

Strategic Environmental Assessment (SEA) for the Norton St Philip Neighbourhood Plan

SEA Environmental Report

Norton St Philip Parish Council

August 2024

Quality information

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Non-Technical Summary

What is Strategic Environmental Assessment?

A Strategic Environmental Assessment (SEA) has been undertaken to inform the Norton St Philip Neighbourhood Plan (hereafter referred to as “the NSPNP”). This process is required by the SEA Regulations.

Neighbourhood plan groups use SEA to assess neighbourhood plans against a set of environmental objectives developed in consultation with interested parties. The purpose of the assessment is to help avoid adverse environmental effects through the neighbourhood plan and identify opportunities to improve the environmental quality of the area covered by the neighbourhood plan and the quality of life of residents.

What is the Norton St Philip Neighbourhood Plan?

The NSPNP is being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012, and in the context of the adopted and emerging Local Plan for Somerset.

The NSPNP presents a plan for the Norton St Philip neighbourhood area and parish between 2019 and 2029. The Plan sets out a vision and a range of policies for the neighbourhood area. These relate to a range of topics, including, but not limited to, housing, green space, heritage, environment and design.

Purpose of this Environmental Report

This Environmental Report, which accompanies the Regulation 14 version of the NSPNP is the second document to be produced as part of the SEA process. The first document was the SEA Scoping Report (April 2024), which included information about the neighbourhood area’s environment and community.

The purpose of this Environmental Report is to:

- Identify, describe, and evaluate the likely significant effects of the NSPNP and alternatives; and
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the NSPNP and its relationship with other relevant policies, plans and programmes.
- Relevant aspects of the current and future state of the environment and key sustainability issues for the area.
- The SEA Framework of objectives against which the NSPNP has been assessed.
- The discussion of alternative approaches for the NSPNP.
- The likely significant effects of the NSPNP.
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the NSPNP.

- The next steps for the NSPNP and accompanying SEA process.

Consideration of reasonable alternatives for the Norton St Philip Neighbourhood Plan

Introduction

In accordance with the SEA Regulations the Environmental Report must include:

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.

This section describes how the SEA process has informed the proposed development strategy for the NSPNP.

Housing growth strategy and site allocation

Policy 4 of the Neighbourhood Plan allocates land at Bell Hill Garage for residential development for up to 15 homes. The site has been identified in the Norton St Philip Conservation Area Appraisal¹ to be making a negative contribution to the conservation area.

The Mendip Local Plan Part 1² (LPP1) sets out a housing requirement of 45 homes for the neighbourhood area. Table 8 in the LPP1 indicates that the housing requirement has been met through completions and commitments.

A key objective of the NSPNP is to preserve the character and heritage of the village and support sustainable housing. The proposed site allocation is not aimed to address an unmet housing need, but to deliver a unique purpose of improvements to townscape character through the redevelopment of the poor-quality site. The redevelopment of the Bell Hill Garage site will provide opportunities to improve the character of the conservation area and there is strong local support for its redevelopment. Therefore, it is not possible to derive meaningful spatial strategy alternatives to the draft Neighbourhood Plan.

A 'do nothing' approach would in effect lead to a continuation of national and local planning policy to apply to the site and would not help facilitate its redevelopment. Considering that there is strong local support for the sustainable development of the site and that a key objective of the neighbourhood plan is to preserve the character and heritage of the village, a 'do nothing' approach was not determined to be a reasonable alternative which needed appraising (in any case, this would simply represent the 'baseline position').

The quantum of housing of up to 15 homes supported on the Bell Hill Garage site in Policy 4 of the Neighbourhood Plan has been established by the NSPNP Steering Group based on consented planning applications³ by the site landowner. Based on the density of housing proposed under the consented scheme, it is considered that if the site was to solely be developed for housing, it could support approximately 15 homes.

¹ Mendip District Council (2007) 'Norton St Philip Conservation Area Appraisal' can be accessed [here](#)

² Mendip District Council (2014) 'Local Plan Part 1: Strategy and Policies' can be accessed [here](#)

³ Consented applications include 025485/010 and 2009/1448.

An alternative to the proposed quantum of homes would be to pursue a higher quantum of housing on the site allocation. Whilst this can provide a wider range of choice and flexibility in delivering additional housing, there is no evidence to justify higher levels of housing growth and there is potential for a higher density of housing to cause harm to townscape character (which would be contrary to the objectives of the NSPNP). Therefore, this alternative is also considered to be unreasonable.

Taking the above into account, it was concluded that there were no reasonable alternatives to the site allocation and the level of growth proposed through the NSPNP at this stage.

Development limit boundary

The LPP1 defines a development limit boundary for Norton St Philip and a revision of this boundary is proposed in the LPP2 to take account of recent development outside the boundary at Longmead Close. The Neighbourhood Plan seeks to define a development limit boundary that follows the proposed LPP2 boundary.

A potential alternative option has been considered to explore a less restrictive approach to development within and outside the settlement boundary. However, amending the boundary to include undeveloped land that is not allocated for a given use on the periphery of the village would be contrary to the spirit of the LPP1 which seeks to limit development to within settlement limit boundaries and protect open countryside. Therefore, this alternative is considered to be unreasonable and has not been taken forward for assessment.

Appraisal of the Regulation 14 version of the Norton St Philip Neighbourhood Plan

The draft NSPNP has been appraised against each of the environmental objectives in the SEA framework. In undertaking the appraisal, each of the policies in the NSPNP has been considered individually and collectively. A summary of the findings is presented in **Table 1** below.

Overall, neutral or positive effects are predicted across each SEA topic, with the exceptions being the 'Landscape' objective, where uncertain minor negative effects are predicted relating to the potential for rural exception sites outside and not adjacent to the settlement boundary (under Policy 5) to cause harm to landscape and townscape character. However, these effects are not predicted to be significant, as existing national and local planning policy should safeguard against unsustainable development in open countryside.

Table 1: Summary of overall effects for each SEA Topic.

SEA Topic	Overall Effects
Biodiversity and Geodiversity	Neutral effect
Climate Change	Neutral effect
Flood Risk	Neutral effect
Community Wellbeing	Minor positive effect
Historic Environment	Uncertain significant positive effect
Land, Soil, and Water Resources	Neutral effect
Landscape	Uncertain minor negative effect
Transportation and Movement	Neutral effect

Next steps

Plan Finalisation

Following Regulation 14 consultation, responses will be considered in finalising the NSPNP and SEA for submission. Following submission, the NSPNP and supporting evidence will be published for further consultation, and then subjected to Independent Examination. At Independent Examination, the NSPNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.

If the examination leads to a favourable outcome, the NSPNP will then be subject to a referendum, organised by Somerset Council. If more than 50% of those who vote agree with the NSPNP, then it will be 'made'. Once 'made', the NSPNP will become part of the Development Plan, covering Norton St Philip parish.

Monitoring

The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the NSPNP to identify any unforeseen effects early and take remedial action as appropriate.

It is anticipated that monitoring of effects of the NSPNP will be undertaken by Somerset Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the NSPNP that should warrant more stringent monitoring measures beyond that already undertaken by Somerset Council.

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1. Introduction

Background

- 1.1 Norton St Philip Parish Council is in the process of preparing a neighbourhood plan for the sustainable future growth of the parish. AECOM has been commissioned by Locality to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Norton St Philip Neighbourhood Plan (hereafter referred to as “the NSPNP”).
- 1.2 The NSPNP is being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012, and in the context of the adopted and emerging Local Plan for Somerset. The Local Plan consists of the Mendip Local Plan Part 1⁴ (LPP1), adopted December 2014. Somerset Council are preparing a Local Plan Part 2 (LPP2) limited update for the former Mendip district area and a new Local Plan to cover the unitary authority area.⁵
- 1.3 The NSPNP will form part of the development plan for the Norton St Philip parish in Somerset, alongside the Local Plan. The NSPNP will cover the period between 2019 and 2029.
- 1.4 The Norton St Philip neighbourhood area is illustrated in **Figure 1.1** below.

⁴ Mendip District Council (2014) ‘Local Plan Part 1: Strategy and Policies’ can be accessed [here](#)

⁵ Somerset Council (2023): [Somerset Local Plan](#)

Norton St Philip - Parish Boundary

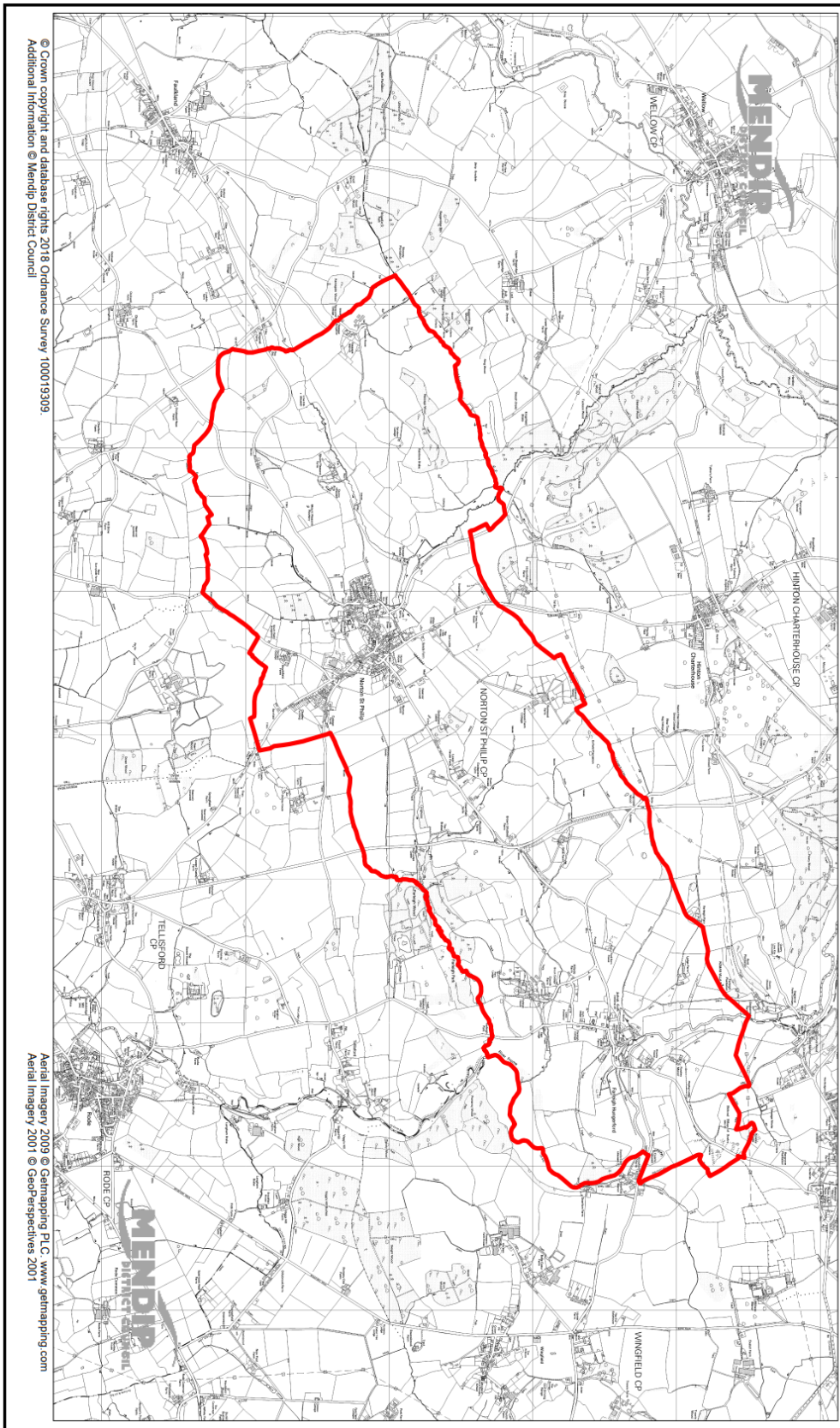
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Figure 1.1: Norton St Philip neighbourhood area (source: former Mendip District Council)

SEA screening for the Norton St Philip Neighbourhood Plan

- 1.5 SEA is a required process for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating potential negative effects and maximising potential positive effects.⁶
- 1.6 A Regulation 14 consultation was held in May 2023 on the draft neighbourhood plan. In response to the consultation, Natural England advised that the neighbourhood plan could result in a likely significant effect on the Bath and Bradford on Avon Bats SAC and the Mells Valley SAC, and a Habitats Regulations Assessment progressing to Appropriate Assessment is required.
- 1.7 Following this advice, the NSPNP Steering Group undertook a HRA and SEA screening exercise in December 2023. This exercise concluded that an HRA and full SEA is required due to the potential for development at the proposed site allocation at Bell Hill Garage to have significant effects on European Sites.
- 1.8 In light of the above, SEA is required to assess the potential for significant environmental effects.

SEA explained

- 1.9 SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating potential negative impacts and maximising the potential for positive effects. Through this approach, the SEA for the NSPNP seeks to maximise the emerging plan's contribution to sustainable development.
- 1.10 Two key procedural requirements of the SEA Regulations are that:
 - i. When deciding on 'the scope and level of detail of the information' which must be included in the Environmental Report, there is a consultation with nationally designated authorities concerned with environmental issues; and
 - ii. A report (the 'Environmental Report') is published for consultation alongside the draft plan (i.e., the draft NSPNP) that presents outcomes from the environmental assessment (i.e., discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.
- 1.11 This 'Environmental Report' is concerned with item 'ii' above.

Structure of this Environmental Report

- 1.12 This document is the SEA Environmental Report for the NSPNP and hence needs to answer all four of the questions listed overleaf with a view to providing the information required by the SEA Regulations.
- 1.13 Each of the four questions is answered in turn within this report, as follows:

⁶ Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that a neighbourhood plan is submitted to the Local Authority alongside either: A) an Environmental Report, or B) a statement of reasons why SEA is not required, prepared following a 'screening' process.

Table 1.1: Questions that must be answered by the SEA Environmental Report to meet the regulatory⁷ requirements

Environmental Report question	In line with the SEA Regulations, the report must include... ⁸
What's the scope of the SEA?	<ul style="list-style-type: none"> What is the plan seeking to achieve? <ul style="list-style-type: none"> An outline of the contents and main objectives of the plan.
	<ul style="list-style-type: none"> What is the sustainability 'context'? <ul style="list-style-type: none"> Relationship with other relevant plans and programmes. The relevant environmental protection objectives, established at international or national level. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
	<ul style="list-style-type: none"> What is the sustainability 'baseline'? <ul style="list-style-type: none"> The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan. The environmental characteristics of areas likely to be significantly affected. Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.
	<ul style="list-style-type: none"> What are the key issues and objectives? <ul style="list-style-type: none"> Key problems/issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment.
What has plan-making/SEA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with. The likely significant effects associated with alternatives. Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan.
What are the assessment findings at this stage?	<ul style="list-style-type: none"> The likely significant effects associated with the Regulation 14 version of the plan. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the Regulation 14 version of the plan.
What happens next?	<ul style="list-style-type: none"> The next steps for the plan making / SEA process.

⁷ Environmental Assessment of Plans and Programmes Regulations 2004

⁸ NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

2. Strategic context and vision for the Norton St Philip Neighbourhood Plan

Strategic context for the Neighbourhood Plan

- 2.1 The neighbourhood area falls within the former Mendip area, now known as Somerset East. The adopted Local Plan relevant to the neighbourhood area consists of the Mendip Local Plan Part 1⁹ (LPP1), adopted December 2014. LPP1 Core Policy 1 identifies Norton St Philip as a primary village, offering key community facilities and some employment opportunities. Table 8 in the LPP1 indicates that the indicative housing requirement of 45 new dwellings for the neighbourhood area has been met through completions and commitments.
- 2.2 Somerset Council has been preparing a Local Plan Part 2 (LPP2) limited update for the former Mendip district area. The LPP2 was adopted in December 2021. However, several site allocations were deleted from the plan following a Judicial Review. Somerset Council are in the process of identifying alternative site options for allocation and intend to submit an updated plan for examination by the end of September 2024.
- 2.3 In April 2023, the four district councils of Somerset came together to form the Somerset Council. The Somerset Council are also in the process of preparing a new Local Plan to cover the unitary authority area.¹⁰
- 2.4 The Norton St Philip Neighbourhood Plan will form part of the development plan for the neighbourhood area, alongside, but not as a replacement for the Local Plan. Neighbourhood plans are required to be in general conformity with the strategic policies of the adopted Local Plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in Somerset, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.

Vision and objectives for the Neighbourhood Plan

- 2.5 The vision of the NSPNP is as follows:
- “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.”*
- 2.6 The vision of the NSPNP is supported by six objectives. They are as follows:
- Encourage sustainable housing development within the village settlement boundary.
 - Ensure that the location, design and scale of any housing development is managed in order to maintain the character and heritage of the village.
 - Identify, protect and enhance the village's key green spaces and recreational facilities.

⁹ Mendip District Council (2014) 'Local Plan Part 1: Strategy and Policies' can be accessed [here](#)

¹⁰ Somerset Council (2023): [Somerset Local Plan](#)

- Support people with a local connection who wish to remain within or return to the community.
- Promote energy efficient buildings and increasing resilience to Climate Change.
- Maintain the rural nature of the Parish and the Green Belt within it.

3. The scope of the SEA

Summary of SEA scoping

- 3.1 The SEA Regulations require that: *“When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”*.
- 3.2 In England, the consultation bodies are Natural England, the Environment Agency, and Historic England.¹¹ These authorities were consulted on the scope of the SEA for a 5-week period between May and June 2024.
- 3.3 The purpose of scoping was to outline the ‘scope’ of the SEA through setting out the following information:
- A context review of the key environmental and sustainability objectives of national, regional, and local plans and strategies relevant to the NSPNP.
 - Baseline data against which the NSPNP can be assessed.
 - The key sustainability issues for the NSPNP; and
 - An ‘SEA Framework’ of objectives against which the NSPNP can be assessed.
- 3.4 The above scope was collated in a report (herein referred to as ‘Scoping Report’). The full Scoping Report is attached as **Appendix B** to this report.
- 3.5 Historic England and Natural England provided a response to the Scoping Report. A summary of the comment made and how it has been considered and addressed, is presented in **Table 3.1** below. The scoping response is provided in **Appendix A**.

Table 3.1: Consultation responses received on the SEA Scoping Report

Consultation response	How the response was considered and addressed
<i>Historic England</i> <i>Historic Places Adviser (email received on 2nd June 2024)</i>	
Historic England welcome reference to their guidance and recommends that the SEA also considers their guidance on Local Plan site allocations in the assessment.	Comment noted. The guidance on Local Plan site allocations has been considered in the SEA.
<i>Natural England</i> <i>Wessex Team (email received on 2nd July 2024)</i>	
Natural England recommends that the SEA considers the allocation of housing within the consultation zone of the Bath and Bradford on Avon Bats SAC and Mells Valley SAC, and the technical guidance for the consultation zone.	Comment noted. The SEA has considered the allocation of housing in proximity to the Bath and Bradford on Avon Bats SAC and Mells Valley SAC and the technical guidance.

¹¹ These consultation bodies were selected “by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effect of implementing plans and programmes” (SEA Directive, Article 6(3)).

Key sustainability issues

- 3.6 Drawing on the review of the policy context and baseline information, the SEA Scoping Report was able to identify a range of sustainability and environmental issues that should be a particular focus of SEA. This section sets out a summary of the key issues that were identified through scoping.
- 3.7 The selected environmental themes incorporate the 'SEA topics' suggested by Annex I(f) of the SEA Directive.¹² These were refined to reflect a broad understanding of the anticipated scope of plan effects (drawing from the screening opinion and local knowledge).
- 3.8 The scoping process allowed for some sustainability topics to be 'scoped out'; as it was considered the NSPNP is unlikely to have significant effects on certain factors. The statutory bodies have not raised any concerns in regards to the scoping out of any sustainability topics.
- 3.9 The sustainability and environmental issues identified at the scoping stage and their scoping outcome under each environmental theme is as follows:

Air Quality

- There are no AQMAs within or in immediate proximity to Norton St Philip and Farleigh Hungerford. It is possible development through the NSPNP could impact upon localised air quality, for example through increasing the number of vehicles on the road network, which will impact upon NO₂ levels.
- Existing air pollution is at a low baseline and any proposed development through the NSPNP is likely to be modest in scale and thus not likely to cause any significant changes to the existing baseline.
- The NSPNP could present opportunities to improve accessibility and support more local and sustainable journeys/connections.

SCOPED OUT

Biodiversity and Geodiversity

- There are no internationally designated sites within the neighbourhood area. However, the area sits within a wider landscape that has a number of biodiversity sensitivities. This includes SPAs, SACs, and buffer zones for protected bat species. It will be important to ensure new development brought forward through the NSPNP does not impact upon these designations, for example, through disrupting bat flight patterns, or disrupting ecological connectivity.
- There are several SSSIs within proximity to the neighbourhood area. The NSPNP should ensure its policies and plans do not adversely impact upon these sites and contribute to their degradation and potential loss. It is possible that policies including through the neighbourhood plan could contribute to the recovery of these sites.
- Although habitat coverage in the neighbourhood area is limited and fragmented, the BAP Priority Habitats in Norton St Philip contribute to the

¹² The SEA Directive is 'of a procedural nature' (para 9 of the Directive preamble) and does not set out to prescribe particular issues that should and should not be a focus, beyond requiring a focus on 'the environment, **including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors**' [our emphasis]

local biodiversity network by providing refuge areas and supporting overall biodiversity connectivity. As such, development through the NSPNP should be focused away from these areas as much as possible, in order to retain their quality and status.

- The Norton St Philip neighbourhood area has great potential to improve biodiversity connectivity and value within the wider landscape. This would likely improve biodiversity quality, but also contribute to the maintenance and improvement of designated sites outside of the neighbourhood area. As such, the NSPNP should take advantage of these opportunity areas wherever possible; this will help secure biodiversity net-gain.

SCOPED IN

Climate Change and Flood Risk

- Somerset Council declared a climate emergency in February 2019 and has set out a plan with actions to achieve carbon neutrality. The NSPNP seeks to allocate a sites and this is likely to increase CO₂ emissions. However, it is unlikely that this will be a significant increase. The scope for the NSPNP to deliver substantial improvements is unlikely to be significant.
- It will be important for new development to adopt best building practices to limit the increase in emissions, such as using sustainable materials, and incorporating renewable energy infrastructure.
- The agricultural sector is the largest contributor of CO₂ emissions in the Mendip area of Somerset, and the transport sector is the second largest. The NSPNP could contribute to a reduction in emissions linked to transport by ensuring development is located in accessible locations and in proximity to good sustainable transport infrastructure.
- There are parts of the neighbourhood area that are at higher risk of fluvial flooding, linked to the presence of water bodies. It is acknowledged these areas can be largely avoided by focusing development in areas with a lower likelihood of fluvial flooding. There are opportunities for the NSPNP to consider flood risk mitigation measures.

SCOPED IN

Community Wellbeing

- The neighbourhood area has low levels of overall deprivation. However, the IMD 2019 data suggests there are high levels of deprivation related to barriers to housing and services. A housing survey has been undertaken which has identified a strong need for affordable housing. Encouraging a more diverse mix of tenure will contribute to community wellbeing by allowing family groups to stay together and diversifying the age of the population.
- Norton St Philip residents on average have reported to have better levels of health compared to the Somerset, regional and national trends.

SCOPED IN

Historic Environment

- With a wealth of both designated and non-designated heritage assets within and surrounding the neighbourhood area, development of the NSPNP provides an opportunity to consider growth strategies that avoids or minimises impacts for the historic environment.
- The Norton St Philip Conservation Area Appraisal highlights the detrimental impact of specific features and sites within the historic core of the settlement. The NSPNP presents an opportunity to provide a growth strategy and supporting policy framework that works to protect and enhance the historic character of the conservation area. The protection and enhancement opportunities brought forward could also extend to non-designated assets and their settings.

SCOPED IN

Land, Soil, and Water Resources

- The provisional ALC data indicates the neighbourhood area is underlain with areas of Grade 1, Grade 3 and Grade 4 agricultural land. It will be important for development to be focused away from undeveloped parts of Grade 1 ALC land. Development should be focused as close to the settlement boundaries to avoid a greater loss of productive agricultural land.
- The neighbourhood area sits within two water body catchments. Given the current and historical ecological statuses of these two water body catchments, and the overlap of the neighbourhood area with the NVZ, water quality is an important consideration in this part of Somerset. Development through the NSPNP could impact upon the water body catchments and the NVZ through increased levels of pollutants entering the water system, linked to a greater built footprint in the neighbourhood area.
- The neighbourhood area includes areas of sand and gravel mineral resources. Where possible, development should be steered away from the mineral safeguarding areas and should be considerate of local finite resources.

SCOPED IN

Landscape

- Though not in the neighbourhood area, the Cotswolds National Landscape is located within proximity to the north. Given the proximity, it is likely development through the NSPNP will impact upon the wider setting of the designation. As such, the NSPNP should take into consideration the key objectives outlined in the Cotswolds National Landscape Management Plan, to ensure the designation is fully considered.
- The neighbourhood area sits within one National Character Area (NCA) - Cotswolds NCA and three Local Character Areas (LCAs). The key features contributing to these areas differ; as such, development through the NSPNP could help maintain or enhance local landscape character by encouraging development that is sensitive and considerate.

- The Norton St Philip Character Assessment identifies seven character areas within the neighbourhood area. These distinct areas should be maintained and enhanced wherever possible through the NSPNP, so that the character of the neighbourhood area is protected.
- There are a number of TPOs within the neighbourhood area, which are important landscape features that are also likely to contribute to visual amenity. New development through the NSPNP should avoid visual impacts to and from these TPOs where possible, in order to maintain the character and quality of the landscape in the neighbourhood area.

SCOPED IN

Transportation and Movement

- There are a number of public rights of ways (PRoWs) to allow for safe and active travel within and to areas outside the neighbourhood area. Norton St Philip is also served by a bus service which approximately runs every 80 minutes in both directions.
- The NSPNP seeks to allocate sites for development which is likely to increase private vehicle use on the local road network. This could contribute to congestion and emission levels in the neighbourhood area, which would need to be considered in the neighbourhood plan.

SCOPED IN

SEA Framework

- 3.10 The SEA framework has been established through the identification of key issues and environmental objectives as part of the scoping exercise. This draws upon the baseline position and policy context that has been prepared for SEA topics.
- 3.11 The framework consists of a set of headline objectives and ancillary questions, which has been used to appraise the environmental effects of the draft NSPNP (and any reasonable alternatives).
- 3.12 **Table 3.2** outlines the full SEA Framework. This SEA Framework provides a methodological framework for the appraisal of likely significant effects on the baseline.

Table 3.2: NSPNP SEA Framework

SEA theme	SEA objective	Supporting assessment questions
Biodiversity and geodiversity	Protect and enhance biodiversity and geodiversity.	<ul style="list-style-type: none"> • Protect and enhance nationally and locally designated sites, including supporting habitats and mobile species that are important to the integrity of these sites? • Protect and enhance semi-natural habitats as well as priority habitats and species? • Achieve biodiversity and environmental net gains and support the delivery of ecosystem services and multifunctional green infrastructure networks? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks? • Support access to, interpretation and understanding of biodiversity and geodiversity?
Climate change and flood risk	Reduce the contribution to climate change made by activities within the neighbourhood area and increase resilience to the potential effects of climate change.	<ul style="list-style-type: none"> • Avoid vulnerable development in areas of high flood risk, taking into account the likely future effects of climate change? • Reduce the number of journeys made and reduce the need to travel? • Promote the use of more sustainable modes of transport, including walking, cycling, public transport, and electric vehicle (EV) infrastructure? • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources, or reduce energy consumption from non-renewable resources? • Ensure that development does not come forward in areas at higher risk of flooding, considering the likely future effects of climate change? • Improve and extend green infrastructure networks in the neighbourhood area? • Sustainably manage water run-off, reducing runoff where possible? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?

SEA theme	SEA objective	Supporting assessment questions
Community wellbeing	Ensure growth in the neighbourhood area is aligned with the needs of all residents, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.	<ul style="list-style-type: none"> • Provide everyone with the opportunity to live in good quality, affordable housing? • Support the provision of a range of house types and sizes? • Meet the needs of all sectors of the community? • Deliver new facilities to reduce the need to travel outside the neighbourhood area? • Provide flexible and adaptable homes that meet people's needs, particularly the needs of an ageing population? • Improve the availability and accessibility of key local facilities, including health infrastructure? • Encourage and promote social cohesion and active involvement of local people in community activities? • Facilitate green infrastructure enhancements, including improved access to open space? • Maintain or enhance the quality of life of existing residents?
Historic environment	Protect, conserve, and enhance the historic environment within and surrounding the neighbourhood area.	<ul style="list-style-type: none"> • Protect the integrity of the historic setting of the Norton St Philip Conservation Area? • Conserve and enhance buildings and structures of architectural or historic interest, both designated and non-designated, and their settings? • Protect the integrity of the historic setting of key monuments of cultural heritage interest as listed in the Somerset HER? • Support the undertaking of early archaeological investigations and, where appropriate, recommend mitigation strategies? • Support access to, interpretation and understanding of the historic evolution and character of the neighbourhood area?
Land, soil, and water resources	Ensure the efficient and effective use of land, and protect and enhance water quality, using water resources in a sustainable manner.	<ul style="list-style-type: none"> • Promote the use of previously developed land wherever possible? • Identify and avoid the development of the best and most versatile agricultural land? • Support the minimisation, reuse, and recycling of waste? • Avoid any negative impacts on water quality and support improvements to water quality? • Ensure appropriate drainage and mitigation is delivered alongside proposed development? • Protect waterbodies from pollution? • Maximise water efficiency and opportunities for water harvesting and/or water recycling? • Avoid any negative impacts on mineral and waste infrastructure?
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape.	<ul style="list-style-type: none"> • Conserve and better reveal the significance of Cotswolds National Landscape? • Protect and / or enhance local landscape character and quality of place? • Conserve and enhance local identity, diversity, and settlement character?

SEA theme	SEA objective	Supporting assessment questions
		<ul style="list-style-type: none"> Identify and protect locally important viewpoints which contribute to character and sense of place? Retain and enhance landscape features that contribute to the landscape setting, including trees and hedgerows?
Transportation	Promote sustainable transport use and active travel opportunities and reduce the need to travel.	<ul style="list-style-type: none"> Support the objectives within the Somerset Future Transport Plan to encourage the use of more sustainable transport modes? Encourage a shift to more sustainable forms of travel and enable sustainable transport infrastructure enhancements? Improve local connectivity and pedestrian and cyclist movement? Facilitate working from home to reduce the use of private vehicles to access workplaces outside of the neighbourhood area? Reduce the impact of the transport sector on climate change? Improve road safety? Reduce the impact on residents from the road network?

4. Consideration of reasonable alternatives through the SEA

Introduction

- 4.1 In accordance with the SEA Regulations the Environmental Report must include:
- An outline of the reasons for selecting the alternatives dealt with; and
 - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.2 The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, how the SEA process to date has informed the consideration of different approaches for key elements of the NSPNP.

Overview of plan making and SEA work undertaken

- 4.3 The former Mendip District Council designated Norton St Philip parish as a neighbourhood area in April 2018.
- 4.4 Since designation, the NSPNP Steering Group have gathered evidence and undertaken consultation with local communities and other key stakeholders to identify the issues and opportunities that need to be addressed in the NSPNP.
- 4.5 A previous version of the neighbourhood plan was prepared and recommended by the former Mendip District Council for referendum in September 2019. This decision was later challenged by way of a Judicial Review, with the decision by the Council to allow the plan to proceed to referendum quashed in October 2020.
- 4.6 Following the High Court and Court of Appeal decisions, amendments were made to the previous version of the neighbourhood plan by Mendip District Council, and these were consulted upon in March and April 2021. The modifications were supported by the NSPNP Steering Group. The former Mendip District Council and Norton St Philip Parish Council subsequently agreed to pause the progression of the neighbourhood plan whilst they await clarity on potential changes to the Norton St Philip village settlement boundary in the Local Plan Part 2 Policy LPP2, which was undergoing examination at the time.
- 4.7 In May 2023, a further Regulation 14 consultation was held on the draft neighbourhood plan. In response to the consultation, Natural England advised that the neighbourhood plan could result in a likely significant effect on the Bath and Bradford on Avon Bats SAC and the Mells Valley SAC, and a Habitats Regulations Assessment progressing to Appropriate Assessment is required.
- 4.8 Following this advice, the NSPNP Steering Group undertook a HRA and SEA screening exercise in December 2023, which went on to conclude that an HRA and full SEA is required due to the potential for development at the proposed site allocation at Bell Hill Garage to have significant effects on European Sites.

- 4.9 The first step in the SEA process was the preparation of a Scoping Report, which was published for consultation in May 2024. The SEA process is being delivered by AECOM as part of the Locality Technical Support Programme.
- 4.10 AECOM has worked alongside the NSPNP Steering Group to identify and appraise any reasonable alternatives, to ensure that the SEA helps to inform the approaches and policies within the draft neighbourhood plan.

Establishing reasonable alternatives

- 4.11 A key element of the SEA process is the appraisal of ‘reasonable alternatives’ for the NSPNP. The SEA Regulations¹³ are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the ‘*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*’.
- 4.12 Case-law (most notably Friends of the Earth Vs. Welsh Ministers, 2015) has established that planning authorities may apply discretion and planning judgement when determining what should reasonably be the focus of alternatives appraisal, recognising the need to apply a proportionate approach and ensure an SEA process/ report that is focused and accessible.
- 4.13 This section describes how the SEA process has informed the proposed development strategy for the NSPNP.

Housing growth strategy and site allocation

- 4.14 Policy 4 of the Neighbourhood Plan allocates land at Bell Hill Garage for residential development for up to 15 homes. The Bell Hill Garage site comprises a brownfield site consisting of a vehicle repair garage and parking area. The site has been identified as one of two sites in the Norton St Philip Conservation Area Appraisal¹⁴ to be making a negative contribution to the conservation area. The other site consisted of a former chicken processing factory, which has since been redeveloped into housing.
- 4.15 Overall housing numbers (targets) are primarily the responsibility of the Local Planning Authority, Somerset Council. As set out in Section 2 of this report, the Local Plan housing requirement of 45 homes for the neighbourhood area has been met. Therefore, in numerical terms, there is no outstanding housing requirement for Norton St Philip for the Local Plan period (up to 2029).
- 4.16 Focusing on potential alternative spatial options for housing allocation, the SEA (in consultation with the NSPNP Steering Group) considered that the only alternative would be to take a ‘do nothing’ approach. The proposed site allocation is not aimed to address an unmet housing need, but to deliver a unique purpose of improvements to townscape character through the redevelopment of the poor-quality site. A key objective of the NSPNP is to preserve the character and heritage of the village and support sustainable housing. The redevelopment of the Bell Hill Garage site will provide opportunities to improve the character of the conservation area and there is strong local support for its redevelopment. Therefore, it is not possible to derive meaningful spatial strategy alternatives to the draft Neighbourhood Plan.

¹³ Environmental Assessment of Plans and Programmes Regulations 2004

¹⁴ Mendip District Council (2007) ‘Norton St Philip Conservation Area Appraisal’ can be accessed [here](#)

- 4.17 A 'do nothing' approach would in effect lead to a continuation of national and local planning policy to apply to the site and would not help facilitate its redevelopment. Considering that there is strong local support for the sustainable development of the site and that a key objective of the neighbourhood plan is to preserve the character and heritage of the village, a 'do nothing' approach was not determined to be a reasonable alternative which needed appraising.
- 4.18 The quantum of housing of up to 15 homes supported on the Bell Hill Garage site in Policy 4 of the Neighbourhood Plan has been established by the NSPNP Steering Group based on consented planning applications¹⁵ by the site landowner. The consented applications (025485/010 and 2009/1448) combined covers a site area similar to the proposed site allocation and obtained consent for 14 homes and office space. Based on the density of housing proposed under the consented scheme, it is considered that if the site was to solely be developed for housing, it could support approximately 15 homes.
- 4.19 An alternative to the proposed quantum of homes would be to pursue a higher quantum of housing on the site allocation. Whilst this can provide a wider range of choice and flexibility in delivering additional housing, there is no evidence to justify higher levels of housing growth and there is potential for a higher density of housing to cause harm to townscape character. Therefore, this alternative is also considered to be unreasonable.
- 4.20 Taking the above into account, it was concluded that there were no reasonable alternatives to the site allocation and the level of growth proposed through the NSPNP at this stage. The retention of the employment use of the Bell Hill Garage site is also considered under the 'do nothing' approach.

Development limit boundary

- 4.21 The LPP1 defines a development limit boundary for Norton St Philip and a revision of this boundary is proposed in the LPP2 to take account of recent development outside the boundary at Longmead Close. The Neighbourhood Plan seeks to define a development limit boundary that follows the proposed LPP2 boundary.
- 4.22 A potential alternative option has been considered to explore a less restrictive approach to development within and outside the settlement boundary. However, amending the boundary to include undeveloped land that is not allocated for a given use on the periphery of the village would be contrary to the spirit of the LPP1 which seeks to limit development to within settlement limit boundaries and protect open countryside. Therefore, this alternative is considered to be unreasonable and has not been taken forward for assessment.

¹⁵ Consented applications include 025485/010 and 2009/1448.

5. Appraisal of the Regulation 14 version of the Neighbourhood Plan

Introduction

- 5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current Regulation 14 draft version of the NSPNP. This chapter presents:
- An appraisal of the current version of the NSPNP under the SEA theme headings; and
 - The overall conclusions at this current stage and recommendations for the next stage of plan-making.

Norton St Philip Neighbourhood Plan policies

- 5.2 The NSPNP contains 9 policies to guide development in the neighbourhood area. These are set out in **Table 5.1** below.

Table 5.1 Norton St Philip neighbourhood plan policies

Policy Reference	Policy Name
Policy 1	Development within the Settlement Boundary of Norton St Philip
Policy 2	Rural Areas/ Green Belt
Policy 3	Housing Development
Policy 4	Housing Site Allocation, Bell Hill Garage
Policy 5	Rural Exception Sites
Policy 6	High Quality Design
Policy 7	Important Green Spaces
Policy 8	Promoting Biodiversity and Addressing Climate Change
Policy 9	Monitoring and Review

Approach to this appraisal

- 5.3 The appraisal identifies and evaluates ‘likely significant effects’ on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.2**) as a methodological framework. The appraisal is structured under each of the SEA objectives.
- 5.4 Account is taken of the criteria presented within Schedule 1 of the SEA Regulations.¹⁶ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the neighbourhood plan to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects. These effect ‘characteristics’ are described within the assessment as appropriate.

¹⁶ Environmental Assessment of Plans and Programmes Regulations 2004.

- 5.5 Every effort is made to predict effects accurately; however, this is inherently challenging given the understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Therefore, there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

Biodiversity and Geodiversity

- 5.6 There are no internationally designated sites within or in close proximity to the neighbourhood area and there are no nationally designated sites within the neighbourhood boundary. However, the area does include areas of priority habitat including ancient woodland, deciduous woodland, traditional orchard, and woodpasture and parkland. There is also potential for development to cause harm to the Mells Valley SAC and the Bath and Bradford on Avon Bats SAC, through increased recreational pressures and poorer air quality.
- 5.7 The proposed site allocation at Bell Hill Garage does not intersect with any biodiversity or geodiversity designations and is not known to include any priority habitats. However, the site is within Band B of the consultation zone for the Bath and Bradford on Avon Bats SAC and Band C of the consultation zone for the Mells Valley SAC indicating the potential importance of habitats on site to the SACs. The site is bounded by trees and shrubs, with some potential to be supporting species such as nesting birds. Horseshoe bats have previously been recorded on site and there is potential for development to have detrimental impacts through badly designed lighting, loss of habitat or fragmentation of hedgerows that alter the micro-habitat network.
- 5.8 NSPNP Policy 1 supports development where it would not result in any 'significant harm' to nature conservation sites and biodiversity networks within the area. NSPNP Policy 8 further seeks to safeguard all 'assets of wildlife and ecological value'. This should help to safeguard ecological connectivity across the site allocation and for speculative growth in the neighbourhood area. However, the policies do not significantly deviate from the baseline protection already afforded in the neighbourhood area through statutory measures and national and local planning policy, and thus significant effects are not predicted. The policies also do not include any site-specific detail to support the preservation and enhancement to existing habitats on the Bell Hill Garage site and to safeguard against any potential effects of development on the SACs.
- 5.9 NSPNP Policy 7 identifies and designates local green spaces in Norton St Philip for protection from development. This will benefit biodiversity as many green spaces provide a habitat for wildlife or form part of an ecological corridor.

- 5.10 NSPNP Policy 8 sets out a requirement for development to 'secure biodiversity net gain for at least 10% where required'. This requirement aligns with the 10% net biodiversity gain mandatory requirement for all qualifying schemes in the Environment Act 2021¹⁷ and thus does not deviate from the established baseline. Opportunities for enhancements through requiring development to deliver a higher amount of net gain or to deliver onsite net gain (where feasible) are missed.
- 5.11 As considered above, the NSPNP sets out measures to protect and enhance biodiversity features and designations. However, cumulatively, the policies do not significantly deviate from the baseline protection already afforded in the neighbourhood area through statutory measures and national and local planning policy. Opportunities to provide meaningful detail to secure biodiversity improvements such as on-site biodiversity net gain are missed. Equally, the scale and location of proposed growth and the mitigation measures set out in policy should likely avoid any significant effects. Overall, **neutral effects** are predicted.

Climate Change and Flood Risk

- 5.12 In the context of a declared climate and ecological emergency, the NSPNP can provide planning support for the transition to a low carbon future and increased resilience to future climatic changes.
- 5.13 In terms of climate change mitigation, the proposed housing will increase greenhouse gas emissions linked to the construction phase, minor increase in the built footprint of Norton St Philip, local population growth and additional traffic flows. Additional traffic is likely due to the limited provision of employment, community services and facilities including but not limited to health facilities and secondary education in the neighbourhood area. Given the scale of growth proposed (likely up to 15 homes), and the likelihood of improvements to construction phase mitigation, energy efficiency and the adoption of new technologies (including increase in electric car usage), this is not considered to lead to significant effects in relation to climate change mitigation.
- 5.14 The provisions in NSPNP Policy 8 provide indirect support for climate change mitigation, particular though the policy encouragement for high levels of sustainability in design including for development to incorporate the 'highest standards of energy efficiency and demonstrate resilience to the likely impacts of climate change including increased flood risk and heat stress' and for the incorporation of electric vehicle charging points, including where appropriate in new street lighting columns.
- 5.15 The policy further supports local renewable energy generation. However, the policy broadly aligns with LPP1 Policy DP7 and does not set out additional detail as to the nature of schemes and locations where energy generation will be supported, and thus is not likely to alter the existing baseline. Policy 8 also encourages sustainable drainage systems with the use of native tree and hedgerow species, which should support mitigation over the long term.

¹⁷ Environment Act (2021) can be accessed [here](#)

- 5.16 The policy framework seeks to minimise operational emissions by supporting the use of renewable energy and encouraging high quality design. Whilst an increase in greenhouse gas emissions is inevitable as a result of the site allocation, development is necessary to support local housing and other community needs. Overall, no significant deviations from the baseline are considered likely, with many climate mitigation and resilience measures being driven largely at the regional or national scale. On this basis, broadly **neutral effects** are concluded in relation to climate change mitigation.
- 5.17 Regarding flood risk, the proposed site allocation at Bell Hill Garage does not fall within an area at risk of fluvial flooding and includes some areas at low risk of surface water flooding. Policy 8 requires development to incorporate sustainable drainage systems and natural drainage. The policy measures alongside the protection afforded in national and local planning policy should help secure adequate mitigation to safeguard against potential exacerbated flood risk from development. Therefore, no significant effects are considered likely, and broadly **neutral effects** are concluded with no anticipated significant deviations from the baseline.

Community Wellbeing

- 5.18 At the strategic level, the Local Plan does not set out an unmet housing need for the neighbourhood area. The Neighbourhood Plan is also not supported with an objective assessment of housing need to set out local housing needs. However, the NSPNP allocates land at Bell Hill Garage for up to 15 homes, which should provide housing choice and new affordable housing provision in the local area. Given that this would exceed the objectively assessed housing needs for the area in the Local Plan, positive effects are predicted. Although, there is some uncertainty, as the NSPNP does not specify an exact housing figure and does not explore into detail the number of homes and density that can be accommodated.
- 5.19 The owner of the land at Bell Hill Garage has indicated that the existing employment use of the site will be retained as part of the redevelopment of the site. However, the retention of the employment use is not secured through the Neighbourhood Plan and there is a potential risk of the permanent loss of employment use and car servicing provision in the neighbourhood area. This is predicted to derive a uncertain minor negative effect.
- 5.20 In terms of the delivery of a mix of housing, NSPNP Policy 4 requires the dwelling mix for the site allocation to be 'predominantly of 2 and 3 bedroom homes' and to include an appropriate proportion of affordable housing units. This should help towards the local delivery of new housing that reflects local need and contribute towards widening of choice. However, the effectiveness of the policy approach is somewhat limited as it only applies to the site allocation and does not cover any speculative development which may come within the settlement boundary during the plan period. Furthermore, the policy does not define the proportion of affordable housing in an area with higher than average house prices. This could undermine the potential for higher levels of affordable housing delivery.

- 5.21 The NSPNP sets out a number of measures to help sustain Norton St Philip parish as an active and thriving place to live. Policies 1 and 7 seek to support recreation and safeguard opportunities for active lifestyles through designating local green space and by requiring development to not result in harm or the loss of public or private open spaces.
- 5.22 Healthy and active lifestyles are encouraged through NSPNP Policy 1 which supports walking and recreation by safeguarding and where appropriate enhancing PROWs in the vicinity of the site. Policies 1 and 8 seek to protect residential amenity from new development including renewable energy generation schemes, which should help protect the wellbeing of residents.
- 5.23 NSPNP Policy 5 supports affordable housing schemes outside the settlement boundary where there is clear evidence of an unmet need within the Parish for the number and type of housing proposed. The policy further seeks to secure the affordable housing provision by requiring applicants to enter into a legal agreement to ensure housing would remain available for affordable housing and exclusively to address local need. This should help secure the long term provision of affordable housing in the parish. In accordance with the NPPF, the policy seeks to offset potential viability issues by supporting the inclusion of market housing. Requirements for the market and affordable housing to not be distinguishable in design quality should support the provision of higher quality affordable housing and help foster equality and diversity in community.
- 5.24 NSPNP Policy 1 does not support development which would require 'substantial new infrastructure or other facilities to support the development'. Whilst the policy is unclear as to what may constitute as substantial new infrastructure or facilities, there is potential for this policy to discourage the provision of new community facilities, services, infrastructure or other forms of social betterment.
- 5.25 Overall, the NSPNP performs well under the community wellbeing objective. In particular, addressing local housing needs and safeguarding green space will derive positive effects. However, the scale of positive effects are not considered to be significant and there is potential for uncertain minor negative effects from the loss of employment use. Overall, a **minor positive effect** is predicted.

Historic Environment

- 5.26 The neighbourhood area has a rich historic environment, recognised through the diversity of features and areas which are nationally and locally designated for their heritage interest. This is reflected by NSPNP policies which have a focus on conserving and protecting the significance of buildings, structures and features of architectural or historic interest and their settings. Policy 1 requires development to not cause 'significant harm to heritage assets' and to not have 'adverse impacts on the conservation area'. Policy 4 allocates the Bell Hill Garage site for housing, which should support the redevelopment of a site identified as one of two sites in the Norton St Philip Conservation Area Appraisal¹⁸ to be making a negative contribution to the conservation area. The policy further sets out requirements for development to adhere to development briefs and the Village Character Assessment, which should help to facilitate the sensitive redevelopment of the site.

¹⁸ Mendip District Council (2007) 'Norton St Philip Conservation Area Appraisal' can be accessed [here](#)

- 5.27 NSPNP Policy 6 requires new development to promote high quality design that follows relevant guidance in the Character Assessment accompanying the plan and the Conservation Area Appraisal. This should help deliver high quality and sensitive design within the conservation area and throughout the parish. Similarly, NSPNP Policy 1 requires development to be of a scale, layout and design that is compatible with the character and density of the surrounding area. The policy further discourages harm or loss of public and private open space that contribute to local built character including residential gardens. These policies positively respond to protecting the distinct character of heritage assets and the built environment of the parish.
- 5.28 Overall, the NSPNP policies take a proactive approach in conserving the distinctive character and heritage interests of Norton St Philip parish. This is recognised through its focus on safeguarding protected features and their settings and ensuring that development respects the character of the built environment. The protection afforded to historic features should help conserve their historic importance in the long-term. However, this does not deviate significantly from the statutory protection already afforded to designated assets and that provided in the Local Plan. Nevertheless, the sensitive redevelopment of the Bell Hill Garage site should enhance the character of the conservation area, and this would be less likely to occur in the absence of the NSPNP. Therefore, an **uncertain significant positive effect** is predicted for this objective.

Land, Soil, and Water Resources

- 5.29 In terms of the location of the best and most versatile agricultural land, a detailed classification has not been undertaken for the neighbourhood area. Therefore, there is a need to rely on the nationally available 'Provisional Agricultural Land Quality' national dataset. The Provisional Agricultural Land Quality dataset shows that the land immediately surrounding Norton St Philip consists of mostly Grade 3 agricultural land, however, the data does not differentiate as to whether this is Grade 3a (e.g. the best and most versatile) or lower quality 3b land. There is also a small area of Grade 1 agricultural land to the north and Grade 4 to the north west of Norton St Philip. The land immediately surrounding the village is susceptible to loss in future development.
- 5.30 The LPP1 Policy CP1 affords protection to agricultural land resources by defining settlement boundaries and limiting residential development in rural areas. The NSPNP carries forward this boundary and Policy 2 requires development outside of the settlement boundary to satisfy requirements of the Neighbourhood and Local Plans. Whilst this should help to ensure the long term preservation and retention of agricultural land resources around Norton St Philip, positive effects are not realised because in the absence of the NSPNP, protection is afforded by the Local Plan.

- 5.31 The proposed site allocation consists of previously developed land and thus in not predicted to result in the loss of the best and most versatile agricultural land. The scale of housing proposed is unlikely to have any significant impacts at the catchment level to cause pressure on water resources. There is potential for residential development to result in pollution in surface water run-off, which could adversely affect water quality. However, it is likely that development would improve surface water run-off quality by providing opportunities to incorporate green infrastructure and sustainable drainage into a brownfield site mostly used as a garage and for car parking.
- 5.32 NSPNP Policy 8 requires development to incorporate sustainable drainage systems and native species of trees and hedgerows. This broadly aligns with the policy framework established by national and local planning policy. However, the use of native species should provide more robust and resilient green infrastructure potentially enhancing the effectiveness of drainage systems.
- 5.33 Overall, the mitigation measures proposed within policy should support the preservation of land, soil and water resources. Proposing housing growth on a brownfield site within the village should further support the preservation of agricultural land resources by addressing local housing needs within the built area. However, as the NSPNP does not propose any significant deviation from the baseline, broadly **neutral effects** are predicted for this SEA objective.

Landscape

- 5.34 The Norton St Philip parish falls to the south of the Cotswolds National Landscape and there are a number of key views between the designation and Norton St Philip neighbourhood area. The area also falls within the Cotswolds NCA and the Frome Valley and Cotswold Edge LCA landscape types. The village and the immediate surrounding area falls within the Norton St Philip, Buckland and Orchardleigh Ridge and Foxcote Slopes LCAs. The eastern part of the neighbourhood area falls within the Lower Frome Valley Spring Gardens, Beckington to Farleigh LCA.
- 5.35 The protection of local landscape and townscape character and appearance is supported through policies that set out measures that directly or indirectly protect and seek to enhance landscape and townscape character and sensitivity. NSPNP Policy 6 sets out design standards and for development to complement the existing character of the surrounding area and incorporate landscaping and high-quality public realm areas as an integrated part of its design and layout. Similarly, NSPNP Policy 1 requires development to be of a 'scale, layout, design and appearance that is compatible with the character and density of the surrounding area'. This should help reduce some impacts on landscape and townscape character through supporting sensitive design and by encouraging a suitable scale and density at the periphery of the village .
- 5.36 The intrinsic qualities of the local landscape are afforded a level of protection through the NSPNP policies which recognise the importance of green and open spaces. Policy 7 designates 16 sites as local green space and seeks to safeguard and protect these spaces from development. These designations include features which contribute positively towards maintaining the rural built character of Norton St Philip and are intrinsic to the landscape character.

- 5.37 NSPNP Policy 8 supports renewable energy generation schemes providing that their siting and scale is 'appropriate to its setting and position in the wider landscape'. This should help reduce adverse effects on the landscape character from schemes that include infrastructure such as solar photovoltaic panels or small-scale wind turbines.
- 5.38 The NSPNP defines a settlement boundary for Norton St Philip. In principle, this should afford additional protection to the countryside which should help preserve existing village character and the openness of the surrounding landscape. However, the settlement boundary aligns with the boundary set out in the Local Plan and supporting policy does not set out any additional requirements to preserve land outside the settlement boundary.
- 5.39 NSPNP Policy 5 supports affordable housing schemes outside the settlement boundary providing that the site is 'adjacent or in close proximity to the defined settlement boundary' and regard has been given to its integration into the form and character of the village and its landscape setting. The policy further limits all proposed rural exception sites to not exceed 5% of the Parish housing stock. The policy aligns closely with the requirements set out in LPP1 Policy DP12 which also allows for rural exception on sites adjacent to settlements. The flexibility in Policy 5 to further allow rural exception on land in close proximity to the settlement boundary could cause harm to local landscape character from development on sites that do not resonate with the built area. Although, the 5% limit for all rural exception sites should limit the potential scale of rural exception housing delivery in the parish and subsequently harm to landscape and townscape character.
- 5.40 The NSPNP allocates previously developed land at Bell Hill Garage for up to 15 homes, within the built area of Norton St Philip. The site benefits from existing landscape features to the north and east which should likely be protected through existing national and local planning policy. The redevelopment of the site further provides opportunities to enhance townscape character through the removal of poorer quality buildings and new buildings of high quality design which are in-keeping with the character of the local area.
- 5.41 It is considered that the NSPNP provides a broadly positive framework for the protection of the local landscape and townscape character. However, there is potential for some harm to landscape and townscape character through allowing rural exception development on sites outside and not adjacent to the settlement boundary and built area of Norton St Philip. Therefore, an **uncertain minor negative effect** is predicted.

Transportation and Movement

- 5.42 It is noted that in Norton St Philip at busy times, parking and pinch point congestion are a continuing challenge. Narrow lanes especially along Church Street and Bell Hill and limited parking associated with the primary school exacerbate congestion issues in the village.
- 5.43 In the absence of strategic transport interventions, growth in the neighbourhood area is likely to exacerbate these issues, and continued reliance on the private vehicle is considered likely to prevail over the neighbourhood plan period. However, the addition of up to 15 homes proposed in the NSPNP is not considered likely to lead to significant effects in respect of the baseline.

- 5.44 Active and sustainable travel is supported by NSPNP Policy 1 which seeks to safeguard and enhance existing PRoW in the vicinity of a site. This should facilitate and encourage walking, recreation and active travel. Policy 1 further requires development to incorporate safe and suitable access for pedestrians and vehicles. NSPNP Policy 8 seeks to support the transition to electric vehicles by requiring new development to incorporate charging points in new street lighting columns where appropriate, supporting the local provision of vehicle charging infrastructure. Whilst these policies are positive in principle, they do not deviate substantially from national and local planning policy and thus their impact on the baseline is predicted to be limited.
- 5.45 The NSPNP adds some minor additional detail in respect of transport measures. However, the principle of sustainable connections, improvements to infrastructure and walkable neighbourhoods are already established in the Local Plan, and the detail set out does not deviate substantially from national and local planning policy. Similarly, additional housing from the proposed site allocation will increase congestion, but the scale of proposed growth is not significant and unlikely to have any notable impact on the highway network. Therefore, **neutral effects** are predicted for this SEA objective.

Conclusions at this stage

- 5.46 Table 5.2 summarises the overall effects of the policies within the draft NSPNP for each SEA topic. It is important to differentiate between significant effects, which are predicted to lead to changes in the baseline position, and those effects that are broadly positive or negative, but are less likely to lead to substantial changes.
- 5.47 Overall, neutral or positive effects are predicted across each SEA topic, with the exceptions being the 'Landscape' objective, where uncertain minor negative effects are predicted relating to the potential for rural exception sites outside and no adjacent to the settlement boundary (under Policy 5) to cause harm to landscape and townscape character. However, these effects are not predicted to be significant, as existing national and local planning policy should safeguard against unsustainable development in open countryside.

Table 5.2: Summary of overall effects for each SEA Topic.

SEA Topic	Overall Effects
Biodiversity and Geodiversity	Neutral effect
Climate Change	Neutral effect
Flood Risk	Neutral effect
Community Wellbeing	Minor positive effect
Historic Environment	Uncertain significant positive effect
Land, Soil, and Water Resources	Neutral effect
Landscape	Uncertain minor negative effect
Transportation and Movement	Neutral effect

Recommendations

5.48 A number of recommendations have been identified to enhance the positive effects of the draft NSPNP and mitigate any negatives. These are summarised below:

- The NSPNP sets out the size of housing supported for the site allocation and requires rural exception site proposals to be supported with a housing needs assessment. The NSPNP could be improved by requiring all housing proposals within the settlement boundary to be supported by up to date evidence of local housing need including type, size, tenures and affordable housing needs and to demonstrate how proposals meet the needs of the local population.
- Policy 1 does not support development which would require ‘substantial new infrastructure or other facilities to support the development’. There is potential for this policy to discourage the provision of new community facilities, services, infrastructure or other forms of social betterment. It is recommended that the policy is reworded to either set out what forms of new infrastructure or other facilities would not be acceptable or to remove this requirement.
- Policy 4 allocates the Bell Hill Garage site for up to 15 homes. The policy could be improved by providing site specific detail to support the preservation of existing on site high quality habitats and to maximise opportunities to enhance and restore damaged habitats and to compensate for lost habitats as a result of development. The policy could be further improved by affording protection to Horseshoe bats and other protected species by requiring development to mitigate any potential adverse effects on protected species and the SACs.
- Policy 5 could be improved by removing the provision to allow for rural exception development on land not adjacent to Norton St Philip. This should avoid potential harm to landscape and townscape character.
- Policy 8 sets out a requirement for development to ‘secure biodiversity net gain for at least 10% where required’. The positive effects of the policy could be enhanced by requiring development to deliver a high amount of onsite biodiversity net gain or by setting out measures to ensure new planting and green infrastructure is robust, native and of high biodiversity value.
- Policy 8 could also be improved by adding detail to require proposals to minimise potential visual impact of renewable energy generation schemes.

6. What are the next steps?

- 6.1 This part of the report explains the next steps that will be taken as part of plan-making and SEA.

Plan finalisation

- 6.2 This Environmental Report accompanies the NSPNP for Regulation 14 consultation. Following consultation, any representations made will be considered by the Steering Group, and the NSPNP and Environmental Report will be updated as necessary. The updated and final version of the Environmental Report will then accompany the NSPNP for submission to the LPA, Somerset Council, for subsequent Independent Examination.
- 6.3 At Independent Examination, the NSPNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.
- 6.4 If the Independent Examination is favourable, the NSPNP will be subject to a referendum, organised by Somerset Council. If more than 50% of those who vote agree with the NSPNP, then it will be 'made'. Once made, the NSPNP will become part of the Development Plan for the parish.

Monitoring

- 6.5 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the NSPNP to identify any unforeseen effects early and take remedial action as appropriate.
- 6.6 It is anticipated that monitoring of effects of the NSPNP will be undertaken by Somerset Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the NSPNP that should warrant more stringent monitoring measures beyond that already undertaken by Somerset Council.

Appendix A - Scoping Consultation Response

Historic England

Norton St Philip Neighbourhood Plan SEA: Scoping Report consultation (Wednesday 1st May - Wednesday 5th June 20...



Stuart, David <[REDACTED]>

To: Khan, Ishaq

Cc: [REDACTED]

Sun 02/06/2024 11:57

Dear Ishaq

Thank you for your consultation on the SEA Scoping associated with the Norton St Philip Neighbourhood Plan.

We were under the impression following the previous SEA Screening consultation from Somerset Council last summer that a full SEA for this Plan would not be required.

However, we note from your Scoping Report that the Plan now intends to allocate sites for development and as a consequence it has been determined that a full SEA is now necessary (para 1.5, p1).

We are pleased to see reference on pages 4 & 5 to our guidance on relevant issues the use of which is likely to prove important to the informed evaluation of the potential of the Plan to impact on heritage assets. To this we would recommend adding our guidance on site allocations. Although titled with reference to Local Plans this has equal application to sites being allocated in Neighbourhood Plans.

The guidance can be downloaded from our website via the following link <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

Kind regards

David

David Stuart | Historic Places Adviser

I now work only 2 days a week, usually Tuesdays and Wednesdays

Historic England | South West
1st Floor Fermentation North | Finzels Reach | Hawkins Lane | Bristol | BS1 6WQ
Direct Line: [REDACTED] | Mobile: [REDACTED]
<https://historicengland.org.uk/southwest>



Historic England

Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at historicengland.org.uk/strategy.

Follow us: [Facebook](#) | [Twitter](#) | [Instagram](#) Sign up to our [newsletter](#)

Historic England

Date: 02 July 2024
Our ref: 474836



Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear [REDACTED],

Norton St Philip Neighbourhood Plan SEA Scoping Consultation

Thank you for your consultation on the above dated 02 May 2024. I apologise for the delay in response.

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

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

Strategic Environmental Assessment (SEA) Scoping request

There is an allocation of housing in the Consultation Zone. We expect this to be considered in the SEA. The allocation is within Band B of the consultation zone for the Bath and Bradford on Avon Bats SAC and Band C of the consultation zone for the Mells Valley SAC indicating the potential importance of habitats on site to the SACs. Bat surveys for a previous application on the allocated site (2021/2928/FUL) recorded both species of horseshoe bat (qualifying features of the Mells Valley SAC and the Bath and Bradford on Avon Bats SAC) using the site, consequently Natural England's advice was that the application would require a Habitats Regulations Assessment. A HRA proceeding to Appropriate Assessment is required as it is not possible to rule out likely significant effects on the SACs.

Biodiversity and geodiversity

In Policy Context Table 4.2 we would expect the Consultation Zone document to be listed: [Mendip Bat SAC Technical Guidance](#). The layers are on the Environment and Planning Section of the My Maps tag [Somerset Council \(mendip.gov.uk\)](#).

Strategic Environmental Assessment

It is Natural England's advice, on the basis of the material supplied with the consultation, that significant effects on protected landscapes are unlikely. Guidance on the assessment of Neighbourhood Plans, in line with the Environmental Assessment of Plans and Programmes Regulations 2004 is contained within the [Planning Practice Guidance](#). This identifies three triggers that may require the production of an SEA:

- a neighbourhood plan allocates sites for development

- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

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

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

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

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

We refer you to the advice in the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

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

Yours sincerely

Rosalind Tuck
Wessex Team

Appendix B - SEA Scoping Report

See separate Scoping Report document

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