

**Representations to the Inspector for the Examination of Mendip
Local Plan Part 2**

from **Norton St Philip Parish Council**

on **Pre-submission Consultation Responses**

Norton St Philip Parish Council

1. Background and Neighbourhood Plan

1.1 Norton St Philip (or 'NSP') has an active parish council, that has prioritised planning issues for many years (www.nortonstphilipparishcouncil.co.uk). A neighbourhood plan has been drawn up with local support, and submitted to Mendip District Council (MDC). It is currently at examination. The Parish Council support the Local Plan Part2 (LPP2) proposals for NSP, including the relevant Proposed Changes Schedule (PC111).

1.2 The Norton St Philip Neighbourhood Plan (NSPNP) has a guiding vision to "maintain the special character and built heritage of the Parish of Norton St Philip while promoting its development as a compact and sustainable community". The Plan is positive, and is promoting brownfield development within the settlement boundary drawn up by MDC, as well as exception sites for local need. The revised settlement boundary has included all the new housing development and extant permissions.

1.3 The setting of NSP village on a ridge makes its visual appearance particularly important in the wider landscape. The historic development of the village around two nodes is only clearly read with the open space maintained between them. The open space creates the distinction between the looser, open and green settlement around the church, and the compact stone terraces of the elevated High Street area. This has been described in the Conservation Area Appraisal, and resulted in significant amounts of open space being included within the conservation area boundary because of their visual importance in maintaining the historic form. The Character Assessment for the Parish also sets out character areas that include both of these historic types.

2. The Housing allocation in Mendip and its impact on NSP

2.1 The housing target for Norton St Philip in the adopted Local Plan Part1 (LPP1) was for a minimum of 45 new dwellings to be provided from 2006 up to 2029. A review of housing provision in the District was carried out in 2017 for the LP2 site allocation work. In the review document [Testing Housing Supply (THS) Dec2017] MDC proposed an 11% uplift as suggested by the evidence of the SHMA. This uplift was directed mainly at the 5 main towns in Mendip as the most sustainable locations. It was agreed that a strategic review of housing provision in the District was not needed at this point, and a five year supply would be maintained with the further allocations of the LPP2 and incorporated uplift until beyond the expected delivery date of the next strategic review in the New Local Plan.

2.2 The LPP1 minimum allocation for NSP had been exceeded by a factor of more than 2 by the time of the 2017 review of housing provision, and the village was therefore not proposed for further housing site allocations in LP2. Of the 29 primary and secondary villages, NSP had one of the highest rates of delivery over minimum allocation listed. The table below (2.3) provides detail. Since 2017 the growth has continued and the NSPNP shows the situation as at March 2018 in Appendix 5: NSP has seen 113 completions and commitments for new dwellings in the 12 years since April 2006. This is 250% of the quantum expected of NSP in LPP1. It is a greater than 35% increase in the village housing stock in 12 years; there were 310 households in the village in 2006. New people moving into the village keeps it vibrant, ensures continuing support for services and generally offers necessary renewal. The recent level of population increase also provides challenges for developing new social links and maintaining and developing the existing strong sense of community.

Sustainable development needs to allow existing infrastructure to expand for the new population, as well as allow time for social integration

2.3 Progress against Local Plan – LPP1 – Primary Villages 2006-2017

Village	LPP1 Minimu m	Actual	% of Requirement
Baltonsborough	45	131	291%
Evercreech	70	161	230%
Chilcompton	70	156	222%
Norton St Philip	45	95	211%
Beckington	55	108	196%
Rode	65	78	120%
Coleford	70	67	96%
Croscombe	35	20	57%
Mells	10	5	50%
Draycott	65	32	49%
Chewton Mendip	15	6	40%
Stoke St Michael	45	15	30%
Butleigh	45	13	29%
Ditchheat	25	6	24%
Westbury sub Mendip	50	12	24%
Nunney	55	2	3%
TOTAL	765	907	

2.4 The table above demonstrates that NSP is in the top quartile of primary villages – a group that have achieved twice their minimum requirement. There have been a further 18 completions/permissions since 2017 and thus the delivery on the LPP1 minima for NSP is currently in excess of 250%.

2.5 Lochailort have objected to what they refer to as a ‘moratorium’ on development in NSP. It is no such thing, it is the implementation of the strategic policy in LP1, and in fact more than two and a half times the minimum development proposed in the LP1 until 2029 has already been agreed and mostly built. Additionally the NSPNP is a positive document with development opportunity encouraged and identified within the settlement boundary, as well as allowing development for local need outside of the boundary in line with the exception site policy. It thus contributes to the ‘Additional Sources of Housing Supply’ noted in LPP2 (para 3.62) It is not however socially sustainable to continue to develop at the rate NSP has experienced in the last 12 years. It is also not environmentally sustainable for too much development to be directed to the villages where travel is generally by private car due to the very limited public transport. The roads, gradients and distances to the nearest towns do not lend themselves to cycling or walking.

2.6 Lochailort argue that an increase of over 30% in the number of homes within 12 years is ‘a modest level of growth’ and is due to the availability of brownfield land. In fact well over half of the new dwellings have been built on greenfield or TPO protected land. Lochailort’s claim shows a complete lack of understanding of the implications for infrastructure, social and actual, and adjustments needed in a small community when substantial rapid development happens.

2.7 LPP2 has rightly increased the amount of housing to be provided from the numbers indicated in LPP1, in line with updated evidenced need. NSP is a village where rapid and extensive development has occurred in a short space of time. The NSPNP promotes and encourages development within the settlement boundary and provides for local need with an Exception Site Policy.

2.8 Conclusion on Housing Supply

The Parish Council supports MDC’s position that NSP does not need further allocations of new housing and population in the Plan’s period. A time of consolidation for the village is needed. The proposed settlement boundary in LP2 is supported. We fully support the policy trajectory of LP1 and LP2, and look forward to continuing to contribute to a Plan led approach in the future as specified in the NPPF para 15

“The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”

3. Local Green Space (LGS) Designations

General Considerations:

3.1 Lochailort in their letter of objection dated the 8th November refer to “anti-development interests” having been given “an unfair and additional voice”. We hope this is not a reference to the Parish Council and local community, and refute any suggestion that we are opposed to *all* development. We are however committed to maintaining the historic fabric and local distinctiveness of our village with appropriate development and have consulted with our community and made representations accordingly and appropriately.

3.2 Several objections to the LGS designations refer to the number of proposed designations as ‘an anti-development tool’ and an abuse of the grounds for designation in the NPPF. There are many places on the settlement boundary where land for future development is not ‘sterilised’ by an LGS designation, and we reject this accusation of misuse of the designation. There are three key green corridors into the village from the surrounding countryside, and the LGS designations help to maintain these, although this is not their only role.

- To the north the historic village is characterised by cottages set in large gardens and surrounded by small fields that lead into open countryside. All of the LGS designations in this area are within the Conservation Area, and the Conservation Area Appraisal speaks of this key landscape setting (para 2.2). Open space is only included within a conservation area designation when it plays an essential part in the historic heritage to be conserved.
- To the south a green corridor starting with the Church Mead Recreation Ground (LGS009) visually separates the two sections of the historic village as described in the Appraisal (para 4.2).
- To the east, LGS010 separates recent modern development from the historic village on the ridge (identified as ‘Close-terraced cottages’ in the Norton St Philip Character Assessment).

3.3 We agree with MDC’s statement that inclusion within the Conservation Area is not equivalent to LGS protection, although it does indicate that the open space has a historic visual significance. As MDC state: “different types of designation are intended to achieve different purposes, and LGS designation is also for qualities of open space such as beauty and tranquillity that will not have been important for inclusion of the open space within the Conservation Area”. Of the 10 LGS sites, 7 are within the Conservation Area. 6 were previously designated Q2 and are currently OALS. The seventh, Church Mead (LGS009) is the iconic village green.

3.4 LGSNSP007 – 009 have been described as together forming an ‘extensive tract of land’ contrary to the requirements of the NPPF. These sites are quite separate areas of open space with obvious historic boundaries and different characteristics. We firmly reject any suggestion that they have just been separated so as not to appear ‘an extensive tract of land’.

LGSNSP009, Church Mead, is the well-established recreational village green, setting for many of the listed buildings within the village and the start of the green corridor separating the historic church area of the village from High Street’s separate and distinctively different historic form.

LGSNSP008, Fortescue Fields West has a key visual role to play in maintaining this separation, especially with the recent construction of the new development at Fortescue Fields. The visual separation needs to lead out to open countryside. Its crucial importance to the setting of NSP was noted by the inspector who refused an appeal for housing on the site in 2015 (APP/Q3305/A/14/2224073).

LGSNSP007 has informal recreational value in the circular walk, as well as rich biodiversity and wildlife features.

A village survey in 2015 was completed by 45% of village households, with 98% being in favour of LGS designation for LGS 007 & 008

3.5 LGSNSP003: The Rocke Associates objection describes the LGS site as being surrounded by a ‘*tight-knit urban context*’, but our survey of the village for the character assessment noted the key features of the village to the south and west of the site as ‘Leafy Cottages’, and the Great Orchard site itself as the beginning of a green corridor from the village northwards. The key attribute of the Leafy Cottages character areas is “*dwellings set in green spaces and the wider rural hinterland*”, and definitely not a ‘*tight-knit urban context*’.

To further refer, as this objection does, to NSP being a ‘*tight-knit, continuous development*’ is to overlook reality on the ground, and the analysis in the Conservation Area Appraisal of the two centres of historic development, separated by open space.

Comments from the Conservation section at Mendip DC and Historic England to the Planning Application for development on Great Orchard (2013/2217/FUL) both refer to the importance of the site as open green space within the Conservation Area. The reasons for refusal included the following:

“The development did not have regard to the duty of the LPA to preserve and enhance the character and appearance of a Conservation Area and the development of Great Orchard was also held to result in harm to a designated heritage asset by reason of its inclusion in the Conservation Area.”

3.6 LGSNSP004: An appeal on the refusal of a previous planning application (Q3305/W/16/3167455) was dismissed with the Inspector commenting as follows:

“I have also had regard to where the Framework refers to Local Green Space and the criteria for designating such areas. However, I find no significant conflict between this and the OALS designation relevant to these appeals as this area is, as set out above, of particular local significance for its beauty and tranquillity, which is one of the criteria for Local Green Space designation”.

Concluding Comment on LGS Designations

3.7 The open spaces in the village have a particularly important role to play in maintaining its historic fabric. MDC’s designation of these 10 sites in its LPP2 submission is very strongly supported by the community and the PC who wish to protect these green areas which are of particular importance. In November 2015 a Public Meeting was held to consider emerging LPP2 proposals, including LGS designations. Over 100 parish residents attended, with 99% support demonstrated for the proposed sites. LGS designation for these 10 sites is entirely consistent with both the development in the village during the Plan period and the sustainable development proposed in the NSPNP.

Summary

4.1 NSP PC consider that the Draft LPP2 provides the necessary vision and framework for the development of NSP during the Plan period. Together with the policies in the NSPNP the needs of NSP in relation to housing development are addressed and met. The PC fully support the Draft LPP2.

Norton St Philip Parish Council

In preparing this submission, Norton St Philip PC sought the advice of Liz Beth MRTPI (LB Planning) who marshalled the relevant information and advised how it should be presented.



References:

Mendip Local Plan Parts 1 and 2

Background Paper: Testing Housing Supply Mendip DC December 2017

Background Paper: Local Green Space Designation Mendip DC December 2017

Norton St Philip Neighbourhood Plan and Appendices
<https://nortonstphilipneighbourhoodplan.com/>