

South Gloucestershire Council

Pucklechurch Neighbourhood Development Plan

Regulation 16 Consultation Responses

Pucklechurch Neighbourhood Development Plan Consultation Responses

These comments below were submitted in response to the Pucklechurch Neighbourhood Development Plan consultation.

This was a consultation to comply with the Neighbourhood Planning (General) Regulation 2012 regulation 16 regarding the publicising of the plan proposal prior to the commencement of the examination.

Response ID	Respondent Name	Agent Name	Feedback on the Pucklechurch Neighbourhood Development Plan
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.
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", 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.
B3S0	Andrew Brace	n/a	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

Response ID	Respondent Name	Agent Name	Feedback on the Pucklechurch Neighbourhood Development Plan
M319	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 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>
U1D5	Tim James and Lauren Ielden on behalf of NHS Bristol, North Somerset & South	n/a	Please see comment in Appendix 1of this document

Response ID	Respondent Name	Agent Name	Feedback on the Pucklechurch Neighbourhood Development Plan
	Gloucestershire ICB		
M9P0	Sally Parish on behalf of National Highways	n/a	<p>Dear Strategic Planning Policy Team,</p> <p>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) 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 policies 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>
N3E1	Grace Lewis on behalf of Network Rail	n/a	Please see comment in Appendix 1of this document

Response ID	Respondent Name	Agent Name	Feedback on the Pucklechurch Neighbourhood Development Plan
W3Q1	Melanie Lindsley on behalf of The Coal Authority	n/a	Please see comment in Appendix 1 of this document
H1M2	Tom Wignall on behalf of National Gas Transmission	Avison Young	Please see comment in Appendix 1 of this document
X3H3	Briony Waterman on behalf of Environment Agency	n/a	Please see comment in Appendix 1 of this document
A4Z3	Sally Wintle on behalf of Natural England	n/a	Please see comment in Appendix 1 of this document
C0S5	Richard Walker on behalf of Lightwood Strategic	Lightwood Strategic	Please see comment in Appendix 1 of this document
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.
O0B8	Danny Dixon on behalf of South Gloucestershire Council	n/a	Please see comment in Appendix 1 of this document

Appendix 1 – Supporting Documents

U1D5 – NHS Bristol, North Somerset & South Gloucestershire ICB

NHS Bristol, North Somerset, and
South Gloucestershire Integrated
Care Board (BNSSG ICB)

Agent's contact details:
NHS Property Services Ltd
10 South Colonnade
Canary Wharf
London E14 4PU
BNSSGICB@property.nhs.uk

South Gloucestershire Council

By email:
neighbourhoodplanning@southglos.gov.uk

30 December 2025

RE: Consultation on the Pucklechurch Neighbourhood Plan Publication (Regulation 16)

Thank you for the opportunity to comment on the above document. The following representations are submitted by NHS Property Services (NHSPS) on behalf of Bristol, North Somerset, and South Gloucestershire Integrated Care Board (BNSSG ICB). BNSSG ICB has delegated authority from NHS England for the commissioning of primary care services (general medical services) for the entirety of the South Gloucestershire area. This includes consideration of estate requirements to deliver these services.

Our comments on the Neighbourhood Plan consultation reflect how the ICB and various system partners are working together at the system level to deliver the health priorities as articulated within the BNSSG Integrated Care Strategy.

NHS Bristol, North Somerset, and South Gloucestershire ICB

The NHS BNSSG ICB covers a large and varied geographical area that includes the densely populated and growing town of Bristol, North Somerset, and South Gloucestershire. The ICB commissions (plans, designs, and purchases) many of the health services that the local population use, including medicines, hospital care, urgent and emergency services, mental health care, GP services, community pharmacy, dentistry, general ophthalmology (eye care services), and various community services.

We are responsible for developing the plans to meet the health needs of our population, managing the NHS budget, and arranging for the provision of health services in our area. We are part of the local Integrated Care System, Healthier Together Partnership. Our ICS is made up of 10 partner organisations including the three Local Authorities in our area, the ICB, NHS Trusts, community providers, general practice and other partners. Locality Partnerships have been established within our ICS, working at a 'place' level, and responding to the specific needs of local people. The ICB and its partners are therefore well placed to identify the implications of the Neighbourhood Plan on healthcare infrastructure and services in the local area.

General Comments on Health Infrastructure to Support Housing Growth

The delivery of new and improved healthcare infrastructure is significantly resource intensive. The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and population growth from new housing development adds further pressure to the system. New development should make a proportionate contribution to funding the healthcare needs arising from new development. Health provision is an integral component of sustainable development – access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area.

Residential developments often have very significant impacts in terms of the need for additional primary healthcare provision for future residents. Given health infrastructure's strategic importance to supporting housing growth and sustainable development, it should be considered at the forefront of priorities for infrastructure delivery. The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be supported to develop, modernise, or be protected in line with integrated NHS strategies. Planning policies should enable the delivery of essential healthcare infrastructure and be prepared in consultation with the NHS to ensure they help deliver estate transformation.

Comments on the Regulation 16 Pucklechurch Neighbourhood Plan

Our comments set out below are focused on ensuring that the needs of the health service are embedded into the Neighbourhood Plan in a way that supports sustainable growth.

Community Aspirations

The ICB broadly support the community aspiration included in Table 3 which states that “additional pop-up services particularly those aimed at prevention and advice on improving general health and well-being”.

We consider that this aspiration generally aligns with the NHS 10-Year Plan¹, which seeks to bring care into local communities and convene professional into patient-centred teams.

The ICB welcome further opportunities to engage on this matter to ensure that local healthcare needs are identified, and, where appropriate, addressed at community-level.

PUCKLE 1 – Protection of Facilities of Importance to the Local Community

BNSSG ICB acknowledge that the Three Shires Medical Practice is included as a ‘site in local community use and other uses’ in Table 4 of the Draft Neighbourhood Plan. We welcome its inclusion within the supporting text of this policy, and we support its intentional omission from Draft Policy PUCKLE 1, as it enables flexibility for the NHS estate in the long-term. While there are no current plans to dispose of this facility, where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation and service transformation programmes, it should be accepted that a facility is neither needed nor viable for its current use, and policies within the Neighbourhood Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community facility use on the land.

We note that the ‘Three Shires Medical Practice’ sub-heading of Table 4 states the following:

¹ [10 Year Health Plan for England: fit for the future - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/672222/10-Year_Health_Plan_for_England_fit_for_the_future.pdf)

“There is no additional funding from Government to increase the number of GPs regardless of population growth, so the ratio will be affected by population increase through whatever means this occurs”.

For full transparency, BNSSG ICB is responsible for arranging local primary care provision. The ICB assesses the impact of proposed developments on the existing primary care estate. In instances where there is insufficient capacity locally to accommodate growth impacts, the ICB will request developer contributions, either in the form of Section 106 monies or via the Community Infrastructure Levy (CIL) to fund additional primary care floorspace within the impacted Primary Care Network(s).

Conclusion

NHS BNSSG ICB respectfully request the above representations on the Neighbourhood Plan are taken into consideration.

We would welcome further engagement in the coming months in relation to the above, and should you have any questions, please contact us at BNSSGICB@property.nhs.uk.

Tim James
Head of Strategic Estates

NHS Bristol, North Somerset & South
Gloucestershire ICB

Lauren Ielden MRTPI
Associate Town Planner

NHS Property Services Ltd.

For and on behalf of BNSSG ICB

N3E1 – Network Rail

From: Grace Lewis <[REDACTED]>
Sent: 16 December 2025 12:56
To: Neighbourhood Planning
Subject: Network Rail comments - Pucklechurch NDP

Follow Up Flag: Follow up
Flag Status: Completed

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OFFICIAL



Network Rail
1st Floor
Bristol Temple Point
Bristol
BS1 6NL

Date: 16 December 2025

TOWN AND COUNTRY PLANNING ACT 1990 (as amended)
PROPOSAL: Pucklechurch Neighbourhood Development Plan

Dear Sir/Madam,

Thank you for consulting us on the Pucklechurch Neighbourhood Development Plan. This email forms for the basis of our response.

Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure.

PUCKLE 13 – Leisure walking routes

Under this policy planning applications for major development should demonstrate how they will protect and improve leisure walking routes within Pucklechurch Parish.

The Dramway runs along the western edge of the parish and can be accessed to the north by Westerleigh Footpath level crossing.

Any development of land within the parish which would result in a material increase or significant change in the character of traffic using rail crossings in the area should be refused unless, in consultation with Network Rail, it can either be demonstrated that they safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission.

Level crossings can be impacted in a variety of ways by planning proposals:

- By a proposal being directly next to a level crossing
- By the cumulative effect of development added over time
- By the type of crossing involved
- By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing
- By developments that might impede pedestrians ability to hear approaching trains
- By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs
- By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing
- By any development or enhancement of the public rights of way

Network Rail has a strong policy to guide and improve its management of level crossings, which aims to; reduce risk at level crossings, reduce the number and types of level crossings, ensure level crossings are fit for purpose and ensure Network Rail works with users / stakeholders and supports enforcement initiatives. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned if any future development impacts on the safety and operation of level crossings.

As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.

The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway:-

- (Schedule 4 (j) of the Town & Country Planning (Development Management Procedure) Order, 2015) requires that *"...development which is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway"* (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both the Secretary of State for Transport and Network Rail for separate approval.

We trust these comments will be useful in the preparation of the forthcoming plan documents.

Yours Sincerely,

Grace Lewis

Town Planning Technician Wales and Western

Network Rail

Temple Point, Redcliffe Way, Bristol, BS1 6NL

www.networkrail.co.uk/property

W3Q1 – The Coal Authority



200 Lichfield Lane
Mansfield
Nottinghamshire
NG18 4RG

T: 01623 637 119 (Planning Enquiries)

E: planningconsultation@coal.gov.uk

W: www.gov.uk/coalauthority

For the attention of: Strategic Planning Policy & Specialist Advice Team

South Gloucestershire Council

[By email: neighbourhoodplanning@southglos.gov.uk]

24th December 2025

Dear Strategic Planning Policy & Specialist Advice team

Re: Pucklechurch Neighbourhood Development Plan

Thank you for your notification of the 3rd December 2025 seeking the views of the Coal Authority on the above.

The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

Our records indicate that within the Pucklechurch Neighbourhood Plan area there are recorded coal mining features present at surface and shallow depth including; mine entries, coal workings and reported surface hazards. These features may pose a potential risk to surface stability and public safety.

Following a review of the Neighbourhood Plan it appears that no new site allocations are being proposed for residential or employment/commercial development in the area. On this basis I can confirm that the Planning team at the Coal Authority have no specific comments to make.

If new development is proposed in areas where our records indicate that coal mining features are present then consideration would need to be given to how these may impact

on the quantum of development that can be accommodated and how any risks will be addressed.

Yours faithfully



Melanie Lindsley *BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI*

Principal Planning & Development Manager



H1M2 – National Gas Transmission

Our Ref: MV/ 15B901605

14 January 2026



South Gloucestershire Council
neighbourhoodplanning@southglos.gov.uk
via email only

Dear Sir / Madam

**Pucklechurch Neighbourhood Plan - Regulation 16 Consultation
December 2025 – January 2026
Representations on behalf of National Gas Transmission**

National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Gas Transmission

National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

Proposed sites crossed or in close proximity to National Gas Transmission assets:

An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure.

National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

National Gas Transmission provides information in relation to its assets at the website below.

- <https://www.nationalgas.com/land-and-assets/network-route-maps>

Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure.

Distribution Networks

Information regarding the gas distribution network is available by contacting:
plantprotection@cadentgas.com

Further Advice

Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:



Matt Verlander, Director

[Redacted]

[Redacted]

Kam Liddar, Asset Protection Lead

[Redacted]

[Redacted]

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

[Redacted]

**Matt Verlander MRTPI
Director**

[Redacted]

[Redacted]

For and on behalf of Avison Young

National Gas Transmission is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Gas Transmission's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Gas Transmission have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Gas Transmission's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Gas Transmission's '*Guidelines when working near National Gas Transmission assets*' can be downloaded here: <https://www.nationalgas.com/document/82951/download>

How to contact National Gas Transmission

If you require any further information in relation to the above and/or if you would like to check if National Gas Transmission's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgas.uk@avisonyoung.com

X3H3 – Environment Agency

Sir/Madam Sir/Madam Strategic Planning
Policy & Specialist Advice Team
South Gloucestershire Council
Planning Policy
PO Box 299 Hanham Road
BRISTOL
BS15 0DR

Our ref: WX/2015/128246/OR-
07/IS1-L01

Your ref:

Date: 27 January 2026

Dear Sir/Madam Strategic Planning Policy & Specialist Advice Team

Neighbourhood Plan for Pucklechurch – Regulation 15 Submission.

Thank you for consulting us on the above neighbourhood plan.

We have no comments to make at this stage.

Yours sincerely

Ms Briony Waterman
Sustainable Places - Planning Specialist

████████████████████
██

A4Z3 – Natural England

Date: 28 January 2026
Our ref: 535483
Your ref: Pucklechurch Neighbourhood Plan



Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ
T 0300 060 3900

Strategic Planning Policy & Specialist Advice Team
South Gloucestershire Council

BY EMAIL ONLY

neighbourhoodplanning@southglos.gov.uk

Dear Sir/Madam

Pucklechurch Neighbourhood Plan - Regulation 16 Consultation

Thank you for your consultation on the above dated 03 December 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#) .

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours faithfully
Sally Wintle
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, [National Parks \(England\)](#), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](#) .

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁴ website and also from the [LandIS website](#)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

COS5 – Lightwood Strategic

PUCKLECHUCH NEIGHBOURHOOD PLAN, REGULATION 16 CONSULTATION

Introduction

Lightwood Strategics comment on the Pucklechurch Neighbourhood Plan relate to its land interests at Shortwood, which fall within proposed Policy LP7 [Carsons Green and Rock House Farm New Neighbourhoods] of the proposed South Gloucestershire Local Plan. This was submitted for examination on October 24th 2025.

Subject to the progression of the examination of the new Local Plan will gather weight during 2026. At yet it is unknown whether the Pucklechurch Neighbourhood Plan will be 'Made' before, after or at the same time as the new Local Plan is adopted.

Lightwood Strategic wholly controls the Rock House Farm part of LP7 (to the north of Shortwood) which is proposed to be allocated for a minimum of 280 homes. A planning application was submitted in December 2025 (P25/02966/O) with the following description of development.

Demolition of existing structures; erection of up to 280 no. dwellings and 1no. building providing up to 350 sq m GIA of commercial space (Class E); vehicular access off Main Road / Shortwood Hill; emergency access off B4465; pedestrian and cycle routes; together with water management measures, green infrastructure and landscaping, and all associated infrastructure (Outline) with access be determined, all other matters reserved.

To the south of Shortwood, Lightwood also control land within the parish, within the larger proposed Carsons Green allocation for 1,600 homes and other uses.

Annex 1 presents the Concept Masterplan that South Gloucestershire Council has submitted alongside proposed Policy LP7.

Schedule of Representations

PUCKLE 1 - Protection of Facilities of importance to the local community	Play Area 8 PUCKLE 1 is proposed to apply to Shortwood Play Area (Ref 8). 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. 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. However, it should not be necessary to end the lease before any application is made for another use. 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
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	<p>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 the current application.</p> <p>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 it does not disengage the wrongful identification of the play space at Shortwood for protection in the first place.</p>
<p>PUCKLE 2 - Requirements for additional Local Community Facilities</p>	<p>Clause 5</p> <p>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.</p> <p>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</p> <p>We recommend the inclusion of the words <i>‘in a suitable location’</i> 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.</p> <p>Clause 6</p> <p>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.</p> <p>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</p> <p><i>“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”.</i></p> <p>The Infrastructure Delivery Plan for the new Local Plan identifies an 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</p>

	<p>community building, with a NEAP further to the north (with both play areas outside the currently leased area of land).</p> <p>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.</p> <p>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</p> <p>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.</p> <p>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</p>
<p>PUCKLE 6 - Good Design and Development Form in Pucklechurch Parish</p>	<p>PUCKLE 6 falls under Section 7 ‘Good Design and Complementary Development’.</p> <p>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.</p> <p>PUCKLE 6</p> <p>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.</p>

	<p>Area Codes</p> <p>These apply to all character areas and all land outside a character area. On occasion the wording seems directed to areas greater than the Character scale but not complete parish scale, which is confusing. It should be very clear to users of Plan if not all Areas Code apply everywhere.</p> <p><u>NE1 (Natural Environment, Views)</u></p> <p>Code NE1 is a good example of this. It speaks of new development at the edge of 'the' settlement maintaining the quality of the existing outward views (to the countryside in general and the National Landscape, from public footpaths and public areas). It then directs users of the Plan to South Gloucestershire Landscape Character Assessment but only LCA 6, and its already protected views. It does not refer uses of the Plan to LCA 12, which covers other parts of the parish (Shortwood and Bristol Fringe. It is not clear whether this Code is targeted at the settlement edge of Pucklechurch village as a whole and its environs or Pucklechurch parish, as a whole.</p> <p>The evidence base supporting the Neighbourhood Plan consultation does not include an assessment of other important views beyond those in the South Gloucestershire LCA. Seemingly, the Code states that any publicly available view whatever its quality/significance must be maintained, and at the baseline quality. This is not justified. An evidence base should have been established needed indicating the key view that the additional views that the Neighbourhood wishes to maintain and these should be subject to consultation and examination.</p> <p>The emerging Local Plan proposes significant change in the parish that will affect current outward views (whatever the significance) from the edge of public accessible areas at Shortwood. This change will be needed to deliver the strategic policies of the new Local Plan.</p> <p>Code NE1 should be removed or further evidenced to demonstrate that there are views, of a significance to be maintained beyond those of the South Gloucestershire LCA (which has conder local and strategic views already)</p> <p><u>BF.2 (height bordering the green belt)</u></p> <p>BF2 states that any development bordering the greenbelt should be no more than 2 storeys in height and have a form of green buffer where possible.</p> <p>The Code is clearly concerned with proposal bordering the Green Belt and therefore on land that is inset from it, not within it.</p>
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Lightwood consider that the 2-storey limit on building heights on land bordering in the Green Belt, with a form of buffer, if possible, is not justified. Critically, it is not the openness of the Green Belt, beyond the inset area than must be the driver of height, but landscape and townscape effects, and any other consideration, which are a distinct and separate consideration to be assessed. Imposing a blanket 2 storey limit in a parish wide code is not justified.

Whilst in many cases, 2 storeys it may be the most suitable design strategy, this may not always be the case, and a third storey or 2.5 storeys should not be dismissed through a Code as mater of course, without site specific analysis, informing the design response.

Below is an example of a successful edge of settlement mixture of 2 and 3 storey homes at Benjmain Street, Bradford on Avon. This street overlooks the Avon Valley (landscape sensitive) and there is a Green Belt context. Defaulting to 2 storeys would prevent this form of high-quality development, with outward facing heigh variation up to 3 storeys

View of Benjamin Street (2 and 3 storeys)



Wider Countryside (and Green Belt) Context



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 more 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 creating a new edge to the Green Belt facing the east fringe and A4174!

Proposed Local Plan Green Belt amendments close to Shortwood
(<https://sgcreg19.participatr.io/index.php?contentid=101>)



3 story's 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

Shortwood Character Area Codes

Paragraph 131 and Code CA6.4

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. 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.

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**'

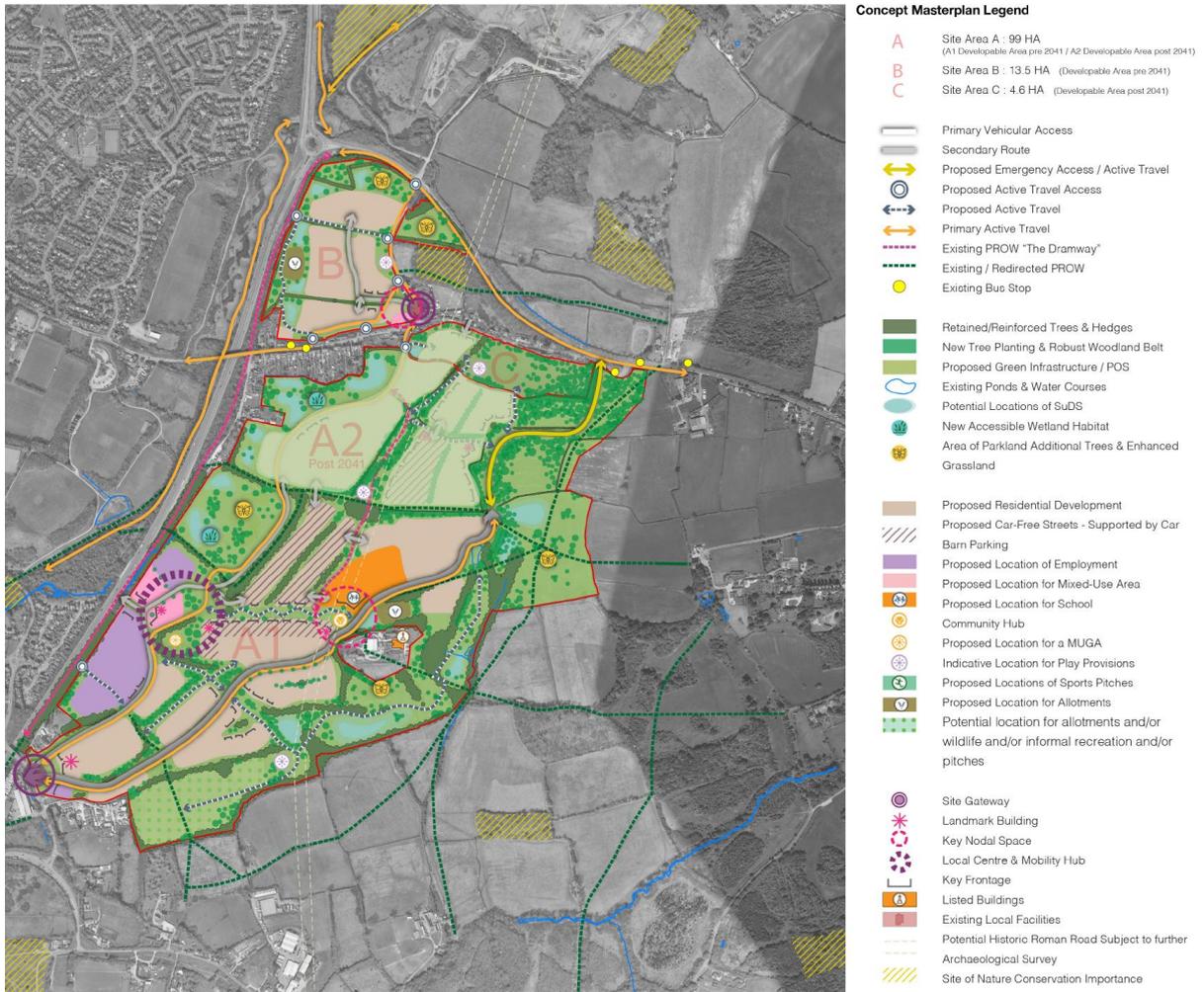
The 10dph limit itself is not justified as it represents an unduly simplistic and professional level of analysis for the Shortwood

	<p>Character area, that would unreasonably limit change and the efficient use of land, where opportunities present themselves.</p> <p>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.</p> <p>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 than 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 further 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.</p> <p>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</p> <p><u>Code CA6.5 for the Shortwood Character Area</u></p> <p>These comments flow from our comments and conclusions on Area Code NE1</p> <p>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, <u>if retained</u>, they should come together as one Code, for clarity. The reference to 'public' and not 'private' is necessary 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 base identifying any important local views from a public footpath or any other public open space within the character area.</p> <p>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.</p> <p>Lightwood consider it material that proposed allocations at Carson Green in the submitted Local Plan that Carson's Green involves</p>
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	<p>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.</p>
<p>PUCKLE 16 - Better Bus Services for Pucklechurch Parish</p>	<p>This policy states that</p> <p><i>“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”.</i></p> <p>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 <u>contributions towards the provision of additional and improved</u>’</p> <p>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</p>

Annex 1 Concept Pan supporting Policy LP7 of the South Gloucester Local Plan (as examination)

Shortwood is located between Areas A2 (Carsons Green) and B (Rock House Farm)



O0B8 - South Gloucestershire Council



Department for Environment and Community Services

Date: 28 January 2026
Our Ref: PNDP Response
Enquiries to:
Section: Planning Policy and specialist Advice Team
E-mail: neighbourhoodplanning@southlgos.gov.uk

Pucklechurch Neighbourhood Development Plan (PNDP) Regulation 16 consultation

South Gloucestershire Council formal comments

These comments relate to the Pucklechurch Neighbourhood Development Plan (PNDP) submission and are made by South Gloucestershire Council as the Local Planning Authority and authority in which the Neighbourhood Plan Area is located. These comments are in response to the Neighbourhood Planning (General) Regulation 2012, Regulation 16 regarding the publicising of a plan proposal.

The council is pleased to see the Plan progress to this stage and the community reach this milestone. This response highlights the council's support for the Pucklechurch Neighbourhood Plan Group (referred to from now on as "the Group") as the Qualifying Body, and the ambitions of the community of Pucklechurch reflected in the PNDP. The plan covers a wide range of local issues that are important to the community including housing, good design and complementary development, employment, environment and open space, getting around and services and facilities. The plan proposal consists of 16 policies. The plan will set the community on an exciting trajectory to promote sustainable housing development, employment opportunities and transport options while maintaining the assets and character of the parish. The plan also seeks to protect and enhance open space including the designation of a Local Green Space.

The plan includes a set of community aspirations and priorities in chapter 4. The plan recognises that not all of these can be addressed by planning policies and the plan is clear that these aspirations and priorities do not have the status of planning policy. The plan also includes actions required to deliver and monitor policy implementation in chapter 11, identified for each policy. South Gloucestershire Council is supportive of this proactive approach to the Plan's implementation.

Response to the Basic Conditions

One of the duties of the Local Planning Authority is to support the Qualifying Body (through the Neighbourhood Planning Group) to meet the Basic Conditions. The neighbourhood plan can only be put to referendum and be made if the Basic Conditions are met. The Basic Conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. This response will also outline the approach to meeting those Basic Conditions relevant to the plan proposal.

Basic condition (a) requires the plan's proposals to have regard to national policies including local plans. The proposals outlined in the Basic Conditions Statement confirm that the plan has had due regard for national policy and that policies do not conflict with national policy. Through close working between the Qualifying Body and the Local Planning Authority, we are satisfied that the plan is not inconsistent with the objectives of national policy.

Basic Conditions (b) and (c) relate only to Development Orders and are therefore not relevant to this plan proposal as the Pucklechurch NP does not contain these.

Basic Condition (d) requires the plan's proposals to set out how it will contribute to sustainable development. The plan's proposals outline how the plan will contribute to achieving sustainable development against the three National Planning Policy primary objectives (economic, social and environmental). Although the plan does not allocate sites, several policies do seek to influence development where it takes place within the Neighbourhood Plan Area. These policies support the objective of achieving sustainable development in a wide range of ways. The supporting evidence base also outlines how the individual policy proposals seek to achieve sustainable development including the Basic Conditions Statement. A Strategic Environment Assessment was considered unnecessary in the Screening Opinion. Both the Basic Conditions Statement and Screening Opinion (including the decision statement) have been available to view during this consultation.

Basic Condition (e) requires the plan's proposals to be in general conformity with the strategic policies contained in the development plan for the area of the authority. Through close working between the council and the Qualifying Body we are satisfied that the policies within the plan's proposal are in general conformity with the Council's adopted Local Plan policies. The Basic Conditions Statement also provides further details on the groups' consideration of strategic policy during the production of the plan.

In working with the Qualifying Body the Council has also sought to satisfy itself that the plan would not be in conflict with the emerging New Local Plan which was submitted to the Planning Inspectorate on 24 October 2025. Although it is recognised that the emerging plan holds little and limited weight at this stage both the council and the group has been keen to ensure that policies used in the 'made' neighbourhood plan be compatible with the emerging Local Plan when this comes into force. The Qualifying Body has documented the changes made to the Regulation 14 consultation draft as a result of the Council's comments. Appendix G of the Consultation Statement also records the dialogue between the Council and Qualifying Body on suggested changes to be made to the draft plan in order to help

ensure clear alignment with the emerging new Local Plan. The Council's main comments of note and which have been resolved satisfactorily through positive conversations with the Qualifying Body include:

- Confirmation that policy Puckle 2 (Requirements for Additional Local Community Facilities) will not *require additional contributions over and above what is set out in emerging Local Plan policies LP6/LP7*. Local Plan allocations will not be able to deliver additional facilities given that this will impact the viability of the development.
- Improving alignment of policy wording between Puckle 3 (Affordable Housing) and the emerging new Local Plan to ensure that tenure split proportions align and that terminology is updated in the neighbourhood plan policy.
- Improving clarity in policy Puckle 4 (Housing type and size) to avoid confusion and provide clarity by affirming that the policy applies to the Neighbourhood Plan area outside of Local Plan allocations. This means the policy will focus on windfall sites over the plan period whilst the Local Plan policies focus on the strategic district need through Local Plan allocations.

Basic Condition (f) requires the plan's proposal does not breach, and is otherwise compatible with, EU obligations. The council has no concerns with regard to the plan proposal and basic condition (f). The Statement of Determination and Screening Opinion to assess the requirement for an SEA has been undertaken and has been published with this consultation. It was concluded by the council in consultation with statutory bodies that a full SEA was not required.

Basic Condition (g) requires the plan's proposal to meet prescribed conditions as set out in regulations 32 and 33 of the Neighbourhood Planning (General) regulations 2012 (as amended) to have regard to schedules 2 and 3 of the regulations. The council has no concerns with regard to the plan proposal and basic condition (g).

Consultation Statement

The plan proposal includes the Consultation Statement prepared to fulfil the legal obligations required by the Neighbourhood Planning (General) Regulation 2012 in particular regulation 15 (1)a and (2). The statement outlines the different ways in which the Pucklechurch Neighbourhood Plan Group has engaged the community to ensure the plan meets the vision, objectives and aspirations of the local community. The statement outlines, who has been consulted, how they were consulted and when. The statement outlines both informal and formal stages of consultation. This outlines that a formal consultation was undertaken in January 2025 which met the requirements of the Neighbourhood Planning (General) Regulation 2012 regulation 14. The council can also confirm that this consultation met the requirements under regulation 14 (a), (b) and (c) allowing the plan to continue to regulation 15.

Working with the local planning authority

The council recognises that neighbourhood planning is for and led by the local community. The plan has been driven by the community's vision and aspirations. The Qualifying Body and the council have worked closely together to review earlier drafts of the plan's proposals to ensure that the aspirations of the local community and the council are aligned.

Legal compliance check

Upon submission of the plan's proposals and the supporting documents to the council under regulation 15 of the Neighbourhood Planning (General) Regulations 2012, a legal compliance check was undertaken. This was to ensure the Qualifying Body had followed the correct legal procedure as outlined in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended). The council can therefore confirm that the plan's proposals have met these requirements and can proceed to examination once this consultation has concluded.

Strategic Environmental Assessment (SEA) – Screening Opinion Statement of Determination

To assist production of the Pucklechurch Neighbourhood Development Plan, South Gloucestershire Council undertook a Strategic Environmental Assessment (SEA) Screening Opinion. The screening opinion must consider the likely environmental effects of the neighbourhood development plan against the criteria set out in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004. Once this opinion has been consulted on with statutory consultees, it is used to determine whether or not the Neighbourhood Development Plan (NDP) requires a full Strategic Environmental Assessment.

Following analysis of likely significant effects, South Gloucestershire Council considered that the Pucklechurch Neighbourhood Development Plan was unlikely to have any significant effects on the environment. The initial opinion was that a Strategic Environmental Assessment of the Pucklechurch Neighbourhood Development Plan was not required.

Through consultation with the statutory consultees (Historic England, Environment Agency and Natural England) also agreed with the conclusion that a full SEA was not required. A Statement of Determination was therefore published. Both the SEA Screening Opinion and the Statement of Determination have been published as part of this consultation.

Conclusion

To conclude this response the council agrees that the legal compliance has been undertaken on the plan and that the plan's proposal can proceed to examination. The plan outlines how it has met the Basic Conditions through the Basic Conditions Statement, the Consultation Statement and the SEA Screening Opinion (including

the Statement of Determination). The Statement of Determination outlines that the plan does not require a full Strategic Environmental Assessment which has been agreed with the statutory bodies. The Pucklechurch Neighbourhood Plan Group has worked with the council and taken on board many suggestions to help improve the plan. The council will continue to support the group where possible at the future stages of the plan process.

Additional comments on the plan

The Council would like to suggest the following additional comments for the Qualifying Body. Officers would encourage the Qualifying Body to take the opportunity to respond in the two week window after the close of the consultation for the benefit of the Examiner.

Department	Section of the plan proposal	Comment
Planning Policy	Figure 1 – Pucklechurch Neighbourhood Plan Boundary	<p>The current map includes in orange a former part of the designated area. This was removed after consultation on the proposed changes. Although it has been helpful in previous iterations to explain the difference between the previous and current NPA designation. The 'made' neighbourhood plan need only be concerned with the current boundary.</p> <p>A clean map has been provided at the end of these comments and can be found on our neighbourhood plans webpage here: Pucklechurch Neighbourhood Area Boundary</p>

Neighbourhood Planning Notice



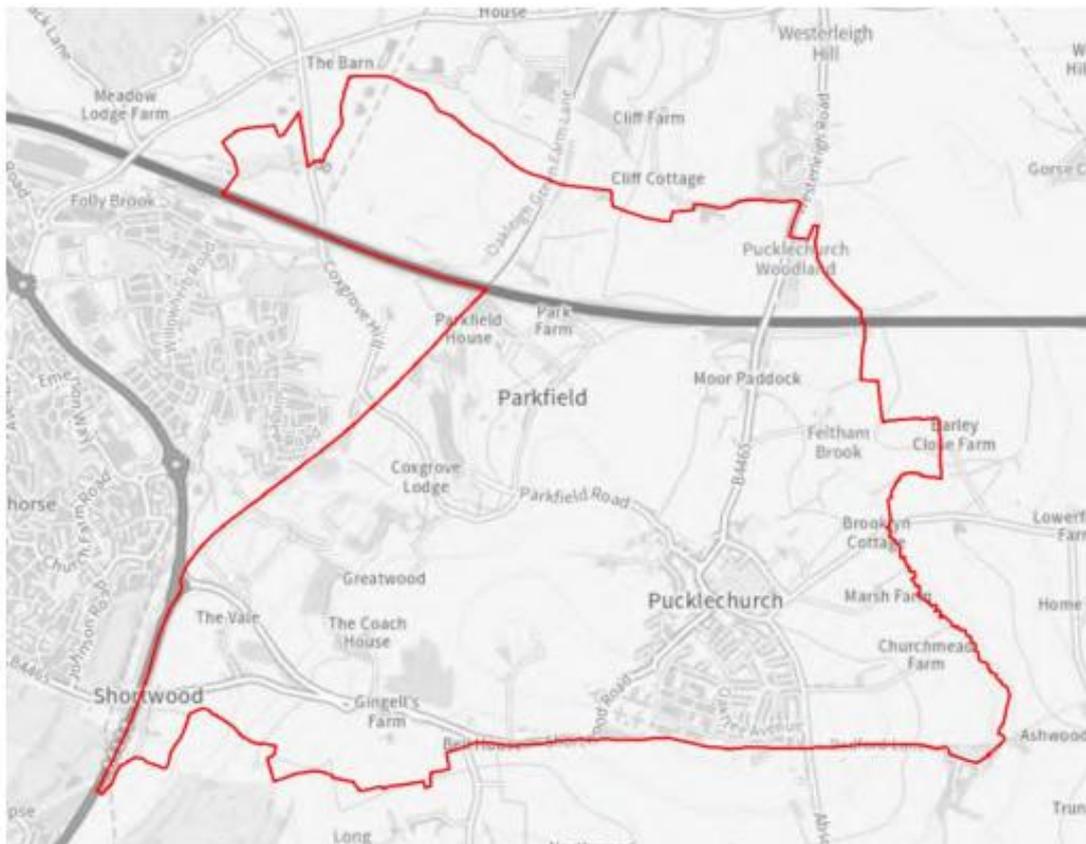
The Neighbourhood Planning (General) Regulations 2012 (as amended)

South Gloucestershire Council has APPROVED, under Article 5A of the above Regulations, the following neighbourhood area:

Neighbourhood Plan Area Name:
Pucklechurch Neighbourhood Plan Area

Relevant body is:
Pucklechurch Parish Council

The approved Neighbourhood Plan Area is identified on the map below.



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Brian Glasson
Service Director – Planning
South Gloucestershire Council
25 October 2023

You can view this document and the map online and find out more about neighbourhood planning at www.southglos.gov.uk/neighbourhoodplanning. If you would like further details please contact South Gloucestershire Council Strategic Planning Policy and Specialist Advice Team on 01454 863464.