

Changes Introduced *After* Regulation 14 (Not in the Reg14 Document)

These are grouped by theme for clarity.

1. New or Updated Evidence & Technical Reports

a. SEA (Strategic Environmental Assessment) updated post-Reg14

- *“Post-Regulation 14 consultation the SEA was amended and re-issued in February 2026 to recognise that the site for policy H9 is a designated Site of Nature Conservation Interest (SNCI).”*
New content: SNCI designation for H9 and SEA update.

b. HRA (Habitats Regulations Assessment) recommendations added

- *“It was recommended that wording was included... requiring applicants... to undertake botanical survey... followed by any necessary offsetting habitat creation... The policy H8 has been amended accordingly.”* **New content:** Mandatory botanical + non-breeding bird surveys for H8.

c. Level 2 SFRA incorporated

- *“Work did not re-start on the SEA until June 2025... Level 2 SFRA... issued to accompany the Regulation 14 version... amended post-Reg14.”* **New content:** Full Level 2 SFRA requirements embedded into FR1 and site policies.

2. New Green Belt / Grey Belt Material

a. Introduction of ‘Grey Belt’ designation (NPPF Dec 2024)

- *“The latest December 2024 NPPF has introduced the concept of ‘grey belt’...”* **New content:** Grey Belt definition and application to H1, H2, H3.

b. Grey Belt Review conclusions

- *“This Grey Belt Review concludes that H1, H2 and H3 should be appropriately considered as grey belt...”* **New content:** Formal review and justification.

c. New Exceptional Circumstances Case

- *“The Exceptional Circumstances Case... sets out the exceptional circumstances for amending the Green Belt...”* **New content:** Full exceptional circumstances argument added.

d. New reference to SGC Development Management Committee decisions (Sept 2025)

- *“...determined... that land... included in Policy H3... should be considered as ‘grey belt’.”* **New content:** Post-Reg14 planning decisions incorporated.

3. New or Expanded Housing Policies

a. H1, H2, H3 rewritten with Grey Belt + 50% affordable housing

- *“It conforms with levels of affordable housing required by the NPPF at **50% for sites removed from Green Belt.**”* **New content:** 50% affordable housing requirement (Reg14 used 35%).

b. H3 expanded to include sheltered accommodation (30–41 units)

- *“Allocated for... up to a maximum 41 units of sheltered accommodation...”* **New content:** Sheltered housing allocation added.

c. New heritage impact requirements for H2, H3, H4

- *“Proposals must demonstrate how cumulative impacts... have been considered and mitigated to preserve the significance and setting of designated assets.”* **New content:** Heritage cumulative impact tests.

d. New drainage / water quality requirements

- *“...updated to add specific stipulations linked to protecting the water environment...”* **New content:** Water quality protection added to multiple policies.

4. New Site-Specific Requirements

a. H8 – mandatory ecological surveys

- *“A botanical survey shall be undertaken... followed by any necessary offsetting habitat creation.”* **New content:** Ecological survey requirement added post-Reg14.

b. H9 – SNCI designation incorporated

- *“...site for policy H9 is a designated Site of Nature Conservation Interest (SNCI).”* **New content:** SNCI constraints added.

c. H7 – safeguarding land for future rail expansion

- *“...development should safeguard a strip of land... for an additional track.”* **New content:** Rail safeguarding requirement.

5. New Flood Risk Policy (FR1) Content

a. No ground-floor sleeping unless justified

- *“There should be no sleeping accommodation on the ground floor... however... sequential approach and/or land raising may allow exceptions.”* **New content:** New flood-resilience rule.

b. Safe refuge requirement

- *“Place of safe refuge 300mm above the maximum flood level...”* **New content:** Refuge height requirement.

c. Mandatory sign-up to EA flood warning service

- *“We recommend both existing and future residents are signed up to the EA’s Flood Warning Service.”* **New content:** New advisory requirement.

6. New Transport & Parking Content

a. New transport hub specification (H7)

- *“Provision of a bus stop/drop off point and bike/e-bike storage.”* **New content:** Transport hub design added.

b. New visitor car park policies TTP1–TTP4 added and then subsequently removed by Parish Council resolution

Deletion of TTP1, TTP2, TTP3, TTP4 — corroborated on three separate grounds

1. SGC (the Local Planning Authority) explicitly recommended replacing them. In their formal Regulation 14 response, SGC states four times (once for each of TTP1 through TTP4) that "an alternative worded policy which provides support to proposal for car parks to serve visitors in appropriate locations... would be a more appropriate approach and could replace policies TTP1 to TTP4 inclusive". This is a direct written recommendation from the LPA in the consultation document.
2. SGC found the policies fail Basic Conditions. SGC states each of TTP1-TTP4 is "not considered to be in general conformity with the adopted Local Plan, in particular Core Strategy Policy CS5". General conformity with the adopted development plan is one of the statutory Basic Conditions an NDP has to pass at examination. This is Examiner-risk language, not just a preference.
3. Multiple public consultation responses called for deletion. Named respondents specifically requested deletion of TTP1, TTP3 and TTP4 on sustainable-transport grounds (car parks incentivising car use rather than modal shift, Green Belt harm, Ramsar/SSSI proximity). Several respondents attacked the policies as contrary to the plan's own sustainability objectives.

On TTP3 & TTP4 specifically, the PC's 6th October 2025 resolution as recorded in the report was to "Support provision with caveats regarding overnight parking" — not to delete. A post-consultation resolution to now delete is a NEW resolution, not a re-affirmation of the October one. The justification for the shift is the SGC formal recommendation plus the objection volume in the responses, both of which came in through Regulation 14 and post-date the October resolution. That's a legitimate basis, but the paperwork should record the shift explicitly rather than imply continuity.

7. New Community Facilities Policies

Addition of TTP6 — corroborated by three specific pieces of evidence in the document

1. The Parish Council's own 6th October 2025 resolution as recorded in the report: "Policy TTP6 – Pilning Station Strategic Enhancement. Adopt proposed policy to safeguard and promote Pilning Station as a regional transport asset."
2. The Chair of Pilning Station Group's formal Regulation 14 response endorsing TTP6 and setting out at length why the omission of a station policy is a fundamental strategic failure of the draft plan.
3. Public feedback repeatedly identified the station gap — including comparisons with the treatment of Severn Beach Station (which does get transport-hub provisions under H7) as unjustifiable disparity.

a. CF1 – new support for pub/bar + takeaway in Severn Beach

- *"The Neighbourhood Plan supports proposals to develop... a family orientated pub... and a takeaway food shop."* **New content:** New retail/community facility policy.

b. CF2 – expanded list of protected facilities

- *"Pilning Telephone Exchange... Pilning Surgery & Pharmacy... Severn Beach Bakery Shop/Café..."* **New content:** New ACV-style protections.

c. CF3 – new CIL investment policy

- *“To seek to ensure that investments... are made to outdoor and indoor sporting activities...”* **New content:** New funding policy.

d. CF4 – expanded green space protection list

- *“Redwick Common... Gorse Cover Road... Frances Barr Way...”* **New content:** New protected green spaces.

8. New Large Commercial Development Policies

a. LCD1 – mandatory green buffer zones

- *“All new development sites... should include a green buffer zone... raised bund and planting...”* **New content:** Buffer zone requirement.

b. LCD2 – support for a truck stop

- *“This NP supports applications for... a ‘truck stop’... suitably located away from residential areas.”* **New content:** Truck stop policy added.

9. New Settlement Boundary Amendments

a. ECGB3 – new settlement boundary maps

- *“Figure 23 and Figure 24... showing the existing and proposed settlement boundaries...”* **New content:** New settlement boundary redraw.

b. Inclusion of H1, H2, H3, H8, H9 within new boundaries

- *“The amendments shall include the addition of development sites identified in... H1, H2, H3, H8 and H9...”* **New content:** Settlement boundary expansion.

10. New Monitoring & Review Framework

a. Annual Monitoring Report

- *“An Annual Monitoring Report will be reported to each Annual Parish Council meeting...”* **New content:** New monitoring mechanism.

b. Mandatory 5-year review

- *“Within 5 years... the Parish Council will consider whether policies... need to be rewritten.”* **New content:** New review cycle.

Summary

The June 2026 Amendment draft contains **substantial additions** not present in the Regulation 14 version, including:

- Grey Belt designation and Green Belt removal policies
- New SEA, HRA, SFRA requirements
- New housing allocations and expanded site criteria
- New flood risk rules
- New car park policies (TTP1–TTP4) **subsequently removed**
- New Pilning Station policy (TTP6)
- New community facility protections
- New commercial development buffer zones
- New settlement boundary maps
- New monitoring framework