

Pucklechurch Parish Council Comments on Neighbourhood Development Plan Regulation 16 Consultation Responses

In response to an invitation to comment, Pucklechurch Parish Council has reviewed responses received during the Regulation 16 Consultation on carried out by South Gloucestershire Council. The Parish Council's response is set out below.

Response ID	Respondent Name	Agent Name	Feedback on the Pucklechurch Neighbourhood Development Plan	Pucklechurch Parish Council Response/Comment
L6S9	John Brooks	n/a	Any development in Pucklechurch should come with overdue improvements to the infrastructure. We have a village that is split into different areas only one pedestrian crossing none for the other two very busy roads which at times is impossible to cross. Please look at the village needs before agreeing to any more housing.	The NDP has been prepared with the explicit objective to identify valued local community infrastructure and environmental assets, to consider the existing need for essential infrastructure and to consider future potential needs in the context of planned strategic development. A core aim of policy PUCKLE 1, PUCKLE 2, PUCKLE 15 and PUCKLE 16 is to identify local priorities for improvement in infrastructure provision.
U8C4	Nigel Sloan	n/a	Section 10 Getting Around, Puckle 15 Active Travel pays lip service to improving cycling routes in general, but does not deliver. Table 8 is almost entirely focussed on providing safe crossing facilities for pedestrians. There is one reference in Table 8 (No. 13) to a desire to complete a mixed-route path to Shortwood Hill, excellent, but with no explanation of the strategic benefits: need to enumerate just where that would enable one to cycle to and why. Para. 205 refers to cycle route "NR17",	If acceptable to the Examiner, Figure 14 has been updated to show <u>existing</u> cycle routes more clearly than on the current map. There are some additional corrections to the route at Shortwood also to reflect a cut-through to the main cycle route/pavement, not previously noted. <u>See attached PDF.</u>

			<p>which I take to mean Regional Route 17 that links the Avon Cycleway with the Wiltshire Cycleway, but there are no proposals to safeguard this important leisure route, let alone improve it.</p>	
B3S0	Andrew Brace	n/a	<p>16 public transport. Since the bus service was stopped between Mangotsfield and Pucklechurch there is no longer an option for non car owners to visit Westerleigh Crematorium. There is no mention of this in the plan</p>	<p>The section on public transport has focused on access from Pucklechurch to nearby centres. It is recognized that Pucklechurch and nearby areas have visitor destinations that people travel to – e.g. Prison and the industrial estate. Westerleigh Crematorium is not located in the parish.</p>
M3I9	Matthew Crovetto on behalf of Avon Fire and Rescue Service	n/a	<p>In the Planning document section 55, you state that Yate fire station is in run by Gloucestershire FRS, this is not the case, that station is run by Avon Fire and Rescue Service, as is Kingswood. Where this plan, supports the overall planning strategy put forward by South Gloucestershire council this year, we welcome detailed and planned growth within the communities that we serve. My single comment is that as our communities grow within South Gloucestershire so should the provision of the Fire and Rescue service. Where this development forms part of the planned 25k housing growth in South Glos, it should also build into those expansions and potentially funding for new fire stations. This should be considered as a whole, not as a parish. We are seeing a growth strategy, of which Pucklechurch is a part, which is moving our</p>	<p>Pucklechurch Parish Council shares these concerns and notes that planning and provision of fire and rescue services lies outside the remit of the NDP.</p> <p>We acknowledge the local provider and are happy to correct the NDP in the appropriate place (para 55).</p>

			<p>communities, beyond our traditional population centres, at speed. In South Glos this is growth beyond the ring road, M4 and M5 into villages and smaller communities such as Pucklechurch. This moves communities further from fire stations, creates an increase in Fire Service demand. I understand that revenue can pay for additional staff within Fire and Rescue Services, however, grant funding for stations is harder to secure at this time. It may not be that Pucklechurch as a single parish in South Glos needs a fire station, but the 25k extra homes being built with the @ 60k additional inhabitants across the South Glos area may create a risk that needs that provision. Our Chief officers are working with al Four Unitary Councils in this regard, however, as part of this consultation at parish level we would be remis in not highlighting a potential gap.</p>	
M9P0	Sally Parish on behalf of National Highways	n/a	<p>Dear Strategic Planning Policy Team, Thank you for providing National Highways with the opportunity to comment on the draft Pucklechurch Neighbourhood Plan – Regulation 16 Consultation. National Highways is responsible for operating, maintaining and improving the strategic road network (SRN) which in this instance consists of the M4 motorway which runs east-west through the Neighbourhood Plan Area. However, the nearest SRN junctions are located at M32 Junction 1 (approximately 5.6km from the Plan area)</p>	<p>The Parish Council notes the comments of National Highways and shares its concern to avoid detrimental impacts from strategic developments in the area on the road network through the parish enroute to M4 motorway junction 18, which passes directly through Pucklechurch Village.</p>

		<p>and M4 Junction 18 (approximately 6.5km from the Plan area). We previously provided comments on the Regulation 14 draft in February 2025.</p> <p>We are interested in the traffic impact of any future development proposal and specifically the impact of growth on the continued safe and efficient operation of the SRN. In respect of traffic and transport, Plan polices should ensure development mitigates its traffic impact on the surrounding network which includes reducing the reliance on the private car by requiring development to both safeguard and improve local facilities, services, and sustainable transport options.</p> <p>Following our review of the submission draft we remain satisfied that the proposed policies within the draft Neighbourhood Plan are unlikely to result in development which will adversely impact the SRN and we therefore have no specific comments to make on the document. This does not however prejudice any future responses National Highways may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the prevailing policy at the time.</p>	
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N3E1	Grace Lewis on behalf of Network Rail	n/a	See separate response provided	The Parish Council notes the comments made by Network Rail. The level crossing referred to does not lie within the parish and NDP policies do not refer to it. Routes shown on Figure 14 of the NDP, which eventually connect to the level crossing, pre-exist the NDP and have been identified by other bodies including South Gloucestershire Council.
U1D5	Tim James and Lauren Ielden on behalf of NHS Bristol, North Somerset & South	n/a	See separate response provided	We note the comments and hope that comments made in detail relating to the closure of local sites were of a general explanatory nature and not presaging future proposals to close local health facilities. The parish council believe that local health provision is an important consideration alongside efficiency and hope that future strategic growth in areas adjacent to Pucklechurch village do not lead to a detrimental reduction in provision in the existing community to facilitate a more strategic provision linked to new settlement further away.
W3Q1	Melanie Lindsley on behalf of The Coal Authority	n/a	See separate response provided	The Parish Council notes the comments of The Coal Authority.
H1M2	Tom Wignall on behalf	Avison Young	See separate response provided	The Parish Council notes the comments of National Gas Transmission.

	of National Gas Transmission			
X3H3	Briony Waterman on behalf of Environment Agency	n/a	See separate response provided	The Parish Council notes the comments (there are no comments) of the Environment Agency.
A4Z3	Sally Wintle on behalf of Natural England	n/a	See separate response provided	The Parish Council notes the comments (there are no comments) of Natural England.
C0S5	Richard Walker on behalf of Lightwood Strategic	Lightwood Strategic	See separate response provided	
O1T7	David Stuart on behalf of Historic England	n/a	Dear Strategic Planning Policy Team Thank you for your Regulation 16 consultation on the submitted version of the Pucklechurch Neighbourhood Development Plan. I can confirm that there are no matters associated with the Plan upon which we wish to comment.	The Parish Council notes the comments (there are no comments) of Historic England.

O0B8	Danny Dixon on behalf of South Gloucessershire Council	n/a	See separate response provided	Noted with thanks
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LIGHTWOOD STRATEGIC	Pucklechurch Parish Council Comments on Response
<p>PUCKLE 1 - Protection of Facilities of importance to the local community</p> <p>Play Area 8</p> <p>PUCKLE 1 is proposed to apply to Shortwood Play Area (Ref 8).</p> <p>The play area is on private land that has been voluntarily leased to the parish council (as noted within Table 4) on a rolling year-by-year basis. This does not constitute its dedication as open access land in perpetuity.</p> <p>Proposals for planning permission for an alternative use on this land should not be subject to PUCKLE 1. The landowner should not be penalised (by the imposition of planning restrictions) for a voluntary leasing arrangement (whether the lease renewed or not prior to an alternative use being proposed). Clearly if the lease is not renewed there would be no facility that would be subject to PUCKLE 1.</p> <p>However, it should not be necessary to end the lease before any application is made for another use.</p> <p>Although the future the this play area will almost certainly be wrapped up in a planning application (now submitted) and play strategy (for a new NEAP and LEAP) in response to emerging Local Plan allocations SS12, it is 'technically conceivable' that a smaller scale standalone application for another use on the play space could be made, subject to the fortunes of</p>	<p>The Parish Council do not see a need to amend PUCKLE 1 in essential respects in response to the comments.</p> <p>Under the current arrangements managed by the Parish Council, the play area has been created to perform a function in meeting play needs in Shortwood and its removal without replacement provision nearby would result in reduced play opportunities.</p> <p>It is important that proposals for new development on land currently in play use, acknowledge the role played by existing sites and, together with ensuring these and new demands from additional population are met, incorporate proposals for play in accordance with local plan policies.</p> <p>The lease status of the site is a secondary matter speaking to the absence of long-term security of the arrangement, but not to the validity of the current use and role of the provision.</p> <p>The Parish Council notes the comments and agrees that Policy PUCKLE 1 contains sufficient mechanisms to allow for the removal of a play area subject to the provision of replacement provision or demonstration that the provision is surplus to requirements.</p>

the current application.

Lightwood considers that the need is for a permanent and improved play space and that this should only be referenced in PUCKLE2 [Requirements for additional Local Community Facilities], and that PUCKLE 1 should not impose a planning hurdle to be overcome.

Without prejudice to need to remove Shortwood Play Area from the PUCKLE 1, Lightwood notes that clause B enables equivalent or enhanced replacement in another suitable location. Although this wording is sound, this is it does not disengage the wrongful identification of the play space at Shortwood for protection in the first place.

PUCKLE 2 - Requirements for additional Local Community Facilities

Clause 5

Clause 5 relates upgrades to play areas and Clause 5a specifically refers to a complete replacement of the play area at 'Shortwood', which essential means the 'Shortwood Play Area' identified in PUCKLE 1. Lightwood's comments under PUCKLE1 set out the background to the Shortwood Play Area.

Taking everything into account Clause 5a of PUCKLE 2 should be focused on securing a permanent play new play area for Shortwood, which it does, but this may not necessarily be where the current play areas is located. PUCKLE 2 should be the only policy where matters concerning the Shortwood and play is referenced, in policy wording

We recommend the inclusion of the words 'in a suitable location' at the end of clause 5(e) to indicate that the upgrade sought could be, but need not be, to the current play area in its current location.

Clause 6

Clause 6 promotes the provision of a new community centre for Shortwood with electric bike hire and safe cycle parking and appropriate sporting and play facilities attached.

To a degree, this is consistent with the emerging Local Plan's policy for Rock House Farm with clause 8 of proposed Local Plan policy LP7 requiring

"new flexible employment space, retail/café/community space and a mobility hub in renovated and or redeveloped farm buildings adjacent the site entrance on Cattybrook Road".

The Infrastructure Delivery Plan for the new Local Plan identifies an

Clause 5e - The Parish Council will accept the inclusion of proposed wording of 'in a suitable location' with reference to the development of a permanent improved play area in Shortwood. This would now read as follows:

e) Shortwood – Requires a complete replacement of play area in a suitable location.

Clause 6 – The Parish Council will accept the removal of the words 'and appropriate sporting' from the wording relating to community centre provision in Shortwood, which would now read as follows:

6)Community Centre in Shortwood - Provision of a new community centre for Shortwood with electric bike hire and safe cycle parking ~~and appropriate sporting and play facilities attached.~~

expected building size of 350sqm and this is reflected in the planning application that has been submitted at Rock House Farm. The submitted planning application also identifies a LEAP next to the community building, with a NEAP further to the north (with both play areas outside the currently leased area of land).

The Carson's Green part of LP7 will also host a larger local centre to serve the planned new neighbourhood, but its location will be just south of the parish boundary.

The requirement for associated sporting facilities, linked to an in-parish community building is not justified given the land take and the Local Plan requirements for a minimum of 280 plots at Rock House Farm. Moreover, South Gloucestershire's strategy for sporting provision the area, as set out in the submitted Local Plan is for developer contributions from LP7 to be used to upgrade existing facilities at Pomphrey Hill (west of the A4174), with any residual land being delivered with southern part of the Carson Green component of LP7, outside the parish. Although these solutions are out of parish planning for sports provision needs to take account for more strategic considerations/catchments

The introductory words to PUCKLE 2 do reference a range of deliver mechanisms (including contributions) for additional facilities, but Clause 5e is couched in terms of physically attached sports facilities to a community building and is less flexible, and counter to the Local Plan that is at examination. There is also no evidence base presented to justify new sports facilities.

The requirements for sporting facilities to be attached to a new community building should be removed from clause 6. Much as for the policies for transport improvements, the Plan should refocus the desire for sports facilities on contributions from qualifying developments

PUCKLE 6 - Good Design and Development Form in Pucklechurch Parish

PUCKLE 6 falls under Section 7 'Good Design and Complementary Development'.

The policy wording itself directs users the Plan to Table 5 (Design Codes) and Table (Densities) which, are also shown in green and therefore judged by Lightwood as being attributed policy or pseudo policy status. There actual status of the codes needs to be clarified before the Plan is Made.

PUCKLE 6

The policy wording itself should include a final phrase at the end of the first paragraph that states that 'Proposed Deviations from an Area Wide or Character Area code will need to be fully justified based on site specific evidence'. At present there is insufficient flexibility afforded for an applicant to deviate (if deemed justified by the LPA) at planning application stage.

More locally, new Local Plan proposes a cookie cutter approach to amend the Green Belt around Shortwood, generating islands of land inset from the Green Belt, with the village, A4174 and part of the Eastern Fringe remaining washed over. Lightwood has issues with the soundness of this cookie cutter approach (versus a mor strategic rationalisation of the boundary), and it remains to be tested at the examination of the Local Plan. It could though be adopted at proposed creatin a new edge to the Green Belt facing the east fringe and A4174!

Proposed Local Plan Green Belt amendments close to Shortwood (

Table 5 provides details of the design codes set out in the AECOM design guidance and codes report.

This is intended to provide a clear link between the plan policy and an important evidence document prepared in support of it.

This approach has been taken following advice from Examiners on other NDPs, about the need to provide a level of information in the plan to support the policies.

It also enables the parish council to have in mind its design codes when commenting on planning applications, and also applicants in shaping their design proposals.

Table 6 on densities provides information (not policy) on the current development densities in the different character areas.

Policy PUCKLE 6 does not demand new development should take place at these densities as this would not be consistent with the objective of ensuring the efficient use of land. More, the information presented is intended to ensure that applicants are aware of the characteristic of adjacent areas of existing development before they formulate their proposals.

It requires that where new development with increased density and more massing is proposed adjacent to existing development, then design measures should ensure the avoidance of overbearing development. This seems reasonable. It is for Design and Access Statements to set out how these matters have been considered and, if taking a particular approach, justified.

NE1 – the position noted in NE1 is that, by virtue of its position below the Cotswold escarpment and above the Bristol fringe, an important character feature of Pucklechurch is the views



3 storeys on the edge of the proposed allocation to the north of Shortwood, adjoining a future 'cookie cutter' Green Belt edge along A4174 would be appropriate in green belt terms (noting that the justification for or the code is incorrectly couched in Green Belt terms alone, not other terms). It would be for the LPA to determine whether this was also suitable in other terms (e.g. landscape and visual), also considering the effect of height on noise mitigation and the requirement for a minimum of 280 homes.

The Code should be redrafted to requires that proposals for more than 2 storeys be carefully evidenced based on full site analysis, rather than to delimit heights without full analysis based on being on the of the Green Belt. Granted, this takes it more towards guidance than Code, but the AECOM document is already couched as a mixture of the two

afforded of these features from the settlement edge and within the settlement outwards.

There is not a specific policy in the NDP on locally important views. In the design code context, a normal response would be for design proposals to retain glimpsed views of these features to maintain the existing character of Pucklechurch as a historic settlement with a Conservation Area. This is not viewed as onerous or preventing strategic development.

BF2 – The following is copied from the AECOM Design Guidance and Codes Report, which supports BF2:

'2.5 Built form Pucklechurch has a variety of build forms spread throughout the different character areas. In the historic core there is a tight urban grain with mainly 2 story terraced dwellings. This and the consistent setbacks create for a uniform and higher density feel to this part of the village. The terrace layout is also very common throughout the Oaktree Avenue which has a very distinctive Radburn layout. On the other hand, places towards the edge of the village such as the Homefield Road estate is made up of single story detached houses with front and back gardens which creates a much more open feel to the area.

Parkfield is almost exclusively made up of terrace housing that was originally designed as miners' cottages. They heavily influence the streetscape of Parkfield and therefore it is important that any future development in the area reflects this existing massing and form.

Shortwood has a linear feel to it particularly along Main Road. Many of the buildings in this area are of a semi-detached typology.'

	<p>It is suggested that BF2 was written by AECOM following its detailed assessment of the specific character context of Pucklechurch development edges and in this context, is valid.</p> <p>The built development edge of Pucklechurch village forms the Green Belt boundary.</p> <p>We think the code is saying that development outside the Green Belt but bordering it, should be no more than 2 story's in height.</p> <p>Based on current boundaries, this would apply only to development within Pucklechurch Village as this is the only land (leaving out the A4174) in the parish that borders green belt.</p> <p>We are happy to accept clarificatory wording if required.</p>
<p>Shortwood Character Area Codes</p> <p>Paragraph 131 and Code CA6.4</p> <p>Paragraph 131 (comprising two sections, one numbered and one unnumbered) notes that the Design Codes for the parish (key to the delivery of PUCKLE 6] and dated August 2023, were published prior to the final form of the proposed new Local Plan being known.</p> <p>Evidently significant development across the parish, especially around Shortwood and north of the M4 is proposed in the Local Plan, with specific allocation policies proposed to deliver the strategic policies of the new Local Plan. Indeed, initial correspondence from the Local Plan inspectors question whether the larger allocation proposed should fact also be strategic policies. The LPA has yet to reply.</p>	<p>Para 131 – We are happy to amend the wording of para 131 from 'directly adjacent to', to 'in' as requested. The Design Codes are intended to apply 'in' the Shortwood Character Area.</p> <p>The Character Area defined in the Design Guidance and Codes Report is based on the built area of the existing Shortwood settlement.</p> <p>Shortwood is washed over by Green Belt and does not have a settlement boundary and as such the extent of the built area is subject to interpretation and justification in the context of infill proposals.</p> <p>Shortwood is a tightly developed linear settlement and any development 'in' Shortwood is likely to involve small scale</p>

The unnumbered paragraph under the Shortwood Character Area sub-heading states, in respect of the Codes, that

They also recognise the need to ensure that new development (should this occur) is provided at lower densities directly adjacent to Shortwood given its current rural character.

A specific code for the Shortwood Character Area (CA.6) is that

Any housing development in Shortwood should not go over 10dph in density, be respectful to the surrounding build form and not be obtuse in relation to the greenbelt.

Setting aside the justification for the 10dph limit itself, on spatial application the Code is clear that CA.6 relates to development in Shortwood i.e. within the Shortwood character area. Consequently, the unnumbered part of paragraph 131 should be amended because 'directly adjacent to' is not what the Code says. The Code says 'in/within' and it means within the Character Area itself, as identified in yellow on Figure 11 and 12 of the Plan.

There is nothing in any of the Area Codes that lend support lower densities beyond Shortwood, and so this issue concerns the misapplication of the CA.6 in the supporting text to it

Lightwood considers that the paragraph 131 phrase 'directly adjacent' Shortwood could be misinterpreted as capturing land outside the character area, and on land that is to be allocated for housing development to deliver the strategic policies of the submitted Local Plan. The supporting text should reflect the Code in respect of in versus 'direct adjacent to'

The 10dph limit itself is not justified as it represents an unduly simplistic and professional level of analysis for the Shortwood Character area, that would unreasonably limit change and the efficient use of land, where

redevelopment of existing plots.

Largescale development would be located 'in' Shortwood where it accesses the highway but would extend much further away, and would consider its relationship to the settlement in different ways.

Impacts on Character of Shortwood will extend to development directly adjoining it. Under the general provisions of PUCKLE 6, proposals are required to demonstrate that they have considered the character features and codes, that they have understood development patterns and form in Shortwood and that they have taken a design approach to avoid overbearing relationships, or they have set out reasoned justification for not doing that.

CA6.4 - Table 6 provides information on plot densities in Shortwood, which includes back gardens. New development adjacent to existing settlement will need to set out an approach which demonstrates understanding of the existing context and proposes a design approach to meet the requirements of the policy, or justify other approaches.

The AECOM design code reference to 10dph does appear to be unduly restrictive in this context and so the parish council is happy to remove reference to this in CA6.4, which would be amended to read as follows:

'Any housing development in Shortwood should ~~not go over 10dph in density~~, be respectful to the surrounding ~~build~~ built form and not be obtuse in relation to the greenbelt'.

CA6.5 – The point raised is acknowledged and provided that the response comments on NE1 above are accepted, that code (as an area-wide code) should be sufficient to secure the

opportunities present themselves.

For example, the 4 pairs of semi-detached houses on Cattybrook Road (8 dwellings) occupy 0.35ha which is 23 dph. That does not mean that this density must be a limit on other land in the character area, but it does show that more nuanced assessment of prevailing density/built form that is capable of being applied (and should be applied to the urban design process) based on-site specific circumstances within the Shortwood character area close those properties.

Similarly, the frontage of Main Road at Shortwood presents as a very compact line of closely space semi-detached dwellings with occasional terracing. The impression from Main Road is, fairly, much more that 10dph, and quite dense, and it is only the uniquely long back gardens of these properties, in association with a smattering very loosely spaced plots future up Shortwood Hill that drive down character areas overall blended average density. In short, a limit of 10dph is not justified and site assessment based on context, other codes, the efficient use of land and any Local Plan policies must prevail.

Moreover, the 10dph CA.6 'cap' is not in tune with the wording of PUCKLE 6 itself which allows for increased densities to be justified whatever the blended average baseline for the whole character area. Code CA.6 should be removed from the Plan

Code CA6.5 for the Shortwood Character Area

These comment flow from our comments and conclusions on Area Code NE1 Code CA6.5 generally relates to the effect of development with the Shortwood character area on existing views out of it. Lightwood contend that the two components appear to be saying much the same thing and, if retained, they should come together as one Code, for clarity. The reference to 'public' and not 'private' is necessary a but Code stops short of identifying that public views need to be of a significance to warrant special protection from blocking/changing/reducing in extent. There is no evidence

objectives of policy PUCKLE6 and so CA6.5 would not be required separately.

base identifying any important local views from a public footpath or any other public open space within the character area.

For this Code to remain the Plan should provide evidence, for consultation of the views that are assessed as being of a value that would be captured by the Code. Without this evidence, the Code is not justified. Lightwood consider it material that proposed allocations at Carson Green in the submitted Local Plan that Carsons Green involves development on a across a visually important hillside in any case. The Rock House Farm allocation, to the north of Shortwood falls on land outside the visually important hillside.

PUCKLE 16 - Better Bus Services for Pucklechurch Parish

This policy states that

“Proposals for major development in Pucklechurch Parish are encouraged to provide additional and improved bus services connecting Pucklechurch with nearby towns, particularly Yate and Emerson’s Green”.

As major developments do not ‘themselves’ provide bus services but can contribute justified and proportionate planning obligations towards the provision of bus services, Lightwood suggest that the wording should amended to ‘provide contributions towards the provision of additional and improved’

Lightwood notes the use of the word ‘encouraged’ and observes that the proportionate obligations a matter for the local highway authority in negotiation with applicants

The point raised is acknowledged. The Parish Council is happy to accept the suggested revised wording to ‘*provide contributions towards the provision of additional and improved*’ bus services.....