the sea wall can be made.

The design of the surface of the small car park area will not impact flood risk.

The principle of the car park at New Passage is to take the existing levels of visitor parking need safely off the road, not to encourage more visitors. Combined with applied parking restrictions the car park should not encourage more users and the roads will remain clear.

The car park proposal will not include EV charging points.

Matters of heritage and Green Belt are further addressed in the proposed amendments being considered to the policy.

Common Response Evidence:

[Public Survey.](#)

Additional Specific Responses:

2	Photographs have been sourced from the public domain or have been taken from a public highway. The photograph in question only shows a partial piece of the property and demonstrates parking congestion within the location.
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Summary of Amendments Considered for the NDP

Wording of policy to be modified to address options such as locking at night and low entry bars.

Add vi) The design and the materials used in the construction of the car park present no visual harm to the area and therefore limits the impact on neighbouring properties.

Add vii) The site maintains and protect the open setting to the Grade II listed Severn Lodge Farm and courtyard outbuildings (converted) on its south / east side. Additionally, there shall be no impact on the remnants of ridge and furrow in the adjacent field. Additionally, the proposal shall demonstrate no harm to the Green Belt.

Add viii) There is no recognised need for electric vehicle charging points which are addressed elsewhere in policy H7.

Topic N. Policy CF4: Preservation of existing public green spaces.

Common Response:

This policy defines that the existing public green spaces of the Parish are maintained, enhanced and preserved. Where any development proposal is made that could mean reduction or loss of a public green space then provision has to be made for equivalent replacement with as needed re-location to a suitable location. Proposed policy H1 for some housing at Pilning playing field is the only example in the NDP and this clearly requires that

public green space is retained on the site with additional and improved provision made elsewhere. The playing field will not be lost. The NPSG appreciates and understands residents' feedback about the importance in the public health with the retention of public green spaces.

The NPSG considered there is no contradiction between its vision and policies in preserving public green spaces. However, it believes some clarification would be helpful on terminology.

'Green spaces' has been used in the Vision statement of the NDP as a generalisation and on its own is open to misinterpretation.

'Public Green Space' is used in Policy CF4 with the appropriate assets listed. These are considered as belonging to the Parish for the leisure and recreation of the public. In submitting feedback, residents have made different references to 'our green space'. It is this public green space land that should be considered that way.

'Green Belt' is land identified as such by the Government and has five purposes (see 3.1.13 in the NDP). The Green Belt land of the Parish is identified in Fig 2 of the NDP. Green Belt land can and does include buildings and can be granted permission for further development. Green Belt boundaries can be modified by Neighbourhood Plans. The NP supports some amendments to the Green Belt boundaries in policies H1, H2, H3, ECGB1 and ECGB2 to allow some development within Pilning and to aid 'green buffering'. Since December 2024 the NPPF has introduced the concept of 'Grey Belt'

'Undeveloped land' may be field, gardens, scrub/wasteland, etc. and may be 'green' or 'green field'. They are the responsibility of the landowner, with access by the public only within public right of ways where they exist or where permission has been given by the owner.

Allotments are not covered as by CF4 as they are amenities with their own regulations rather than public green spaces.

Common Response Evidence:

Public Survey

Additional Specific Responses:

	The NPSG considers it cannot include as part ii) of the policy other nominations of privately owned land as 'public green spaces'
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Summary of Amendments Considered for the NDP

Consider whether there are additional public green spaces to be included and a revised map to go with the policy. Redwick Common was identified by the Parish Council and added to the policy.

Should the PC decide to withdraw the availability of the land for H1 from the NP, then the bracketed text in d) would need to be removed. The PC did not decide to withdraw H1 from being available.

Topic O. LCD1: Separation of large commercial developments from residential areas.	
Common Response:	
<p>This policy defines that a green 'buffer' zone should be established/maintained between the large commercial developments and the residential areas of the Parish. It is not possible to apply this retrospectively on existing developments but there is an opportunity to place conditions on future projects and planning proposals.</p>	
Common Response Evidence:	
Public Survey.	
Additional Specific Responses:	
187	Are any other means to reduce the impact of Severnside development on the Parish such as banning HGVs travelling through the villages. These measures are already in place, however their implementation and enforcement are outside of the scope of the NP.

Summary of Amendments Considered for the NDP	
<p>Consider amending policy LCD1 to better describe the height requirements of buffering, especially in light of the recent mega-shed.</p> <p>The NPSG will consider the expansion and strengthening of the Green Buffer Zones described in the policy, with developments set further back, broader and higher planted bunds of tree belts and acoustic screening.</p>	

Topic P. Policy LCD2: Provision of a truck stop for Severnside.	
Common Response:	
<p>This policy defines the NDP support for a truck stop but only, for the reasons identified within the body of the policy, where it is located central to the Severnside commercial area and ideally adjacent to the new M49 motorway junction. This has been somewhat superseded by more recent developments where an application for a truck stop was approved by South Gloucestershire Council at planning committee. This will be located at the entry to Western Approach close to the junction of the A403 on Govier Way, opposite Severnwood Gardens in Severn Beach. It should be noted that the Neighbourhood Plan Steering Group objected to this application.</p> <p>The NDP's support for the need of an appropriately located truck stop aligns with that of the Parish Council and with SevernNet. Such a truck stop itself would not bring additional vehicles into the Parish. It would serve the existing and developing numbers of trucks using Severnside and keep them away from the A403. The existing facilities at Avonmouth and Severn View do not serve Severnside,</p>	

It is anticipated that the recently consented truck stop will be far from large enough, with the need to develop another at sometime into the future. The requirements of LCD2 will continue to apply to that.

Common Response Evidence:

[Public Survey.](#)

Additional Specific Responses:



Summary of Amendments Considered for the NDP

Truck Stop (LCD2):

Add to policy 'Outside of land recommended as green buffer zones' Note: this has been ignored in a passed planning application of December 2025.

Topic Q. General Observations and Comments opposing development

Common Response:

The NDP has been created by volunteers from within the Parish for the benefit of members of the Parish. It has been produced independently from the Parish Council and South Glos Council. The NP has been developed to the process specified by the Government, which is wholly transparent, and with the required level of public consultation and communication.

The NP has commissioned independent technical reports which includes a Housing Needs Assessment (in itself, this identified the need for additional housing in the Parish), used the services of town planning consultants, liaised with lead planners within South Gloucestershire Council, and conducted a substantial survey (this also confirmed the additional housing requirement) in which every household of the community was canvassed for their views.

The evidence of the need for additional housing in the Parish is overwhelming. There has been very little new build in the Parish for some 25 years and that would continue due to barriers such as flood risk and Green Belt, matters that SGC appeared unwilling to address except for the provision of warehousing. Some change and growth is inevitable; that is how our communities have got to where they are today. There was very little in Severn Beach 100 years ago and growth of Pilning came initially from the railways.

The NPSG understands some residents' concerns with regard to over-development and reduction of open spaces. This has been taken onboard throughout the development of the NDP.

In having a NDP, Parishioners will get to have their say on certain future development, including design and location of housing. Without this Plan, the decisions, and criteria for those decisions, will remain with SGC, as it is at present. An increase in housing will support

improved public transport provision, will sustain our local schools, medical services and small businesses (all have been approached and supported the need for new housing) and increase the money received by the Parish from local council in an increased percentage of Council Infrastructure Levy (CIL), allowing further investment in amenities.

The NDP does not constitute planning permission. This still has to be sought by individual developers and landowners meeting the criteria of the National Planning Policy Framework (NPPF), SGC's Local Plan and the policies of an agreed NDP. Local residents and the Parish Council will still have the opportunity to review, then object to, or support, any applications submitted.

The NPSG has created an Aspirations Document which will accompany the NDP. This document details observations and aspirations identified that by regulation, cannot be included in the NDP. Issues such as public transport services, road networks and traffic management, maintenance of facilities, are included and will help focus Parish Council activity to help meet those needs for parishioners.

Many residents have asked whether landowners and developers can still apply for planning permission to develop their sites should the NDP not be approved. The answer is yes. The NDP is the Parish's best opportunity to detail how applications should be dealt with and what conditions should be addressed or imposed. Without a NDP the Parish will not have the same influence or control over future developments. If not earmarked for future well-designed and affordable housing, what could become of the land? More warehousing, caravan sites or van dwellers?

The levels of new housing for Severn Beach and Pilning are relatively small at 150 and 100 respectively over a 10-year period. These will not change the character of our villages, or given modern ecology and biodiversity requirements, damage our environment or wildlife. Public rights of way will be protected and developments will include public green space. The inclusion of green buffer zones should provide residents with shielding from industrial development. The location of developments are sustainable, being within walking distance of village centres and amenities.

Whilst statements of just objection are noted, they are of limited benefit to shaping the NDP. We do hope our response has helped to reassure you of the positive intention for the Parish and its residents.

Common Response Evidence:

[Public Survey.](#)

[Housing Needs Assessment.](#)

[South Gloucestershire's Planning Policy Appendix 1 to New Proposed Local Plan](#)

Additional Specific Responses:

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Summary of Amendments Considered for the NDP

None.

Topic R. General observations and warehousing.

Common Response:

<p>The NDP has been created by volunteers from within the Parish for the benefit of members of the Parish. It has been produced independently from the Parish Council and South Glos Council. The NP has been developed to the process specified by the Government, which is wholly transparent, and with the required level of public consultation and communication.</p>
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<p>The NPSG agrees with your concerns over new warehousing and is not responsible for bringing forward any of the recent developments around the Parish. The NPSG has reviewed planning applications as part of its work and has opposed developments that it considered damaging to our Parish. This included the 'Mega' warehouse (Plot 4). The Neighbourhood Development Plan does include policies which should reduce the impact of industrial development by maintaining a green buffer zone (see Policy LCD1) and influencing design and layout. But without a 'made' NDP planners have largely ignored those objections and therefore the outcome has remained with the decisions and responsibility of SGC.</p>
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<p>Although the NPSG recognises the strategic importance of the industrial development on Severnside, the NDP contains no policies actively supporting further development. It is essentially beyond the scope of the Neighbourhood Plan and remains the responsibility of SGC.</p>

<p>Should the NDP ultimately be unsupported by Parishioners, the encroachment of warehousing of similar or greater size, right up to residential areas, may continue. Indeed, the new Local Plan proposed by SGC includes further employment land to the north of Marsh Common Road. This expands on the areas of warehouse and employment land development already consented on former ICI land (see page 147 of SGC's Planning Policy Appendix 1 to New Proposed Local Plan).</p>

Common Response Evidence:

South Gloucestershire's Planning Policy Appendix 1 to New Proposed Local Plan.
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Additional Specific Responses:

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Summary of Amendments Considered for the NDP

None.

Topic S. General observations on public transport including rail stations	
Common Response:	
<p>The NDP has been created by volunteers from within the Parish for the benefit of members of the Parish. It has been produced independently from the Parish Council and South Glos Council. The NP has been developed to the process specified by the Government, which is wholly transparent, and with the required level of public consultation and communication.</p> <p>The NPSG agrees with your concerns over the enhancement and development of improved transport services links for our community but these areas unfortunately fall outside of the remit for the NPSG and remain the responsibility of SGC, the rail companies, highways or other operators. For Severn Beach Railway Station, the NDP includes a land allocation which allows certain physical and planning related areas to be addressed by the NP. Matters in relation to Pilning Station, whilst supported by the NPSG, are strategic and go beyond the scope of a NP.</p> <p>We have however, included these elements in the aspirations document that accompanies the NDP. This document will give guidance and direction to the Parish Council when it comes to investing additionally gained funds from local development back into our community and help transport companies to understand Parish needs when making transport infrastructure decisions.</p> <p>The NDP does support sustainable transport with new developments being close to village centres and amenities, allowing the opportunity to walk rather than use vehicles. The moderate increases in numbers of dwellings and residents over the next 10 years should be a positive contributor to public transport services.</p>	
Common Response Evidence:	
<p>Public Survey.</p>	
Additional Specific Responses:	

Summary of Amendments Considered for the NDP	
None.	

Topic T. General support	
Common Response:	
<p>Thank you for your general support of the NDP. Your recognition of the collective efforts that have gone into the NDP and the potential benefits for the Parish as a whole are much appreciated.</p>	
Common Response Evidence:	
<p><u>Public Survey.</u></p>	
Additional Specific Responses:	

Summary of Amendments Considered for the NDP	
	None.

APPENDIX B2 TEMPLATE FOR LETTER USED TO RESPOND TO RESIDENTS

The following letter template has been used to respond to all residents submitting feedback during the Regulation 14 consultation. The template provides a consistent approach with a description of how feedback has been processed, NPSG response and proposed changes to the NDP for each topic raised and an explanation of the next stages for the NP.

Dear

The Neighbourhood Plan Steering Group (NPSG) thanks you for your feedback during the Regulation 14 consultation for the Pilning & Severn Beach Neighbourhood Plan. We apologise for the time it has taken to get this response to you, but we received a lot of feedback, all of which had to be properly considered to allow us to reach appropriate conclusions. The feedback received, responses given and changes to the Neighbourhood Development Plan (NDP) can all be found in the Regulation 14 Consultation Summary Report, which will shortly be posted on the pages of the Parish Council website. The revised NDP can also be found on the website.

[... detail of NPSG response and any associated changes to the NDP or other documents.....](#)

The next stage for the Neighbourhood Plan is for it to be submitted to the Parish Council who will decide whether to forward it to South Gloucestershire Council (SGC) for its independent examination. SGC will appoint a planning consultant as an independent examiner who will determine whether the Neighbourhood Plan meets the basic conditions and other legal requirements, and whether the responses to feedback from the Regulation 14 consultation have been appropriate. The independent examiner should be allowed to make those decisions in relation to feedback and we therefore respectfully ask that you don't reply to this email. You will have the opportunity to comment on proposals in the plan in the future when they may come to planning applications. Before then, there will also be a public referendum when we sincerely hope you will appreciate the overall benefits to the Parish of the plan and will be able to support it by voting for it.

Kind regards

Chair of Pilning & Severn Beach Neighbourhood Plan Steering Group

APPENDIX C BUSINESSES, GROUPS AND ORGANISATIONS FEEDBACK AND RESPONSES

C1. ST PETER'S SCHOOL

Feedback was received through the feedback portal on the website, stating:

I support the Neighbourhood plan and need for more housing in particular to sustain the number of children in the area ensuring the long term viability of the local schools.

NPSG Response

The NPSG has concluded that the feedback is noted and welcomed. The NPSG will acknowledge receipt, but no amendments to the NDP are required.

C2. MOTION PRINTING LTD

Feedback was received through the feedback portal on the website, stating:

Like many residents of Severn Beach, I regularly use the field. I often encounter locals walking their dogs and stop for a chat. The trees and bushes have grown back since the field was cleared, creating tracks and tunnels that my grandchildren love to explore. They enjoy discovering the tracks across the field that connect to public rights of way. During the summer, many people came out to pick blackberries. This field is not a bramble wasteland; it is used frequently. There is an abundance of wildlife, along with beautiful plants and trees growing wild. My neighbour even spotted something unusual and Googled it, discovering that it was dormouse hides! The trees are full of singing birds, and disrupting the habitat for this wildlife would be unacceptable. I was under the impression that the field is regularly visited by South Gloucestershire wildlife officers, who have shown interest in identifying various species of plants and wildlife. I believed there was also a tree preservation order in place. Additionally, the field acts as a valuable barrier against the industrial development that is rapidly expanding next to the village. We have already lost so much of our green space, with the destruction of Orchard Ponds, please don't allow further development on green fields.

NPSG Response

Although, identified as a response from Motion Printing, the NPSG considers this to be a personal comment rather than a business comment, and relates to the site of policy H9 in Severn Beach. The feedback will be addressed as a Parish resident's submission under the topic of Policy H9.

C3. RACHEL GARDINER ESTATE AGENTS LTD

Feedback was received through the feedback portal on the website, stating:

As an Estate Agent selling in the area. This has a negative impact on prices achieve for houses on the market . The area is becoming over ran with industrial units for Pilning , Severn Beach. The height of this building is way over for industrial backing onto residential.

NPSG Response

Although submitted as feedback on the NDP, this feedback related to awareness of the construction of a very large and high warehouse on the south side of Marsh Common Road just outside of the settlement boundary of Pilning. Whilst the NPSG agrees with the sentiments, it is not directly related to the content of the NDP. However, the NPSG will consider amending policy LCD 1 to specifically identify building height as an issue to be taken into account on the edges of industrial areas.

Amendments Considered for the NDP

Consider amending policy LCD 1 to specifically identify building height as an issue to be taken into account on the edges of industrial areas.

C4. CHAIR OF PILNING STATION GROUP

Feedback was received through the feedback portal on the website, stating:

We are writing to formally object to the inadequate treatment of Pilning Railway Station within the proposed Neighbourhood Development Plan and to strongly endorse the request submitted by our group leader, Olga Taylor, via the Parish Council, for the addition of Policy TTP6.

Background to Our Campaign

Pilning Station Group has been campaigning for a decade to restore proper railway services to Pilning Station. During this time, we have achieved the improvement of Platform 1, demonstrating both the feasibility of station enhancement and our commitment to this cause. For many years, our appeals were dismissed by various authorities. However, the landscape has fundamentally changed - South Gloucestershire Council and our local MP have now expressed genuine interest in supporting our campaign. This represents a critical turning point that the Neighbourhood Development Plan must capitalise upon.

The Glaring Omission in the Current Plan

The current draft plan mentions Pilning Station only in passing (paragraph 8.4.11), briefly acknowledging the ARUP Strategic Case and noting that the station could "form a hub for the local area, serving in-commuters switching to rail, visitors to leisure and retail opportunities, and local residents' trips." Yet inexplicably, this recognition translates into zero planning policies to support station development.

This is not merely an oversight - it is a fundamental failure of strategic planning. The plan dedicates extensive policy detail to Severn Beach Station improvements (including transport hub provisions within Policy H7), yet offers nothing comparable for Pilning Station despite its significantly greater potential to serve the Parish and wider Severnside employment area.

Why Pilning Station is Critical to the Plan's Own Objectives

The plan itself identifies multiple problems that enhanced Pilning Station services would directly address:

1. *Transport Objectives (7.3): The plan seeks to "improve service levels and reliability of public transport" and "support delivery of improvements to the walking and cycle network." A functioning Pilning Station would dramatically advance both objectives.*
2. *Car Dependency Crisis: The plan notes 92.4% of households own cars and identifies this as problematic, yet proposes adding 246+ new dwellings without addressing the root cause - inadequate public transport. Pilning Station offers the single most effective solution to reduce car dependency across the entire Parish.*
3. *Traffic and Road Issues: Residents identified traffic volume, particularly HGVs, as a top concern (Table 2). The plan acknowledges roads are deteriorating under loads they were never designed for. Enhanced rail services at Pilning Station would enable modal shift for both commuters and potentially freight, directly alleviating these documented problems.*
4. *Employment Connectivity: The plan references 12,000-25,000 new jobs anticipated in Severnside (8.1.3). Pilning Station is geographically positioned to serve these employment sites far more effectively than Severn Beach Station. Without proper rail connectivity, these jobs will generate thousands of additional car journeys through residential areas.*
5. *Sustainability Claims: The plan claims to support sustainable development and carbon reduction, yet fails to support the most sustainable transport infrastructure available. This contradiction undermines the plan's credibility.*

The Strategic Opportunity Being Wasted

The ARUP Strategic Case provides comprehensive evidence for Pilning Station's viability and potential. The plan references this work but fails to build upon it. This is particularly frustrating given:

- The emerging political support we have secured after years of advocacy*
- The strategic location serving both existing residential areas and Severnside employment*
- The proven delivery of Platform 1 improvements demonstrating feasibility*
- The alignment with national and local policies on sustainable transport and modal shift*

The Neighbourhood Development Plan represents a once-in-a-generation opportunity to embed strategic support for Pilning Station into statutory planning policy. Once made, this plan will form part of the development framework until 2035. Failing to include meaningful policies for Pilning Station now means missing this critical window when political will and strategic need finally align.

The Need for Policy TTP6

We fully endorse the request for Policy TTP6 submitted by Pilning & Severn Beach Parish Council, to explicitly support Pilning Station development. Such a policy should:

- 1. Recognise Pilning Station as strategic transport infrastructure serving the entire Parish and Severnside employment area*
- 2. Support enhancement of station facilities, services, and accessibility*
- 3. Require new major developments to consider and contribute to station improvements where appropriate*
- 4. Safeguard land and access routes necessary for future station enhancement*
- 5. Support partnership working between the Parish Council, South Gloucestershire Council, Network Rail, and Great Western Railway to deliver improved services*

Comparison with Severn Beach Station Treatment

The disparity in how the two stations are treated is stark and unjustifiable:

- *Severn Beach Station: Integrated into Policy H7, allocated land for transport hub development, specific provisions for car parking, bus stops, cycle storage, and potential three-trains-per-hour service consideration.*

- *Pilning Station: Brief mention in supporting text, no policy support, no site allocations, no infrastructure provisions, no service enhancement considerations.*

This imbalance cannot be explained by evidence or strategic logic. Both stations serve the Parish; both offer sustainable transport potential. The difference is that Pilning Station has far greater capacity to serve the wider area, particularly the Severnside employment zone that generates the traffic problems the plan seeks to address.

The Risk of Policy Failure

Without adequate support for Pilning Station, the plan will:

- *Fail to deliver its own stated transport and sustainability objectives*
- *Miss a critical opportunity to influence strategic transport planning*
- *Add hundreds of new dwellings to an already car-dependent community*
- *Undermine years of community campaigning at the precise moment when success becomes achievable*
- *Create a planning framework that locks in car dependency for the next decade*

Our Formal Request

We formally object to the current draft and request that the Neighbourhood Plan Steering Group:

1. *Adopt Policy TTP6 as submitted by Pilning & Severn Beach Parish Council, establishing clear planning support for Pilning Station enhancement*
2. *Allocate specific provisions for station improvement within relevant site policies, particularly those proposing significant housing numbers*
3. *Include station enhancement in the list of priority infrastructure projects for Community Infrastructure Levy funding*
4. *Strengthen transport policies to require major developments to demonstrate how they support modal shift to rail*
5. *Acknowledge the strategic importance of Pilning Station in serving both residential and employment needs across the Parish*

Conclusion

After ten years of campaigning, we have finally achieved political support for our cause. South Gloucestershire Council and our local MP are listening. The Neighbourhood Development Plan must maximise this momentum by providing the planning policy foundation that others can build upon to achieve our shared goal of restored rail services at Pilning Station.

The evidence is clear, the strategic need is documented within the plan itself, and the political will is emerging. What is missing is the planning policy to make it happen. We urge the Steering Group to correct this fundamental omission before this consultation period closes on 26 October.

The plan's credibility as a serious strategic document depends on addressing this issue comprehensively.

During the course of the consultation period there were various direct email communication from the Chair of the Pilning Station Group with individual members of the NPSG. The topic was raised by the Chair of the Pilning Station Group, who is also a Parish Councillor, at the Parish Council Meeting on 6th October 2025 and included in the feedback received from the PC (see Appendix A1a). The matter was addressed and minuted in the NPSG Working Group Meeting of 28th October 2025 (See appendix A1b). A further email on the topic, repeating much of the above, was received by the NPSG from the Councillor on 7th November.

NPSG Response

The minutes of the NPSG Working Group Meeting of 28th October 2025 (See appendix A1b) form part of the response which includes: There is no land allocation in the NP for Pilning Station and guidance informs that NPs cannot include policies relating to service levels of public transport, therefore it is concluded a policy for the station cannot be added. The NPSG strongly supports the station and can strengthen the wording, particularly in the area of the Aspirations Document. The NDP needs to be amended to reflect that there are currently 2 trains per week. The suggested policy TTP6 would be a Strategic Policy which is inappropriate for a NP policy. A direct response to the feedback submitted through the Regulation 14 consultation portal, repeating the above will be made to the Chair of the Pilning Station Group.

Amendments Considered for the NDP

The NPSG is happy to consider proposals for specific wording to bolster the case for Pilning Station in either the NDP or the Aspirations Document. The NPSG has in any case amended the wording in the NDP and Aspirations Document to better recognise the support for Pilning Station. The NDP and Aspirations Document have been amended to reflect there are currently 2 trains per week.

C5. HALCYON HOUNDS

Feedback was received through the feedback portal on the website, stating:

I am strongly against the proposed development of Pilning Village Hall and playing fields. I hire the hall for at least 8 hours a week and have done for several years.

The hall is a busy community hub used by many groups and individuals. The playing fields are really popular and are used by many people of all ages for activities such as walking, exercising dogs, young children playing, older children and young adults spending time together, older people meeting and sporting activities.

Such a space is vital to a community and green space should be cherished and protected, not built upon.

NPSG Response

The NPSG is pleased to know that Halcyon Hounds is a regular hirer of Pilning Village Hall and hopes that will long continue. Please refer to Appendix D topic Policy H1 for the detail the response provided by the Steering Group.

APPENDIX D LANDOWNER/DEVELOPER FEEDBACK AND RESPONSES

D1. H3 Land behind Surgery and Allotments, Pilning

The original letter content received is shown below in italics with the NPSG response and discussion points shown after the relevant points in regular text.

On behalf of my clients, I submit the following representations to the Regulation 14 version of the Pilning and Severn Beach Neighbourhood Plan (NDP).

Paragraph 1.1.4

*We note the Neighbourhood Plan period as proposed covers the period up to 2035, which aligned with the emerging South Gloucestershire Local Plan when preparation of the NDP commenced. However, the Regulation 19 version of the Local Plan, published in March 2025 covers the period to 2040. In the interests of ensuring the Neighbourhood Plan remains a valid component of the Development Plan for the life of the Local Plan, the Neighbourhood Plan period should be extended to 2040. **The dates have not been challenged by SGC, so therefore the NPSG does not propose to change them from the original plan.***

Paragraph 3.1.6

*The Plan refers to the Housing Needs Assessment Report (HNA) which provides the evidenced need to support the housing provision within the NDP. The HNA identifies an indicative overall housing need figure of 17.6 dwellings per year, equating to 246 dwellings over the Neighbourhood Plan period 2021-2035. We welcome the clarification that this represents a minimum estimate and not an absolute maximum figure, however, in light of our comment above, the requirement should be increased pro rata to take account of an extended plan period to 2040. Accordingly, the housing requirement should be 334 dwellings. **The NPSG does not propose to change the end date to 2040 so therefore the minimum target figure remains at 246 dwellings and this is not an upper limit.***

*The Housing Needs Assessment, prepared in 2021" refers to a strategic housing needs requirement of 714 homes per annum in South Gloucestershire. However, the updated standard methodology for calculating housing need, introduced by the current Government, has increased the housing need to circa 1,700 homes per annum and accordingly there is a much more acute housing need than was previously understood. **This may be so, but the NPSG should stick with the evidence determined during the NDP. Text could be added to 3.1.6 to identify that since the HNA was completed, the methodology has been changed by the Government, hence supporting the figure of 246 as a minimum requirement.***

The quantity of affordable housing has been calculated on the basis of a pro-rata application of the 2018/19 Strategic Housing Market Assessment for Wider Bristol (SHMA), of which Pilning and Severn Beach represents 0.41% of the wider Bristol population. Applying the principles in the SHMA, the HNA identifies a need for 407 affordable homes over the NDP plan period, of which 134 would be affordable rent and 273 affordable for sale. The level of affordable housing need exceeds the overall housing need figure identified in the Neighbourhood Plan. It is therefore evident that there is a demonstrable need for housing land to be brought forward, at

sufficient quantities to make a meaningful contribution towards affordable housing provision, as well as market housing needs. The NDP is working to the December 2024 issue of the NPPF, which requires the level of affordable housing on green belt or grey belt land for more than 10 dwellings to be at 50%.

*The HNA identifies an ageing population in the NDP area, however, it is recognised that plans for additional employment growth at Severnside could reverse this trend and bring new working age people into the area. In addition, there is evidence of an increasing the number of households in which adult children are living at home in the area (at a rate which is more than double that of the wider area). Additional housing is therefore required for newly formed households. Finally, there is a high rate of under-occupancy in existing properties, with 76% of people living with at least one more bedroom than they would be expected to need, highlighting an opportunity for downsizing. **No comment.***

In respect of housing for older people, there is estimated to be around 344 people over 75 years old in the NDP area. A potential need for specialist housing in the form of additional care is considered, with a possible need for 30-41 specialist units over the plan period. Among the older population there is a higher need for market housing on the basis that these residents generally own their own property and will wish to buy. It is recognised that these housing needs could be met through adaptation of existing housing stock or other schemes which meet the community's wider objectives, are appropriately located and suitable for other reasons.

*In light of these findings and the latest housing needs based on the Government's standard methodology, the NDP should support the delivery of higher levels of housing to increase provision of market and affordable housing, through a range of house types to meet a range of housing needs including concealed households and the ageing population. We support the HNA's recommendations that circa 50% of new homes should be 3-bedroom units with 25% smaller units and 25% larger units to meet housing needs. These objectives should be made clear in the NDP text. **The NPSG believes this is clearly stated in the relevant policies, i.e. 80% 3 bedroom or less, 50% affordable on greenbelt, 35% on non-green belt.***

*The NDP refers to Policy CS18 of the Adopted Local Plan for affordable housing policy. However, to ensure the NDP aligns with the emerging Local Plan, once adopted, it should also refer to policy LPS4 of the new Local Plan. Policy LPS4 clarifies that the threshold of 5 dwellings for rural areas only applies within the Cotswold National Landscape and therefore is not relevant to this NDP. Accordingly, reference to this lower threshold should be removed from the NDP to avoid confusion. The threshold for affordable housing within the NDP area is 0.5 hectares or 10 dwellings, whichever is the lower figure. **The NPSG considers, where possible, care needs to be taken in referring to the new Local Plan as it is not yet made and is not expected to be until after the NP is made. The NP only has one site falling within the band of 5-10 dwellings, but it is not in Green Belt and therefore CS18 applies, requiring a 35% level of affordable housing.***

*We recognise that proposals for major development within the Green Belt should comply with the 'Golden Rules' of the National Planning Policy Framework (2025) and deliver 50% affordable housing. However, planning application proposals for minor development (less than 10 dwellings) are not affected by the Golden Rules and should be considered against local policy. This should also be clarified through the NDP. **The NPSG considers there are no sites in the NP of 5-10 dwellings and located in the Green Belt, therefore clarification is not required.***

Paragraph 4.5.4

The NDP notes that a larger proportion of retired persons in the NDP area live in caravans or mobile park homes than the wider local area or national average. This is considered to indicate a notable shortage of care accommodation for the elderly. However, it is unclear why care accommodation is considered necessary to meet the needs of those living in caravans /mobile park homes'. This is not something the NPSG had intended to imply and will review and as necessary amend the content. It would appear to suggest that smaller, more affordable types of housing are needed, not necessarily housing with care. Smaller house types and housing capable of adaptation or meeting accessible standards could reasonably meet these needs.

Provision of specialist housing would require specialist operators to manage and maintain the properties. Due to the limited size of the site, the relatively rural location, the walking distance to public transport and the relatively limited availability of facilities within a short walking distance of the site, operators approached on behalf of my clients have advised that a sheltered housing or extra care scheme would not be viable. Such operators are normally seeking sites to accommodate around 100 units, or a minimum of 60 units for smaller operators. **The NPSG recognises from its own investigations that viability of such sites of less than 60 units may prove difficult. In discussion at the meeting it was apparent that collaboration with adjacent landowners to provide a large enough footprint may also prove difficult. Therefore, the NPSG will consider amending the NDP wording to recognise the earlier point that smaller house types and housing capable of adaptation or meeting accessibility standards could reasonably meet these needs**

To ensure the NDP delivers housing capable of meeting the needs of the older population, the policies should adopt a flexible approach towards the provision of a range of housing including smaller units, bungalows, accessible housing and housing which is capable of adaptation. As addressed above, however bungalows would not be considered as appropriate.

Paragraph 7.6

We strongly support the objective to amend the Green Belt boundaries and remove some land adjacent to Pilning from the Green Belt to allow new housing development. The land to the north of Pilning does not contribute strongly towards the five purposes of the Green Belt and the boundary can be redefined by Bank Road, an established public highway. The removal of land from the Green Belt is necessary and justified to meet the local housing needs within the NDP area. The NPSG acknowledges the support for the proposed policies.

Paragraph 8.1.10

My clients own the land immediately adjacent to the doctors' surgery in Pilning which is part of a wider allocation identified for housing including possible warden-supported sheltered units. For the reasons set out above, there is limited market demand from operators to manage an extra-care/sheltered housing facility here due to its rural location and the relatively small-scale nature of the site. A more flexible policy approach should be adopted to the allocation of land near Pilning Surgery to ensure a feasible housing scheme capable of meeting housing needs can be realised. As discussed and recorded above the NPSG recognises this difficulty and will consider amendments. However, in further discussion and in viewing a draft plan for the site, the NPSG stated that the limited numbers of dwellings would not meet the NP's expectations for the site and suggested that further consideration should be given to

designs and layouts to allow higher numbers of units including those smaller house types capable of adaptation or meeting accessibility standards.

Paragraph 8.1.42 Site Allocation Policy H3: Land behind surgery and allotments, Pilning

*My clients support the allocation of this site under Policy H3 for residential development. The land subject to the allocation is in multiple ownership and in accordance with residents' preference for housing developments to be modest and incremental, rather than large-scale projects (paragraph 8.1.12), the allocation should recognise that the allocation is likely to be brought forward as several individual schemes, potentially at different times across the plan period. **The NPSG recognises the multiple ownership and will consider amendments to reflect for this site the likelihood that this may lead to the site being delivered in separate smaller schemes.***

I can confirm that my clients are willing to make the land available for development and have instructed a design team to gain a full understanding of the opportunities for development on their land and the contribution which this can make towards the policy allocation.

Policy H3

The policy allocates the land for residential development comprising up to a maximum of 41 units of sheltered accommodation (specialist homes for older people) and up to 30 dwellings'

We have reached out to three potential developer partners who specialise in housing for older persons, including retirement villages and care homes. In all three cases the operators considered the site to be too small to accommodate a scheme for sheltered housing. One operator advised that they are typically developing sites of 100 to 120 units, with some operators willing to manage smaller developments of around 60 units. However, a scheme of up to 41 units would be too small to achieve a suitable level of development on site.

In addition, the location of the site and availability of services for the older population was a key factor for operators. Despite the proximity of the GP surgery, the walking distance to bus stops and the limited availability of services in the village centre was not considered appropriate for older residents who would most likely not have access to a car and need a regular and accessible bus stop to access facilities and services. These constraints would apply to all sites in Pilning and are not exclusive to site H3.

The feedback from operators in this development sector indicates that there would be limited interest in delivering a scheme of sheltered housing in Pilning and therefore it may prove impossible to meet the requirements of policy H3 as drafted.

*We support the Neighbourhood Plan objective to deliver housing to meet local needs, including the ageing population. However, the policy wording as drafted is too prescriptive and could impede development to the detriment of meeting the NDP's overarching objectives to deliver housing to meet local needs. The HNA identified several means through which the needs of the older population could be met through new housing development. Policy H3 should be amended to allocate the site for residential development of up to 71 residential units and include a statement of support for the delivery of housing to meet the needs of older persons including bungalows, smaller housing units and housing which meets accessible standards. **As discussed and recorded above, however the NPSG considers bungalows would not be appropriate.***

Bullet Point iii)

In light of the above, the prescribed requirements for sheltered accommodation should be removed accordingly. The NPSG will consider modifying the wording as discussed above.

Bullet point iii) refers to a 50% affordable housing requirement based on the NPPF. This refers to the Golden Rules which apply to major development on land within or removed from the Green Belt. Major development is defined as 10 or more dwellings. If the development is brought forward incrementally under the separate landownerships it is possible that individual planning applications may deliver less than 10 dwellings. In such cases, the Local plan policy for affordable housing which prevails at the time of determination of the planning application would apply. Bullet iii) should be amended accordingly. The NPSG does not consider there is an identified need for sites of less than 10 dwellings on Green Belt sites. Additionally, the NP does not intend to actively encourage developments of less than 10 dwellings, which could be viewed as an approach to bypass the affordable housing the Parish requires.

“Affordable housing should be provided in accordance with the prevailing Local plan policy, or the NPPF, where relevant”

Bullet Point vi)

The proposed access requirements are broadly accepted. However, reference to paved footpaths should be amended to “segregated footways”. Although the term paved footpaths is used in all policies, the NPSG recognises this may be too prescriptive and will consider appropriately amending the wording.

Bullet Point viii)

The purpose of this bullet point is unclear. The level of detail required for the site plan will be determined by the local planning authority's validation requirements for planning applications and will depend on whether outline or full planning permission is sought. Reference to a detailed site plan should be deleted. The same terminology has been used in all policies and has not been challenged by SGC. The NPSG recognises that the required level of detail will be determined by the planning process, but the main purpose of identifying the need for a detailed site plan at planning stage is to give the community the understanding it is not needed in the NDP.

In respect of density, this should be in keeping with nearby developed areas and appropriate to the site's constraints and opportunities, however, to limit density to the average density of existing developments in Pilning could impose an undue constraint and prevent the terms of the allocation being achieved.

Reference to average density should be deleted. The NPSG will consider amending this wording which has been used across all housing development policies.

Bullet Point ix)

It is stated that net gain in biodiversity should be achieved as encouraged by national planning policy. The net gain improvement in biodiversity is required through the Environment Act 2021. It is a mandatory requirement to deliver at least 10% net gain on or off-site. The wording of the bullet point should be amended as follows:

"a net gain improvements to biodiversity achieved as required by legislation" **The NPSG will consider making this amendment as written.**

Bullet Point x)

*The requirement for plans to provide details of natural drainage solutions i.e. SUDS within the design is unduly onerous. In accordance with national policy proposals should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The surface water drainage hierarchy should be applied. If it is shown not be possible to infiltrate to ground, a hierarchical approach should be taken to exploring other options which includes man-made drainage solutions' The policy provides no justification for departing from the surface water drainage hierarchy to identify the most sustainable drainage option. Accordingly, there is no need for a site-specific policy on drainage. **The NPSG was advised through the SEA and HRA work to include this wording and therefore would not propose to alter this.***

The following amendments are to be considered for the NDP in response to the feedback received and discussions at the meeting.

Amendments Considered for the NDP

Text could be added to 3.1.6 to identify that since the HNA was completed, the methodology has been changed by the Government, hence supporting the figure of 246 as a minimum requirement.

The NPSG will review and as necessary amend the content of paragraph 4.5.4 to remove any unintended relationship between care accommodation for the elderly those living in caravans/mobile park homes'.

The NPSG will consider amending the NDP wording (in 8.1.5c) to recognise the point that smaller house types and housing capable of adaptation or meeting accessibility standards could reasonably meet the needs as opposed to dedicated extra care accommodation.

The NPSG recognises the multiple ownership and will consider amendments to reflect for this site the likelihood that this may lead to the site being delivered in separate smaller schemes.

Bullet Point iii) the prescribed requirements for sheltered accommodation will be re-considered by the NPSG.

Bullet Point vi) Reference to paved footpaths; the NPSG recognises this may be too prescriptive and will consider appropriately amending the wording.

Bullet Point vii). The NPSG will consider amending this wording 'average density' which has been used across all housing development policies.

Bullet Point ix.) The NPSG will consider making the amendment as proposed. "a net gain improvement to biodiversity achieved as required by legislation"

D2. H6 19 VICARAGE ROAD, PILNING.

A feedback response was received via the website feedback portal and by email via the Parish Council on 24th October 2025 from the agent acting on behalf of the landowner in relation to site H6 19 Vicarage Road. See Appendix D2 for the detail of the feedback.

I write on behalf of Site Allocation H6 in Pilning & Severn Beach Neighbourhood Plan (PSBNP) on behalf of the landowner and local developer.

This consultation response is to confirm that Site H6 remains available and deliverable. In respect of next steps and timescales for this site, on the back of its inclusion in the Draft PSBNP, instructions have been sent out to local architects and third party sub consultants to formally scope the site in advance of the preparation of a pre-application enquiry submission to South Gloucestershire Council. This is the recommended next step in respect of the promotion of any site. Any formal planning application would be submitted 'at risk' in advance of the adoption of the PSBNP, however these scoping studies (which relate to flooding, ecology, transport and access, arboriculture) are considered essential to understand the site specific constraints and formalise a layout that can deliver the identified housing on this site and needed in the Parish.

We trust that providing confirmation of these next steps confirms the commitment of the delivery of this site. If you wish to discuss anything further, please do not hesitate to contact me.

NPSG Response

The NPSG notes the feedback received and is pleased to be advised that the site remains available and deliverable. The NPSG concluded there was no current requirement for further discussion or amendments needed to be considered for the NDP.

D3. H7 LAND AT STATION ROAD SEVERN BEACH

The following feedback response was received directly by email on 19th September 2025 from the owner of site H7 Land at Station Road, Severn Beach.

Thanks for sending this across, and all the hard work that has evidently gone into the document - a labour of love I'm sure!

I have only had a quick flick through so far, can I just check on the allocation specified for our site (H7), which states: "Land at Station Road, Severn Beach. (identified on Figure 14 below) is allocated for a residential development for up to a maximum 25 dwellings and a quantity of 1st floor and 2nd floor apartments above retail units. Retail uses of pub/bar, takeaway and shop are supported. An area of public car parking (minimum 30 spaces) with proportion of electric vehicle charging points. Enhancements as a transport hub with provision of a bus stop/drop off point and bike/e-bike storage."

Can I just check that this is stating an allocation of 25 dwellings (houses), plus a quantity of 1st and 2nd floor apartments above retail units? We had obviously outlined quite considerably more units in our plans, which I'm sure will be appended to the final copy of the NP. Previous discussions had also suggested a potential need for these apartments to be retirement / care home units, which we would still like some flexibility towards, if we could possibly add some wording to support this and for greater clarity on the housing numbers?

Feel free to let me know your thoughts.

NPSG Response on 19th September 2025

The content of policy H7 is based around what we've previously discussed and it is meant to read an allocation of 25 dwellings (houses (towards the southern end of the site)), plus a quantity of 1st and 2nd floor apartments. There could be a need for some of the apartments to be retirement/care home, however our primary target for that is behind the doctors' surgery in Pilning. That said they are struggling to get an agreement with another landowner to get sufficient land to provide 30 to 41 units. So we may need to reconsider some elsewhere.

Although it is helpful to both yourself and the Steering Group to have a masterplan to determine what may be achieved on a site, our understanding is that a detailed plan does not have to be included in the NP. The importance is in the wording of the policy, which the future planning application must align with.

We have another 5 weeks of the consultation period to go, but we will be looking to make any final amendments very quickly at the end of that period. So please give the wording some further reading and thought and perhaps we should look at having a meeting before the end of the consultation?

H7 Owner/Developer on 23rd September

Happy if we amend to 'plus' as per the below. Maybe we could add some flexibility so that it might help out in case this other site has difficulties? We would probably be looking at a model with independent living units (studio flats with kitchenettes) which is usually the same use class of c3 anyway - it is just an initial idea given the demographics of the area.

NPSG Response

The NPSG confirmed that the policy's intention for the site was for 25 dwellings towards the southern end of the site, plus an additional allocation of 1st and 2nd floor apartments above retail units. A detailed masterplan was not required for the NDP. The Steering Group agrees that some flexibility in the design of apartments, e.g. models with independent living units (studio flats with kitchenettes), should retirement/care home provision not be fully met on alternative sites.

Amendments Considered for the NDP

The NPSG will consider amending policy H7 to reflect the need for 1-bedroom apartments with design considerations for accommodating elderly residents. This will need to consider access arrangements for apartments at first floor or above.

D4 FEEDBACK RECEIVED FROM OTHER LANDOWNERS/DEVELOPERS

D4.1 Feedback from Stantec UK Limited on behalf of Robert Hitchins

The text below represents the content of the submitted feedback report that is relevant to the NP (Section 4 onwards)/

4 Pilning & Severn Beach Parish Council Neighbourhood Plan – Regulation 14 Response

4.1.1 Whilst the SGC emerging Local Plan, if adopted, will form the predominant determining factor in the planning balance for any submission, the PSBNP will form part of the relevant development plan for any subsequent application on land at Piling Green.

4.1.2 Neighbourhood plans must meet certain ‘basic conditions’ and other legal requirements before they can come into force. These are tested through an independent examination before the neighbourhood plan may proceed to referendum. The ‘basic conditions’ are set out in Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended). This states that,

“A draft order meets the basic conditions if—

- (a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,
- (b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,
- (c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,
- (d) the making of the order contributes to the achievement of sustainable development,
- (e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),
- (f) the making of the order does not breach, and is otherwise compatible with obligations, and
- (g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.”

4.1.3 The emerging plan references that the recent and continuing significant growth of the local industrial parks was recognised by the PSBNP steering group. The Strategic Infrastructure-led Masterplan for Severnside (SIMPS) estimates a potential further increase of 12,000 jobs, whilst the draft Local Plan forecasts 25,000 new jobs being needed between 2023 and 2043 for which 82% of available land for industrial jobs and 95% of land for warehousing and logistics is in Severnside. We support the emerging plan’s recognition of Severnside’s strategic role and the intent to manage rather than curtail employment growth, aligning with the SIMPS.

4.1.4 To ensure the plan aligns with the ‘basic conditions’ set out above, we request amendments improvements to clarification to LCD1, LCD2, FR1, TTP and ECGB2. These will be outlined within this response.

4.2 Policy D1 – Design

4.2.1 We welcome the general design criteria included within draft policy D1. The Pilning Green Park masterplan has been conceived to apply Policy D1 and the Pilning & Severn Beach Design Codes in a manner appropriate to an employment-led scheme.

4.2.2 The policy, however, is unclear which criteria i-ix relate specifically to residential development and which relate to commercial, employment or other uses. For example, it is unlikely that commercial or employment uses within the Severnside Employment Area will use stone, brick and render as the main material palette, as required by criteria iv.

4.2.3 Whilst not necessarily related to adherence of the ‘basic conditions’ of the Plan, the policy criteria i-ix should be reworded as below to improve clarification for future schemes.

For all developments

- i. Demonstrate energy efficiency and sustainability*
- ii. Where external lighting is considered essential for safety or other reasons, it should use low powered LED fittings, with shaded lights, to avoid light pollution and spill and to ensure no adverse impact on wildlife.*
- iii. Show how established layouts, building lines, infrastructure, and landscaping will be maintained.*
- iv. Boundary treatments and materials should maintain wherever possible existing trees and hedgerows and continue to use extensive soft landscaping and tree planting to soften the lines of buildings and their settings.*

In addition to the above, all residential developments must consider,

- v. the density to meet the criteria detailed in the NPPF (paragraphs 129/130) and maintains the areas prevailing character*
- vi. Development needs to present a varied appearance, while using traditional materials of stone, brick, and some render as the main palette.*
- vii. Development shall avoid single storey dwellings to accord with flood risk mitigation. A mix two and three storey dwellings can be used to achieve the varied and informal appearance.*
- viii. Provision of open public green space for developments of 25 dwellings or greater*
- ix. Dwellings should have garden space and off-road parking provided within their curtilage.*

4.3 Travel, Transport and Parking Policies (TTP1 to TTP5)

4.3.1 Land at Pilning Green Park offers two access points from the B4055—including the consented Access 6C, and establishes a through-site active travel corridor linking Pilning Station to the Avonmouth Severnside Enterprise Area and the new M49 junction, directly supporting the movement and connectivity objectives of both the Neighbourhood Plan and the Strategic Infrastructure-led Masterplan for Severnside

Policy TTP5: Improvements to Walking and Cycling Network

4.3.2 Policy TTP5 lists a number of walking and cycling improvements that the NP seeks to support. These include the provision of foot / cycle route between Pilning and Easter Compton, referenced at part i) c). These policy requirements are supported.

4.3.3 Land at Pilning Green Park lies adjacent to the B4055, which connects Pilning and Easter Compton. Development of the site provides the opportunity to support the delivery of part of the aforementioned route along the site’s frontage with the B4055 / as part of its masterplan. Opportunities to support the wider delivery of the route would be explored as part of any future planning application, together with enhancements to other parts of the network (in relation to part ii) of the policy).

Concerns regarding HGV Traffic

4.3.4 The Regulation 14 consultation document refers to existing transport issues caused by the volume and speed of HGVs, notably in Pilning (see paragraph 8.4.4 and Table 2).

4.3.5 Land at Pilning Green Park is identified as a potential allocation for employment development within SGC's new Local Plan. By its nature as an employment development, this will generate HGV movements.

4.3.6 To the west of the site lies an area of land, between the M49 and the B4055, that will deliver employment development in the form of a distribution park, known as 'Westgate'. Phase 1 of Westgate is occupied by Tesco and is linked to the neighbouring Western Approach Distribution Park (WADP) (on the west side of the M49) via an overbridge of the M49. Along the southern section of the site's western boundary, the principle for a new junction to serve land on the west side of the B4055 (known as 'Access 6C') is agreed as part of an extant outline planning consent (Reference: SG4244, dated November 1957). A reserved matters application to reposition this access and provide a signalised junction was consented in July 2009 (Reference: PT08/2196/RM). It is envisaged that this junction will provide a secondary access to the Westgate scheme.

4.3.7 The access strategy for the site includes a vehicular access via a connection to the consented access (Access 6C) located along the southern section of the site's frontage onto the B4055. This strategy would enable development traffic to route to the WADP. This would overcome issues associated with the existing weight restriction on the B4055 and avoid the need for routeing of HGVs through Pilning.

4.3.8 Future connections will be available to the M49 Avonmouth Junction (a connection at the western arm via WADP was consented in November 2023 under Reference: P23/00268/F, with potential for a future connection at the eastern arm), ensuring efficient routeing to the strategic network.

4.4 Large Commercial Developments Policies (LCD 1 to LCD2)

4.4.1 Policy LCD1 and LCD2 are the most relevant PSBNP draft policies to the site. As stated previously, this NDP recognises and endorses the design requirements of SGC's Core Strategy in CS1 (and emerging SGC Local Plan policies), however the draft NDP identifies needs for additional measures such as green buffer zones and orientation of sites which are important to residents.

4.4.2 We support the use of policy mechanisms to allow for schemes to reduce their carbon emissions and improve their energy security.

Policy LCD1: Separation of large commercial developments from residential areas

4.4.3 Policy LCD1 reinforces the benefits of green buffer zones and the importance of reducing impacts on residents of Pilning and Severn Beach.

4.4.4 We believe that the policy requirement should be criteria-based and in the context of individual developments. At present the use of a specified and unevidenced buffer will sterilise

areas of the Severnside Employment Area and fail to maximise on the economic potential of the area. The proposals, shown on the diagram are akin to a local gap and fail to follow an evidenced and character-based approach.

4.4.5 We agree that all development, where relevant, can incorporate a green buffer and but do not believe that the policy as it stands meets the 'basic conditions' as it fails to provide evidence for such a mechanism and specifically does not support achievement of sustainable development as it risks constraining economic growth and thus does not accord with national policy. A broader area with a more diagrammatic approach for potential green buffers would be more appropriate.

4.4.6 We also raise further concerns with regards to the requirement within the policy for the construction of raised bunds as part of the green buffer zones. Such mitigation may not be appropriate within the large areas of Flood Zone that occupy the PSBPC area.

4.4.7 In summary, we are concerned this policy sterilises deliverable employment land even where on site buffers and design mitigation would achieve the same (or better) outcomes. This conflicts with the NDP's wider positive stance on Severnside and with national policy's criteria based approach. The policy could be effectively amended as below to provide flexibility whilst maintaining the emerging plan's priorities for residential and visual amenity. The amendment removes parts i) and ii) of the policy and rewards criteria v) in relation to visual screening.

i) ~~To establish and protect a green buffer zone between residential areas and large commercial developments. This NDP designates the area identified in Figure 6 (in section 7.5 Large Commercial Development Objectives), as a green buffer zone, where both new commercial and residential development shall only be supported if it recognises and delivers this requirement for the benefit of the local community.~~
ii) ~~New large commercial developments at planning application stage must identify and reserve the land necessary for them to establish the green buffer zones described in section 8.6.8. Where green buffer zones between Severn Beach and the industrial area are shown as fields in Figure 6, these fields should not be granted planning permission for development.~~

i. New planning applications for large commercial developments shall demonstrate consideration for orientation of sites to reduce impacts on the residents of P&SB.

ii. New planning applications for large commercial developments are encouraged to demonstrate they have considered impact on the environment and on local residents. Applications are encouraged to include measures to address; reduction of carbon emissions, improvement of energy security and impact of climate change/flooding, beyond existing planning requirements.

iii. All new development sites that face outwards from the Severnside industrial parks towards the residential areas of Pilning and Severn Beach should include a green 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 offer ecological enhancements. The buffer zone would be designed to provide visual

screening in the form of planting, attenuation of noise and light pollution and offer ecological enhancements.

iv. P&SBPC shall make formal checks on all planning applications for large commercial developments, to ensure they have adequately addressed adverse flooding impacts on residential dwellings within the Parish. Where this is not the case P&SBPC should raise an objection to the application.

4.5 Policy FR1 – Flood Risk

4.5.1 We support FR1 and the Level 2 SFRA basis. To avoid misapplication of residential standards to employment schemes, we recommend that proportionality be added to FR1(iii)(h):

“For non residential development, FRAs should apply EA/SGC SFRA guidance proportionately to the vulnerability class; demonstrate no net loss of floodplain storage (or provide compensatory storage), manage tide locking/high groundwater, and ensure safe access/egress consistent with ADEPT/EA guidance.”

4.5.2 This clarification secures safety without unnecessarily constraining platform levels/SuDS solutions essential for logistics sites.

4.6 The Environment, Countryside and Green Belt Policies (ECGB1 to ECGB3)

4.6.1 While the NPPF allows NDPs to amend Green Belt boundaries, this is in the context that strategic policies within the Local Plan have already established the need for the Green Belt boundary change.

4.6.2 The Site is currently located within the Green Belt but, as a result of its draft inclusion within the new Severnside Employment Area (SEA) policy (LP14) of the SGC emerging local plan, is proposed for removal.

4.6.3 We recommend that this section of the emerging plan reference the amendments to the Green Belt, that would arise at the point of adoption of the emerging Local Plan, that support the growth of the Severnside employment area.

5 Conclusion

5.1.1 We support the emerging plan’s recognition of Severnside’s strategic role and the intent to manage rather than curtail employment growth, aligning with the Strategic Infrastructure-led Masterplan for Severnside (SIMPS).

5.1.2 We commend the Pilning & Severn Beach Neighbourhood Plan Steering Group for the positive, proactive approach taken throughout the preparation of the draft Neighbourhood Plan. The Group’s commitment to community engagement, evidence-led policy making, and the principled recognition of Severnside’s strategic employment role is clear throughout the document.

5.1.3 Pilning Green Park (EPS-PSB3) continues to be available, deliverable and sustainably located to support the employment land offer adjacent to the boundary of the wider Avonmouth and Severnside Enterprise Area (ASEA). The promoters are committed to working with the Council and local stakeholders to bring forward development that is tailored to the needs of the community ensuring significant benefits are derived for existing and new residents.

5.1.4 By seeking to balance growth with local character, amenity, and sustainability, the Steering

Group has created a good foundation for managed change that benefits both residents and the wider economy. We support the Plan's constructive stance towards employment growth at Severnside and its alignment with regional and national objectives. With targeted refinements, the Neighbourhood Plan will provide a sound, enabling framework for high-quality development.

NPSG Response

The NPSG appreciates the interests of Stantec and Robert Hitchins in the NP and their supportive comments made in their report which are summarised well in their conclusions.

The NPSG has taken a stance against the inclusion of the development the land between the B4055 and Pilning Station in the evolving Local Plan. However, in this response the NPSG will ignore that stance and address, on their own merit, only the feedback comments that are relevant to the policies of the NP.

Policy D1 – Design. Whilst the NP recognises Severnside's strategic role, it does not propose any policies to bring forward additional employment land or industrial building. The main reasons being the lack of available employees locally or the appropriate infrastructure to support them. Therefore, design policy D1 is only intended for the proposed residential, community amenity and retail developments, and not for employment or industrial sites. This will be made clearer in the policy.

TPP5: Improvements to Walking and Cycling Network – The NPSG welcomes opportunities to improve the route between Pilning and Easter Compton. However, as the proposed employment land has limited frontage to the B4055 due to the presence of residential properties, the opportunity to offer a solution is seen as very constrained and would not offer a solution even if it comes forward in the Local Plan.

Concerns regarding HGV Traffic – this does not relate to policies within the NDP. The proposed industrial developments will increase the burden of HGV traffic. Whilst additional connectivity may reduce the impact it will not remove it as experienced currently where the issues are largely a lack of enforcement.

Large Commercial Developments Policies (LCD 1 to LCD2) - For LCD1 Stantec believes that the policy requirement should be criteria-based and in the context of individual developments. The NPSG considers the policy does this by identifying green buffer zones applying to new developments that face outwards towards residential areas. Maximising the economic potential of developments shall not compromise the conditions for local residents by bringing development too close and too high without adequate buffering as specified in v) of LCD1. The NPSG believes that the policy as it stands does meet the 'basic conditions' as its evidence base

is around the land that is included in the 1957 extant consent, with buffering outside of that and/or as defined in that original consent. The NPSG will consider amending the NDP to make the evidence base for Figure 6 clearer.

The NPSG does not consider that raised bunds as part of the green buffer zones may not be appropriate within the large areas of flood zone. There are many examples of bunding has been introduced e.g. around the motorway network and some commercial development. Drainage of the flood plain is effected by the rhine network which would continue to be the case with appropriate flood risk assessment, design and positioning of bunds.

Policy FR1 – Flood Risk applies to development sites included in the NDP, which does not include large commercial developments. The NPSG will consider amending policy FR1 to clarify that position.

The Environment, Countryside and Green Belt Policies (ECGB1 to ECGB3) – The NPSG has considered Stantec's recommendation the amendments to the Green Belt should include their site between the B4055 and Pilning Station. The NPSG does not propose to make such amendments on the basis it has already in the evaluation of sites in the NP eliminated sites in this area for residential development due to Green Belt and its separation of the designated settlement area of Pilning. The NDP cannot adopt content of the draft Local Plan until it is made. It is known that there are outstanding objections to the site's inclusion in the Local Plan which are still to be addressed. Residents do not support the growth of the Severnside employment area in the Parish, beyond the boundaries of the 1957 extant planning consent.

SUMMARY OF AMENDMENTS CONSIDERED FOR THE NDP

Policy D1, make it clearer in the policy that this is intended for residential, community amenity and retail developments and is not for employment or industrial sites.

In relation to green buffer zones, the NPSG will consider amending the NDP to make the evidence base for Figure 6 clearer.

The NPSG will consider amending policy FR1 that it has not been prepared to address large commercial developments.

APPENDIX D4.2 Savills/Stonegate - the Kings Arms Public House

The feedback from Savills comprised of a report of 14 pages. The text below in italics is what the NPSG considers to be the parts relevant to the consultation.

1. Introduction

1.1. *These representations have been prepared by Savills on behalf of Stonegate (the 'Client') in response to the Regulation 14 consultation on the Draft Pilning and Severn Beach Neighbourhood Plan, published for Regulation 14 Consultation on the 9th September 2025.*

1.2. Stonegate has a land interest at the Kings Arms, Redwick (the 'site), as illustrated in Figure 1 below.

1.3. This chapter sets out the relevant background information, including site context with the subsequent chapters setting out the planning policy context for neighbourhood plans followed by our response to the Regulation 14 Draft Policies contained within the Pilning and Severn Beach Neighbourhood Plan.

1.4. Our client welcomes this opportunity to engage with Pilning and Severn Beach Neighbourhood Plan Steering Group (P&SBNP Steering Group) in respect of the Regulation 14 publication.

The Kings Arms / Background Context

The Site

1.9. The representations specifically focus on the land surrounding the Kings Arms, Redwick, BS35 4LU. A copy of the Site Location Plan is detailed in Figure 1. The site is currently occupied by the Kings Arms public house, a two-storey building with an associated outbuildings and grounds. The site includes surface-level car parking and is predominantly covered by hardstanding, with the exception of two landscaped areas located to the north and south of the main building, with predominantly comprise the beer garden.

1.10. In addition to the public house itself, the site contains a number of ancillary outbuildings which are currently used in support of the pub's operations. The overall layout and condition of the site suggest that it is well suited to accommodate a modest scale of infill development within the defined settlement boundary for Pilning, subject to appropriate design and planning considerations. Further detail on the site and its surroundings are contained within Section 3 of this representation.

Stonegate

1.11. As aforementioned, the public house and its surroundings are controlled and managed by Stonegate, the largest pub company in the UK with a vast portfolio of over 4,500 sites which from leased and tenanted to managed properties. The company's intention is to retain the site's community use while actively exploring opportunities to secure its long-term viability. This includes considering measures that would support the financial sustainability of the public house, ensuring it remains a functional and accessible facility for local residents.

1.12. The UK is experiencing a significant decline in the provision of public houses nationwide, with an estimated one public house per day closing down. Rising maintenance, increases in staff costs, business rates and rising prices of drinks are significant factors that push people away from public houses, forcing their closure. To ensure that the Kings Arms does not follow this national trend these representations put forward on behalf of Stonegate are intended to strengthen the long term viability of the site by enabling the potential for modest residential infill; thus, assisting with maintaining the community asset for the benefit of local residents in perpetuity.

1.13. In light of these challenges, it is essential to take proactive steps to safeguard the future public houses. The representations submitted on behalf of Stonegate are intended to support the long-term viability of the site, ensuring that it remains a functioning and accessible public house for the local community. The subsequent chapters of this representation will put forward Stonegate's proposed amendments to the P&SBNP to aid in delivering this ambition.

3. Assessment of Neighbourhood Plan Policies

3.1 Stonegate does not intend to provide detailed commentary on all of the proposed policies contained within the Draft Pilning and Severn Beach Neighbourhood Plan (P&SBNP). However, we wish to take this opportunity to express our views on two key areas of the draft plan: the proposed residential site allocations and the wording of Policy CF2 (Retention of Existing Community Facilities). These views are outlined in turn below, including commentary on the Kings Arms site.

3.2 We consider these elements to be of particular relevance to the future development potential within the Parish and consider that further consideration is warranted to ensure that the Plan is both positively prepared and aligned with strategic planning objectives contained within South Gloucestershire's Development Plan.

Draft Policies H1 – H9: Residential Allocations

3.3 Stonegate acknowledges the proposed residential allocations set out in Policies H1 to H9 of the Regulation 14 Draft P&SBNP. While they do not wish to comment on the individual sites identified at this stage, we do wish to express a broader concern regarding the overall capacity of these allocations to fully meet the Parish's objectively assessed housing need over the plan period.

3.4 It is essential that the Neighbourhood Plan demonstrates a robust and deliverable strategy for housing growth that is both responsive to local needs and flexible enough to accommodate unforeseen changes in circumstances. The Neighbourhood Plan positively recommends the release of land falling within the green belt to meet its housing needs. We support this principle but recognises that for the Neighbourhood Plan to demonstrate that it meets the 'basic conditions' it must be in general conformity with the current adopted Development Plan, and in this case, the sites within the green belt are not permitted for Green Belt release. It is prudent, therefore, to allocate reserved housing sites to ensure that the housing requirement of the neighbourhood plan area is robust.

3.5 In this context, we would like to draw attention to the opportunity presented by land at The Kings Arms, Redwick. This site is available, suitable, and achievable for residential development and could make a meaningful contribution to the Parish's housing supply.

3.6 It is recognised that the amount of housing that can be delivered on the site would be modest, certainly less than the cumulative number of dwellings that would be built on sites that are proposed for allocation but currently designated within the green belt.

3.7 The Kings Arms site offers an opportunity to provide smaller scale development, in the form of infilling, aiding in the 'topping up' of housing figures for the Parish should the larger proposed allocation fall on difficulty coming forward. In this context, we consider that the allocation of small-scale infill development at the Kings Arms site would make a valuable contribution to housing delivery over the plan period.

3.8 We respectfully suggest that the inclusion of this additional, deliverable sites such as this would strengthen the soundness of the Plan and provide greater assurance that housing needs

will be met in full, whilst also ensuring the long term future viability of the Kings Arms Public House and Community Facility.

Site and Surroundings

3.9 The site has not previously been promoted for redevelopment or allocation, however, it is in the control of Stonegate who are currently exploring a divergent strategy for releasing land value from its owned public houses, enabling investment back into the maintenance and running costs of its extensive public house real estate.

3.10 The site is currently occupied by the Kings Arms public house, a two storey building with associated outbuildings and surface level car parking. Approximately 35% of the site area is hardstanding, with a further two areas of green space to the rear (north and south) of the main public house complex.

3.11 Primary vehicular and pedestrian access to the site is provided via Redwick Road to the west. There are no alternative access points, but the existing access arrangement is considered appropriate and sufficient to support a modest residential development. The site benefits from a sustainable and accessible location, situated within convenient proximity to the local services and amenities available in both Pilning and Severn Beach, the latter being to the west. Furthermore, the site lies within approximately 50 metres of the Kings Arms bus stop, which offers regular public transport services to key destinations including Cribbs Causeway and Severn Beach Railway Station. This level of connectivity enhances the site's suitability for development by promoting sustainable travel choices and reducing reliance on private vehicles.

3.12 The site is bound by existing residential development to the northwest and southeast, with further residential dwellings being present to the west across Redwick Road.

3.13 The site is located within Flood Zone 3, consistent with much of the wider Severn Beach and Pilning Parish area. It is acknowledged that development within this flood zone will require appropriate mitigation measures and a site-specific Flood Risk Assessment to ensure compliance with national and local planning policy. However, the site's location does not preclude development, particularly given the precedent for residential development in similarly designated areas within the Parish.

3.14 The site is situated within the defined Redwick Settlement Boundary, which presents a clear opportunity for small-scale infill development. This is supported by Policy CS5 (Location of Development) of the South Gloucestershire Local Plan: Core Strategy (2013), which allows for limited infilling within settlement boundaries in the Green Belt where it is consistent with the character of the area.

3.15 Importantly, the site does not contain any statutory or locally listed buildings, nor is it subject to any known heritage or ecological designations that would constrain development. As such, the site is considered to be technically suitable and policy-compliant for modest residential development, subject to appropriate design and mitigation measures. Planning Policy – Adopted and Emerging South Gloucestershire Local Plan

3.16 In adopted planning policy terms, the site falls within the Redwick settlement boundary, as per the South Gloucestershire Local Plan interactive Policy Map. The site also falls within an undesignated Open Space within urban areas and settlements which supports development providing that it would not adversely affect, *inter alia*, the quality, character, recreational opportunities, heritage value, amenity or distinctiveness of the area. This designation extends across the entirety of the settlement boundary.

3.17 South Gloucestershire Council has recently published a Regulation 19 Draft Local Plan (February 2025) which is expected to be submitted to the Secretary of State for examination imminently. The aforementioned site designations are retained within the proposed Local Plan and are not anticipated to be lost or removed following adoption of the Emerging Local Plan. Pilning and Severn Beach Neighbourhood Plan

3.18 Stonegate support Draft Policy H10 (Infill Housing) of the P&SBNP which supports the delivery of infill development. The policy outlines particular support for the redevelopment of underutilised buildings and structures and where new development naturally infalls small open sites between established residential buildings (either outside or inside the green belt).

Proposed Allocation

3.19 Taking account of the above, and given the accessibility of the site and the neighbouring residential land uses, the site offers an exciting opportunity for a small-scale development / infill allocation.

3.20 The suggested policy sets out the broad principles for development on the site, with the proposed wording of a policy for a small scale infill allocation at the Kings Arms would read along the lines of the following:

Policy H12: Land at The Kings Arms

Land at the Kings Arms, Redwick, is allocated for a residential development for up to a maximum of 4 dwellings. Proposals which deliver this scale of dwelling will be supported where:

- a) Proposals would ensure that the principal buildings required to function as a public house are retained.*
- b) The development proposal must substantially accord with the provisions of the Neighbourhood Plan's Sequential Test, the Level 2 SFRA and the Flood Risk Policy (F1). The developer will be required to submit a compliant site-specific FRA to that effect.*
- c) It conforms with the Design Policy (D1) and the expectations of Design Codes and Guidelines.*
- d) Suitable access arrangements are proposed off of Redwick Road.*
- e) Adequate parking provision is retained for the public house.*

3.21 In light of both the adopted and emerging planning policy context, it is considered appropriate to support the allocation of the site for small-scale infill development. The site's location within the defined Redwick Settlement Boundary, combined with its potential to contribute positively to local housing supply without undermining the character or function of the area, reinforces its suitability for inclusion within the Neighbourhood Plan.

Deliverability

3.22 Such an allocation would align with the principles of sustainable development and reflect the strategic objectives of the South Gloucestershire Local Plan, particularly Policy CS5, which supports limited infilling within settlement boundaries in the Green Belt and furthermore, Policy H10 of the P&SBNP which supports infill development whether that be within or outside of the Green Belt. The site presents a realistic and deliverable opportunity to meet local housing needs in a manner that complements the existing built form and supports the vitality of the community. In summary, the site demonstrates the facets of deliverability due to the following:

- First, the development is achievable; the land necessary to facilitate development is within the control of Stonegate and public land, free from legal or ownership impediments which would otherwise preclude construction.
- Secondly, is the duration of the planning process. Given Stonegate's control of the site, the submission of a planning application could take place as soon as the principle of development is sufficiently established within emerging policy.
- Third, is the infrastructure and other costs required to deliver the site. Based on the scale of development anticipated Stonegate are not aware of any irregular infrastructure or costs that would render the development undeliverable.
- Finally, is the rate at which development can be delivered and absorbed in the market. With high market demand in Bristol the market is likely to be strong for residential development in this location. Especially in light of the identified housing need for the Parish, as outlined in the P&SBNP.

3.23 Furthermore, should the site be formally allocated, its deliverability would be significantly enhanced. This is because allocated sites are deemed to have satisfied the requirements of the Sequential Test, in accordance with Policy FR1 (Flood Risk) of the P&SBNP. This policy position provides greater certainty for future development and strengthens the planning justification for the site's inclusion.

Draft Policy CF2: Retention of Existing Community Facilities

3.24 Stonegate wishes to comment on the proposed wording of Policy CF2 (Retention of Existing Community Facilities) within the Draft P&SBNP.

3.25 We are concerned that the current wording of Policy CF2 may inadvertently restrict opportunities for modest infill development within the grounds of the Kings Arms. Such development could play a vital role in supporting the financial sustainability of the public house by enabling the release of funds for reinvestment into the long term maintenance of the facility. As currently drafted, the policy appears to preclude any form of enabling development, even where it would not compromise the community function of the site and could, in fact, enhance its long-term viability. This preclusion is contained within iii) e) of Policy CF2, which concerns the Kings Arms. In its current wording it reads as follows:

The following existing facilities shall be protected from loss or change of use to non-retail:

e) Kings Arms Pub and Car Park

3.26 We propose that this is amended to remove reference to the 'car park' (see red text struck through below) and confirm that the policy wording relates to the principal buildings required to function as a public house, allowing the greater ability for small-scale infilling within the site

whilst protecting the community asset, which the aim and emphasis of the policy. The proposed wording would read as follows:

The following existing facilities shall be protected from loss or change of use to non-retail:

e) Kings Arms Pub (limited to the principal buildings required to function as a public house) and Car Park

3.27 We respectfully suggest that the policy wording be reviewed to allow for small-scale, sensitively designed infill development where it can be demonstrated that such proposals would directly support the retention and enhancement of existing community facilities. This would ensure the policy is both protective and pragmatic, enabling sustainable solutions and maintenance of the public house for that benefit the wider community.

3.28 The Kings Arms is primarily a ‘wet-led’ pub, with its core revenue derived from the sale of alcoholic beverage rather than food service. Given this operational model, the Kings Arms does not function as a food-led destination public house that attracts visitors from outside the immediate area. Instead, it primarily serves the local resident population, many of whom would be within walking distance. In this context, it is reasonable to consider a more flexible approach to the use of the land, such as car parking areas, particularly where modest infill development could support the financial sustainability of the public house without compromising its community function.

3.29 We recommend that Policy CF2 be amended to more accurately reflect the operational realities of wet-led establishments. Specifically, we propose the removal of direct protection for the pub car park to enable development that supports the long-term viability of the venue. This revised approach aligns more closely with the adopted planning policy framework for South Gloucestershire, particularly Policy PSP34, which states that development proposals affecting public houses will be acceptable where they do not compromise the viability of the site. With the retention of protection for the public house itself and the removal of protection for the associated car park, any future development would be limited to a reconfiguration of the parking provision, without undermining the continued operation of the venue.

3.30 Furthermore, Policy CF2 of the P&SBNP states that the Kings Arms and its associated car park are further protected by Policies CS32 and PSP24. The reference to policies within the adopted development plan is erroneous, with Policy CS32 of the South Gloucestershire Core Strategy concerning Thornbury, and Policy PSP24 of the South Gloucestershire Policies, Sites and Places Plan concerning Mineral Safeguarding Areas. The draft policy should be amended to reflect the relevant policies of the South Gloucestershire Development Plan that concern the retention of community facilities, these being: CS23 (Community Infrastructure and Cultural Activity) and PSP34 (Public Houses).

4. Conclusion

4.1 Schedule 4B of the Town and Country Planning Act 1990 (as amended) requires that in order for a Neighbourhood Plan to proceed to a Referendum, the Examiner must consider whether it meets a set of ‘basic conditions’, including that of being in general conformity with the relevant Development Plan.

4.2 Criterion 'a' of the basic conditions requires that neighbourhood plans should have regard to national policies and advice contained in Guidance issued by the Secretary of State

4.3 Paragraph 32 of the NPPF requires the preparation of all policies to be underpinned by relevant and up-to-date evidence.

4.4 As aforementioned with this representation, both the adopted and emerging policy position for South Gloucestershire outlines support for small-scale infill development within settlements boundaries and the Green Belt. This support is also extended to that of the draft P&SBNP.

4.5 Stonegate welcomes the opportunity to engage with the Regulation 14 consultation on the Pilning and Severn Beach Neighbourhood Plan and supports the overarching aim of guiding sustainable development that reflects the needs and aspirations of the local community.

4.6 Through this representation, we have sought to highlight the potential of the Kings Arms site to contribute positively to the Parish's housing supply through modest infill development, while simultaneously supporting the long-term viability of a valued community asset. We have also raised concerns regarding the current wording of Policy CF2, which may inadvertently restrict opportunities for enabling development that could secure the continued future of the public house.

4.7 Stonegate remains committed to maintaining the Kings Arms as a functioning public house and community facility. We respectfully request that the Neighbourhood Plan be amended to reflect a more flexible and pragmatic approach to development within the site, ensuring that planning policy supports, not hinders, the sustainable retention of local amenities.

4.8 In summary, the site is available, achievable and deliverable and is available to be brought forward immediately should the policy position be amended with the P&SBNP to accommodate such development.

NPSG Response

The proposal for the site was not submitted at an early enough stage in the NP process for it to be identified and included in the NDP as the studies such as; site evaluation, flood risk SEA and HRA have all been completed. Furthermore it would not have been included in the public regulation 14 consultation.

In the NDP Policy H10 Infill Housing Sites, allows for suitable small infill sites in the future that are not identified and included in the NP. The NPSG's recommendation would be that the conventional planning approach should be taken making reference to policy H10.

Policy CF2 Retention of existing community facilities includes e) Kings Arms Pub and Car Park. The NPSG considers that the car park is essential to the viability of the public house and was regularly used to full capacity in recent times. Any loss of the car park to development would either turn away customers, or without alternative provision force cars to park on what is a busy road.

It is recognised that investment to the building and facilities of the public house would be welcomed. Should some infill development come forward appropriately through the planning

process on land behind the pub or by conversion of outbuildings, money raised could be invested in the public house. However, the NPSG cannot see how there would be any guarantees that would happen.

Regarding Policy CF2, references to Policies CS32 and PSP24 within the adopted development plan (South Gloucestershire Core Strategy) have been checked and will be replaced by CS23 and PSP34 respectively.

SUMMARY OF AMENDMENTS CONSIDERED FOR THE NDP

References to Policies CS32 and PSP24 within the adopted development plan (South Gloucestershire Core Strategy) made in NDP policy CF2 will be replaced by CS23 and PSP34 respectively.

APPENDIX E EXAMPLES OF LETTERS USED TO NOTIFY PARTIES OF REGULATION 14 CONSULTATION

APPENDIX E1 LETTER TO STATUTORY CONSULTEES

Dear Sir or Madam - Statutory Body/Consultee for Pilning & Severn Beach Neighbourhood Plan

The Pilning & Severn Beach Neighbourhood Plan Steering Group is sending your organisation this email because we have been advised by South Gloucestershire Council (SGC) and the Government organisation for Neighbourhood Planning, Locality, that you should be considered as a Statutory Body/Consultee for the Pilning & Severn Beach Neighbourhood Plan at Regulation 14 Consultation stage.

For some recipients, where we were not supplied with a contact email address or the Steering Group has had to make a judgement themselves, as to whether your organisation should be identified as a consultee, we have made best endeavours to find an appropriate email address. We would be very pleased, should this not have found the most appropriate point of contact in your organisation, if you could redirect it internally.

Our Neighbourhood Plan is now at the important stage of Regulation 14 consultation. Please see the attached letter for details of where you can find the draft Neighbourhood Development Plan, and how you can provide any feedback you may have.

Your feedback, as appropriate, is very important to the Neighbourhood Plan. Therefore, it would be helpful if you could provide a response to advise of; receipt of this email, whether it has been redirected, and whether you anticipate providing us with any feedback.

Attached letter:

Pilning & Severn Beach Neighbourhood Plan Steering Group
Cranmoor Villa, 31, Cross Hands Road, Pilning, BS35 4JB. Tel. 01454 632170.
E: neighbourhoodplan@pilningsevernbeach-pc.gov.uk

Dear Statutory Consultation Body

We are writing to you as an identified Statutory Body / Consultatee for the Regulation 14 Consultation of the Pilning & Severn Beach Neighbourhood Plan. Your organisation has been identified in the neighbourhood planning guidance provided by Locality and confirmed by South Gloucestershire Council. The Neighbourhood Plan Steering Group (NPSG) has now brought the Neighbourhood Plan close to completion, to the stage of Regulation 14 consultation.

The NPSG has a duty to notify statutory bodies, residents, local businesses and landowners of the consultation to ensure they are informed and have the opportunity to

provide feedback on the Neighbourhood Plan. We are therefore writing now to inform you of the process. Should this email have arrived at the incorrect part of your organisation, we would appreciate it if you could appropriately redirect it internally. The Regulation 14 consultation period is for six weeks commencing on 15th September and concluding on 26th October. The NPSG is holding two drop-in sessions within the Parish to allow people to come and meet with us and to ask any questions. These will take place as follows:

- Thursday 18th September 5pm To 8:30pm at Emmaus Church, 2, Gorse Cover Road, Severn Beach, BS35 4NP.
- Saturday 20th September 10am To 2pm at Mafeking Hall, Redwick Road, Pilning, BS35 4LQ.

The Neighbourhood Development Plan, the document produced at the end of the Neighbourhood Plan process, is available to be seen with its supporting documents on the Neighbourhood Plan pages of the Parish Council's website found at:

www.psbpc.co.uk/neighbourhood-plan.

Your feedback on the Neighbourhood Plan is welcomed and can be best submitted using the returns form on the website. Alternatively, forms could be placed in boxes at the drop-in sessions or posted to P&SBNP Steering Group, Cranmoor Villa, 31, Cross Hands Road, Pilning, BS35 4JB.

We thank you for your engagement in the Neighbourhood Plan consultation and we do hope you can appreciate the benefits the Neighbourhood Plan intends to bring to the community through its policies.

APPENDIX E2 LETTER TO BUSINESSES, GROUPS AND ORGANISATIONS

Dear Pilning & Severn Beach Businesses and Organisations

We are pleased to update you with the recent progress of the Neighbourhood Plan. Please see the attached letter announcing; the start of the important stage of Regulation 14 consultation, where you can find the draft Neighbourhood Development plan, and how you can provide any feedback you may have. Also, if you wish to talk with the Steering Group or have questions to ask, there are two drop-in events in the coming week – details again in the letter.

If you have received this email and are unsure of which organisation the Steering Group believed you represented, please come back to us for clarification.

Attached Letter:

Dear Pilning & Severn Beach Businesses and Organisations

As you will be aware, the Parish of Pilning & Severn Beach has been developing a

Neighbourhood Plan since January 2021. The Neighbourhood Plan Steering Group (NPSG), who are preparing the plan on behalf of the Parish Council, has brought it close to completion and it is now at the stage of Regulation 14 consultation.

The NPSG has a duty to notify statutory bodies, residents, local businesses and organisations of the consultation to ensure they are informed and have the opportunity to provide feedback on the Neighbourhood Plan. We are therefore writing now to inform you of the process.

The Regulation 14 consultation period is for six weeks commencing on 15th September and concluding on 26th October. The NPSG is holding two drop-in sessions to allow people to come and meet with us and to ask any questions. These will take place as follows:

- Thursday 18th September 5pm To 8:30pm at Emmaus Church, 2, Gorse Cover Road, Severn Beach, BS35 4NP.
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The Neighbourhood Development Plan, the document produced at the end of the Neighbourhood Plan process, is available to be seen with its supporting documents on the Neighbourhood Plan pages of the Parish Council's website found at:

www.psbpc.co.uk/neighbourhood-plan

Your feedback on the Neighbourhood Plan is welcomed and can be best submitted using the returns form on the website. Alternatively, forms can be placed in boxes at the drop-in sessions or posted to P&SBNP Steering Group, Cranmoor Villa, 31, Cross Hands Road, Pilning, BS35 4JB.

As a local business or organisation, we thank you for any earlier help you gave us with our surveys back in 2022/2023. We do hope you'll be able to engage in the consultation process and can appreciate the benefits the Neighbourhood Plan intends to bring to the community through its policies.

APPENDIX E3 LETTER TO LANDOWNERS/DEVELOPERS

Dear

Please see the attached letter announcing the start of the Regulation 14 consultation, for your attention as a landowner of a site included in the draft Neighbourhood Development Plan.

Attached letter:

Dear Neighbourhood Plan Landowner/Developer

We do hope you have kept abreast of the progress of the Neighbourhood Plan, which started all the way back in January 2021. The Neighbourhood Plan Steering Group

(NPSG) has now brought it close to completion, to the stage of Regulation 14 consultation.

The NPSG has a duty to notify statutory bodies, residents, local businesses and landowners of the consultation to ensure they are informed and have the opportunity to provide feedback on the Neighbourhood Plan. We are therefore writing now to inform you of the process.

The Regulation 14 consultation period is for six weeks commencing on 15th September and concluding on 26th October. The NPSG is holding two drop-in sessions to allow people to come and meet with us and to ask any questions. These will take place as follows:

- Thursday 18th September 5pm To 8:30pm at Emmaus Church, 2, Gorse Cover Road, Severn Beach, BS35 4NP.
- Saturday 20th September 10am To 2pm at Mafeking Hall, Redwick Road, Pilning, BS35 4LQ.

The Neighbourhood Development Plan, the document produced at the end of the Neighbourhood Plan process, is available to be seen with its supporting documents on the Neighbourhood Plan pages of the Parish Council's website found at:

www.psbpc.co.uk/neighbourhood-plan.

In particular you should review the site allocation policy relevant to yourself which now includes any content needed from SEA and HRA.

Your feedback on the Neighbourhood Plan is welcomed and can be best submitted using the returns form on the website. Alternatively, forms can be placed in boxes at the drop-in sessions or posted to P&SBNP Steering Group, Cranmoor Villa, 31, Cross Hands Road, Pilning, BS35 4JB.

We thank you for your interest and contributions to the Neighbourhood Plan so far. We do hope you'll be able to participate in the consultation process and can appreciate the benefits the Neighbourhood Plan intends to bring to the community through its policies.

APPENDIX E4 LETTER TO PARISH RESIDENTS

The following message and email was sent to the 300+ database of residents built up during the development of the NP:

Dear Neighbourhood Plan Mailing List Member

We are pleased to update you with the recent progress of the Neighbourhood Plan.

Please see the attached letter announcing; the start of the important stage of Regulation 14 consultation, where you can find the draft Neighbourhood Development plan, and how you can provide any feedback you may have. Also, if you wish to talk with the Steering Group or have questions to ask, there are two drop-in events in the coming week – details again in the letter.

Attached letter:

Pilning & Severn Beach
Neighbourhood Plan Steering Group
Cranmoor Villa, 31, Cross Hands Road, Pilning, BS35 4JB.

Tel. 01454 632170

E: neighbourhoodplan@pilningsevernbeach-pc.gov.uk

Dear Neighbourhood Plan Mailing List Member

It's been a little while since we've sent you an email directly, but we do hope our monthly newsletters in In View have kept you abreast of the progress of the Neighbourhood Plan, which started all the way back in January 2021. The Neighbourhood Plan Steering Group (NPSG) has now brought it close to completion, to the stage of Regulation 14 consultation.

The NPSG has a duty to notify statutory bodies, residents and local businesses of the consultation to ensure they are informed and have the opportunity to provide feedback on the Neighbourhood Plan. We are therefore writing now to inform you of the process. The Regulation 14 consultation period is for six weeks commencing on 15th September and concluding on 26th October. The NPSG is holding two drop-in sessions to allow people to come and meet with us and to ask any questions. These will take place as follows:

- Thursday 18th September 5pm To 8:30pm at Emmaus Church, 2, Gorse Cover Road, Severn Beach, BS35 4NP.
- Saturday 20th September 10am To 2pm at Mafeking Hall, Redwick Road, Pilning, BS35 4LQ.

The Neighbourhood Development Plan, the document produced at the end of the Neighbourhood Plan process, is available to be seen with its supporting documents on the Neighbourhood Plan pages of the Parish Council's website found at:

www.psbpc.co.uk/neighbourhood-plan

Your feedback on the Neighbourhood Plan is welcomed and can be best submitted using the returns form on the website. Alternatively, forms can be placed in boxes at the drop-in sessions or posted to P&SBNP Steering Group, Cranmoor Villa, 31, Cross Hands Road, Pilning, BS35 4JB.

As someone who has engaged with us before, we thank you for your interest and support. We do hope you'll be able to participate in the consultation process and can appreciate the benefits the Neighbourhood Plan intends to bring to the community through its policies.

APPENDIX E5 NEWSLETTERS IN PARISH MAGAZINE – IN VIEW

September Issue:

PUBLIC CONSULTATION DROP-IN EVENTS

THUR 18TH SEPTEMBER 5PM TO 8:30PM

at EMMAUS CHURCH, GORSE COVER ROAD, SB.

SAT 20TH SEPTEMBER 10AM TO 2PM

at MAFEKING HALL, REDWICK RD, PILNING.

For six weeks, from 15th September, the Neighbourhood Plan will enter into Regulation 14 Consultation. The final draft of the Neighbourhood Development Plan (NDP) and all supporting documents will be made publicly available. These can be seen on-line or at the above drop-in events. The Steering Group will notify all statutory bodies of the consultation and will communicate with local businesses.

The NDP has been developed in line with the mandate from surveys, has used independent technical advice and is considered to be in the best interests of the Parish as a whole. It is a lengthy document, so summary leaflets will be made available at the drop-ins and at the library.

Opportunity to provide feedback on the proposed plan will be given at the drop-in events and online via the NP pages of the Parish Council's website.

The Steering Group must consider and address all feedback received. The NDP will be amended as appropriate.

The NDP will then be formally submitted by the Parish Council to South Gloucester Council for independent examination in late October. And finally, there will be a public referendum expected to take place in the New Year.

October Issue:

REGULATION 14 PUBLIC CONSULTATION

A big thank you to everyone that came to the drop-in events on 18th and 20th September. We are delighted that you came and gave us your feedback on the Neighbourhood Plan. Your questions and queries will all be addressed with a response. Comments of support, demonstrating your understanding of the Neighbourhood Plan are also helpful to us and are welcomed. The consultation period is for six weeks in total and continues through to 26th October. So, it's not too late for you to take a look. The final draft of the Neighbourhood Development Plan (NDP) and all supporting documents remain publicly available on-line, just visit www.psbpc.co.uk/neighbourhood-plan.

[https://www.psbpc.co.uk/neighbourhood-plan](http://www.psbpc.co.uk/neighbourhood-plan). A paper copy can be seen at the library in Severn Beach. All statutory bodies have been informed of the consultation as have local businesses, organisations and groups. We thank SevernNet for their help in informing businesses.

As a reminder, the NDP has been developed in line with a formal government process, using the mandate from surveys, independent specialist advice and technical support from approved

consultants. The contents are based on what is considered to be in the best interests of the Parish.