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**From:** Holly Simkiss   
**Sent:** 03 October 2024 14:05  
**To:** NortonStPhilip Clerk <[clerk@nortonstphilipparishcouncil.gov.uk](mailto:clerk@nortonstphilipparishcouncil.gov.uk)>  
**Cc:** James Petherick   
**Subject:** Norton St Philip - Neighbourhood Plan Reg 14 consultation response

Good afternoon,

Please find below a response to the Reg 14 consultation from Stonewood Homes as the developer, and on behalf of Philip Rose as the landowner:

#### **Policy 4**

Policy 4 of the Norton St Philip Neighbourhood plan (NSPNP) seeks to allocate the Bell Hill Garage site for residential development. The continued allocation of this site is welcomed.

It is noted that the content of the policy has been amended to provide for up to 15 dwellings but no masterplan proposals are provided to support this. The policy confirms the land to be previously development land (brownfield land) that is wholly contained within defined settlement limits. The proposed site allocation includes the garage and parking area to the north.

Policy 4 stipulates a requirement for a mix of predominately 2 and 3-bedroom homes. Based on current parking standards, this would necessitate a minimum of 2-parking spaces per unit plus visitor spaces at 0.2 spaces per dwelling (a minimum in total of 33 parking spaces).

Appendix 1 of the NSPNP sets out a development brief for the proposed allocation. Paragraph 21.3 requires significant and effective landscaping on the northern boundary to present a soft edge that will blend any new development into the wider field, which is designated as an open area of local significance (OALS). Existing landscaping along the eastern boundary is also required to be retained.

Policy 4 states that the site is well suited to residential development. It also states that any proposal should conserve, and if possible, enhance the Conservation Area, in accordance with both the Village Character Assessment, and policies contained within LPP1.

In terms of the Village Character Assessment, the site straddles two-character areas; 'Close Terraced Cottages' to the south and 'Leafy Cottages' to the north. To redevelop the site with up to 15 dwellings would result in a density of 37.5 houses per hectare on the 0.4HA site. 9 houses on the site represents a housing density of 22.5 houses per hectare and also allows for the inclusion of a new commercial garage, retaining employment opportunities within the village.

When combined with the policy requirements for roads, pavements, drainage, gardens, parking, landscaping and opportunities for biodiversity net gain, it demonstrates many competing requirements that need to be accommodated within the site. If a soft edge along the northern boundary is to be created, then a transitional arrangement into the OALS is required, otherwise a hard edge will be achieved. Without scope within Policy 4 for transitional landscape arrangements, the policy is viewed as overly restrictive, and a barrier to the

development being brought forward.

As noted above, the continued allocation is welcomed, but development is made less viable by the overly restrictive approach to the treatment of the northern boundary. If development of this site is made unviable it will lead to a failure of the NSPNP and risk other sites, not favoured for development, being brought forward.

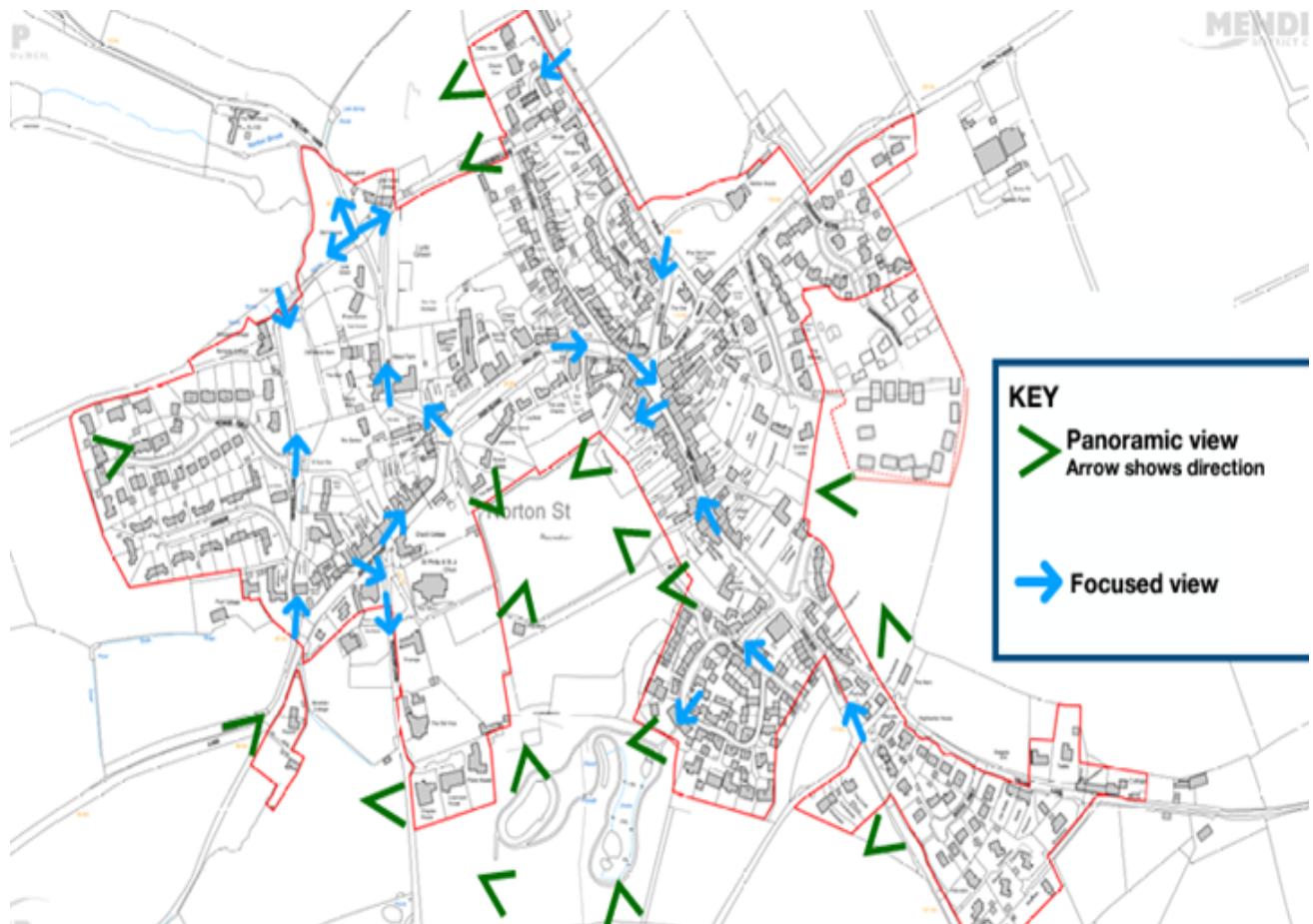
The site is currently subject to a live planning application for a viable scheme that adheres to all relevant Local Plan policies. As part of that scheme the northern boundary is subject to a transitional landscape boundary that will be managed and offer benefits in terms of wider views and biodiversity.

It is accepted that the current planning application boundary encroaches on to the OALS slightly. However, mitigation has been proposed and it should be noted that the encroachment is by way of domestic gardens. We note that other areas of OALS within the village are within domestic curtilages, hence setting a precedent for this use within an OALS.

It is requested that Policy 4 is amended to include for transitional landscaping arrangements.

### **Policy 7**

The Village Character Assessment (August 2024) which is a supporting document to the NSPNP demonstrates at figure 10, important views into and out of Norton St Philip. This shows that there are limited opportunities for public enjoyment of the site as the road (Chevers Lane) focuses the view in a westerly direction and towards Lyde Green Cottage. As the site is in private ownership, and there are no public rights of access, physical enjoyment of the space does not exist; only visual. As detailed below, there are no apparent views into the site from the east, south and west.



The field to the north, known as Lyde Green within the NSPNP is also proposed as being designated through Policy 7 as an Important Green Space. Policies regarding the sites former OALS designation in the Mendip Local Plan LPP1 and LPP2 contain circular guidance. Critically LPP2 details that areas designated as OALS will be accompanied by information as to why the designation has been made. It does not however provide this.

The NSPNP also does not provide information as to why the subject land, which is in private ownership, has been identified as a site worthy as designation for Green Space or Infrastructure. To be designated as such, the site must comply with criteria set out in the NPPF, and should only be used where the green space is:

1. In reasonably close proximity to the community it serves,
2. Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
3. Local in character and is not an extensive tract of land.

If the land received such a designation, then it would be afforded protection through planning policies consistent with those for Green Belts.

The land currently subject to OALS status is in private ownership, and subject to little management. The site's ecology and biodiversity is of relatively low value. The backdrop of the OALS is against the existing garage site and parking areas to the south. The OALS land is bordered on all sides by residential development.

It is noted at paragraph 15.3 of the NSPNP that the Bell Hill Garage site has been identified within the settlement boundary as suitable for infill development. Infill development is the antithesis of sprawl or encroachment; it is development that is contained. It is also of note that Green belt policies allow for limited infilling in villages.

The continued pursuit of the protection of this space as either OALS or as Green Space appears to conflict with National planning policies. Mendip Council have included the entire site (both brownfield and greenfield) within defined settlement limits. The site is not publicly accessible and therefore any enjoyment is limited to those neighbouring properties that over-look the field, which is (aside garden space) not proposed for development.

A criterion of Policy 7 is that proposals for new development should have regard to and, where possible, seek to enhance the identified important Green Spaces. Policy 7 references Natural England's guidance on "Principles of Green Infrastructure". This guidance references 15 principles, which aims to shape stronger green infrastructure policy and delivery:





The subject site is neither accessible, managed or connected. The site is therefore not considered to meet the tests for allocation as Important Green Space. As such the inclusion of the site within Policy 7 is objected to.

I would be very grateful if you could please confirm receipt of this email.

Kind regards,

Holly



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