



# Pilning and Severn Beach Neighbourhood Plan Green Belt Review

November 2023

Project Reference: 00167



## Document Issue Record

Version:	1	2	3	
Description/ Status:	Initial draft to NPG	Updates incorporated	Incorporation of exceptional circumstances paper, etc	
Date:	16/10/2023	24/10/2023	16/11/23	
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# 1 Introduction

- 1.1 This Review explains how the Pilning and Severn Beach Neighbourhood Plan could remove selected sites from the Green Belt at Pilning in order to enable their allocation for additional housing.
- 1.2 Following this Introduction, this Review is in four parts:
- *Principle of Green Belt change via Neighbourhood Plans* sets out the process by which Neighbourhood Plans can enable Green Belt boundaries to be altered, with reference to national planning policy and to examples where this has been done elsewhere.
  - *Exceptional Circumstances* explains the process by which it is possible to make the case that Green Belt land at Pilning should be released, even though there are existing areas at Severn Beach which are not within the Green Belt. This case has been made in a separate *Exceptional Circumstances Case* report prepared by the Neighbourhood Plan Steering Group, and included at **Appendix E**.
  - *Site Assessment* assesses a number of Green Belt sites against the five Green Belt purposes, as well as providing commentary about other considerations that might affect their overall suitability for development.
  - The *Conclusion* draws the above together, and recommends the sites that would result in the least impact on the Green Belt if they were released for housing, based on the exceptional circumstances set out by the Neighbourhood Plan Steering Group.
- 1.3 Flooding and flood risk matters are outside the scope of this Review. We understand that others will advise in relation to these matters.

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## 2 Principle of Green Belt Change via Neighbourhood Plans

- 2.1 This section provides guidance on how Neighbourhood Plans can amend Green Belt boundaries, beginning with an explanation of National Planning Policy in this regard, and then setting out how a number of Neighbourhood Plans have altered Green Belt boundaries.

### National Policy

- 2.2 As a starting point we would note that the National Planning Policy Framework (NPPF) includes the following in this regard:

*“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.”<sup>1</sup>*

The reference to the role of Neighbourhood Plans was added to the 2018 version of the NPPF<sup>2</sup>. The previous, 2012, version, simply said that *“Green Belt boundaries should only be altered in exceptional circumstances, through the preparation of review of the Local Plan.”*<sup>3</sup>

- 2.3 It is therefore clear that the NPPF enables Neighbourhood Plans to influence the Green Belt boundary, but the wording of the NPPF is also clear that this should happen where strategic policies (i.e. in the Local Plan) have established the case for altering the Green Belt boundary in the first place.

### Examples

- 2.4 A series of examples where Neighbourhood Plans have enabled Green Belt boundary changes is set out at **Appendix A**.

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<sup>1</sup> National Planning Policy Framework, September 2023, paragraph 140

<sup>2</sup> National Planning Policy Framework, July 2018, paragraph 136

<sup>3</sup> National Planning Policy Framework, March 2012, paragraph 83

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## Key messages

2.5 The key messages from the review of Neighbourhood Plans and Local Plans at **Appendix A** are as follows:

1. Before the 2018 NPPF was released, Neighbourhood Plans could only recommend Green Belt boundary changes for Local Plans to consider.
2. Since the 2018 NPPF was amended to provide a role for Neighbourhood Plans in this regard, Neighbourhood Plans have amended Green Belt boundaries themselves.
3. 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.
4. Any proposed change to the Green Belt would need to be “*fully evidenced and justified*”. This will need to include an explanation of the *Exceptional Circumstances* that justify a change to the Green Belt (unless the adopted Local Plan provides this justification. See Chapter 3 for further details.
5. South Gloucestershire Council would need to confirm that there is a strategic need for the Green Belt amendments based on the *Exceptional Circumstances Case*, and they would also need to agree that the changes proposed at Pilning fall within the definition of “*detailed amendment*” as described in paragraph 140 of the NPPF.
6. We understand that the Neighbourhood Plan Steering Group has obtained some assurance from South Gloucestershire Council that the emerging South Gloucestershire Local 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.

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## 3 Exceptional Circumstances

3.1 In order to justify allocating sites for housing in the Green Belt over sites outside the Green Belt, at Severn Beach for example, there is a need to make a case that “*Exceptional Circumstances*” exist to enable Green Belt land to be released.

3.2 This requirement stems from NPPF:

*“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.”<sup>4</sup>*

3.3 The text highlighted in blue at **Appendix A** provides specific examples of Exceptional Circumstances cases put forward to support Neighbourhood Plans proposing Green Belt changes elsewhere.

3.4 The Neighbourhood Plan Steering Group have prepared an *Exceptional Circumstances Case*, setting out why additional homes are needed at Pilning, and why the delivery of these homes requires land to be released from the Green Belt. The NPSG’s *Exceptional Circumstances Case* is included at **Appendix E**.

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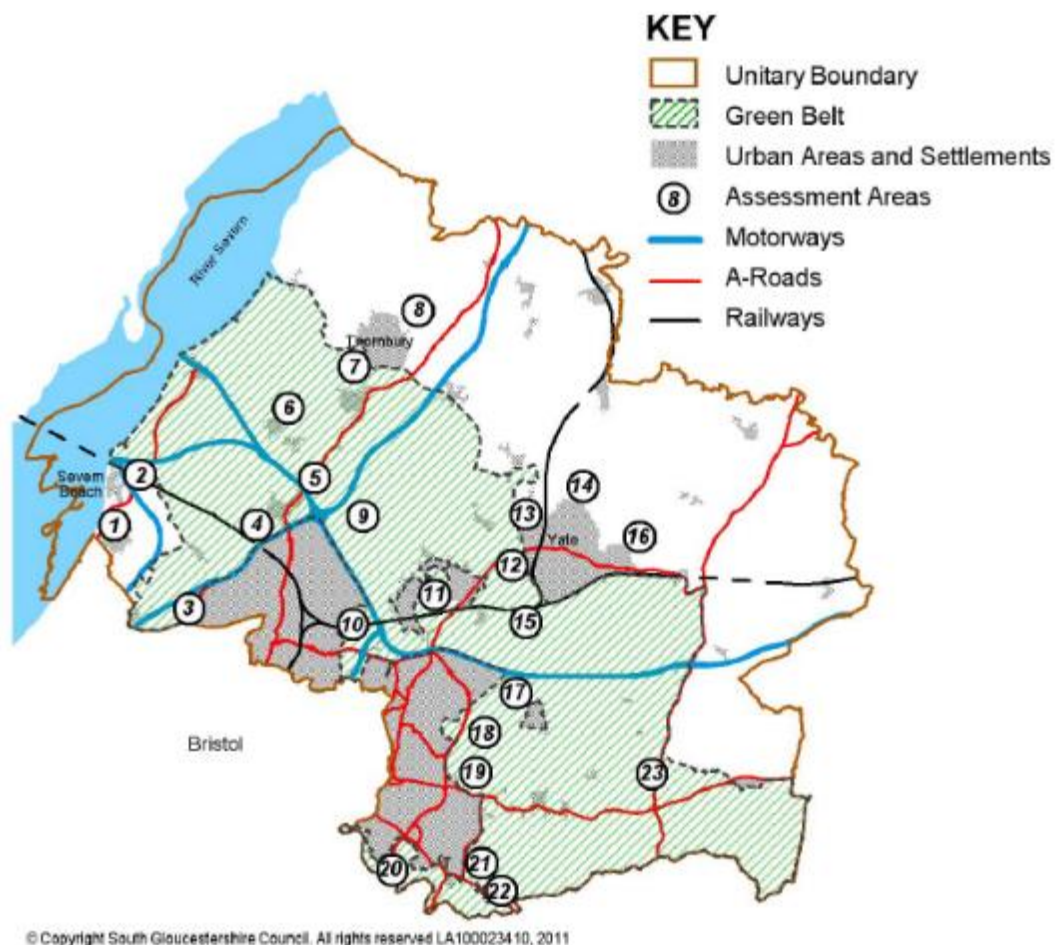
<sup>4</sup> National Planning Policy Framework, September 2023, paragraph 140

## 4 Site Assessment

### Past Green Belt Assessments

- 4.1 Before undertaking any Green Belt Review, it is important to understand the context set by the strategic Green Belt assessments that informed the current and emerging Local Plans.
- 4.2 As part of the examination into the South Gloucestershire Core Strategy Examination, South Gloucestershire Council prepared a *Strategic Green Belt Assessment* (December 2011) ([link here](#)).
- 4.3 This *2011 Assessment* focussed on 23 “*Strategic Assessment Areas*”, as shown on the plan below.

**Diagram 1: The South Gloucestershire – Strategic Green Belt Assessment: General Indication of the Strategic Assessment Areas**



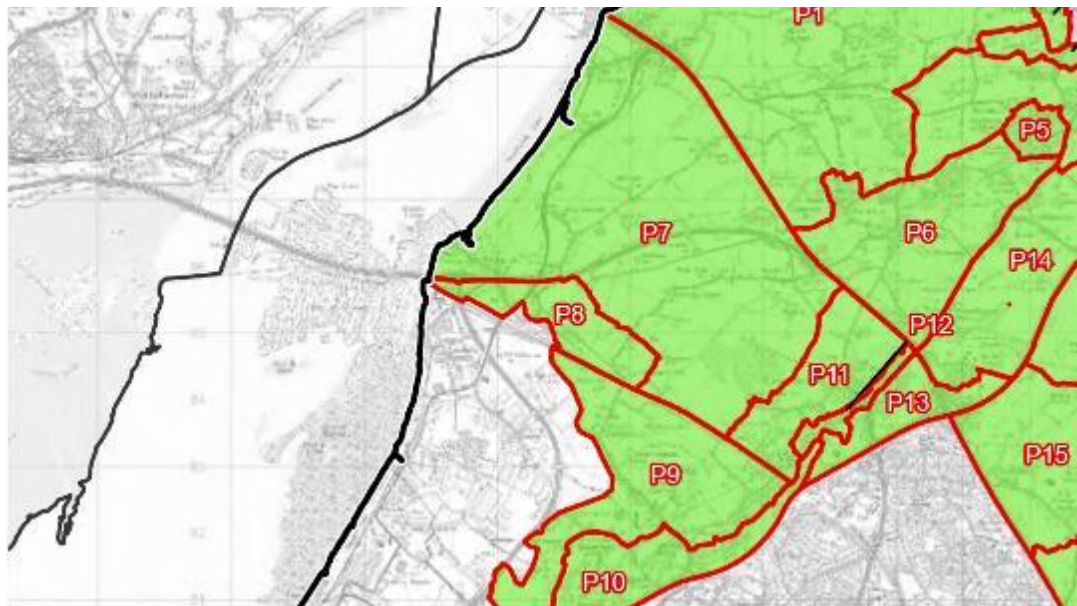
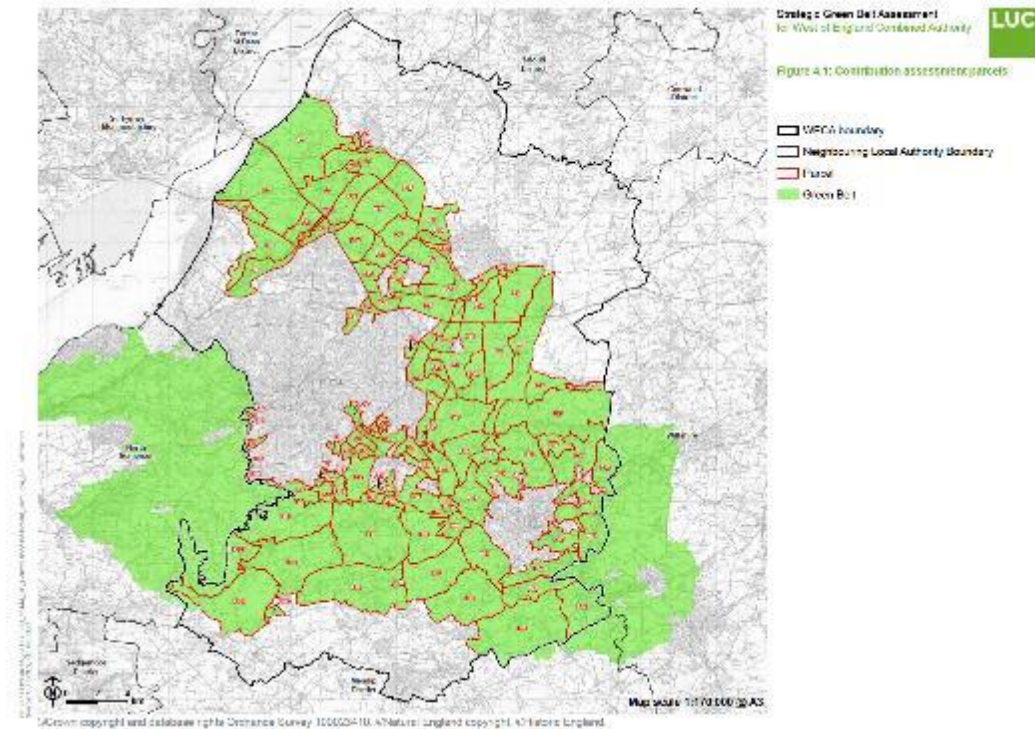
- 4.4 The area of Green Belt generally to the north of Pilning is denoted as



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## Assessment Area 2.

- 4.5 Table 2 of the *2011 Assessment* reviews each Assessment Area against the five purposes of the Green Belt, and uses a simple “yes” or “no” method to determine whether or not Assessment Area 2 meets the purposes.
- 4.6 The purposes are:
1. To check the unrestricted sprawl of large built-up areas;
  2. To prevent neighbouring towns from merging into one another;
  3. To assist in safeguarding the countryside from encroachment;
  4. To preserve the setting of historic town; and
  5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 4.7 Table 2 concludes that Assessment Area 2 meets Purposes 1, 2, 3 and 5, but not Purpose 4.
- 4.8 Each Assessment Area was then assessed against “*Broader Considerations*”, i.e. Sustainability, Environmental, and Infrastructure Availability/ Delivery Constraints, and each Constraint was given either a ✓ - indicating a “*Critical/decisive constraint which would limit the scope/scale of sustainable strategic development in this area*”, or a ✗ - meaning “*Constraint not critical/decisive.*”
- 4.9 However, the scale of the Assessment Areas means that this Assessment is only very broad brush. As it treats all of the Green Belt land in and near Pilning as the same Assessment Area, it does not help to define which parts of the Green Belt near to Pilning are most valuable from a Green Belt perspective, and which are least valuable.
- 4.10 Later, as part of the evidence base for the West of England Joint Strategic Plan, the West of England Combined Authority prepared a *Strategic Green Belt Assessment* in September 2022 ([link here](#)).
- 4.11 This *2022 Assessment* includes all of the land covered by this Review within Parcel P8, as shown on the image below, and on the enlarged extract of the same image below that.



4.12 Table 4.1 of the *2022 Assessment* rates the strategic contribution of each parcel towards the Green Belt purposes. The ratings for parcel P8 are as follows.

Parcel	Purpose 1	Purpose 2	Purpose 3	Purpose 4	Purpose 5
P8	Significant contribution	Moderate contribution	Significant contribution	Limited/no contribution	Equal contribution

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- 4.13 An “*Equal contribution*” is given to all assessed Parcels in relation to Purpose 5, so it is ultimately the first four purposes that are used to distinguish one parcel against another in terms of performance against the Green Belt purposes.
- 4.14 Appendix C to the *2022 Assessment* provides additional detail about the assessment. This is repeated at **Appendix B**, but a significant conclusion in relation to this review is that the “*Key considerations...*” note that:
- “... the area contained between Pilning, Bank Road, the B4055 and the A403 to the north of Pilning (map point B), has some urbanising development which would limit harm if land in that area were released, even though a mature, well-treed hedgerow creates relatively strong separation from the inset settlement.”*
- 4.15 This implies that land generally between the Pill, which defines the current Green Belt boundary in this area, and Bank Road, contributes less towards the Green Belt purposes than Parcel P8 as a whole, and suggests that, if Green Belt releases are necessary at Pilning, then looking to land between Pilning/The Pill and Bank Road would provide a reasonable starting point for that search.
- 4.16 We would agree with this. When travelling along Bank Road between Northwick Road and St Mary’s Orthodox Indian Church, land to the south of Bank Road appears to be far less open than land to its north. Land to the south of Bank Road is generally developed and the frontage is often hedged or treed, whereas land to the north of Bank Road is generally open farmland, with lower hedging to screen it from the road.
- 4.17 Both of these factors suggest that, generally at least, land to the south of Bank Road adds less value to the Green Belt than land to the north of Bank Road.

## Sites Review

### Determining which Sites to assess

- 4.18 Turning to an assessment of specific sites, we first need to determine which Sites should be reviewed in detail.
- 4.19 In order to do this, we first define an Area of Search.

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- 4.20 AECOM's *Site Options and Assessment* explains<sup>5</sup> that a total of 47 sites were identified through Calls for Sites for the Local Plan or Neighbourhood Plan, or otherwise identified by the Neighbourhood Plan Steering Group.
- 4.21 Of these, AECOM explain that 27 sites were taken forward.
- 4.22 We have no reason to disagree with the process by which AECOM discounted 20 potential sites, so we take the 27 sites that AECOM took forward as a starting point. These are indicated on Figures 4.4 and 4.5 of AECOM's report, repeated at **Appendix C**.
- 4.23 On the assumption that an *Exceptional Circumstances* case is set out by the Neighbourhood Planning Group as described in Section 2 of this Review, we only assess sites at Pilning.
- 4.24 In this context "at Pilning" is taken to mean those sites at Pilning/Redwick north of the railway line and east of the A403 Severn Road.
- 4.25 The A403 has been chosen as the western boundary to our area of search on the basis that it provides a barrier/disincentive to anyone walking to Pilning's local facilities and services. Given that "*the purpose of the planning system is to contribute to the achievement of sustainable development*"<sup>6</sup>, this is likely to mean that, in general, any potential housing site west of the A403 is less sustainable than a site to the east of the A403.
- 4.26 This is also reflected by the settlement hierarchy set out in Core Strategy Policy CS5, and the way that settlement boundaries have been drawn around Pilning – removed from the Green Belt, and Redwick – washed over by the Green Belt.
- 4.27 The following sites outside the Green Belt fall within the Area of Search:
1. CfS1: 19 Vicarage Road, Pilning
  2. CfS9: 21 Cross Hands Road, Pilning
  3. CfS10: 23 Cross Hands Road, Pilning
  4. NP17: Land at end of Chessell Avenue, Pilning
  5. SG830: The Vicarage, The Glebe, Pilning

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<sup>5</sup> Site Options and Assessment, Pilning and Severn Beach Neighbourhood Plan, AECOM, May 2023, paragraph 4.1

<sup>6</sup> National Planning Policy Framework, September 2023, paragraph 7

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- 4.28 The following sites within the Green Belt fall within the area of search:
1. Cfs4: Land on south side of Bank Road, Pilning
  2. NP16: Land at west end of Bank Road, north side
  3. SG136/NP14: Land on south side at Bank Road west of school, between school and travellers' site
  4. SG807/NP13: Pilning Village Hall and playing field
  5. SG808/NP15: Pilning end of Northwick Road incl Surgery & Telecom, old rail line and traveller site on Bank Road and allotments
- 4.29 All of the Sites within the Area of Search and outside the Green Belt are small, ranging from 0.07 hectares to 0.29 hectares.
- 4.30 Additionally, Cfs1, Cfs9 and Cfs10 propose "backland development" behind existing dwellings, which is often not supported by planning policy, and SG830 proposes a new dwelling on a site on which an application for a new dwelling was refused in January 2014 (ref PT13/4265/F), so there is a strong possibility that this proposal is not deliverable.
- 4.31 Given that Pilning and Severn Beach's housing need is 246 dwellings, the delivery of anything more than a small handful of new dwellings at Pilning will require a site or sites larger than any outside the Green Belt, which therefore means there is a need to review sites within the Green Belt.
- 4.32 As we note in Section 2, it will be for the *Exceptional Circumstances Report* to explain why a reasonable proportion of Pilning and Severn Beach's housing need should be met at Pilning, but on the basis that that case is made out, and that none of the Sites outside the Green Belt are large enough to meet the Parish's housing needs in any meaningful way, the Sites set out in paragraph 4.28 are those that we take forward for review.

## **Methodology**

- 4.33 In terms of methodology, for consistency, we use the *2022 Assessment* as a starting point. However, as the *2022 Assessment* was more strategic in scale than this Review, there are necessarily some differences, and some points that become more important at the local scale of this Review.
- 4.34 The key points to note in this regard are set out below:



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1. The *2022 Assessment* sets out<sup>7</sup> “two principal factors that could influence the potential harm resulting from the release of land”.

The first refers to areas, or sites, within the more strategic Parcels that make a weaker contribution to the Green Belt purposes than the Parcel as a whole. In relation to Pilning, the *2022 Assessment* conclusion quoted at paragraph 4.14 gives us a starting point for consideration of this issue. In other words, developing sites in the area generally between Pilning and Bank Road is likely to result in less Green Belt harm than developing sites elsewhere in the Green Belt around Pilning.

The second “principal factor” referred to in the *2022 Assessment* refers to “The existence of physical features within the parcel that could form a new Green Belt boundary that would limit the impact of release on the integrity of adjacent Green Belt land.”

In our Review, given that we are considering individual Sites, this consideration relates to physical features on the boundary of the site, rather than within the Site or Parcel.

2. The *2022 Assessment* explains that “Green Belt openness ... relates to a lack of ‘inappropriate development’ rather than to visual openness; thus both undeveloped land which is screened from view by landscape elements (e.g. tree cover) and development which is not considered ‘inappropriate’ are still ‘open’ in Green Belt terms.”<sup>8</sup>

It is on this basis that this Review assesses the potential harm to the openness of the Green Belt, and to each of the purposes of the Green Belt.

3. The *2022 Assessment* notes that “Land that is related more strongly to urbanising development typically makes a more limited contribution to most of the Green Belt purposes, with development of it being likely to be perceived as being less significant sprawl (Purpose 1), as having less impact on narrowing the gap between towns (Purpose 2) and as having less encroachment on the countryside (Purpose 3).”<sup>9</sup>

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<sup>7</sup> Strategic Green Belt Assessment, September 2022, West of England Combined Authority, paragraph 3.12

<sup>8</sup> Strategic Green Belt Assessment, September 2022, West of England Combined Authority, paragraph 3.21

<sup>9</sup> Strategic Green Belt Assessment, September 2022, West of England Combined Authority, paragraph 3.25

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This is taken forward as a factor in this Review's assessment of the contribution that each Site makes to the Green Belt purposes, and therefore to the harm that its development would cause to those purposes.

4. Green Belt Purpose 1, as defined in the NPPF, refers to *"large built-up areas"*.

The *2022 Assessment* explains that *"The term 'Bristol urban area' is used in this study to refer to the city of Bristol together with contiguous urban development in South Gloucestershire."*<sup>10</sup>

This means that, despite their physical separation from Bristol, Severn Beach and Pilning are both part of the *"Bristol Urban Area"* according to the *2022 Assessment*.

As this Review considers the harm that each Site might cause to the Green Belt in a relative sense rather than an absolute sense, there is no need to challenge this approach, so we adopt it for consistency.

5. Green Belt Purpose 2, as defined in the NPPF, refers to *"towns"*.

The *2022 Assessment* explains that *"The city of Bristol together with contiguous urban development in South Gloucestershire is treated as one 'town' for the assessment of Purpose 2."*<sup>11</sup>

This means that Severn Beach and Pilning are treated as the same *"town"* as Bristol according to the *2022 Assessment*. For consistency, we adopt the same approach, on the basis of the rationale relating to Purpose 1.

In addition, the *2022 Assessment* explains that Bath, Keynsham, Midsomer Norton combined with Radstock, Thornbury and Yate combined with Chipping Sodbury *"are considered to be significant enough to be defined as Green Belt towns in the study area."*<sup>12</sup>

In the context of Pilning, there are two key gaps: the gap to the north, between Pilning and Thornbury; and the gap to the east, between

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<sup>10</sup> Strategic Green Belt Assessment, September 2022, West of England Combined Authority, reference 20

<sup>11</sup> Strategic Green Belt Assessment, September 2022, West of England Combined Authority, reference 21

<sup>12</sup> Strategic Green Belt Assessment, September 2022, West of England Combined Authority, paragraph 3.48

6. Green Belt Purpose 3, as defined in the NPPF, refers to “*countryside*”.

The *2022 Assessment* explains that “*Some open land may, through its usage, have a stronger relationship with the adjacent urban area and, as a result, not be considered ‘countryside’ to the same degree as other open land.*”

*Equally, land largely contained by urban development may nonetheless retain, as a result of its use and/or size, a countryside character...*<sup>13</sup>

In the context of this Review, we generally consider greenfield land to have a countryside character, and previously developed land not to have a countryside character.

Additionally, we consider the locational context of the land in this regard, so if a greenfield site is surrounded by urban development, then its countryside character is less than if that same site was surrounded by farmland, for example.

7. Green Belt Purpose 4, as defined by the NPPF, refers to “*historic towns*”.

The *2022 Assessment* explains that “*Bath, Bristol, Thornbury and Keynsham have been identified as settlements to which Green Belt Purpose 4 is applicable to some degree*”<sup>14</sup>

Development at any site at Pilning could potentially affect only “*the setting and special character*” of the City of Bristol and Thornbury, and in reality, given the distance from Pilning to either the City of Bristol or to Thornbury, it is unlikely to affect either. On that basis, we conclude that the harm to this purpose resulting from the development of any of the potential sites would be Minor.

8. Green Belt Purpose 5, as defined by the NPPF, relates to “*... the recycling of derelict and other urban land*”.

The *2022 Assessment* does not distinguish between the parcels in relation to this purpose, on the basis that “*... it is highly unlikely that*

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<sup>13</sup> Strategic Green Belt Assessment, September 2022, West of England Combined Authority, paragraph 3.57 and 3.58

<sup>14</sup> Strategic Green Belt Assessment, September 2022, West of England Combined Authority, paragraph 3.65



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*development pressures operate at a sufficiently localised level to draw out meaningful judgements on the relative impact of discreet parcels of Green Belt land on purpose 5.”<sup>15</sup>*

However, differences do exist on a site by site basis, because some Green Belt Sites are already “*derelict or other urban land*”. Where that is the case, the harm to this purpose resulting from the development of the site is less than it would be if the site was not “*derelict or other urban land*.”

On this basis, this Review diverges from the *2022 Assessment*, by distinguishing between the Sites in terms of their potential harm to Green Belt Purpose 5.

9. The *2022 WECA Assessment* defines the contribution that each Parcel of land makes to each Green Belt purpose using criteria set out in Chapter 3. This Review defines the potential harm to the Green Belt on the basis of the *2022 Assessment* criteria. Therefore:
- if a Site provides a **Significant Contribution** towards a Green Belt purpose, then this Review considers the development of that parcel to result in **Major Harm**;
  - if a Site provides a **Moderate Contribution** towards a Green Belt purpose, then this Review considers the development of that parcel to result in **Moderate Harm**;
  - if a Site provides **Limited/No Contribution** towards a Green Belt purpose, then this Review considers the development of that parcel to result in **Minor Harm**.

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<sup>15</sup> Strategic Green Belt Assessment, September 2022, West of England Combined Authority, page 67

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## Results

- 4.35 The results of our Review, for the five sites within scope, are set out in detail at **Appendix D**, and summarised in the table below.
- 4.36 The sites are ranked, with the sites that, if developed, would result in the least harm to Green Belt purposes at the top, and the sites that would result in the most harm to Green Belt purposes at the bottom. This is on the assumption that each Green Belt Purpose is given an equal weighting.

Site	Purpose 1	Purpose 2	Purpose 3	Purpose 4	Purpose 5
<b>SG808/ NP15</b>	Minor	Minor	Minor/ Moderate	Minor	Moderate
<b>SG136/ NP14</b>	Minor	Minor	Moderate	Minor	Moderate/ Major
<b>SG807/ NP13</b>	Moderate	Moderate	Moderate	Minor	Moderate/ Major
<b>NP16</b>	Major	Moderate	Moderate	Minor	Moderate
<b>CfS4</b>	Moderate/ Major	Moderate/ Major	Major	Minor	Major

- 4.37 To enable easy cross-referencing, the Sites and the Green Belt Purposes are listed below.

### Site references

- SG808/NP15: Pilning end of Northwick Road incl Surgery & Telecom, old rail line and traveller site on Bank Road and allotments
- SG136/NP14: Land on south side at Bank Road west of school, between school and travellers' site
- SG807/NP13: Pilning Village Hall and playing field
- NP16: Land at west end of Bank Road, north side
- CfS4: Land on south side of Bank Road, Pilning

### Green Belt Purposes

- Purpose 1: to check the unrestricted sprawl of large built-up areas

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- Purpose 2: to prevent neighbouring towns merging into one another
- Purpose 3: to assist in safeguarding the countryside from encroachment
- Purpose 4: to preserve the setting and special character of historic towns
- Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- 4.38 It should be noted that Green Belt considerations alone will not be sufficient to determine whether a site can or should be allocated.
- 4.39 The analysis at **Appendix D** therefore includes “*Other considerations*” to be borne in mind before deciding whether to propose any Green Belt Sites for allocation, and then in deciding which to propose for allocation.
- 4.40 In this regard, a number of points should be emphasised.
- 4.41 All of the Sites assessed are included in Natural England’s Priority Habitat Inventory, so any that are considered for allocation will need to be assessed for their biodiversity value before any can be confirmed to be deliverable. This is likely to start with a desktop assessment, with field assessments potentially to follow.
- 4.42 Before SG808/NP15, SG136/NP14, SG807/NP13 or CfS4 could be allocated, it will be necessary to understand how each Site would be accessed. This is likely to need the involvement of a highways specialist.
- 4.43 Before SG807/NP13 could be allocated, you would need to assess the redevelopment of the site against South Gloucestershire Policies PSP44 and CS23, which protect playing fields and community centres such as the village hall.
- 4.44 While we understand that there is no intention to redevelop the doctors’ surgery and pharmacy as part of the redevelopment of SG808/NP15, you should bear in mind that if this were to change, you would need to assess this proposal against Policy CS23.
- 4.45 Finally, we note that the NPSG’s *Exceptional Circumstances Case* suggests that the Green Belt boundary might be moved more strategically, to Bank Road.
- 4.46 This Review focussed on considering the contribution made to the Green Belt purposes of sites proposed for housing development, so this more strategic boundary alteration is beyond the scope of this Review.

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- 4.47 However, paragraph 143 of the NPPF lists the criteria which new Green Belt boundaries should meet.
- 4.48 Criterion f) requires boundaries to be defined *“clearly, using physical boundaries that are readily recognisable and likely to be permanent”*. Moving the boundary to Bank Road is likely to meet this criterion better than creating a “crenellated” boundary around the proposed allocations only.
- 4.49 This more strategic boundary change to Bank Road would also help to meet criterion e), which explains that plans should *“be able to demonstrate that Green Belt boundaries will not be altered at the end of the plan period”* (criterion d)).

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## 5 Conclusion

- 5.1 The first part of this Review confirms that the NPPF allows Neighbourhood Plans to make detailed amendments to Green Belt boundaries where the corresponding strategic policies (normally in a Local Plan) have established the need for the Green Belt to be amended.
- 5.2 Green Belt amendments can only be made where exceptional circumstances are fully evidenced and justified. In principle, this could be set out in either the Neighbourhood Plan or the Local Plan.
- 5.3 The second part of this Review sets the context for the *Exceptional Circumstances Case* which has been prepared by the Neighbourhood Plan Steering Group – included at **Appendix E**. The NPSG’s *Exceptional Circumstances Case* concludes that exceptional circumstances exist to justify releasing land from the Green Belt at Pilning to accommodate approximately 100 dwellings.
- 5.4 Given the requirements of the current NPPF, South Gloucestershire Council would need to confirm that there is a strategic need for the Green Belt amendments based on the NPSG’s *Exceptional Circumstances Case*, and they would also need to agree that the changes proposed at Pilning fall within the definition of “*detailed amendment*”.
- 5.5 All the Neighbourhood Plans we have found that have successfully amended Green Belt boundaries 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.
- 5.6 If, as planned, the Pilning and Severn Beach Neighbourhood Plan is to be made before the emerging South Gloucestershire Local Plan policy hook is adopted, then the Neighbourhood Plan policy would need to be carefully worded for a Neighbourhood Plan Examiner to be satisfied that it meets the basic conditions.
- 5.7 The third part of this Review assesses a series of potential housing sites at Pilning against the Green Belt purposes, based on evidence to be provided by the Neighbourhood Planning Group that some of the Parish’s housing need should be met at Pilning.
- 5.8 The Review concludes that there are no sites outside the Green Belt at Pilning that are large enough to meet the exceptional circumstances need defined by the NPSG, so there is a need to

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- consider potential sites within the Green Belt.
- 5.9 The site rankings, with the sites that, if developed, would result in the least harm to Green Belt purposes at the top, and the sites that would result in the most harm to Green Belt purposes at the bottom (all assuming that each Green Belt Purpose is given an equal weighting) is below:
1. SG808/NP15 – the telephone exchange/ doctors’ surgery etc site.
  2. SG136/NP14 – site south of Bank Road, to the west of the primary school.
  3. SG807/NP13 – Pilning Village Hall and playing field.
  4. NP16 – west end of Bank Road, north side
  5. CfS4 – south side of Bank Road, Pilning
- 5.10 Approximately 4 to 5 hectares of land is likely to be needed to deliver the 100 dwellings that the *Exceptional Circumstances Case* concludes need to be delivered on current Green Belt land at Pilning, assuming standard development densities.
- 5.11 The top two sites from a Green Belt impact perspective (SG808/NP15 and SG135/NP14) total 2.1 hectares in area, and some of site SG808/NP15 is not proposed to be redeveloped. Therefore, a third site is likely to be required to meet the identified need. The third best site from a Green Belt impact perspective is SG807/NP13.
- 5.12 Therefore, it is our conclusion that the release of sites SG808/NP15, SG136/NP14 and SG807/NP13 would result in the least Green Belt impact whilst meeting the identified need.
- 5.13 However, we would note that this assessment is based on Green Belt impact alone, so the NPSG will need to satisfy itself that other issues and constraints, including those set out under “*Other Considerations*” at **Appendix D** do not alter this conclusion, and that, ultimately, these three preferred sites are deliverable.
- 5.14 Finally, we note that the NPSG’s *Exceptional Circumstances Case* suggests that the Green Belt boundary might be moved more strategically, to Bank Road.
- 5.15 This more strategic alteration is outside the scope of this Review, which focusses on considering the contribution made to the Green Belt purposes of sites proposed for housing development. However, if the three sites

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which this Review concludes contribute least to the Green Belt purposes are ultimately allocated, then moving the Green Belt boundary to Bank Road is likely to meet the requirements of NPPF paragraph 143 better than the alternative of only removing the three sites from the Green Belt, and leaving intervening land within the Green Belt.

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# Appendices

## Appendix A: Examples of Neighbourhoods Plans enabling Green Belt boundary amendments

### Note

*Blue text indicates an example of Exceptional Circumstances cases made in relation to each Neighbourhood Plan, as cross referenced in section 2.*

### **Little Aston Neighbourhood Plan/ Litchfield Local Plan**

Lichfield District Local Plan was adopted in February 2015, and the Little Aston Neighbourhood Plan was made in April 2016, so both plans were finalised before the NPPF was amended to enable Neighbourhood Plans to make Green Belt boundary changes.

Core Policy 1 of the Lichfield District Local Plan includes the following:

*“Changes to Green Belt boundaries that do not have a fundamental impact on the overall strategy may be appropriate for all settlements within the Green Belt, with the precise boundaries of these changes being determined through the Local Plan Allocations document.”*

The supporting text to Policy 1 explains that:

*“4.16 The important role of the Green Belt is recognised, and whilst the Spatial Strategy seeks to minimise impact upon the Green Belt, this has to be considered in the light of a range of options including the need to locate development to the most sustainable settlements where there is easy access to a range of existing services and facilities and supporting infrastructure. Additionally, minor changes to Green Belt boundaries may be appropriate to meet local needs or aspirations and to facilitate local and neighbourhood planning in the future.”*

The Little Aston Neighbourhood Plan includes the following policy:

*“Policy GB1: Green Belt Boundary*

*In accordance with Core Policy 1 of the Lichfield District Local Plan, it is proposed that the green belt boundary should be amended to exclude Tufton Cottage, Roman Road. This should be undertaken through the Lichfield Local Plan Site Allocations process.”*



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The Neighbourhood Plan therefore uses the Core Policy 1 hook, to recommend to Lichfield District Council that the Green Belt should be amended via a later Local Plan document.

As the NPPF had not yet been amended to enable the Neighbourhood Plan to amend the Green Belt, this is all that could have been done at that time.

### **East Hertfordshire District Plan**

The East Herts District Plan was adopted in October 2018, after the NPPF was amended to enable Neighbourhood Plans to make Green Belt boundary changes.

It includes a Policy VILL1, relating to the villages designated as Group 1 Villages.

Criterion III, repeated below, explains how Neighbourhood Plans relating to Group 1 Villages are encouraged to consider accommodating additional development and the District Council undertakes to consider amending the Green Belt in a later Local Plan.

*“Policy VILL1 Group 1 Villages*

*...*

*III. Within the Group 1 Villages of Hertford Heath, Stanstead Abbots & St. Margarets, and Watton-at-Stone, as defined on the Policies Map, development for housing, employment, leisure, recreation and community facilities will be permitted subject to (VII) below and all other relevant policies in this Plan. These villages will be encouraged to consider whether it is appropriate, through the formulation of a Neighbourhood Plan, to accommodate additional development especially where it contributes to wider sustainability objectives and the delivery of community benefits. Where such proposals would involve changes to Green Belt boundaries, the District Council will consider making these amendments either through the next Review of the District Plan or through a separate Site Allocations Development Plan Document if necessary.”*

The East Herts District Plan therefore provides a strategic policy “hook” to enable Neighbourhood Plans to recommend Green Belt changes, but not to enable Neighbourhood Plans to make those changes.

### **Thorpe Neighbourhood Plan/ Runnymede Local Plan**

The Runnymede Local Plan was adopted in July 2020, and the Thorpe Neighbourhood Plan was made in June 2021, so both plans were finalised after the

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NPPF was amended to enable Neighbourhood Plans to make Green Belt boundary changes.

The Runnymede Local Plan includes a policy SD1 – Spatial Development Strategy.

The policy does not explicitly enable Neighbourhood Plans to amend the Green Belt, but the supporting text to policy SD1 includes the following:

*“5.27 Thorpe Village will be removed from the Green Belt through this Local Plan, however given its position in the centre hierarchy, the village is only considered to present limited opportunities for growth over the period of the Local Plan which will be dealt with in a Neighbourhood Plan for the Thorpe area. The Council acknowledges that the neighbourhood plan being prepared for Thorpe will be assessed against the 2019 NPPF. Under paragraph 136 of the 2019 NPPF, neighbourhood plans can make detailed non-strategic amendments to Green Belt boundaries where strategic local plan policies have established the need for strategic changes to the Green Belt boundaries. The Local Plan has justified the need for changes to the Green Belt boundaries in Runnymede given the existence of exceptional circumstances. As such, further non-strategic changes to the Green Belt boundaries in Thorpe may occur as a result of the Thorpe Neighbourhood Plan...”*

The Thorpe Neighbourhood Plan uses the Local Plan’s supporting text as a hook to enable it to review the Green Belt around Thorpe.

Policy TH1 of the Thorpe Neighbourhood Plan reads as follows:

*“TH1: Thorpe Village Boundary*

*The Neighbourhood Plan defines a boundary for the village of Thorpe, as shown on the Policies Map, which establishes a detailed Green Belt boundary amendment to encompass land to the East of Ten Acre Lane and North of Coldharbour Lane to support sustainable development.”*

The supporting text to policy TH1 justifies this as follows:

*“5.7 Policy SD1 also establishes a minimum housing requirement of 89 homes (C3 and C2) for the designated area of Thorpe Village. This housing requirement reflects paragraph 65 of the NPPF 2019. This housing number supersedes the Forum’s own Local Housing Needs Assessment prepared prior to the publication of the Runnymede Submission Local Plan and the subsequent modifications to Policy SD1. While the Local Housing Needs assessment indicates a need of 188 dwellings,*

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*this is an unconstrained figure that does not reflect the significant constraints to development in Thorpe.*

*5.8 However, given the limited availability of suitable land within the village boundary to meet this figure would require a strategic release of Green Belt land rather than a 'detailed amendment' defined in NPPF paragraph 136 and confirmed by policy SD1. In the absence of guidance on what constitutes a 'detailed amendment' the Forum sought the views of RBC. They advised that an amendment which would release sufficient land to accommodate a small to medium sized site which could make an important contribution to meeting the housing needs of the neighbourhood area would be acceptable."*

Policy TH2 (iii) then allocates a 13.57 hectare site for a mix of uses including residential, and removes this land from the Green Belt.

As this is one of only two examples that we have found of a Neighbourhood Plan removing land from the Green Belt itself, rather than recommending that the Local Plan should do this later, it is worth noting some key points from the Examiner's Report (dated November 2020), as follows:

Paragraph 58 notes that the Local Plan, at paragraph 5.27, explicitly acknowledges *"The scope for the Thorpe Neighbourhood Plan to make further amendments to the Green Belt".*

Paragraph 59 explains that: *"The purpose of this boundary change is to facilitate a residential development, which will contribute to meeting locally identified housing requirements... The additional housing land is a recognition that the housing needs of the village ... are higher than those set out in the local plan. The NPPF explicitly permits neighbourhood plans to be able to plan for a level of housing in excess of the Local Plan housing figures."*

Paragraphs 60 and 61 refer to the evidence prepared to support the Neighbourhood Plan:

- *"a **rigorous site selection process**, which is described in the **Site Selection Report** as well as the **Sustainability Appraisal** which justifies the release of this particular area of Green Belt, over other alternative sites."*
- *"The requirement to demonstrate that the policy threshold of "exceptional circumstances" has been articulated in the submitted **Green Belt Exceptional Circumstances Note**. The package of community benefits, the creation of the country park, providing public access to an area where there is a deficiency of open space, the provision of additional village*

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*car parking, needed for the Village Hall and the Church, the extension to the cemetery, as well as the ability to influence the type of housing being provided so as to meet the village's needs, justifies the scale of land being released."*

- *"I am also satisfied that **the location of the land being taken out of the Green Belt is a logical extension to the village**, being close to village facilities and its development will not undermine the strategic function of the Green Belt in this area."*

We would note that in this case it was the Neighbourhood Plan that set out the exceptional circumstances for the Green Belt change, in contrast to the situation below.

### **Wheatley Neighbourhood Plan/ South Oxfordshire Local Plan**

The South Oxfordshire Local Plan was adopted in December 2020, and the Wheatley Neighbourhood Plan was made in May 2021, so both plans were finalised after the NPPF was amended to enable Neighbourhood Plans to make Green Belt boundary changes.

Policy STRAT6 of the South Oxfordshire Local Plan, relating to Green Belts, includes the following:

*"3. Detailed amendments to the Green Belt made by the Wheatley Neighbourhood Development Plan must be in compliance with the requirements of the NPPF and the need identified within the Local Plan."*

The supporting text to Policy STRAT6 explains that:

*"3.118 Wheatley is the only Larger Village which is inset from the Green Belt where a Neighbourhood Development Plan is being prepared. According to current national planning guidance, a NDP can make detailed amendments to the Green Belt boundary where the Local Planning Authority sets the need. The Council is committed to supporting Wheatley and their ambitions for their Neighbourhood Development Plan. Within two years of the adoption of the Local Plan, the Wheatley Neighbourhood Plan will release land from the Green Belt, to enable the allocation of land for mixed use development."*

*3.119 The inset boundary at Wheatley is drawn tightly around the built edge of development. There are limited opportunities to redevelop existing land within the inset boundary and the removal of Green Belt would enable new development to take place at this village. The Green Belt Study found that the land immediately*

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*adjacent to the eastern built up edge of Wheatley has few essential characteristics of the Green Belt.*

*3.120 The exceptional circumstances for the NDP to release the land at Wheatley are as follows:*

- to support the Neighbourhood Development Plan and to ensure that future allocations can be made through the NDP;*
- Wheatley is a Larger Village and benefits from a number of services and facilities and represents an appropriate location for accommodating additional development; and*
- the location of this land is recognised to be positioned between existing residential development to the west and industrial buildings to the east and has limited essential characteristics of the Green Belt.”*

Therefore, in this case it is the Local Plan that sets out the exceptional circumstances to enable the Neighbourhood Plan to amend the Green Belt boundary.

The Wheatley Neighbourhood Plan then includes the following policy:

*“POLICY GBBA1: Green Belt Boundary Amendments*

*Detailed amendments to the Green Belt boundary are made to accommodate allocations at WHE15, WHE16 and WHE17. The boundary of the amended Green Belt is identified on Figure 10.3.”*

It is worth noting that an earlier draft of the Wheatley Neighbourhood Plan went to examination proposing Green Belt amendments before the policy hook in the Local Plan was adopted. The Examiner reported in February 2020, and deleted all the Neighbourhood Plan policies which proposed to amend the Green Belt. The Examiner’s rationale for doing so is below:

*“7.77 ... establishing the need for the release of three sites from the Green Belt is a strategic matter rather than ‘detailed amendments.*

*7.78 The submitted Plan has sought to align itself in both timing and context to the approach taken to the release of land from the Green Belt in the emerging Local Plan. This relates both to the principles set out in Planning Practice Guidance where a neighbourhood plan and a local plan are emerging at the same time and to a common sense approach that would avoid the emerging neighbourhood*

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*plan either to be delayed or to be reviewed/updated after the eventual adoption of the emerging Local Plan.*

*7.79 Nevertheless the delay in the production of the South Oxfordshire Local Plan ... has had a very significant effect on the approach taken in the Plan. Two fundamental issues arise. The first is that there is no certainty of the eventual outcome of that Plan. The neighbourhood plan may seek to allocate sites which are not eventually released from the Green Belt. The second is that there is no clarity on the timetable for the adoption of the emerging Local Plan. In the event that the sites proposed to be allocated for development in the neighbourhood plan are eventually released from the Green Belt there would be an unhealthy stand off period before the second part of the neighbourhood plan policy took effect. This would not provide the clarity required by the NPPF. Equally it would provide no certainty for landowners and potential developers.*

*7.80 ...*

*7.81 In all the circumstances I recommend that the policy is deleted. In effect the ambitious intentions of the neighbourhood plan have been overtaken by events. As such given the current context proposals to make detailed amendments to the Green Belt boundary in Wheatley do not meet the basic conditions. I acknowledge that this outcome will be a disappointment for the Parish Council. Nevertheless, some or all of the work undertaken on the proposed allocations could be consolidated and updated within a review of any made NP once the emerging Local Plan has been adopted. This approach would also assist in the delivery of the broader Village Enhancement Plan. Plainly this will be a matter for a separate examination at that time.”*

After the Local Plan was adopted, the Neighbourhood Plan was re-examined, in August 2023, and this time the Examiner accepted the Neighbourhood Plan’s proposed Green Belt amendments.

The Examiner considered the evidence provided as follows:

Paragraph 7.62 refers to an “**Environment Report**”, which “**looked in detail at reasonable alternatives** which could have been pursued for new development in the neighbourhood area ... underpinned by the earlier site assessment work undertaken by WPC ... informed by the SHLAA and the SHELAA ... reviewed local sites and compiled a comprehensive list of sites related to the neighbourhood area...”

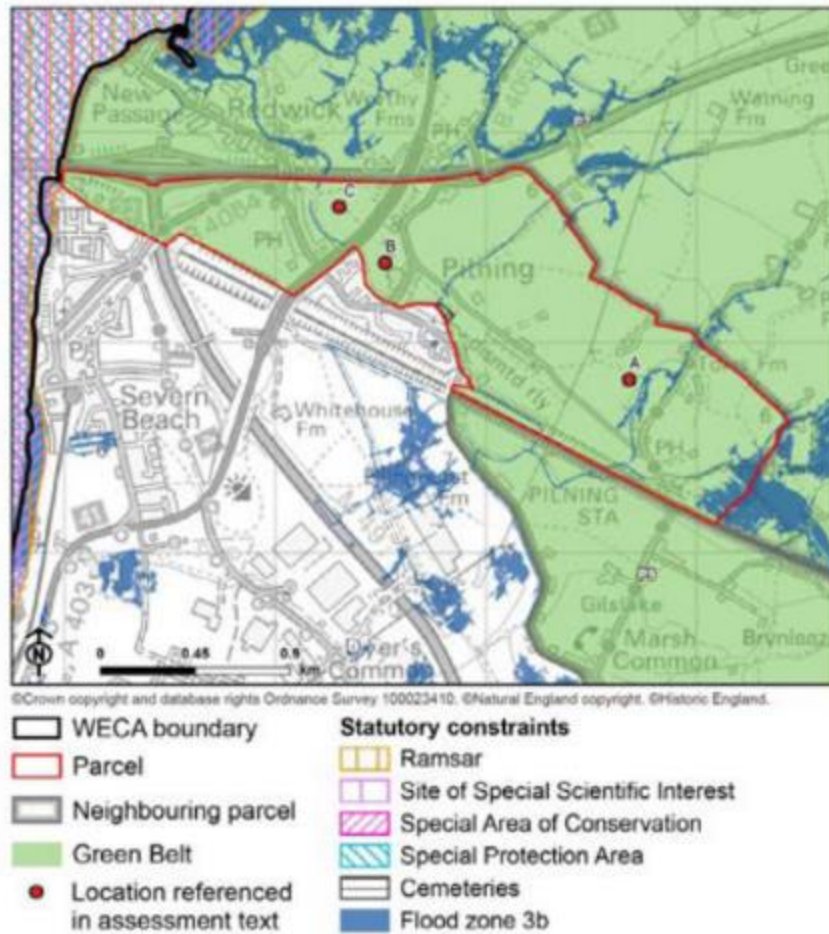
The Examiner then noted that “*The ER identifies two reasonable alternatives for new development...*”

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## **Appendix B: Extract from WECA Strategic Green Belt Assessment relating to parcel P8**



## Parcel P8



The parcel is located to the north and east of Pilning, consisting predominantly of agricultural fields. There is an area of lower openness to the west due to residential development associated with the settlement on Redwick Road, however, it does not significantly affect the openness of the parcel on a strategic scale. The parcel is bordered by the M4 motorway to the north, and is crossed by the A403 Severn Road from north to south.

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## Strategic contribution to the Green Belt purposes

### Purpose 1 – Checking the unrestricted sprawl of large built-up areas

#### Significant contribution

Land is adjacent to Pilning which is contiguous with Bristol, so development in this parcel would constitute expansion of the large built-up area. Some land within the parcel has, through a combination of boundary features, strong physical and visual distinction from the urban edge, which means that it makes a significant contribution to Purpose 1.

### Purpose 2 – Preventing neighbouring towns from merging into one another

#### Moderate contribution

The parcel is peripheral to the gap between the town of Thornbury and the Bristol urban area. Although the gap between Thornbury and the Bristol urban area is relatively wide, it is compromised by the A38, which is a connecting feature, and intervening urbanising development at Alveston, Rudgeway and Almondsbury. Some of the land within the parcel has strong distinction from the inset urban area of Pilning, which increases its contribution to settlement separation.

### Purpose 3 – Assisting in safeguarding the countryside from encroachment

#### Significant contribution

The parcel generally has rural uses, and includes land which has strong distinction from Pilning, where development would therefore be considered a significant encroachment on the countryside.

### Purpose 4 – Preserving the setting and special character of historic towns

#### Weak / no contribution

The parcel is isolated from the historic core of Bristol, and is not prominent in the context of any principal routes into the city.

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## **Purpose 5 – Assisting in urban regeneration, by encouraging the recycling of derelict and other urban land**

### **Significant contribution**

All Green Belt land is considered to make a significant contribution to this purpose.

### **Key considerations with regard to potential harm to Green Belt purposes from substantial release of land**

The prevention of sprawl of a large built-up area (Purpose 1) and encroachment on the countryside (Purpose 3) are likely to be the most significant considerations when determining the potential harm of release of land for development within this parcel. Land to the north of Bank Road (map point A), within the north eastern area of the parcel, has strong distinction from Pilning, and there are no alternative boundary features that would not represent a weakening of the Green Belt edge. However, the area contained between Pilning, Bank Road, the B4055 and the A403 to the north of Pilning (map point B), has some urbanising development which would limit harm if land in that area were released, even though a mature, well-treed hedgerow creates relatively strong separation from the inset settlement.

To the west of the A403 (map point C), although there is strong distinction from existing inset development, the northern part of Pilning has diminished openness and some urbanising influence on adjacent land. In addition, harm to the wider Green Belt to the north would be negligible because of the strong boundary formed by the M4.

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## **Appendix C: Figures 4.4 and 4.5 from AECOM's Site Options and Assessment**

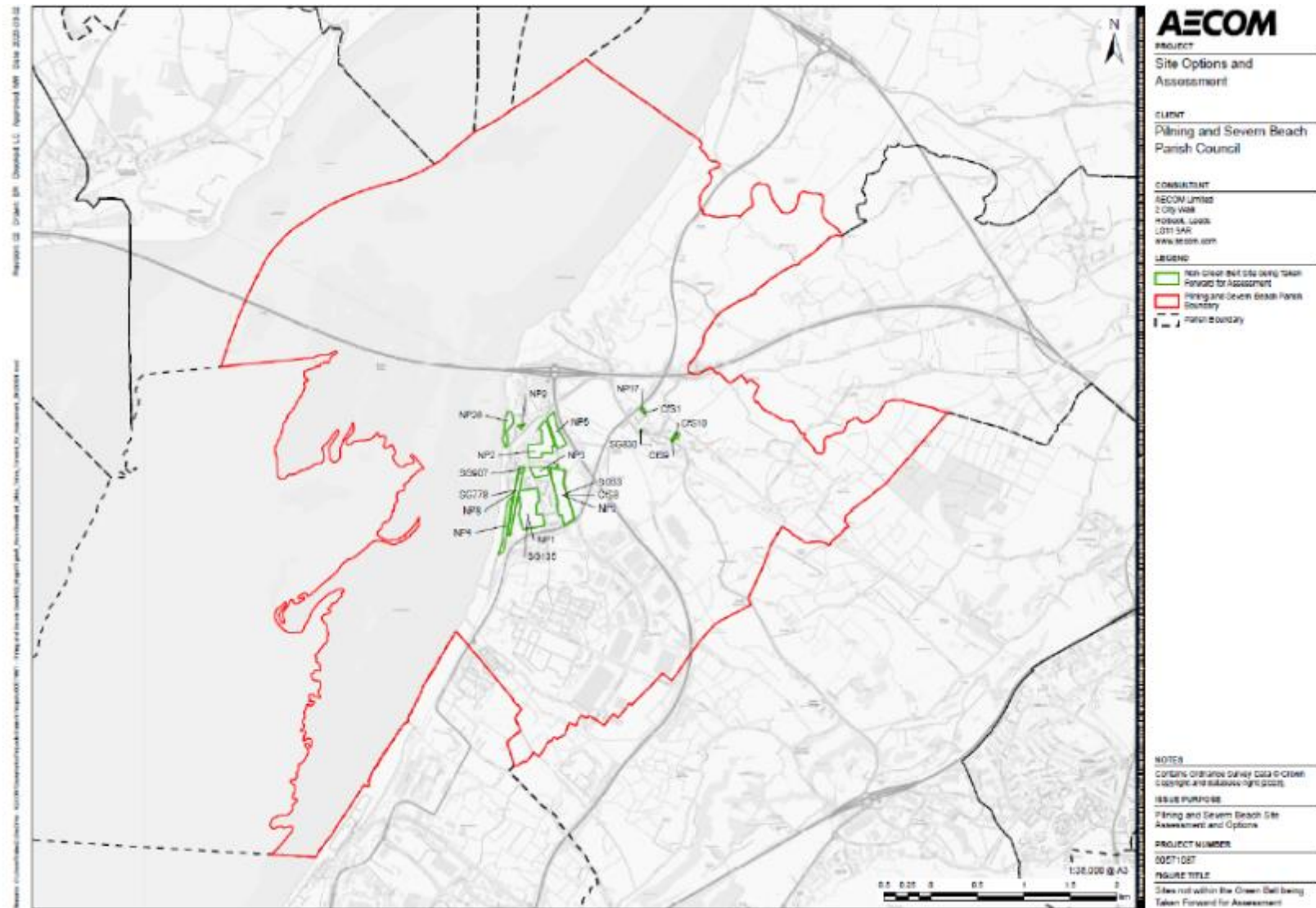


Figure 4.4 Map of non-Green Belt sites taken for assessment (source: PSBPC/SGC/AECOM)

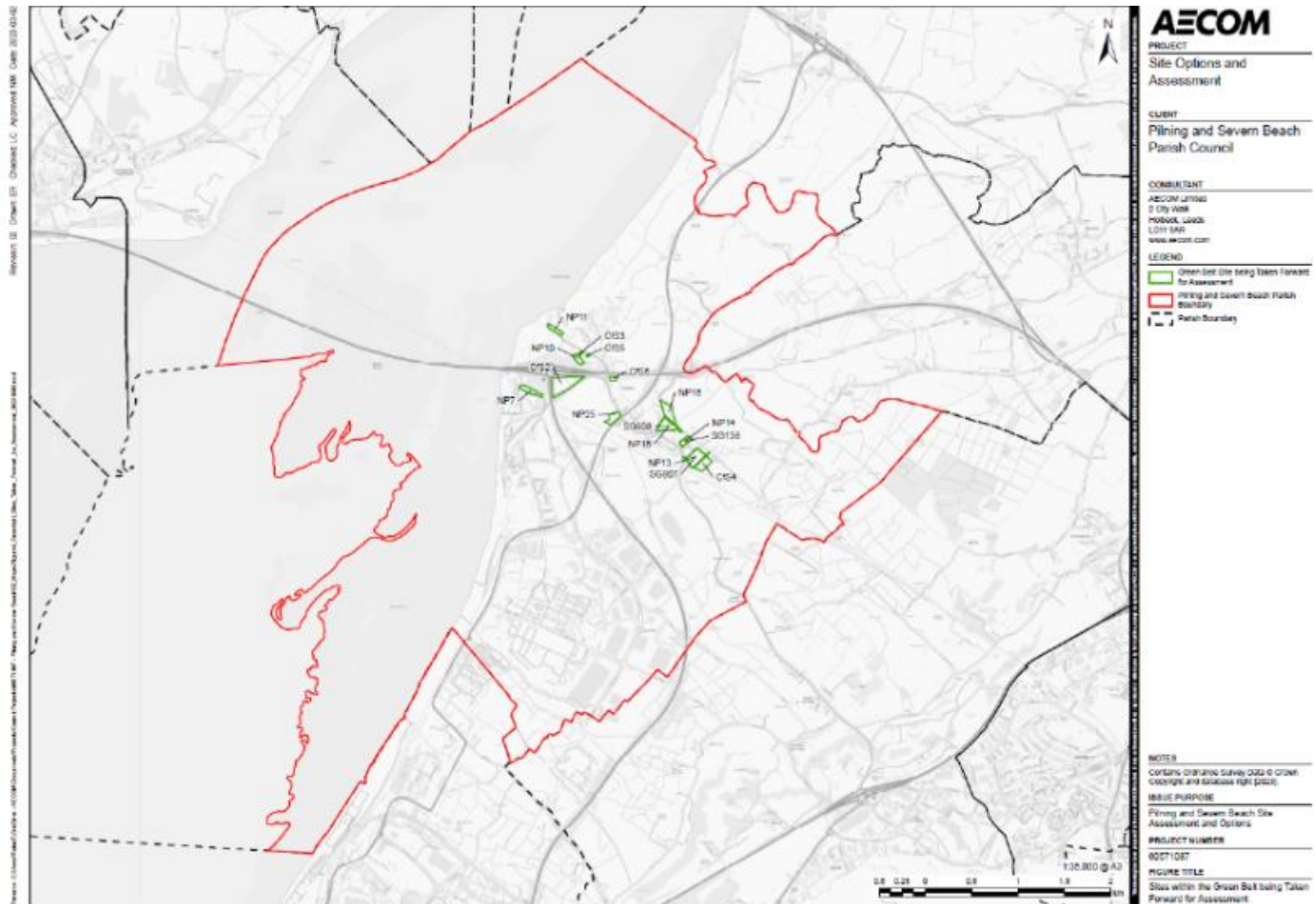




Figure 4.5 Map of Green Belt sites taken forward for assessment (source: PSBPC/SGC/AECOM)



## Appendix D: Green Belt Site Assessment

<b>CfS4: Land on south side of Bank Road, Pilning</b>		
Site area (hectares) <sup>16</sup>	2.00	
<b>Assessment of Potential Harm against Green Belt Purposes</b>		 <p>Aerial view of site (Source: AECOM)</p>  <p>View of site from access in N corner</p>
<b>Purpose</b>	<b>Potential Harm</b>	
1: to check the unrestricted sprawl of large built-up areas	Moderate/ Major	
2: to prevent neighbouring towns merging into one another	Moderate/ Major	
3: to assist in safeguarding the countryside from encroachment	Major	
4: to preserve the setting and special character of historic towns	Minor	
5: to assist in urban regeneration, by encouraging the recycling of derelict & other urban land	Major	

<sup>16</sup> From Site Options and Assessment, AECOM, May 2023

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## Commentary re Potential Green Belt Harm

### Purpose 1

The site is near to Pilning, and therefore near to the *“large built-up area”* defined in paragraph 4.34. However, harm is considered to be less than *“major”* as the site is contained to the north and south by the railway line and development along Bank Road. Equally, the harm is considered to be greater than *“moderate”* because the site’s eastern boundary is relatively weak. Therefore, the harm to purpose 1 is considered to be **Moderate/Major**.

### Purpose 2

Harm to purpose 2 depends partly on the size of the gap between settlements. The gap between the east of Pilning and Bristol is narrow, relative to the gap between the north of Pilning and Thornbury. The gap to the east therefore contributes to Green Belt purpose 2 to a greater extent, and a reduction in that gap results in a greater level of harm. However, the harm resulting from the development of this parcel is reduced slightly as a result of development to the north, which stretches eastwards along Bank Road, slightly beyond the eastern boundary of this site, as well as by the railway line to the south. Therefore, the harm to purpose 2 is considered to be **Moderate/Major**.

### Purpose 3

This site is in equestrian use, divided into paddocks, and therefore has a countryside character. It is also on the edge of Pilning, with open countryside to its east. Therefore, the harm to purpose 3 would be **Major**.

### Purpose 4

The redevelopment of any of the proposed sites would have an equal, minor, impact on any of the historic towns set out in paragraph 4.33. Therefore, the harm to purpose 4 is considered to be **Minor**.

### Purpose 5

This site is greenfield, so its development would not *“assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”* Therefore, the harm to purpose 4 is considered to be **Major**.

### Other Considerations

- Access to the Site needs further consideration.  
The Site could potentially be accessed via the village playing field access, if SG807/NP13 was also redeveloped, or via the access to the west of the Indian Orthodox Church on Bank Road.  
However, the existing playing field access is via a narrow bridge across the Pill that would require third party land to widen, and the junction of the access with Cross Hands Road is acute, so the Highways Authority may require improvements/ alterations.

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The access towards Bank Road is narrow, and would require access to third party land (i.e. the Indian Orthodox Church) to widen, as well as the relocation of an existing electricity substation and a sewage pumping station to widen.

On this basis, a highways assessment will be needed in order to be certain that any potential allocation of this site meets the basic conditions against which an Examiner would assess the Neighbourhood Plan.



- This site is identified on Natural England's Priority Habitat Inventory, as *"Coastal and Floodplain Grazing Marsh (England)"*. Natural England's *"User Guide for Natural England's Priority Habitats' Inventory Version 3.0"* (November 2022), explains that: *"Natural England's Priority Habitats' Inventory (PHI) is a spatial dataset that describes the geographic location and extent of 25 priority habitats in England. It maps most of the terrestrial semi-natural habitat types that were identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP)."*

*The original list of UK BAP priority habitats was created between 1995 and 1999. In 2007 a revised list was produced following a 2-year review of UK BAP processes and priorities. The selection of UK habitats for the priority list followed consideration by expert working groups against a set of criteria, based on international obligations, risk, and the importance for key species.*

*All BAP Priority Habitats occurring in England are identified as habitats of principal importance for the conservation of biodiversity under section 41 of The Natural Environment and Rural Communities (NERC) Act."*

On this basis, an ecological assessment of the site will be needed in order to be certain that any potential allocation of this site meets the basic conditions against which an Examiner would assess the Neighbourhood Plan.



NP16: Land at west end of Bank Road, north side		
Site area (hectares) <sup>17</sup>	1.98	
Assessment of Potential Harm against Green Belt Purposes		 <p>Aerial view of site (Source: AECOM)</p>  <p>View of site from Bank Road</p>
Purpose	Potential Harm	
1: to check the unrestricted sprawl of large built-up areas	Major	
2: to prevent neighbouring towns merging into one another	Moderate	
3: to assist in safeguarding the countryside from encroachment	Moderate	
4: to preserve the setting and special character of historic towns	Minor	
5: to assist in urban regeneration, by encouraging the recycling of derelict & other urban land	Moderate	

<sup>17</sup> From Site Options and Assessment, AECOM, May 2023

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## Commentary re Potential Green Belt Harm

### Purpose 1

The site is near to Pilning, and therefore near to the *“large built-up area”* defined in paragraph 4.34. The site is located on the northern side of Bank Road, and Bank Road forms a strong boundary between the more open land to its north and the more urban land to its south. Furthermore, the site’s northern boundary is weak, with open land to its north. Therefore, the harm to purpose 1 is considered to be **Major**.

### Purpose 2

Harm to purpose 2 depends partly on the size of the gap between settlements. The gap between the north of Pilning and Thornbury is less narrow than the gap between the east of Pilning and Bristol. The gap to the north therefore contributes to Green Belt purpose 2 to a lesser extent, and the harm to this Green Belt purpose resulting from development reduces accordingly. However, as the site is to the north of Bank Road, which forms a strong boundary between the more open land to its north and the more urban land to its south, the harm to purpose 2 is considered to be **Moderate**.

### Purpose 3

The various planning permissions on this site for gypsy and traveller accommodation diminish the site’s countryside character. Nevertheless, the parts of the site without planning permission still have a countryside character, and the site borders open countryside. Therefore, the harm to purpose 3 is considered to be **Moderate**.

### Purpose 4

The redevelopment of any of the proposed sites would have an equal, minor, impact on any of the historic towns set out in paragraph 4.34. Therefore, the harm to purpose 4 is considered to be **Minor**.



### Purpose 5

The parts of this site that have been redeveloped to provide gypsy and traveller accommodation can be considered to be previously developed land, so the redevelopment of these parts of the site would *“assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”* The remaining parts of the site are greenfield, so the redevelopment of these parts would not help to meet this purpose. Therefore, the harm to purpose 5 is considered to be **Moderate**.

### Other Considerations

- This site has planning permission for a number of gypsy and traveller sites. South Gloucestershire Core Strategy Policy CS21, and its supporting text, explain that there is a need for additional gypsy and traveller sites, so the loss of these sites is unlikely to be supported by South Gloucestershire Council.

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- Most of this site is identified on Natural England's Priority Habitat Inventory, as *"Coastal and Floodplain Grazing Marsh (England)"*. Natural England's *"User Guide for Natural England's Priority Habitats' Inventory Version 3.0"* (November 2022), explains that: *"Natural England's Priority Habitats' Inventory (PHI) is a spatial dataset that describes the geographic location and extent of 25 priority habitats in England. It maps most of the terrestrial semi-natural habitat types that were identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP). The original list of UK BAP priority habitats was created between 1995 and 1999. In 2007 a revised list was produced following a 2-year review of UK BAP processes and priorities. The selection of UK habitats for the priority list followed consideration by expert working groups against a set of criteria, based on international obligations, risk, and the importance for key species. All BAP Priority Habitats occurring in England are identified as habitats of principal importance for the conservation of biodiversity under section 41 of The Natural Environment and Rural Communities (NERC) Act."* On this basis, an ecological assessment of the site will be needed in order to be certain that any potential allocation of this site meets the basic conditions against which an Examiner would assess the Neighbourhood Plan.

<b>SG136/NP14: Land on south side at Bank Road west of school, between school and travellers' site</b>		
Site area (hectares) <sup>18</sup>	0.7	
<b>Assessment of Potential Harm against Green Belt Purposes</b>		 <p>Aerial view of site (Source: AECOM)</p>  <p>View of site from access onto Bank Road</p>
Purpose	Potential Harm	
1: to check the unrestricted sprawl of large built-up areas	Minor	
2: to prevent neighbouring towns merging into one another	Minor	
3: to assist in safeguarding the countryside from encroachment	Moderate	
4: to preserve the setting and special character of historic towns	Minor	
5: to assist in urban regeneration, by encouraging the recycling of derelict & other urban land	Moderate/ Major	
<b>Commentary re Potential Green Belt Harm</b>		
<b>Purpose 1</b>		

<sup>18</sup> From Site Options and Assessment, AECOM, May 2023

The site is perceived as being within Pilning, and therefore within the “*large built-up area*” defined in paragraph 4.34. The site is located on the southern side of Bank Road, and Bank Road forms a strong boundary between the more open land to its north and the more urban land to its south. The strength of this boundary is improved by the heavily vegetated northern boundary to the site. Therefore, the harm to purpose 1 is considered to be **Minor**.

#### **Purpose 2**

Harm to purpose 2 depends partly on the size of the gap between settlements. The gap between the north of Pilning and Thornbury is less narrow than the gap between the east of Pilning and Bristol. The gap to the north therefore contributes to Green Belt purpose 2 to a lesser extent, and the harm to this Green Belt purpose resulting from development reduces accordingly. Furthermore, the site is to the south of Bank Road, which forms a strong boundary between the more open land to its north and the more urban land to its south. Therefore, the harm to purpose 2 is considered to be **Minor**.

#### **Purpose 3**

This site is greenfield, with a countryside character. However, it is bordered on three sides by urban development, which diminishes that countryside character. Therefore, the harm to purpose 3 is considered to be **Moderate**.

#### **Purpose 4**

The redevelopment of any of the proposed sites would have an equal, minor, impact on any of the historic towns set out in paragraph 4.34. Therefore, the harm to purpose 4 is considered to be **Minor**.

#### **Purpose 5**

This site is greenfield, so its development would not encourage the recycling of derelict land, but the site is an infill plot within urban land, so the harm to this purpose is lower than “*major*” as a result. Therefore, the harm is considered to be **Moderate/Major**.

#### **Other Considerations**

- Visibility from the site’s existing access is poor towards the east, so a future access is likely to need to be further east, towards the centre of the site’s frontage. This is then likely to require the relocation of a telegraph pole. This should not be prohibitive to the site’s redevelopment, but you would need to investigate this in order to be sure that the site is deliverable and to convince a Neighbourhood Plan Examiner that the allocation of this site meets the basic conditions.
- This site is identified on Natural England’s Priority Habitat Inventory, as “*Coastal and Floodplain Grazing Marsh (England)*”. Natural England’s “*User Guide for Natural England’s Priority Habitats’ Inventory Version 3.0*” (November 2022), explains that: “*Natural England’s Priority Habitats’ Inventory (PHI) is a spatial dataset that describes the geographic location and extent of 25 priority habitats in England.*”



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*It maps most of the terrestrial semi-natural habitat types that were identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP).*

*The original list of UK BAP priority habitats was created between 1995 and 1999. In 2007 a revised list was produced following a 2-year review of UK BAP processes and priorities. The selection of UK habitats for the priority list followed consideration by expert working groups against a set of criteria, based on international obligations, risk, and the importance for key species.*

*All BAP Priority Habitats occurring in England are identified as habitats of principal importance for the conservation of biodiversity under section 41 of The Natural Environment and Rural Communities (NERC) Act.”*

On this basis, an ecological assessment of the site will be needed in order to be certain that any potential allocation of this site meets the basic conditions against which an Examiner would assess the Neighbourhood Plan.

SG807/NP13: Pilning Village Hall and playing field		
Site area (hectares) <sup>19</sup>	2.30	
Assessment of Potential Harm against Green Belt Purposes		 <p>Aerial view of site (Source: AECOM)</p>  <p>View of site from NE corner</p>
Purpose	Potential Harm	
1: to check the unrestricted sprawl of large built-up areas	Moderate	
2: to prevent neighbouring towns merging into one another	Moderate	
3: to assist in safeguarding the countryside from encroachment	Moderate	
4: to preserve the setting and special character of historic towns	Minor	
5: to assist in urban regeneration, by encouraging the recycling of derelict & other urban land	Moderate/ Major	
Commentary re Potential Green Belt Harm		
Purpose 1		

<sup>19</sup> From Site Options and Assessment, AECOM, May 2023



The site adjoins Pilning, and therefore adjoins the “*large built-up area*” defined in paragraph 4.34. The site is contained to the north and south by the railway line and development along Bank Road, and the site’s eastern boundary is relatively strong. Therefore, the harm to purpose 1 is considered to be **Moderate**.

#### **Purpose 2**

Harm to purpose 2 depends partly on the size of the gap between settlements. The gap between the east of Pilning and Bristol is narrow, relative to the gap between the north of Pilning and Thornbury. The gap to the east therefore contributes to Green Belt purpose 2 to a greater extent, and a reduction in that gap results in a greater level of harm. However, the harm resulting from the development of this parcel is reduced by development stretching eastwards along Bank Road, some distance beyond the eastern boundary of this site. Therefore, the harm to purpose 2 is considered to be **Moderate**.

#### **Purpose 3**

This site is in use as playing fields, with a village hall in the site’s south eastern corner, and hardstand parking along the site’s southern boundary. Playing fields are an urban land use, although their greenness provides them with a semi-countryside character. Therefore, the harm to purpose 3 is considered to be **Moderate**.

#### **Purpose 4**

The redevelopment of any of the proposed sites would have an equal, minor, impact on any of the historic towns set out in paragraph 4.34. Therefore, the harm to purpose 4 is considered to be **Minor**.

#### **Purpose 5**

Recreation grounds are explicitly omitted from the definition of previously developed land by the NPPF, so this site is greenfield, and its development would not encourage the recycling of derelict land. However, despite the nuances of the NPPF, the site has been developed for an urban use, so the harm to this purpose is lower than “*major*” as a result. Therefore, the harm to purpose 1 is considered to be **Moderate/Major**.

#### **Other Considerations**

- The redevelopment of the playing fields is likely to conflict with South Gloucestershire Policy PSP44. This policy includes a set of three criteria, at least one of which must be met for the redevelopment to be acceptable. If this site is proposed for allocation, it will be necessary to undertake this assessment at the Neighbourhood Plan stage. If not, an Examiner is likely to conclude that the basic conditions are not met.
- The loss of the village hall, without its reprovion elsewhere, is likely to conflict with South Gloucestershire Core Strategy Policy CS22.
- It is unclear how this site would be accessed.



The site could potentially be accessed via the existing access onto Cross Hands Road, or via the access to the west of the Indian Orthodox Church on Bank Road.

However, the existing access is via a narrow bridge across the Pill that would require third party land to widen, and the junction of the access with Cross Hands Road is acute, so the Highways Authority are likely to require improvements/ alterations.

The access towards Bank Road is narrow, and would require access to third party land (i.e. the Indian Orthodox Church) and the relocation of an existing electricity substation and a sewage pumping station to widen. This access also appears to be within the control of the owners of Cfs4, although this would need to be confirmed.





On this basis, a highways assessment will be needed in order to be certain that any potential allocation of this site meets the basic conditions against which an Examiner would assess the Neighbourhood Plan.

- This site is identified on Natural England's Priority Habitat Inventory, as *"Coastal and Floodplain Grazing Marsh (England)"*. Natural England's *"User Guide for Natural England's Priority Habitats' Inventory Version 3.0"* (November 2022), explains that: *"Natural England's Priority Habitats' Inventory (PHI) is a spatial dataset that describes the geographic location and extent of 25 priority habitats in England. It maps most of the terrestrial semi-natural habitat types that were identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP)."*

*The original list of UK BAP priority habitats was created between 1995 and 1999. In 2007 a revised list was produced following a 2-year review of UK BAP processes and priorities. The selection of UK habitats for the priority list followed consideration by expert working groups against a set of criteria, based on international obligations, risk, and the importance for key species*

*All BAP Priority Habitats occurring in England are identified as habitats of principal importance for the conservation of biodiversity under section 41 of The Natural Environment and Rural Communities (NERC) Act."*

On this basis, an ecological assessment of the site will be needed in order to be certain that any potential allocation of this site meets the basic conditions against which an Examiner would assess the Neighbourhood Plan.

SG808/NP15: Pilning end of Northwick Road incl Surgery & Telecom, old rail line and traveller site on Bank Road and allotments		
Site area (hectares) <sup>20</sup>	1.4	
Assessment of Potential Harm against Green Belt Purposes		<div></div> <div><p>Eastern paddock</p></div> <div><p>Telephone exchange</p></div> <div><p>Pharmacy and Doctor's Surgery</p></div>
Purpose	Potential Harm	
1: to check the unrestricted sprawl of large built-up areas	Minor	
2: to prevent neighbouring towns merging into one another	Minor	
3: to assist in safeguarding the countryside from encroachment	Minor/ Moderate	
4: to preserve the setting and special character of historic towns	Minor	
5: to assist in urban regeneration, by encouraging the recycling of derelict & other urban land	Moderate	
Commentary re Potential Green Belt Harm		
Purpose 1		

<sup>20</sup> From Site Options and Assessment, AECOM, May 2023

The site is perceived as being within Pilning, and therefore within the “*large built-up area*” defined in paragraph 4.34. The south western quadrant of the site already includes development that is “inappropriate” in a Green Belt context, so the openness of this part of the site is compromised. A stretch of land along the site’s northern edge gained planning permission for use as a gypsy and traveller site (ref P23/00117/F) and, as gypsy and traveller sites are generally considered to be inappropriate in the Green Belt, this further urbanises and reduces the openness of the site. The allotments are likely to be considered to comply with paragraph 150 e) of the NPPF, and so are not likely to be “inappropriate”, but this land is nevertheless previously developed as a result of it including the former railway line to New Passage. The greenfield parts of the site are well contained, particularly by Bank Road (and the gypsy and traveller site), which forms a strong boundary between the more open land to its north and the more urban land to its south. The strength of this boundary is improved by the heavily vegetated northern boundary to the site. Therefore, the harm to purpose 1 is considered to be **Minor**.

#### **Purpose 2**

Harm to purpose 2 depends partly on the size of the gap between settlements. The gap between the north of Pilning and Thornbury is less narrow than the gap between the east of Pilning and Bristol. The gap to the north therefore contributes to Green Belt purpose 2 to a lesser extent, and the harm to this Green Belt purpose resulting from development reduces accordingly. Furthermore, the site is to the south of Bank Road, which forms a strong boundary between the more open land to its north and the more urban land to its south. Therefore, the harm to purpose 2 is considered to be **Minor**.

#### **Purpose 3**

The south western corner of this site has an urban character, which will continue to be the case if the site is redeveloped. The harm to this Green Belt purpose resulting from the development of this part of the site would therefore be “*minor*”. The planning permission for the gypsy and traveller site in the north western corner also has an urbanising effect. The eastern part of the site is greenfield, with a more countryside character, but as this part is bordered on three sides by urban development, the harm resulting from the development of this part of the site is “*moderate*”. Therefore, the harm to purpose 3 is considered to be **Minor/Moderate**.

#### **Purpose 4**

The redevelopment of any of the proposed sites would have an equal, minor, impact on any of the historic towns set out in paragraph 4.34. Therefore, the harm to purpose 4 is considered to be **Minor**.

#### **Purpose 5**

The parts of this site that are developed with the telephone exchange or the surgery/pharmacy and the car parking, or the land with planning permission for gypsy and traveller accommodation, along with the former railway line alignment, can be considered to be previously developed land, so the redevelopment of any of these parts of the site would recycle derelict or other urban land to a greater

or lesser extent. The remaining parts of the site are greenfield, so the redevelopment of these parts would not help to meet this purpose. Therefore, the harm to purpose 5 is considered to be **Moderate**.

### Other Considerations

- The redevelopment of this site is complicated by the existing land uses.  
The Neighbourhood Planning Group understand that, although the telephone exchange is still in use, it will no longer be required beyond 2030. The redevelopment of the apparently vacant building to the south of the telephone exchange may be possible sooner. Openreach would need to confirm.  
The existing allotment is protected by Core Policy CS9, as is likely to be protected under Section 8 of the Allotments Act 1925. Any proposed redevelopment of this part of the site would require alternative provision, as a minimum, and may require the approval of the Secretary of State.  
Although we understand that there is no plan to redevelop the doctors' surgery and pharmacy, it is worth noting that its redevelopment, without its reprovision elsewhere, is likely to conflict with South Gloucestershire Core Strategy Policy CS22.  
If the redevelopment of any land east of the existing gate was considered, including the greenfield part of the site, then you would need to be sure that the site could be adequately accessed – the existing access driveway is relatively narrow. This is likely to affect the doctors' surgery and pharmacy, even if this part of the site is not proposed for redevelopment.
- The undeveloped part of this site is identified on Natural England's Priority Habitat Inventory, as *"Coastal and Floodplain Grazing Marsh (England)"*. Natural England's *"User Guide for Natural England's Priority Habitats' Inventory Version 3.0"* (November 2022), explains that: *"Natural England's Priority Habitats' Inventory (PHI) is a spatial dataset that describes the geographic location and extent of 25 priority habitats in England. It maps most of the terrestrial semi-natural habitat types that were identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP)."*  
*The original list of UK BAP priority habitats was created between 1995 and 1999. In 2007 a revised list was produced following a 2-year review of UK BAP processes and priorities. The selection of UK habitats for the priority list followed consideration by expert working groups against a set of criteria, based on international obligations, risk, and the importance for key species.*  
*All BAP Priority Habitats occurring in England are identified as habitats of principal importance for the conservation of biodiversity under section 41 of The Natural Environment and Rural Communities (NERC) Act."*  
On this basis, an ecological assessment of the site will be needed in order to be certain that any potential allocation of this site meets the basic conditions against which an Examiner would assess the Neighbourhood Plan.

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## **Appendix E: Exceptional Circumstances Case (prepared by Neighbourhood Plan Steering Group)**