



**MINUTES OF THE ORDINARY PARISH COUNCIL MEETING HELD ON WEDNESDAY
18TH SEPTEMBER AT 19:30 AT THE BUNGALOW HMP ASHFIELD.**

Present.

Cllrs G Boyle (chair), R Dunning, D Freestone, M Pibworth, J Hawkins, A Hemmings and H Parker

In attendance: Clerk D Dunning, Ward Cllrs Palmer and Stokes and 1 member of public.

Cllr Boyle welcomed Helen Parker to her first meeting as a parish councillor. Introductions were made.

Public Participation

A member of public spoke about his planning application – item 7aii.

2024/09/18 No 1. To receive apologies for absence and approve reasons given.

Cllr T Symons (work) and J Bailey.

2024/09/18 No 2. Declarations of interest (if any) and dispensations.

Cllr Boyle declared an interest in 5d as she lives within the vicinity of St Aldams park,

2024/09/18 No 3. To approve minutes and sign as a correct record of the council meeting.

Resolved to approve the minutes of the meeting on 21st August 2024. Minutes were duly signed by the chair of council.

2024/09/18 No 4. To receive report from ward councillor(s).

Ward Cllr Palmer:

- New multi-use path – issues with fly tipping and parking on an area of contested hard-standing.
- Property to the rear of the Fleur – ongoing matter with Enforcement due to deviation from plans.
- Enforcement also aware that work is proceeding on the third property (managers flat) within the Fleur building although permissions not yet granted. Agent has told the clients work is at their own risk.
- In addition to the Local Plan a further 6000 homes will now be required in South Gloucestershire. Currently 5488 on housing needs list an increase of 15% while 147 households are in temporary accommodation.

In response to a question on the impact of the National Planning Policy Framework (NPPF) review might have on the local plan, it is believed the plan will not fall into the transitional category.

Ward Cllr Stokes:

- Follow on to the Regulation 18 consultation, new local housing targets means Bristol targets have fallen and pressure on South Gloucestershire is likely to come from Bath whose targets have doubled and Cotswold. All the evidence suggests that nationally large amounts of housing are going to be in more rural areas.
- A432 bridge at Wick Wick roundabout is staying open longer for pedestrians and cyclists and the bridge will not be removed until March 2025. Project due to complete late 2025.
- Streetcare is undertaking an upgrade of the first-generation energy efficient lighting.

2024/09/18 No 5 AGENDA ITEMS TO ACTION

2024/09/18 No 5a To consider matters relating to the community centre and agree any actions including:

- **Pucklechurch Community Association request for a condition survey of the community centre**
- **Update from Cllr Hemmings on H&S support**

Agreed there is a need for a condition survey but a priority must be a focus on a fire risk assessment and probably alarm system.

Resolved to continue to support Pucklechurch Community Association to prioritise health and safety issues and investigate scope and costs of appropriate surveys.

2024/09/18 No 5b. To receive information on support from South Gloucestershire Council for bulb planting in Pucklechurch and agree any actions.

Resolved to accept offer of bulbs and engage with Guides and wider community to help with planting.

Resolved to spend up to £200 on bulbs for planting on parish land starting with St Aldams.

In accordance with Standing Order 3m, it was unanimously agreed to consider items 5c and d at the end of the meeting.

2024/09/18 6. AGENDA ITEMS TO NOTE

2024/09/18 6a. To note correspondence from a member of public regarding speeding on Abson Road and agree any actions.

Ward Cllr Stokes has requested speed data collection on both Abson and Westerleigh Roads but has not had a response. The parish council noted the research undertaken by the resident and confirmed it is happy to support an application by the resident to apply to reduce the speed limit to 30mph but agreed it is important to highlight just how long such a request can take to be considered and if approved to complete. Clerk/Chair to action.

2024/09/18 6b. To note correspondence from a member of public regarding the new bus service to Keynsham and agree any actions.

Response noted.

2024/09/18 6c. To note tree inspections booked at a cost of £950 (increase of £50 to reflect inclusion of Eagle Crescent).

Noted.

2024/09/18 6d. To note agreed response submitted for Local Plan Additional Regulation 18 consultation.

Noted thanks were extended to the clerk for the research and collation of information – Appendix 1. Ward Cllrs were made aware that the imposed word count for electronic submissions was unhelpful.

2024/0/21 6e. To note any feedback on latest version of Pucklechurch News.

Autumn edition ran to 6 pages with many new contributors. It was noted the Citizens Advice article appeared twice. Two articles were overlooked but were published on social media outlets. Winter edition will need to be restricted to 4 pages to stay within budget. A costed proposal outlining any changes from 2025 will need to be submitted for consideration during budget discussions.

2024/09/18 7. PLANNING

2024/09/18 7a. Planning applications.

2024/09/18 7ai P24/02021/F Land at Meadow View Shortwood Road Pucklechurch South Gloucestershire

Erection of 1no. self-build dwelling with associated works.

Resolved to object Appendix 2.

2024/09/18 7aii P24/02049/O Land Adjacent To 150 Westerleigh Road Pucklechurch South Gloucestershire BS16 9PY

Erection of 2no. self-build dwellings (outline) with access to be determined, all other matters reserved.

Resolved to object Appendix 3.

Applications received after the agenda issued

2024/09/17 7aiii P24/02159/TCA 4 Castle Road Pucklechurch South Gloucestershire BS16 9RF

Works to Crown reduce 1no. Acer platanoides drummondii back to old pruning points leaving height of 10m and radial spread of 6m in Pucklechurch Conservation Area.

Submitted comments - defer to tree officer under delegated powers.

2024/09/18 7b. Planning decisions – all noted.

2024/09/18 7bi. P24/00787/F Land Adjacent To 28 Becket Court Pucklechurch South Gloucestershire BS16 9QG

Erection of 1no. attached dwelling with parking and associated works. Approved with conditions.

2024/09/18 7bii. P24/01769/TCA 16 Abson Road Pucklechurch South Gloucestershire BS16 9RH

Works to 1no. Sycamore to crown reduce by 3m, crown lift by up to 2m, and to crown thin by up to 30%, as situated in the Pucklechurch Conservation area. No objection.

2024/09/18 7biii. P24/01511/F Fleur De Lys 12 Shortwood Road Pucklechurch South Gloucestershire BS16 9RA

Change of use of Micro Pub (sui generis) to 2no. offices (Class Eg(i)) as defined in the Town and Country Planning (Use Classes) Order 1987 (as amended). Approved with conditions

2024/09/18 7biv. P24/00688/HH Brimstones 22 Westerleigh Road Pucklechurch South Gloucestershire BS16 9RD

Erection of a two-storey side extension, single storey rear extension to form additional living accommodation. Erection of front extension to form porch. Approved with conditions.

7c. Planning enforcement and any other actions.

2024/09/18 7ci COM/24/0593/BOC Land To The Rear Of Fleur De Lys Shortwood Road Pucklechurch South Gloucestershire BS16 9RA

Breach of condition 2 (approved plans) attached to planning permission APP/P0119/W/22/3309174 (P22/01548/F). Creation of an additional bedroom and alterations to the approved door and window fenestration.

2024/09/18 No 8. REPORTS

2024/09/18 8a. To receive report from the Clerk.

- Request for councillors to have lanyards - agreed to investigate costs.
- S106 project on the Recreation ground – approved in principle now in call-in period.
- South Gloucestershire council confirmed no work planned for the bridge over the Oaktree Avenue subway

- Formal letter received from the Scouts Association regarding the scout hut. This will be on the October agenda
- Sent PCA information on energy audit offer from CVS
- Enforcement considering if action needed at Fleur site
- Trees felled in Eagle Crescent

2024/09/18 No 9 FINANCE

2024/09/18 9a. To approve contractual and other obligations for September 2024.

All invoices were checked and confirmed for accuracy against payment list - Cllr Freestone

BACS for authorisation 18/09/24				
Payee	Description	Net	VAT	Amount Paid
D Dunning	September pay	£1,860.28	£0.00	£1,860.28
D Dunning	mileage/homeworking	£76.40	£0.00	£76.40
Viking Direct	Stationery	£69.55	£13.91	£83.46
HMRC	September tax	£639.51	£0.00	£639.51
Primrose Gardening	Litter	£200.00	£0.00	£200.00
Primrose Gardening	monthly contract	£1,541.67	£0.00	£1,541.67
PATA	Payroll services 24/0048/PPS	£39.45	£0.00	£39.45
BDO	Limited assurance review	£420.00	£84.00	£504.00
Total		£4,846.86	£97.91	£4,944.77
Awaiting invoices payments due before next meeting				
Ensign Print	Pucklechurch News	tbc		£0.00
Midland Forestry	Tree works Eagle Crescent	£1,920.00	£384.00	£2,304.00
Silverback	Annual tree inspections	£850.00	£170.00	£1,020.00
Total		£2,770.00	£554.00	£3,324.00

Direct debits

Supplier	Frequency	Goods	Net	VAT	Total
o2	monthly	phone	£11.96	£2.39	£14.35
BT	monthly	broadband	£33.11	£6.62	£39.73
NEST	monthly	Pension Contribution	£128.31	£0.00	£128.31
EDF Energy	monthly	Electricity Eagle Crescent	£18.00	£0.00	£18.00
EDF Energy	monthly	Electricity Parkfield	£24.00	£0.00	£24.00
707	monthly	Monthly waste collection	£48.13	£9.63	£57.76

Resolved to approve payments. Cllrs Boyle and Hemmings to authorise.

2024/09/18 9b. To receive and agree reconciliations for August 2024.

Reconciliation checked for accuracy against bank statements and duly signed by Cllr Freestone

Balance per bank statements as at 01/08/24	£
NatWest reserve account	£30,687.25
Unity Bank	£78,943.67
NatWest current account	£62,257.78
Current A/C activity for August 2024	
NatWest current account	
Less: payments for August 2024	£0.00
Plus: income for August 2024	£0.00
Balance per NatWest current A/C bank statements as at 31/08/24	£62,257.78
Unity Bank	
Less: payments for August 2024	£31,024.22
Plus: Unity income for August 2024	£17,254.46
Balance as at 31/08/24	£65,173.91
NatWest Reserve account	
Plus annual interest	£0.00
Balance per NatWest reserve A/C bank statements as at 31/03/24	£30,687.25
Total bank accounts as at 31/08/24	
	£158,118.94
Less: any un-presented cheques as at 31/08/24	£0.00
Add: any un-banked cash as at 31/08/24	£0.00
Net NatWest Current A/C balance as at 31/08/24	£62,257.78
Net Unity balance as at 31/08/24	£65,173.91
Net NatWest reserve A/C balance as at 31/08/24	£30,687.25
Total balances all bank accounts as at 31/08/24	£158,118.94

Figure 1 Print screen of August 2024 accounts

Total receipts	62,257.78	30,687.25		0.00	0.00	31,024.22
Less: payments in month	0.00	0.00		391.95	0.00	70,742.26
Balance c/fwd	62,257.78	30,687.25				
	A	B				
Combined balance	D	158,118.94	Bank rec at 31 08 24			
			NW Current A/c	62,257.78		
			NW Bus Reserve A/c	30687.25		
Balance as at 1st April 2024		134,805.36	Unity	65,173.91		
Plus: receipts in year to date		94,447.79		158,118.94		
Less Payments in year to date		71,134.21	Less: uncleared chqs	0.00		
Balance as at 31st August 2024	E	158,118.94	F should equal D & E	158,118.94	Diff	0.00

Figure 2 Print screen of NatWest current account balance as at 31/08/2024

Welcome to your NatWest Statement				
Why file and store your statements when we can do it for you? Manage your statements online at www.natwest.com If you have changed your address or telephone number please let us know.				
Date	Description	Paid In(£)	Withdrawn(£)	Balance(£)
06 JUN 2024	BROUGHT FORWARD			62,299.78
01 JUL	Direct Debit EDF ENERGY A-E7470400-001 INITIAL PAYMENT		24.00	62,275.78
	Direct Debit EDF ENERGY A-37F88231-001 INITIAL PAYMENT		18.00	62,257.78

Figure 3 Print screen Unity bank balance as at 31/08/2024

06/08/2024	Faster Payment Debit	B/P to: HMRC Cumbernauld	£639.71	£0.00	£72,136
07/08/2024	Direct Debit	Direct Debit (BT GROUP PLC)	£39.73	£0.00	£72,096
14/08/2024	Direct Debit	Direct Debit (707 LIMITED)	£57.76	£0.00	£72,038
21/08/2024	Direct Debit	Direct Debit (NEST)	£128.31	£0.00	£71,910
23/08/2024	Faster Payment Debit	B/P to: Gordon Playground	£390.00	£0.00	£71,520
23/08/2024	Faster Payment Debit	B/P to: South Glos Council	£2,516.62	£0.00	£69,003
23/08/2024	Faster Payment Debit	B/P to: VisionICT	£60.00	£0.00	£68,943
23/08/2024	Faster Payment Debit	B/P to: Primrose Gardening	£92.19	£0.00	£68,851
23/08/2024	Faster Payment Debit	B/P to: Primrose Gardening	£250.00	£0.00	£68,601
23/08/2024	Faster Payment Debit	B/P to: Primrose Gardening	£1,541.67	£0.00	£67,059
23/08/2024	Faster Payment Debit	B/P to: Daphne Dunning	£1,886.08	£0.00	£65,173

All approved.

2024/09/18 9c. To note conclusion of audit.

Paperwork on website and main noticeboard in accordance with regulations. No issues beyond reference to 11a left blank and was returned for amendment to state 'No'. Noted.

Pursuant to 1 (2) of the Public Bodies (Admission to Meeting Act 1960), resolved that, because of the confidential nature of the business to be transacted, the Public and Press are requested to leave the meeting. One member of the public and the ward councillors left the meeting.

2024/09/18 5c. To receive update on matters pertaining to Eagle Crescent.

Noted. Agreed councillors need to select location(s) of any new trees which South Gloucestershire council may be able to supply. Agenda item for October

2024/09/1805d St Aldams active play project.

- **To receive update on funding options and agree any actions**

Report noted. **Resolved** to resubmit Suez application and use council reserves to cover £10K shortfall following failure to secure Sports England funding. Grants awarded February 2025.

- **To evaluate tenders received for the above project**

Anonymised tenders were independently evaluated by each councillor with the results considered by the council. Company D was unanimously selected as the preferred supplier subject to usual checks subject to the project obtaining grant funding in February 2025.

Next meeting **13th October 2024**

Meeting closed at 21:15

APPROVED MINUTES SIGNED VERSION HELD BY THE CLERK

Appendix 1 submitted comments for Local Plan Reg 18 consultation

1. Emerging Spatial Strategy - Site Selection Process

Do you support the process, as set out in section 10 of the Topic Paper, used to select sites which are currently included in the Emerging Spatial Strategy?

Comments:

It is hard to conclude that the process for selecting sites as set out in section 10 of the Topic Paper has produced results that are in the best interest of residents of South Gloucestershire. The local plan is meant to provide a positive vision for the future of South Gloucestershire; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings (National Planning Policy Framework ch. 3:p15). That means everyone, all communities and all residents. Despite the best efforts to convince the public that all sites have been assessed equally against a framework of HELAA, lens allocations, emerging preference strategy assessments and subsequent re-assessment (as detailed in Appendix 1A site assessment spreadsheet), the whole emerging strategy is based on unbalanced and biased results as it is premised on the urban expansion of greater Bristol and the requirement for major substantive development of the green belt along the East Fringe and to a lesser extent the Northern Fringe.

The council claims its first priority is to meet its own district's housing needs and its ongoing rhetoric claims this local plan is about providing residents with affordable and secure homes and access to employment, facilities and services against the background and challenges of climate change. Yet all the language within this new local plan whether intentional or inadvertent, is promoting the expansion of greater Bristol which actually risks disadvantaging many South Gloucestershire residents. What follows suggests that despite attempts to make the assessment process of sites appear obvious and transparent, indicates that the emerging strategy and urban focus on the extension of the East Fringe of greater Bristol and to a lesser extent the Northern Fringe, has influenced and skewed the selection of sites at every stage of evaluation. In the absence of evidence to the contrary it is difficult not to conclude that the whole process is flawed as it lacks a transparent, consistent strategic approach to ensuring that every site was dealt with equitably and consistently to achieve balanced conclusions and that each site was included purely on merit rather than in keeping with a plan for urban expansion.

The initial HELAA appear factual and consistently applied. Sites were considered against lens criteria. Detailed Sustainability Assessments were undertaken but this is where the process becomes opaque. There are no guides to show whether weightings were applied for each of the 27 elements identified. In many cases it is impossible to determine why sites that failed on multiple sustainability elements were selected whereas others deemed more sustainable were not. Immediately this raises questions about whether the sustainability information has any actual impact on the site evaluations as many selected sites will damage rather than contribute to and enhance the natural and local environment (NPPF 180) and are likely to contribute to rather than mitigate climate breakdown and bio-diversity loss. This brings into question whether South Gloucestershire council's actual commitment to addressing the climate and nature emergencies had any impact.

While the section *Reg 18 Local Plan Phase 3 Consultation Emerging Preferred Strategy (Topic Paper Paragraph 10.12 - 10.14)* match sites to criteria for infrastructure, services etc, decisions start to become highly subjective in nature rather than evidence-based or factual criteria for consistent and structured examination. A quick example of two blank greenfield sites where SG055 is deemed a commuter town without any evidence to show public transport would not be possible or commercially viable while SG868 does the opposite and assumes public transport will automatically be commercially viable and extend beyond the

local area to the northern fringes and Severnside. To ensure fair treatment of every site, evaluations should be evidence based.

Similar inconsistencies appear throughout the evaluations. Further examples having looked across multiple sites - both rejected and included – demonstrate clear patterns indicating the differing treatment of sites along key transport routes including A38, A432 and A4174.

Schools

Data has been produced on primary school capacity yet restrictions have been applied differently. For example:

- Winterbourne produced many sites along B4058 which were considered developable or deliverable in the plan period and required no major new infrastructure. Yet overall development is restricted to 235 due to limited primary school places. Sites appears to have been selected to reflect these number - SG437 (70), SG446 (20) & SG762 (145) = 235.
- Likewise, Frampton Cotterell/Coalpit Heath have many sites considered developable or deliverable in the plan period and requiring no major new infrastructure. Again, development was restricted to 60 due to limited primary school places. In this case sites SG380 (60) & SG107 (90) for 150 homes were selected, some 2.5 times over capacity. It is interesting that as both are large conurbations with the potential for further sustainable development that with growing housing demands it was not thought prudent to even consider of the potential for combined developer contributions to enable school capacity to increase.
- At the other extreme 2 small villages - Cromhall and Rangeworthy which both have capacity needs to limit housing to 30 have 6 sites for 152 homes in Cromhall and 5 sites for 212 homes in Rangeworthy respectively included in the emerging strategy. If school capacity is unlikely to change why cause unnecessary stress to the communities?
- In contrast, a completely different approach was adopted along the Eastern fringe where decisions on green belt sites with no existing facilities appear based on aspirations not fact simply because sites are adjacent to A4174 and/or A420. These include SG209, SG346, SG868, SG459 and SG897. Despite these sites providing 5800 homes, there is no assessment of whether local schools have capacity just an assumption that new schools will be built on these large sites. Experience at Lyde Green should have highlighted the difficulties and protracted timescales to procure schools. The new secondary school in Lyde Green will not open until 2026/27 and even the Education Infrastructure Position Statement Topic Paper highlights the uncertainty around capacity beyond the Lyde Green development. Interestingly planned Secondary education expansion is due at Abbeywood & Brimsham Green – both areas where there is no development proposed in the local plan.

Roads and traffic

South Gloucestershire's 2023 Monitoring Report shows existing infrastructure is already at or near capacity and will require new investment if developments are to be sustainable. Evidence shows high rates of car use by South Gloucestershire residents to commute with only 3% using public transport, 2% cycling and 5.7% walking. It is already known that air pollution including NO₂, and particulates PM_{2.5} & PM₁₀ is an ongoing problem across the county and while levels meet UK standards, they exceed World Health Organisation (WHO) target levels and continue to pose a threat to health. Yet despite this mass of evidence showing county-wide road congestion is growing, depending on the road and highway capacity issues in question, recorded evaluation decisions differ and appear subjectively selective.

Small discrepancies appear in two Coalpit Heath sites where SG068 for 1317 homes was deemed not suitable with constant reference to adding to traffic congestion on A432 corridor and negative impact on public transport while SG107 for 90 homes was deemed suitable yet although it feeds onto A432 there is no mention of adding to traffic congestion on this road corridor and the negative impact on public transport.

In the Yate area despite being located on the B4058 with access to services and public transport SG382 Engine Common for 594 homes was deemed not suitable in part due to its impact on A432. The site is not on the A432 and any commuter route to M32/M5/Bristol would be on B4058 via Winterbourne (where there is no reference to roads or congestion in the sites selected). In contrast SG100 Badminton Road Yate for 650 homes is sited very close to the new park and ride and dedicated cycle lane for active travel along the A432. With access to services and public transport including rail, the site was deemed unsuitable due to the additional demand on the 'heavily congested' A432. Furthermore, it claimed services/facilities were not walkable despite meeting statutory walking distances for schools with Culverhill and Abbotwood schools 1.5 miles away (2 miles at primary and 3 miles at secondary) and the town centre approx. 1.9 miles, the same distance as Ladden Garden village which is deemed 'walkable'.

At Chipping Sodbury SG108 for 207 homes failed on the grounds that *it was not a reasonable walking access to services and facilities including education and there was no public transport*. Yet the site is adjacent to a dedicated flat cycle/walking path along the Wickwar Road and 1.4 miles from Chipping Sodbury with its range of services and 1.4 miles from Brimsham Green school.

Development around A38/M5 Junction 14 area

From the outset it was argued that issues with Junction 14 of the M5 prevented major development around the Thornbury/Buckover area and restricted development in the wider Charfield area further necessitating the use of green belt land. Yet according to Stroud District Local Plan *Examination Pause Short Report July 2024*, South Gloucestershire Council is working collaboratively with Stroud District Council, Gloucestershire County Council, National Highways and others in support of Stroud's Local Plan. Not only is South Gloucestershire Council collaborating on their M5 Junction 14 Project, it is actively involved in the M5 J14 Interim Scheme to provide an interim traffic mitigation scheme associated with the 1000 new homes planned for Sharpness Vale. This raises questions over why the council is willing to support works and/or upgrades which will allow another district to build, but it prevents South Gloucestershire from doing so. Surely this council has a duty to ensure appropriate suitable development in this part of South Gloucestershire which will provide the needed housing and economic benefit the area needs before it considers sacrificing green belt.

Other examples of inconsistencies include greenfield sites SG055 at Falfield for 1220 homes and SG115 Buckover for 3000. Both are undeveloped sites on the major A38 (4.3 mile and 2.3 miles from Thornbury respectively), and each will have easy access to the new Charfield train station. Both require major infrastructure investment but the recorded decisions to reject the sites include highly subjective reasons for rejection without evidence to support the suggestions that these sites would be less able to develop sustainably than others even when they are close to A38, a major A-road, M5 motorway and train station. Economies of scale could easily make them an attractive proposition for public transport.

This is in direct contrast the sites with similar constraint and no infrastructure along the eastern fringe A4174/A420 where without any guarantees infrastructure to service these sites can be delivered, sites have been selected based on wishful thinking. SG459, SG868 & SG897 state 'development of these site will significantly increase highway flows along the A4174 and wider local road network and solutions will be required to mitigate these'. There are no solutions provided yet the sites are included. Despite proposals for over 5000 homes along the A4174 and A420, the disproportionate negative impacts of increased traffic

congestion along the eastern fringe are simply dismissed as is the fact that pressure on the already overloaded A4174 will further exacerbate the existing challenges of getting to Parkway station and the northern fringe.

At the other extreme, smaller sites in the same area at SG209 & SG346 make no mention of roads despite feeding onto the A4174.

Park and Rides and local employment options based on claims the East Fringe of Bristol has a 'homes-to-jobs' imbalance is envisaged as the solution to traffic congestion. However, access profiles (DAPs) show low numbers of residents actually live and work in the same place even in areas with multiple employment and if patterns of low-level usage of park and rides such as at Yate are repeated not only will it undermine the viability of proposed park and ride sites along the eastern fringe, it will substantially add more traffic. As Jacobs *A4174 Junction Improvements Public Consultation Report* noted the A4174 was designed to accommodate longer distance car journeys and is important for 'necessary strategic car trips'. Add delays and traffic will simply reroute through local communities.

It is argued that the purpose of the chosen methodology is to select the best sites to address housing needs. Yet many of the identified green field sites are in fact green belt and as CPRE's *State of the Green Belt* (2018) report demonstrates, building on the green belt does not lead to an increase in affordable homes. Figures from 87 authorities show less than 22% of housing units on green belt sites are affordable compared with the average target of 31% set out in local plans. While the Government claims half of all green belt development must be affordable, the exploitable "subject to viability" loophole remains and as building in the green belt is costly, evidence suggests developers will continue to exploit this and most schemes will be unlikely to comply¹.

Building more homes alone does not significantly reduced prices, increased construction rates are also needed and this is not happening. With this plan supporting large amounts of new building in the green belt which it is known will result in fewer homes being built per acre, overwhelmingly the homes are likely to be expensive four- to five-bedroom and prices on average 20% more than equivalents elsewhere. When 'affordable' housing can cost anything up to 80% of market value, how will these levels benefit the very people it is claimed the local plan will help who currently live in poor housing or with unstable tenancies?

The overall impression is the eastern fringe development is being driven by profit-hungry developers at the expense of local people and the planet, which appears contradictory as South Gloucestershire Council has declared a climate emergency. Concentrating so much housing along the eastern fringe is likely to impact flooding, damage critical carbon storage, and impact the ability for the land to alleviate the urban heat island effects through shading/cooling, impact air quality improvements and destroy safe havens for vulnerable species. At the same time the remaining 22% of development (1755 homes) is widely spread across 18 smaller villages.

The section process has not provided each community with the homes they desperately need, rather as has been demonstrated, the selected sites will worsen the situation, with high cost homes which are likely to attract people from beyond to the county. Market towns such Yate/Chipping Sodbury and Thornbury appear excluded but the decisions lack valid and considered reasons why they are avoiding further development beyond claims that they "have played a key role in delivering the new homes over the last 5 years". These towns have the same housing needs as other areas and have also benefited the most from substantial investment in infrastructure and access to services yet only 1% of development will occur here. This raises concerns that in the absence of logical reasoning, this is a purely political decision to avoid and unfairly protect certain areas and sites. This increases the

¹ <https://www.theguardian.com/commentisfree/article/2024/sep/10/countryside-ministers-threat-pristine-green-belt-land>

feeling that evaluation outcomes have been too often based on arbitrary decision making with the aim of manipulating a green belt review which can then be used to justify the development of the eastern fringe green belt. While some small-scale green belt development throughout this area may be warranted or even preferable, according to the Local Government Association (LGA) *Independent Group briefing on NPPF Consultation August 2024*², proposing such large eastern fringe incursion into the green belt with 56% of all new development (further 21% development in the northern fringe) which will fundamentally undermine its function to prevent urban sprawl, prevent coalescence of towns or distinct areas and prevent encroachment on the countryside should not be supported. This proposed loss of green belt will allow the main urban area sprawl to creep inexorably towards joining places such as Winterbourne, Coalpit Heath, Yate and Pucklechurch. This should be of great concern to South Gloucestershire residents. It undermines the fundamental purpose of the Green Belt specifically in an area deemed to be checking urban sprawl, especially when the Government's proposed changes do not support the release of land where doing so would undermine the function of the Green Belt across the area of the plan as a whole.

2. South Gloucestershire's Housing Need

Do you have any comments on the provision of additional supply to ensure greater flexibility to meet South Gloucestershire's housing needs, as set out in section 11 of the Topic Paper? Please also include comments about any individual sites listed at Table 1 at paragraph 11.1 and Appendix 1B.

Comments

The same methodology will produce results will all the flaws identified above.

3. Council's Approach to whether it can assist with Bristol City Council's Unmet Housing Need

Do you have any comments on the Council's approach to considering whether it can assist with Bristol City Council's (BCC) unmet housing need, as set out in section 12 of the Topic Paper?

Comments

Housing needs are fluid and have no boundaries so it is actually impossible for South Gloucestershire council to claim it cannot assist Bristol with its unmet need. It has no control over who buys houses. However, the very choice of language and tone used throughout the local plan and its constantly inward focus toward Bristol and its proposal that 77% of all the proposed developments are concentrated along the urban fringes gives a strong impression that this is a plan for the expansion of Greater Bristol not a local plan for South Gloucestershire where a more sustainable approach would be to serve local people's housing needs more fairly across the whole county. There is no doubt this plan will indirectly but positively assist Bristol with its housing needs.

To say this plan is to meet the needs of the whole population of South Gloucestershire and doesn't contribute to Bristol is disingenuous. As has already been noted, pressure on affordable housing is cross-county with the council admitting the county has shrinking households with less people in each home and a population that is both growing and aging. Yet the council has actively chosen to excluded development in and around its main towns of Thornbury, Yate and Chipping Sodbury who combined site allocations have a mere 75 homes proposed without evidencing how those starting out, looking to downsize or developing new blended families will be able to find a suitable home to live in if they wish to remain in these areas.

² <https://www.local.gov.uk/lga-independent/our-work/publications-independent-group/lga-independent-group-briefing-nppf>

What is planned is that along the eastern fringe alone the local plan intends to sacrifice green belt to provide 38% of all its housing needs on the basis that developers will cough up and provide all the infrastructure, services and facilities to support the housing, from local centres, education facilities, park and rides to new recreation, open space and green infrastructure and provide extensive affordable housing. The reality is infrastructure costs alone will inevitably lead to invoking the “subject to viability” loophole to reduce affordable housing.

No regard has been given to the close-knit existing communities near these sites who will be consumed or impoverished by the sheer scale of developments and loss of green belt. The fact that green belt developments produce less numbers of houses and attract price premiums means housing at these locations will be beyond the financial reach of residents on average wages or who currently live in poor housing or unstable tenancies, the very people with housing needs that this plan is meant to address. This expansion of greater Bristol into the green belt is not only a developers’ dream but will be hugely attractive to urbanite Bristolians wishing a more rural location or anyone with deep pockets able to afford the premium prices.

APPROVED MINUTES SIGNED VERSION HELD BY THE CLERK

Appendix 2 7ai P24/02021/f land at Meadow View Shortwood Road Pucklechurch South Gloucestershire

This application seeks consent for the erection of 1 no. permanent 3 bedroomed detached bungalow described as 'self-build', for market housing purposes.

Pucklechurch parish council objects to this proposal as it believes it to be at odds with the following planning policies:

1. The application site lies outside of a settlement boundary in open countryside within the Green Belt. Irrespective of appeal decisions that have determined that the Council's settlement boundaries are out of date, the proposal must still be tested against Green Belt policy. What is proposed does not conform to any of the types of development considered to be appropriate within the Green Belt as described in South Gloucestershire Local Plan Core Strategy Policy CS 34 Rural Areas, and Core Strategy Policy CS 5 Location of Development which sets out exceptions to Green Belt policy. No special circumstances have been offered that would override the permanent harm to the openness and visual amenity of the Green Belt that would arise from the construction of a settled permanent dwelling, and substantial weight needs to be given to that harm so that development should not be approved except in very special circumstances.
2. The development site is situated on a safeguarded Gypsy & Traveller site listed within SGC CS21 as "No.21: Meadow View, Shortwood Road, Pucklechurch". Contrary to the images and plans supplied, which suggest this plot is not fully occupied, as of 8th September 2024, it is easy to see from the roadside that there are now at least 3 large mobile homes parked within this plot (as allowed for by extant permission), one of which is located directly where the proposed bungalow would be. PSP40 outlines the limited forms of residential development that are acceptable in the open countryside and also states that "the replacement of residential caravans or mobile homes on traveller sites with permanent buildings will not be acceptable". This proposal would therefore also be in contravention of PSP40.
3. The authorised use of the site is for permanent gypsy and traveller pitches and since South Gloucestershire Council has been shown not to be able to meet the current need for additional pitches it would be wrong to allow the reduction of current pitch provision in favour of permanent market housing
4. Although parking spaces have been referenced on the application form, no plans have been supplied that show where these would be situated and therefore cannot be adequately tested against or shown to meet the requirements of PSP16. Equally no plans have been provided to show the provision of 60m² private amenity space required by PSP43, nor how this site would be demarcated with fencing or boundary treatments, from the pre-existing Gypsy & Traveller pitches. No hard or soft landscaping plan has been provided at all.
5. Policy CS1 requires development to demonstrate the highest standards of design and site planning. Since this proposal is for a permanent dwelling, PPC believes that its design does not reflect the characteristics of the locality's permanent settled dwellings and would therefore not make a positive contribution to the distinctiveness of the area/locality.
6. The proposal is described as 'self-build' – it is not clear whether or not the initial owner of the home will have primary input into its final design and layout.

Appendix 3 7aii P24/02049/O Land Adjacent To 150 Westerleigh Road Pucklechurch South Gloucestershire BS16 9PY

This application seeks consent for the erection of two self/custom build single storey dwellings in the residential curtilage north of 150 Westerleigh Road. Pucklechurch parish council notes this is an Outline application for development.

Pucklechurch parish council first wishes to make the following contextual observations that should be taken account of when determining this application as well as then specifying planning policies it believes the proposal conflicts with. Pucklechurch Parish Neighbourhood Plan has not as yet progressed to public consultation nor independent examination. At the time of writing, a screening opinion has been circulated to the three consultation bodies for feedback (Historic England, Environment Agency, Natural England). The consultation lasts five weeks and the deadline is 13 September 2024. This means that none of the policies outlined within it have been tested or completed the regulatory process. Similarly, public consultation on Government proposals to revise the NPPF and a series of wider national planning policy reforms does not conclude until 24th September 2024. Pucklechurch parish council questions what weight these carry with regard to the material considerations applicable to this proposal. Changes to the Green Belt that may be afforded by these revisions allow for changes to be made during the local plan making process and not piecemeal and that the release of land should not be supported where doing so would fundamentally undermine the function of the Green Belt across the area of the plan as a whole – South Gloucestershire Council has already identified potential changes as part of its emerging preferred strategy that does not incorporate changes to the Green Belt in this area. NB this same site was previously offered up as part of the SGC local plan-making 'Call for Sites' process (HELAA reference SG960) and was discounted.

Pucklechurch parish council **objects** to this proposal as it believes it to be at odds with the following planning policies:

The application site lies well outside of a settlement boundary in open countryside within the Green Belt. Several planning application decisions relating to 150 Westerleigh Road (e.g. PK16/6025/F) and the stable conversion opposite (P22/06238/F) all describe this location as being in open countryside washed over by the Green Belt. Furthermore, applications for the development of properties much closer to the development boundary (e.g. P20/09180/CLP) also confirm these sites to be located outside of any defined settlement boundary and within the open countryside. This site cannot as such therefore be reasonably described as being within the village development boundary and therefore although limited infill is one of the listed exceptions this does not apply and is not a determinative factor. Since the site does not lie within a village, it would be inappropriate development in the Green Belt and conflict with Green Belt policy. The site lies on the eastern side of Westerleigh Road, to the north of the built-up area of Pucklechurch. Along the frontage of the site, the road has a distinctly rural character. Whilst there are a small number of dwellings located along the road and adjoining the application site, these are well-spaced apart, and the site is surrounded almost entirely by agricultural farmland in isolation of the higher density development present to the south.

Irrespective of appeal decisions that have determined that the Council's settlement boundaries are out of date, the proposal must still be tested against Green Belt policy. Since what is proposed does not conform to any of the types of development considered to be appropriate within the Green Belt as described by the NPPF, or as described in South Gloucestershire Local Plan Core Strategy Policy CS 34 Rural Areas, and Core Strategy Policy CS5 Location of Development which sets out exceptions to Green Belt policy, it does not comply with these policies. No special circumstances have been offered that would override the permanent harm to the openness and visual amenity of the Green Belt that would arise from the construction of two additional permanent dwellings, and substantial weight needs to be given to that harm so that development should not be approved. The site is currently largely laid to grass, with small trees and shrubs enclosed by fencing and

hedging, but with no built development within it. The proposal would result in the introduction of built development within the site and would therefore visually and spatially result in loss of openness of the Green Belt at this location. Openness is not defined by whether or not something is visible within it since openness is capable of having both spatial and visual aspects.

Whilst the application site does have access to bus services, it should be noted that the foot path to the nearest facilities is of substandard width and construction, and adjacent to a 40 mph stretch of unlit road. The path itself is frequently compromised by overgrown hedges and traffic along the road is currently subject to investigation by SGC with regard to frequent speeding at the request of Pucklechurch parish council and local ward councillors.

With regard to Self-Build and meeting the needs of the local population, Pucklechurch parish council notes the examples provided that have been approved in other areas:

- P24/00907/F – was not located in the Green Belt and in effect a replacement for a pre-existing dwelling
- P23/02881/O – was not located in the Green Belt and had been identified within the emerging Local Plan as a potential site for residential development.

Of those examples used to demonstrate permissions granted for sites outside development boundaries, each application must be taken on its own merit and there were other considerations that could be identified as in play:

- P24/01175/F: not in the Green Belt
- P23/03312/O: land apparently sold by SGC for development
- P22/06238/F: deemed an exception site (development was for the re-use of buildings)
- PT17/4635/F: land deemed clearly within the built-up area of the existing hamlet.
- P21/03217/F – exception site as deemed to be 'limited infilling in a village'

Since the aspiration for the applicant is to occupy one of the two dwellings, the proposal would make an insubstantial contribution towards meeting the identified housing needs of the local population, whereby one very much larger house would presumably be released onto the open-market and one smaller bungalow plot offered to a self-builder. It is also not clear what degree of input the independent self-builder would have into the design of the project as a whole, nor could it be mandated who that person/persons would be demographically speaking. The latest Housing Needs survey produced to support the neighbourhood-planning process (April 2023) also showed that there is a clear issue of affordability in Pucklechurch, and that both entry level and new build homes are generally out of reach for the average earning household. Pucklechurch parish council does not believe that this proposal would address that local need, nor many of the other needs expressed by the Housing Needs survey. This application is not being proposed or determined as a rural exception site or for affordable housing. As such Pucklechurch parish council's position is that what is being proposed and the justifications provided cannot be used to demonstrate that very special circumstances exist so as to clearly outweigh the potential harm to the Green Belt by reason of inappropriateness.