

**Pilning & Severn Beach Neighbourhood Plan
STATEMENT OF COMMON GROUND**

between

**Pilning & Severn Beach Neighbourhood Plan Steering Group
South Gloucestershire Council**

Draft 29 August 2025

1. Introduction and background

- 1.1 This Statement of Common Ground (SoCG) covering approaches to the adjustment to the Green Belt boundary in Pilning has been prepared during the development of the Pilning & Severn Beach Neighbourhood Plan (P&SBNP) and has been signed by Pilning & Severn Beach Neighbourhood Plan Steering Group (P&SBNPSG) and South Gloucestershire Council (SGC), referred to hereafter as ‘the parties’.
- 1.2 The purpose of the SoCG is to set out as at August 2025, areas of agreement between the parties in respect of how Green Belt boundary in Pilning has been addressed through the preparation of the P&SBNP and the new SGC Local Plan.
- 1.3 The agreed SoCG is intended to support the progress of the P&SBNP through the stages of Regulation 14 consultation and independent examination by providing confidence that matters relating to adjustment to the Green Belt boundary have been discussed and agreed between the parties and are accurately reflected in the draft Neighbourhood Development Plan (NDP) and the draft new Local Plan.
- 1.4 P&SBNPSG was established and commenced its work in January 2021.
- 1.5 An independent Housing Needs Assessment was completed by AECOM with their technical support package through Locality in 2021. This identified the need for 246 new dwellings plus 30 to 41 specialist homes for older people in the plan period through to 2035.
- 1.6 This need was supported in surveys of residents and local business undertaken in 2021 and 2022. For reasons of sustainability of the two main settlement areas of Pilning and Severn Beach there is an identified need for new housing in both villages.
- 1.7 Potential sites were identified in ‘Calls for Sites’ undertaken by both SGC and P&SBNPSG. Other potential sites were put forward by P&SBNPSG. These sites have been subject to a filtering process and evaluation of their availability, suitability and deliverability, resulting in a short list of potential sites being put forward in the draft NDP.
- 1.8 Development for new housing within the village of Pilning is physically constrained by the railway line and its cutting for the Severn Tunnel, and by motorways (M4 and M49) and the main road of the A403. The railway line to the south of Pilning provides a solid southern boundary stopping development. The number of potential development sites in Pilning is largely limited to sites on the north side of the village, along the south side of Bank Road, which currently fall into Green Belt.

- 1.9 There has been regular communication between P&SBNPSG and SGC Strategic Planning, through emails and at meetings, with SGC providing guidance and advice in the development of the Neighbourhood Plan.
- 1.10 Issues of Green Belt and flood risk were identified by SGC as significant policy challenges for the Neighbourhood Plan to overcome in a meeting at their offices with P&SBNPSG on 6th July 2023. SGC outlined that for Green Belt, P&SBNPSG must resolve the approach following national policy in the National planning Policy Framework (PPF) and demonstrate the exceptional circumstances that would allow land in Pilning to be removed from the Green Belt for development. Additionally, a 'policy hook' would need to be included in the emerging Local Plan to allow such Green Belt adjustments to be made where identified in Neighbourhood Plans.
- 1.11 The 'Exceptional Circumstances Case' report has been prepared by the Neighbourhood Plan Steering Group and sets out the exceptional circumstances for amending the Green Belt at Pilning specifically. The 'Green Belt Review' report prepared by Vision Planning to inform the NDP, supports WECA's (implied) view that proposed housing sites between Bank Road and The Pill would result in less harm to the purposes of the Green Belt than other sites proposed.
- 1.12 Both the 'Exceptional Circumstances Case' and the 'Green Belt Review' were shared with SGC and discussed at a meeting held on 25th January 2024 along with the inclusion of a 'policy hook' in the emerging Local Plan. The way forward for Green Belt was agreed and SGC completed their own due diligence on the reports prepared by the P&SBNPSG.
- 1.13 In line with the agreements at the meeting 25th January 2024 and the latest NPPF, the NDP has been developed to address making minor adjustments to the local Green Belt boundary. The objectives and policy (ECGB1), are detailed in the Environment, Countryside and Green Belt section (8.7 of the draft NDP).
- 1.14 The Regulation19 publication of the emerging SGC Local Plan has already established that there is a need to alter the Green Belt in order to deliver new homes (e.g. clause 15 in part 1 Strategy Principles of the Policy Wording identifies seven village locations where land should be removed from Green Belt). Additionally, the background report prepared by WECA to inform SGC's Green Belt review has noted that the area of Green Belt at Pilning generally south of Bank Road does not serve the Green Belt purposes well.
- 1.15 Clause 16 in part 1 Strategy Principles of the Policy Wording of the Regulation19 publication of the emerging SGC Local Plan provides the following policy hook: *Communities that seek to deliver homes through neighbourhood plans will be supported and, where sufficient evidence and justification is provided, detailed amendments to the Green Belt will be acceptable in line with National Planning Policy Framework paragraph 145.*
- 1.16 The draft NDP identifies that Green Belt amendments will not take effect until the Neighbourhood Plan is made after successful examination and referendum. Additionally, the amendments and any development cannot commence until the new Local Plan is made. If, when adopted, the SGC Local Plan does not enable this Green

Belt boundary alteration by the included 'policy hook', then the Neighbourhood Plan will be immediately reviewed to determine how any shortfall in housing provision can be met.

2. Governance arrangements

- 2.1 P&SBNPSG is responsible for preparing the Neighbourhood Plan on behalf of the Pilning & Severn Beach Parish Council who will ultimately submit the Neighbourhood Development Plan to SGC for its Regulation 16 examination and public referendum. P&SBNPSG shall ensure that the Neighbourhood Plan represents the views of the Parish, is evidence based, has alignment with the Local Plan and undergoes the appropriate stages of consultation and review.
- 2.3 SGC is responsible for its existing Core Strategy and Policies, Site and Places Plan and preparation of the new Local Plan. SGC has operated in an advisory capacity to P&SBNPSG throughout the development of the Neighbourhood Plan. SGC is a statutory consultee and will formally review the Neighbourhood Plan at Regulation 14 Consultation. SGC will put the Neighbourhood Plan through its Regulation 16 examination and when finalised, through public referendum.

3. National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans can provide for housing and other development in a sustainable manner. It was last amended and re-issued in December 2024. The current content relevant to adjustments of Green Belt addressed in Section 13. Protecting Green Belt land and is as follows:

142. *The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.*
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 assist in safeguarding the countryside from encroachment; d) to preserve the setting and special character of historic towns; and e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*
144. *The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. Any proposals for new Green Belts should be set out in strategic policies, which should: a) demonstrate why normal planning and development management policies would not be adequate; b) set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary; c) show what the consequences of the proposal would be for sustainable development; d) demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining areas; and e) show how the Green Belt would meet the other objectives of the Framework.*
145. *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.
146. *Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.*
147. *Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph and whether the strategy: a) makes as much use as possible of suitable brownfield sites and underutilised land; b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.*
148. *Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.*
149. *When defining Green Belt boundaries, plans should:*
a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;
b) not include land which it is unnecessary to keep permanently open;
c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;
e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.
150. *If it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.*

151. *Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. Where Green Belt land is released for development through plan preparation or review, the 'Golden Rules' in paragraph 156 below should apply.*
152. *The National Forest and Community Forests offer valuable opportunities for improving the environment around towns and cities, by upgrading the landscape and providing for recreation and wildlife. The National Forest Strategy and an approved Community Forest Plan may be a material consideration in preparing development plans and in deciding planning applications. Any development proposals within the National Forest and Community Forests in the Green Belt should be subject to the normal policies for controlling development in Green Belts.*

Proposals affecting the Green Belt

153. *When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness⁵⁵. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.*
154. *Development in the Green Belt is inappropriate unless one of the following exceptions applies:*
- a) buildings for agriculture and forestry;*
 - b) the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;*
 - c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
 - d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
 - e) limited infilling in villages;*
 - f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and*
 - g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.*
 - h) Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:*
 - i. mineral extraction; engineering operations;*
 - ii. local transport infrastructure which can demonstrate a requirement for a Green Belt location;*
 - iii. the re-use of buildings provided that the buildings are of permanent and substantial construction; v. material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and*
 - iv. development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.*

155. *The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:*
 - a. *The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
 - b. *There is a demonstrable unmet need for the type of development proposed⁵⁶;*
 - c. *The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework⁵⁷; and*
 - d. *Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.*
156. *Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review⁵⁸, or on sites in the Green Belt subject to a planning application⁵⁹, the following contributions (‘Golden Rules’) should be made:*
 - a. *affordable housing which reflects either:*
 - (i) *development plan policies produced in accordance with paragraphs 67-68 of this Framework; or*
 - (ii) *until such policies are in place, the policy set out in paragraph 157 below;*
 - b. *necessary improvements to local or national infrastructure; and*
 - c. *the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.*
157. *Before development plan policies for affordable housing are updated in line with paragraphs 67-68 of this Framework, the affordable housing contribution required to satisfy the Golden Rules is 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%⁶⁰. In the absence of a pre-existing requirement for affordable housing, a 50% affordable housing contribution should apply by default. The use of site-specific viability assessment for land within or released from the Green Belt should be subject to the approach set out in national planning practice guidance on viability.*
158. *A development which complies with the Golden Rules should be given significant weight in favour of the grant of permission.*
159. *The improvements to green spaces required as part of the Golden Rules should contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan. Where no locally specific standards exist, development proposals should meet national standards relevant to the development (these include Natural England standards on accessible green space and urban greening factor and Green Flag criteria). Where land has been identified as having particular potential for habitat creation or nature recovery within Local Nature Recovery Strategies, proposals should contribute towards these outcomes.*
160. *When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.*

The recent introduction to the NPPF of the concept of ‘Grey Belt’ is noted by the P&SBNPSG. SGC Planning Officers have indicated that the land identified in the NDP for Green Belt amendments to allow development, could now largely be considered as Grey Belt. However, as the NDP and supporting Green Belt documents were already prepared, the potential application of the case for Grey Belt consideration has not been made in the NDP.

4. Key strategic matters that are agreed

- 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.
- 4.2 An 'Exceptional Circumstances Case' report has been prepared by the Neighbourhood Plan Steering Group and sets out the exceptional circumstances for amending the Green Belt at Pilning specifically. A 'Green Belt Review' report prepared by Vision Planning informs and underpins the content of the draft NDP in relation to Green Belt.
- 4.3 In line with the agreements at the meeting 25th January 2024 and the latest NPPF, the NDP has been developed to address making minor adjustments to the local Green Belt boundary. The objectives and policy (ECGB1), are detailed in the Environment, Countryside and Green Belt section (8.7 of the draft NDP).
- 4.4 Clause 16 in part 1 Strategy Principles of the Policy Wording of the Regulation 19 publication of the emerging SGC Local Plan provides the following policy hook:
Communities that seek to deliver homes through neighbourhood plans will be supported and, where sufficient evidence and justification is provided, detailed amendments to the Green Belt will be acceptable in line with National Planning Policy Framework paragraph 145. This 'policy hook' along with
- 4.4 This 'policy hook' along with the aforementioned content for adjustments to the Green Belt included in the draft version of the NDP for regulation 14 consultation will support the Neighbourhood Plan passing through Regulation 14 consultation and independent examination.
- 4.5 Green Belt amendments will not take effect until the Neighbourhood Plan is made after successful examination and referendum. Additionally, the amendments and any development cannot commence until the new Local Plan is made. If, when adopted, the SGC Local Plan does not enable this Green Belt boundary alteration by the included 'policy hook', then the Neighbourhood Plan if made, will be immediately reviewed to determine how any shortfall in housing provision can be met.

5. Matters that are not agreed

- 5.1 How, the principle of 'Grey Belt' may apply to land identified in the NDP for Green Belt amendments.

6. Signatories

Signed on behalf of South Gloucestershire Council

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Signed on behalf of Pilning & Severn Beach Neighbourhood Plan Steering Group

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Dated

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