

## Part B: Please use a separate sheet for each representation

### 2. Full Name or Organisation:

Pucklechurch parish council

*Please do not include other personal details such as your address or other identification in the sections below or your response will be invalid.*

### 3. To which part of the Local Plan does this representation relate?

*This question is required and should be answered for each policy or site commenting on, unless commenting on the whole plan.*

Policy number or Policy Title e.g. LPS10		Policy Criteria or Paragraph number		Site allocation reference e.g. NX1	
Table in policy		Figure in Policy		Other	

or please mark 'X' instead if your response is not specific / relates to the whole plan. ☒

### 4. Do you consider the Local Plan is: *please mark your response marking 'X' in a box*

4.(A) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(B) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(C) Complies with the Duty to Co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please note, the tests of soundness are set out in paragraph 35 of the National Planning Policy Framework December 2023 (NPPF). Plans are sound if they are:

- Positively prepared
- Justified
- Effective
- Consistent with National Policy

Please, see the separate statement of representation procedure (guidance note) for further information on 'soundness'.

[National Planning Policy Framework - 3. Plan-making - Guidance - GOV.UK](#)

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**5. Please give details of why you consider the Local Plan is not compliant with relevant legislation, or does not meet the tests of soundness set out in the NPPF, or fails to comply with the duty to co-operate. Please be as precise as possible making reference to specific aspects of the plan and relevant legislation and policy.**

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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Legal compliance-

(please continue on a separate sheet /expand box if necessary)

Soundness-

Pucklechurch parish council does not believe the 'Vision for 2041' is either sound nor deliverable. It states:

*Local plan's vision for South Gloucestershire is local people's vision: "We want what local people want for South Gloucestershire".*

SGC might claim to want what local people want but consultation feedback shows how little they have listened to these people. Understandably developers see the potential for profits, but local people clearly articulated that they want to see:

- small scale growth spread across the district to meet the needs of local communities
- prioritising environmental, climate and Green Belt protection.

*A greener, fairer and more inclusive South Gloucestershire with affordable housing, key facilities (shops, primary schools, healthcare etc) on the doorstep and good sustainable transport links and active travel network to address over-reliance with on private vehicles*

No regard has been given to the close-knit existing communities near these large-scale eastern fringe sites who will be consumed or impoverished by the sheer scale of developments and loss of green belt.

CPRE highlight that green belt developments produce less numbers of houses and attract price premiums - attractive to urbanite Bristolians or anyone with deep pockets wishing a more rural location.

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 suggesting use of the exploitable "subject to viability" loophole. The implication is that much of the housing at these new neighbourhoods 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.

The overall impression is the eastern fringe developments are being driven by profit-hungry developers at the expense of local people and the planet. This appears contradictory to the 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/

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cooling, impact air quality improvements and destroy safe havens for vulnerable species.

The whole plan is premised on developers providing sufficient contributions to build these new neighbourhoods from scratch. The parish council does not believe the stated expectations that enough funding will be available to provide the extensive affordable housing and the long list of infrastructure needs; from local centres, education facilities, park and rides, to recreation and community venues, open spaces, green infrastructure and for BNG to be realised or delivered. This is an archaeologically rich area which will need investigations, BNG is a statutory requirement and in the queue for resource sits ahead of other types of infrastructure (including affordable housing).

East Fringe already provides the highest residential concentration for South Gloucestershire, with key strategic employment assets such as the Bristol and Bath Science Park and the National Composite Centre. Evidence suggests these enterprise areas attract employees from throughout South Gloucestershire and beyond and actually increase commuting. It is anticipated that emerging jobs in the area will be in fin-tech and digital/technology research but these will only be suitable for those with the specialist skills.

*‘Improved air quality and reduced carbon emissions’*

There is a mass of evidence showing county-wide road congestion is growing and existing infrastructure is already at or near capacity and will require new investment if developments are to be sustainable (South Gloucestershire’s 2023 Monitoring Report). Yet three large-scale developments with the potential for over 10,000 vehicles will feed onto the already congested A4174 and A420. Evidence shows there are high rates of car use by South Gloucestershire residents to commute - only 3% using public transport, 2% cycling and 5.7% walking. Air pollution remains an ongoing problem across the county and continues to pose a threat to health. Imagining that everyone will suddenly start to use public transport is fanciful and aspirational.

Despite claims that this plan addressed the East Fringe ‘homes-to-jobs’ imbalance and will be a solution to traffic congestion, many access profiles (DAPs) within the greater Bristol area show low numbers of residents actually live and work in the same place even in areas with multiple employment. However, this pattern is not replicated to the north where there is minimal development planned. Not only does Yate have an enviable range of services and facilities (retail, commercial, healthcare, leisure and employment), and good public transport and active travel options, 47% of residents work at home/within the area (including Chipping Sodbury). Likewise, Thornbury where £4.6m has been invested in its high street, educational and health, plus active travel improvements to A38, 42% of residents work at home/within the area. In nearby Falfield 50% work at home/within the area and in Charfield it is 24%.

*‘Right types of homes in the right places to regenerate urban, market towns and ensure villages thrive’ and ‘Increased economic prosperity for all’*

Pucklechurch parish council does not have confidence that this local plan is sound and benefits and contributes to the prosperity of all South Gloucestershire communities. The focus on urban expansion along the East and Northern Fringes by releasing prime green belt land for development can only be described as a developers’ dream while disadvantaging many South Gloucestershire communities. Housing needs are fluid and have no boundaries but the language throughout the plan gives a strong impression that this is a plan for the expansion of Greater Bristol not a local plan for South Gloucestershire. On one hand this will indirectly but positively assist Bristol with its

housing needs. On the other, having actively chosen to excluded developments to the north, the ability to unlock growth, attract employment and address perceived car dependency in the main towns of Thornbury, Yate and Chipping Sodbury will not be realised by the refusal to address capacity issues at M5 junction 14. This is despite

By focussing on the narrow selection of locations, the emerging preferred strategy does not provide everyone with access to decent, safe and sustainable homes, including affordable and specialised homes and tenures in the communities where they live. Growth is needed in all settlements to maintain their viability and sustainability or over time, outlying villages risk becoming dormitory suburbs with no facilities

The local plan constantly refers to well-designed places but placemaking is more than proving the physical building, layouts and structures and requires genuine community engagement. The evidence suggests community feedback does not support large-scale developments in the green belt and their locations and these 'branded' developer led sites are merely a collection of imposed buildings and layout.

*'Connected green infrastructure networks so nature can thrive' and 'urban parks and green spaces providing access to nature'.*

Green corridors are essential in "delivering environmental, economic, health and wellbeing benefits for nature, climate and communities" as defined in the NPPF. Despite previous commitments to "protect the open green hillsides of Pucklechurch Ridge, Shortwood Hill and Oldland Ridge", this mosaic of interconnected but declining habitats including ancient hedgerows, copses and fragments of ancient woodlands, and a network of calcareous and neutral grassland supporting a variety of fauna and flora including protected and amber and red listed species are threatened (Landscape Character Assessment Area 6) Pressure from new housing developments does cause irreversible damage to nature and the climate (Natural England). A genuine commitment to protecting this area's green infrastructure would have been proposals for smaller more sensitive developments. Green/blue infrastructure under BNG (even if onsite) will never compensate for the damage caused by the large-scale developments (policy LP6, 7 & 8), and the remaining green spaces, Commons, woods and green corridors will be placed under immense pressure through increased footfall.

(please continue on a separate sheet /expand box if necessary)

Complies with the Duty to Co-operate -

(please continue on a separate sheet /expand box if necessary)

**6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.**

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Modifications-

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*Please mark your response marking x in a box*

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 <p>South Gloucestershire Council Delivering with you</p>	<b>South Gloucestershire Local Plan 2026-2041</b> Regulation 19 Consultation Stage Representation Form	Our Ref:  (For official use only)		
<table border="1" style="width: 100%;"> <tr> <td style="width: 60%; text-align: center;"> <b>South Gloucestershire Local Plan Regulation 19 Consultation</b> </td> <td style="width: 40%; text-align: center;">         Public response form       </td> </tr> </table>			<b>South Gloucestershire Local Plan Regulation 19 Consultation</b>	Public response form
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<p><b>Please return this form to South Gloucestershire Council by emailing to <a href="mailto:policy.consultation@southglos.gov.uk">policy.consultation@southglos.gov.uk</a> by 11:59pm 11/04/2025. Return this form in MS Word format rather than PDFs.</b></p> <p><b>Data Protection</b></p> <p>Please be advised that all comments made on the new Local Plan will be published online in due course. Please note that all responses received, including some personal details cannot be kept confidential and will be made publicly available.</p> <p>Information about how we will use your personal data, and a copy of South Gloucestershire Council's Privacy Notice is available to view at: <a href="http://www.southglos.gov.uk/privacy">www.southglos.gov.uk/privacy</a>, and our data protection policy is available to view at: <a href="https://beta.southglos.gov.uk/data-protection-policy/">https://beta.southglos.gov.uk/data-protection-policy/</a>.</p> <p>If you have any questions, please contact us by email at <a href="mailto:policy.consultation@southglos.gov.uk">policy.consultation@southglos.gov.uk</a> and we will respond in a timely manner.</p> <p><i>A copy of the representations will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination. The representations will be made available in line with the Town and Country Planning (Local Planning) (England) Regulations 2012 – Regulations 20,22 and 35. This includes publication on the South Gloucestershire Council's website.</i></p>				
<p><b>This form has two parts:</b></p> <p><b>Part A</b> – Personal Details: need only be completed once.</p> <p><i>Please note: your <u>name</u> and <u>response</u> will be made publicly available but not your other personal details. This is in line with GDPR legislation and is a requirement of the Town and Country Planning (Local Planning) (England) Regulations 2012. If you do not submit contact details your representation will not be able to be considered by the Inspector.</i></p> <p><b>Part B</b> – Your representation(s). Please fill in a separate sheet for each representation you wish to make.</p> <p><i>Please do not include any personal details on this sheet as this will invalidate your response.</i></p>				

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## Part A: Personal Details

1. Personal Details*		2. Agent's Details (if applicable)
		<i>*If an agent is appointed, please complete only the Title, Name and Organisation in the boxes below but complete the full contact details of the agent in 2. Please submit in MS Word format rather than PDF.</i>
First Name	Daphne	
Last Name	Dunning	
Job Title*	Clerk and Responsible Financial Officer	
*(where relevant)		
Organisation*	Pucklechurch parish council	
*(where relevant)		
Respondent's category*	Parish clerk	
*(please let us know whether you are responding as: a member of the public, Statutory Body, Developer/ Agent/ Site Promoter, Registered Charity, Neighbourhood Planning Group, Business or Company, Community Group, Local Councillor, Town & Parish Council or Clerk, Utility Company or Infrastructure provider, Other.)		
Address Line 1	25 Parkfield Rank	
Address Line 2	Pucklechurch	
Address Line 3		
Address Line 4	Bristol	
Post Code	BS16 9NR	
Telephone Number	07525 842 095	
And/or		
E-mail Address	clerk@pucklechurchparishcouncil.gov.uk	

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Pucklechurch parish council

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Policy number or Policy Title e.g. LPS10	LPS1	Policy Criteria or Paragraph number		Site allocation reference e.g. NX1	
Table in policy		Figure in Policy		Other	

or please mark 'X' instead if your response is not specific / relates to the whole plan. ☐

**4. Do you consider the Local Plan is:** *please mark your response marking 'X' in a box*

4.(A) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(B) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(C) Complies with the Duty to Co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

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Legal compliance-

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Soundness-

Pucklechurch parish council does not believe the strategy and policy framework is sound and deliverable. Considerable work appears to have gone into the individual policies that support the strategy but an overall vision and cohesive, growth focussed approach to ensure the whole county thrives both now and into the future, while minimising the impact on the climate and protecting the natural environment appears to be lacking. The strategy is far too reliant on a small number of large-scale developments to meet the identified housing needs. The parish council is unconvinced that this actually provides the housing where it is needed which has implications for keeping family networks together. The strategy is also premised on developer contributions providing or contributing to the infrastructure and services these large-scale sites need despite this model having already been shown to be problematic with delays, rising costs or non-provision a strong possibility eg Lyde Green or Brabazon

The West of England is an attractive place to invest, work and/or live but ensuring South Gloucestershire thrives requires engagement not only with South Gloucestershire's communities but necessitate the involvement and greater cooperation and co-ordination of other major West of England stakeholders. The local plan presented such an opportunity, not only to select the best sites from the call for sites to ensure organic and sustainable development across all communities but to ensure investment for regeneration, growth and employment opportunities are realised. The parish council is concerned that the consequences of not trying to address the problematic M5 junction 14 has resulted in an inward-looking plan based on short-term decisions which will result in an expansion of Greater Bristol at the expense of green belt while disadvantaging and potentially precluding Yate, Thornbury and the northern parts of the county from realising new growth opportunities. Beyond the county, Stroud District may also have been negatively affected.

(please continue on a separate sheet /expand box if necessary)

Complies with the Duty to Co-operate -

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Legal compliance-

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Soundness-

Pucklechurch parish council does not believe this strategy is positively prepared, is justified or effective in the following areas.

1. There has been no lack of sites offered as part of the call for sites. Their allocation to lenses provided detailed analysis of suitability and sustainability including having access to amenities and good transport links. Yet South Gloucestershire council's (SGC) insistence that the main focus of their local plan remains on the urban East and Northern Fringes as the only sustainable options for the majority of new development rather than adopting a pick-and-mix approach to benefit all communities, has influenced and skewed the selection of sites throughout every stage of evaluating the plan. This is despite SGC's commitment that it *"values the county's diverse landscape, beautiful countryside and areas of outstanding natural beauty"*. SGC has stated it *"wants to keep it that way, recognising the importance of maintaining what residents' value most, particularly the area's heritage and access to nature rich green spaces"* (climate emergency strategy p11) yet consultation responses have not been heeded or totally ignored which support:
  - small scale growth spread across the district to meet the needs of local communities
  - prioritising environmental, climate and Green Belt protection.
2. The Green Belt boundary on the eastern fringe is clearly defined by the A4174 and M4 motorway . SGC itself has also considered the eastern fringe as "not considered to be suitable for development because of major constraints, specifically the importance of the open countryside, hillside and ridgelines that establish the setting and help define the extent of the urban area, the current limited employment opportunities, the lack of potential for integrating new development and the extreme difficulty of delivering essential transport improvements". While some organic development of communities will be in the green belt, the parish council does not believe the necessary 'Exceptional circumstances' have been proven for such extensive development (NPPF p145)
3. The green belt benefits not only South Gloucestershire residents, but with a lack of green belt in Bristol (600ha) and being so easily accessible, South Gloucestershire's 23,040ha of green belt plays a vital role in the wellbeing of Bristol residents. There is no evidence of cooperation with Bristol on this matter.
4. The opaque sustainability assessment process prevents analysis of the rationale why sites failing on multiple sustainability elements were selected above more sustainable sites. Indeed, the ARUP 2025 Sustainability Assessments contains changes to the West of England Combined Authority (2022) Strategic Green Belt

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Assessment for eastern fringe sites covered by policies LP6 , 7 & 8 without supporting evidence so:

- LP6 North Lyde ecotech village assessed 'Significant' for (a), (b) and (c) (NPPF p143) by WECA is downgraded to all 'moderate' allowing a 'professional judgement' that development would not be deemed urban sprawl.
- LP7 Carsons Green and Rockhouse Farm New Neighbourhoods and LP8 North Warmley New Neighbourhood both assessed 'Significant' for (a) & (c) downgraded to 'moderate' for (a) allowing a 'professional judgement' to 'conveniently' reduce green belt protection.

The parish council remains concerned that the whole process contains flaws and errors and lacks a transparent, consistent strategic approach to achieve balanced conclusions for each site so inclusion is purely on merit not subjective conclusions to support urban expansion.

5. Sites covered by policies LP6 , 7 & 8 are green belt sites with no facilities. Based on the experiences of existing large-scale developments such as Brabazon, Lyde Green and Ladden Garden village, the parish council believes it is not possible to ensure appropriate infrastructure and facilities to support such large scales developments will be provided/ delivered or are achievable over the plan period.
6. The SGC Monitoring Report 2023 shows existing infrastructure across the county is already at or near capacity and will require new investment if developments are to be sustainable. Additionally, SGC data and access profiles show that even with multiple employment options, low numbers of residents live and work in the same place - Patchway 11628 jobs/12% work in the area, Cribbs 6466/10%, Bradley Stoke 8177/12% & Stoke Gifford 20006/15%. Yet despite investment on the A432/A38 corridors, the local plan places a disproportionate burden on the strategically important A4174 and to a lesser extent the A420. Potentially 6000+ properties could feed onto the already congested A4174, where "congestion along this and adjacent traffic routes will considerably worsen due to planned local growth in the area" (Jacobs 2021). There are no indications to counter existing evidence that shows the high rates of car use by South Gloucestershire residents will alter. For commuting only 3% use public transport, 2% cycle and 5.7% walk despite extensive investment in public transport and active travel routes. The parish council believes by not spreading the burden of development across the county, the eastern fringe will be disproportionately affected by congestion and worsening air quality - air pollution including NO<sub>2</sub>, and particulates PM<sub>2.5</sub> & PM<sub>10</sub> while within UK standards are already problematic – which will pose a threat to the health of residents and cannot be justified.
7. There is a failure to address capacity issues at M5 junction 14 (within South Gloucestershire). This poses constraints on regional housing development and economic growth affecting both South Gloucestershire and Stroud District as well as having wider impact across Gloucestershire, West of England Combined Authority area and the Western Gateway. Improvements are deemed essential to unlock additional housing and accommodate additional growth both now and beyond the current plan periods of Stroud and South Gloucestershire's local plans (AECOM (2024) M5 Junction 12 and 14 Improvement Schemes). While Stroud, Gloucester, Cheltenham and Tewkesbury planning authorities collaborate over M5 junction12, and despite the impact on housing growth, the Statement of Common Ground shows SGC has elected to disregard the economic opportunities and consider the numerous sustainable development sites in this northern sector on the grounds they

will impact on M5 J14. SGC does not intend to look to secure improvements to the motorway junction even though this would unlock growth, attract employment and address many of the claims around sites being car dependent. The decision could also negatively impact Oldbury decommissioning Policy LP31. It is unclear if this decision is a material consideration in the Planning Inspectors decision to propose the Stroud district local plan is withdrawn.

SGC seem to be working in a silo. Pucklechurch parish council does not believe the decision not to address junction 14 can be justified as not only will this have a detrimental impact on South Gloucestershire communities in that area, it will curtail growth opportunities and new investment across the West of England. There is no evidence to demonstrate that SGC has fully explored and considered all the environmental, social and economic benefits of finding sustainable solutions to solve the issues at junction 14 in collaboration with Stroud and other major stakeholders including WECA and Western Gateway which will benefit the whole region. This would appear to be in contravention of NPPF p24.

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Legal compliance-

(please continue on a separate sheet /expand box if necessary)

Soundness-

Whilst Pucklechurch parish council welcomes the inclusion of policy LPS5, if SGC is to overcome some of the resistance to such sites, the language used throughout the policy needs to be more specific and clearer as currently the subjectivity leaves it open to interpretation – words such as ‘acceptable’ and ‘adequate’ need definition to overcome unfavourable views. There are also concerns there remains insufficient land allocation for sites in sustainable locations

The criteria for selecting new sites for allocation is unclear but there are questions over the sustainability of GTPU04 for 8 pitches which also appears contrary to the policy (a) as it has poor vehicular access and accesses a 50mph B-road at the entrance to a motorway bridge and is located down an unlit rutted narrow grass farm track and is subject to high noise and pollution levels from the M4.

(please continue on a separate sheet /expand box if necessary)

Complies with the Duty to Co-operate -

(please continue on a separate sheet /expand box if necessary)

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Modifications-

A more suitable site would be adjacent to TSP01 which is more sustainable and has good vehicular access

(Continue on a separate sheet /expand box if necessary)

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***Please mark your response marking x in a box***

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Hearing sessions-

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Table in policy		Figure in Policy		Other	

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### 4. Do you consider the Local Plan is: *please mark your response marking 'X' in a box*

4.(A) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(B) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(C) Complies with the Duty to Co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

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Legal compliance-

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Soundness-

Pucklechurch parish council does not believe the inclusion of LP6 North Lyde ecotech village in its current format is justified as there are concerns around the subjective nature of its selection. Despite this area of Green Belt being assessed as 'Significant' for purposes (a), (b) and (c) (NPPF p143) by WECA, this was conveniently downgraded in the ARUP 2025 Sustainability Assessments to 'moderate' which has allowed a 'professional judgement' to be made that development would not be deemed urban sprawl.

The whole sustainability of the site is questionable and aspirational and is unlikely to be deliverable based on other recent large-scale developments.

- This is an 'isolated island' of green belt hemmed in by the M4 and Westerleigh Road which will be viewed as adding to 'greater Bristol'.
- Proposed employment opportunities associated with an extended Science Park will be in specialist fields. This will provide little benefit to most residents and based on the existing science park will generate additional traffic to the site.
- There is nothing wrong with proposing denser housing and reduced car parking to encourage uses of sustainable public transport and active travel options. However, nothing has been learnt from the Brabazon "New Town" which has similar housing but within a larger more sustainable site. Even with greater economies of scale SGC is aware of its transport infrastructure issues and a potential influx of cars (up to 12,000). Similar results can be anticipated at this site which could generate 4000 cars.
- Site infrastructure delivery is mainly premised on developer contributions. The site is located within a heritage rich and environmentally diverse area but no consideration appears to have been given to the potential implications and costs in the event of archaeological outcomes or costs associated with BNG which could impact funding for infrastructure. Based on experiences at neighbouring Lyde Green, far longer timeframes and larger financial contributions are needed to get the infrastructure in place if it happens at all (secondary school still not built, huge problem with GPs who are already at capacity or closed Emersons Green Medical Centre, dentists etc) suggesting infrastructure will not be delivered within the plan period.
- There has been no consideration that LP6 is an area of green space already used for recreation by the adjacent Lyde Green and Emersons Green communities. Once this disappears any remaining green areas will be subject to unsustainable and damaging footfall.

(please continue on a separate sheet /expand box if necessary)

Complies with the Duty to Co-operate -

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Modifications-

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Table in policy		Figure in Policy		Other	

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Legal compliance-

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Soundness-

Pucklechurch parish council does not believe the inclusion of LP7 Carsons Green and Rockhouse Farm New Neighbourhoods in its current format is justified, nor is this a coherent and deliverable plan for what is in effect three distinct areas of development which overwhelm the existing Shortwood settlement. These are not physically connected as stated. The Rockhouse farm site is marooned between the A4174 and B4465 but will most likely look towards Emersons Green for its services. Predominately unconnected to Shortwood, the Carsons Green site is isolated by the A4174. While it acknowledges areas previously built upon are probably suitable for smaller scale development (such as around the Carsons Road entrance), the lack of robust justification for 'conveniently' reducing the green belt protection across all the sites (ARUP 2025 Sustainability Assessments) to allow such extensive development is questionable and only extends 'greater Bristol'.

- The Green Belt boundary on the eastern fringe is already clearly defined by the A4174 Development in this eastern fringe green belt has always been considered unsuitable. The parish council does not believe the necessary 'Exceptional circumstances' have been proven for such extensive developments (NPPF p145)
- Large swaths of the former golf course play a vital role for nature and in addressing climate change. The sites sit below a visually important hillside and between three important green infrastructure corridors and provides critical carbon storage, helps to alleviate urban heat island effects and mitigate against flood risk.
- It is also meant to be a priority area for expanding on the Common Connections project and Western Forest
- This area of easily accessible green belt benefits both South Gloucestershire and Bristol residents, yet there is no evidence of cooperation with Bristol on this matter.
- Sites have been assessed in isolation and only highlight their own impacts. No-one has looked at the combined impacts of LP 7 & 8 (which are adjacent) on the remaining green spaces and the immense pressure through increased footfall on local Commons, woods and green corridors.
- Visually important hillsides including Pucklechurch Ridge and adjacent Oldland Ridge, will be directly impacted by the proposed developments.
- Promoting sustainable public transport and active travel options is to be applauded but nothing has been learnt from the Brabazon "New Town". Even with greater economies of scale it has encountered transport infrastructure issues leading to a large influx of cars. Similar results can be anticipated across these sites with up to 4000 cars feeding onto the already congested A4174

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- Site infrastructure delivery is mainly premised on developed contributions. The site is located within a heritage rich and environmentally diverse area but no consideration appears to have been given to the potential implications and costs in the event of archaeological outcomes or costs associated with BNG which could impact funding for infrastructure. Based on experiences at neighbouring Lyde Green, far longer timeframes and larger financial contributions are needed to get the infrastructure in place if it happens at all (secondary school still not built, huge problem with GPs who are already at capacity, dentists etc) suggesting infrastructure will not be delivered within the plan period,

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Complies with the Duty to Co-operate -

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Modifications-

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Table in policy		Figure in Policy		Other	

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### 4. Do you consider the Local Plan is: *please mark your response marking 'X' in a box*

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4.(B) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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Legal compliance-

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Soundness-

Pucklechurch parish council believes LP8 North Warmley New Neighbourhood in its current format is another site where there is a lack of robust justification for 'conveniently' reducing the green belt protection across all the sites (ARUP 2025 Sustainability Assessments) to allow such extensive development.

- This is yet another development marooned behind the A420 which will be seen as adding to 'greater Bristol'. Its isolated location makes it highly unlikely that the envisaged connection to Warmley High Street will materialise.
- No-one has looked at the combined impacts of LP 7 & 8. These sites together with the adjacent Carsons Green neighbourhood will actually put enormous stress on the remaining green spaces and immense pressure through increased footfall on local Commons, woods and strategic green corridors which it is claims will benefit from the development.
- Visually important hillsides including Pucklechurch Ridge and adjacent Oldland Ridge, will be directly impacted by the proposed developments.
- Promoting sustainable public transport and active travel options is to be applauded but nothing has been learnt from the Brabazon "New Town". Even with greater economies of scale it has encountered transport infrastructure issues leading to a large influx of cars. Similar results can be anticipated across these sites with up to 2000 cars feeding onto the already congested A420
- Site infrastructure delivery is mainly premised on developed contributions. The site is located within a heritage rich and environmentally diverse area but no consideration appears to have been given to the potential implications and costs in the event of archaeological outcomes or costs associated with BNG which could impact funding for infrastructure. Based on experiences at Lyde Green, far longer timeframes and larger financial contributions are needed to get the infrastructure in place if it happens at all (secondary school still not built, huge problem with GPs who are already at capacity or surgery closed, dentists etc) suggesting infrastructure will not be delivered within the plan period,

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Modifications-

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Legal compliance-

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Soundness-

Pucklechurch parish council welcomes the recognition and obligations to limit the impact of development on the climate through adaptation, by reducing emissions and building resilience. As noted in LP23 it seems ironic that SGC did not appear to apply the same rigor to the selection of sites LP6, 7 & 8 where inclusion in the local plan will directly contribute to climate change through the loss of natural carbon sinks, alleviation of urban heat island effects (especially around the already densely populated urban eastern fringe) and flood risk mitigation. The fracturing of important wildlife and green corridors are not be rectified by BNG initiatives which are not guaranteed on site.

The parish council is concerned the descriptions in the policy are broad and non-specific and open to interruption and the aims are aspirational. This increases the likelihood they will not be deliverable as envisaged for the following reasons:

- Climate mitigation measures are more costly – there is a risk during development, developers claim measures are too financially onerous/impactful on profits leading to a scaling back.
- Risk above will impact the financial contributions for other essential infrastructure, biodiversity and sustainability matters which could be reduced.
- Rowing back of government commitment to green agenda.

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Soundness-

This objective of this policy is to protect green infrastructure which is commendable and to be supported but the obvious conflict between this policy and the choice/preference of meeting needs through large-scale development means these measures are already being undermined by the development proposals in the Local Plan itself. Pucklechurch parish council does not believe this policy is sound or can be effective.

The county's irreplaceable green corridors are interdependent upon each other and are essential in "delivering environmental, economic, health and wellbeing benefits for nature, climate and communities" as defined in the NPPF. Fracture the infrastructure in one area through inappropriate or ill-considered development and there are likely to be devastating consequences for others.

Natural England has already raised growing concerns that pressure from new housing developments causes irreversible damage to nature and the climate. So it is therefore ironic that the scale of development proposed along the eastern fringe in the Local Plan does precisely that despite a previous commitment to "*protect the open green hillsides which encompass the Pucklechurch Ridge, Shortwood Hill and Oldland Ridge*". The topography of the area provides a mosaic of different interconnected environments providing habitats for European protected and amber and red listed species. The mix includes ancient hedgerows, copses and fragments of ancient woodlands, a network of calcareous and neutral grassland supporting a variety of flora and species-rich grassland providing springtime nesting and wintertime foraging for birds (Landscape Character Assessment Area 6) criss-crossed by rights of way. All the above are in decline. A genuine commitment to protecting this area's green infrastructure would have been proposals for smaller more sensitive development.

WECA's Local Nature Recovery Strategy sees expanding the Common Connections project as a priority for the area and it is included in the proposed new Western Forest. Not only will any pockets of green/blue infrastructure under BNG (even if onsite) not compensate for the damage caused by the large scale developments around the Shortwood area (policy LP7 & 8), the remaining green spaces Commons, woods and green corridors will be placed under immense pressure through increased footfall.

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**8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:**

*Please note this section must be submitted as an MS Word document rather than a PDF.*

Hearing sessions-

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## Part B: Please use a separate sheet for each representation

### 2. Full Name or Organisation:

Pucklechurch parish council

*Please do not include other personal details such as your address or other identification in the sections below or your response will be invalid.*

### 3. To which part of the Local Plan does this representation relate?

*This question is required and should be answered for each policy or site commenting on, unless commenting on the whole plan.*

Policy number or Policy Title e.g. LPS10	LPS 12	Policy Criteria or Paragraph number		Site allocation reference e.g. NX1	
Table in policy		Figure in Policy		Other	

or please mark 'X' instead if your response is not specific / relates to the whole plan. ☐

### 4. Do you consider the Local Plan is: *please mark your response marking 'X' in a box*

4.(A) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(B) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(C) Complies with the Duty to Co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please note, the tests of soundness are set out in paragraph 35 of the National Planning Policy Framework December 2023 (NPPF). Plans are sound if they are:

- Positively prepared
- Justified
- Effective
- Consistent with National Policy

Please, see the separate statement of representation procedure (guidance note) for further information on 'soundness'.

[National Planning Policy Framework - 3. Plan-making - Guidance - GOV.UK](#)

**5. Please give details of why you consider the Local Plan is not compliant with relevant legislation, or does not meet the tests of soundness set out in the NPPF, or fails to comply with the duty to co-operate. Please be as precise as possible making reference to specific aspects of the plan and relevant legislation and policy.**

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

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Legal compliance-

(please continue on a separate sheet /expand box if necessary)

Soundness-

Pucklechurch parish council does not believe that this policy will prove effective or enforceable . It is again commendable that SGC is trying to influence the design, but the subjective language and aspirational nature of much of the content makes the policy open to different interpretations and meaningless. What is attractive to one may not be to another, coherent design can mean rows of identical housing, social spaces may be a haven or vectors for anti-social behaviour. As has been shown in recent large-scale developments in the county such as Ladden Garden, community and stakeholder engagement does not influence the final designs. The uniform nature of most developments suggests developers in the main already have pre-made masterplans for a well designed neighbourhoods which they 'tweak' in order to get planning permission.

The local plan makes no reference to 'placemaking' which is more than proving the physical building, layouts and structures and requires genuine community engagement. The evidence suggests community feedback does not support large-scale developments in the green belt nor their locations and these 'branded' developer led sites are merely a collection of imposed buildings and layout.

(please continue on a separate sheet /expand box if necessary)

Complies with the Duty to Co-operate -

(please continue on a separate sheet /expand box if necessary)

**6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above.**

You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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Modifications-

(Continue on a separate sheet /expand box if necessary)

*In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s).  
You should not assume that you will have a further opportunity to make submissions.*

**7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?**

*Please mark your response marking x in a box*

☒

**No**, I do not wish to  
participate in hearing session(s)

☐

**Yes**, I wish to participate  
in hearing session(s)

*Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.*

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## Part B: Please use a separate sheet for each representation

### 2. Full Name or Organisation:

Pucklechurch parish council

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### 3. To which part of the Local Plan does this representation relate?

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Policy number or Policy Title e.g. LPS10	LP23	Policy Criteria or Paragraph number		Site allocation reference e.g. NX1	
Table in policy		Figure in Policy		Other	

or please mark 'X' instead if your response is not specific / relates to the whole plan. ☐

### 4. Do you consider the Local Plan is: *please mark your response marking 'X' in a box*

4.(A) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(B) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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Legal compliance-

(please continue on a separate sheet /expand box if necessary)

Soundness-

Whilst Pucklechurch parish council welcomes LP23, much of the content is aspirational and the language is highly subjective and open to interpretation. The parish council questions if it can be viewed as positively prepared and effective as there are concerns in the huge irony that the very measures and priorities it claims will be implemented, delivered and measured are exactly the issues ignored by the council itself in the selection of sites on the eastern fringe which will directly contribute to climate change contrary to *2d and 4d* as:

- The proposed eastern fringe developments sit between three important green infrastructure corridors which DEFRA and the Environment Agency stress contribute to mitigating climate change (House of Lords 2022:160).
- Greenfield land has more functionality for climate adaptation or nature conservation if left undeveloped ((CPRE State of the Green Belt 2023:146), as recognised by NPPF 124b.
- The undeveloped Green Belt around the east fringe plays a vital role in addressing climate change by providing critical carbon storage, helping to alleviate urban heat island effects and with its ability to adsorb heavy rain, mitigating against flood risk.

(please continue on a separate sheet /expand box if necessary)

Complies with the Duty to Co-operate -

(please continue on a separate sheet /expand box if necessary)

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Policy number or Policy Title e.g. LPS10	LP28	Policy Criteria or Paragraph number		Site allocation reference e.g. NX1	
Table in policy		Figure in Policy		Other	

or please mark 'X' instead if your response is not specific / relates to the whole plan. ☐

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Legal compliance-

(please continue on a separate sheet /expand box if necessary)

Soundness-

Pucklechurch parish council does not agree that this policy has been positively prepared.

When such large scale and impactful developments are proposed along the eastern fringe green belt (LP6, 7 & 8) which will irreversibly change the local environment, there are minimal protections to ensure BNG is delivered onsite. These are large sites with plenty of scope for BNG. SGC should strengthen the requirement for onsite delivery within legal constraints. Otherwise there remains a risk that any of the statutory restorations for biodiversity could potentially occur either offsite or indeed out of county.

The parish council believes this lack of a guarantee of benefits in the affected area is unacceptable and potentially damaging for residents, for nature and for South Gloucestershire as the local natural environment could be irreplaceably changed to the detriment of all.

(please continue on a separate sheet /expand box if necessary)

Complies with the Duty to Co-operate -

(please continue on a separate sheet /expand box if necessary)

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Modifications-

A more suitable site would be adjacent to TSP01 which is more sustainable and has good vehicular access

(Continue on a separate sheet /expand box if necessary)

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