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Sent by email to [planning@southsomerset.gov.uk](mailto:planning@southsomerset.gov.uk)

24 January 2020

Dear Mr Kenyon,

**Planning application reference; 19/03416/OUT Outline application for the demolition of existing buildings and residential development of up to 80 dwellings including the creation of a new vehicular access and pedestrian accesses, open space, landscape planting and surface water attenuation (all matters reserved except access). Land At Manor Farm, Combe Hill, Templecombe Somerset.**

CPRE Somerset welcomes the opportunity to comment on the above outline planning application and wishes to **object** to this outline development proposal.

This Major application consists of outline planning for 80no. dwellings (mix not specified), application boundary 4.31 ha, proposed development footprint area of 2.41ha, 2.44 ha green infrastructure, mains sewer, SUDs.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires determination of the planning application must be made in accordance with the development plan unless material considerations indicate otherwise. The relevant development plan is South Somerset Local Plan 2006-2028 (Adopted March 2015).

CPRE Somerset considers this outline application for 80 dwellings contrary to South Somerset HELAA 2018 Abbas and Templecombe, which for this proposed site (E/ABTE/0013) states; '*Suggest reduced density due to conservation issues (30 dwellings per hectare yields 78 dwellings – suggested yield 35 dwellings)*'.

There are currently 746 dwellings in Abbas and Templecombe, approximately 20% of which lie north of the railway line in Abbas. This outline application would amount to an approximate 13% increase in dwelling number to Templecombe, which is south of the railway. CPRE Somerset considers this would constitute an

unacceptable development pressure on Templecombe, village infrastructure and the existing inhabitants.

In addition, there is already an outline application 19/01604/OUT at E/ABTE/0007 for 49 dwellings, a site which in HELAA 2018 is stated as 'suggest about 30 dwellings...'.  
1

It should be noted that since 2006 to 31 March 2018 there have been 58 dwelling completions and a further commitment of 93 dwellings totalling 151 dwellings. Whilst CPRE's core policy is to be pro-development, any development must contribute 'to place', to create beautiful places for present, and future generations in perpetuity. Therefore, CPRE Somerset considers that this outline proposal for 80 dwellings will not contribute to sense of place or social cohesion, an increase of over 43% cannot be considered sustainable development and therefore contrary to SD1 which states;

#### *'POLICY SD1: SUSTAINABLE DEVELOPMENT*

*When considering development proposals the Council will take a proactive approach to reflect the presumption in favour of sustainable development contained in the National Planning Policy Framework and seek to secure development that improves the economic, social and environmental conditions within the District.*

*Planning applications that accord with the policies in this local plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.*

*Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:-*

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or*
- Specific policies in that Framework indicate that development should be restricted or refused.*

*Where necessary the Council will work with applicants to improve proposals so that they are capable of being approved.'*

Furthermore, South Somerset Peripheral Landscape Study (2008) states;

*'Two areas lay outside this 'high' sensitivity evaluation: The first is two fields that lay at the intersection of both the present and former rail-line, which has a low visual profile; a degree of intervisibility with the village edge; and possesses a scattering of random built forms. This area is graded 'moderate' sensitivity, as is the area between Manor Farm, and the housing to its north. Seen against a backdrop of built form, this area comfortably abuts adjoining housing and displays very little forward projection when viewed from the village edge (photo 8). However, as it is sited along an edge of the village that has some prominence when viewed from the vale, this area too is graded 'moderate' sensitivity.'* (page 14)

*7.6 Area (iii) indicates land alongside Manor Farm, backing on to High Street. Whilst of insufficient scale to offer strategic development potential, it is included as being appropriate in scale to its village context for housing development. The site lays close to the skyline as viewed from the vale, hence low densities (circa 30 dph) are considered appropriate, with sufficient space set aside for landscape mitigation to the east edge, to soften views of development from the vale.*

*8.5 (iii) By Manor farm - 1.05ha residential (circa 30dph) 0.15ha open space and structural landscape'*

CPRE Somerset considers the outline proposal to be contrary to NPPF Paragraph 170 (b) which states;

*'170. Planning policies and decisions should contribute to and enhance the natural and local environment by:*

*b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*

and contrary to NPPF paragraph 118 states;

*'118. Planning policies and decisions should:*

*b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production; '*

CPRE Somerset wishes it should be noted that this land should not be classified as 'previously developed land' as defined in the NPPF which states;

*'Previously developed land: Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape'.*

Thus, this outline proposal is contrary to Policy HG2 which states;

*'POLICY HG2: THE USE OF PREVIOUSLY DEVELOPED LAND (PDL) FOR NEW HOUSING DEVELOPMENT*

*South Somerset District Council will seek to provide a minimum of 40% of new dwellings on previously developed land over the period of the local plan. This will be monitored through the Annual Monitoring Report and reviewed as necessary.'*

Conservation issues were highlighted in the HELAA to limit housing development to 35no. dwellings, therefore CPRE Somerset considers that exceeding this number would be contrary to policy EQ3 Historic Environment which states;

*'Heritage assets will be conserved and where appropriate enhanced for their historic significance and important contribution to local distinctiveness, character and sense of place. Their potential to contribute towards the economy, tourism, education and local identity will be exploited.*

*All new development proposals relating to the historic environment will be expected to:*

*☑ Safeguard or where appropriate enhance the significance, character, setting and local distinctiveness of heritage assets;*

*☑ Make a positive contribution to its character through high standards of design which reflect and complement it and through the use of appropriate materials and techniques;*

*☑ Ensure alterations, including those for energy efficiency and renewable energy, are balanced alongside the need to retain the integrity of the historic environment and to respect the character and performance of buildings, adopting principles of minimum intervention and reversibility.'*

At present the development site environs produces 4-8 nanoWatts/cm<sup>2</sup>/sr of light pollution (see

<https://www.nightblight.cpre.org.uk/maps/> ), classed as in a zone of above 'brighter skies'. To the east and south of the site, the night skies are subject to less light pollution, emanating 0.5-1 nanoWatts/cm/sr within under a mile. Unless strictly controlled, any further street and external lighting will increase light pollution in this and the wider area being detrimental to dark night skies, the nocturnal feeding habits and circadian rhythms of nocturnal fauna, and human health. NPPF para 180 which states;

*'180. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:*

- a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;*
- b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and*
- c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.'*

CPRE Somerset requests that should the case officer be minded to approve the application then South Somerset DC is mindful of and ensures that appropriate lighting conditions are put in place to conserve the dark night skies of the wider environs. Such conditions to restrict the hours of any streetlight illumination e.g. streetlights to be turned off between 10pm- 4am, to minimise impacts upon wildlife and biodiversity. Also, CPRE Somerset requests that South Somerset DC should insist that any external lighting should be downward emitting lighting with clear glazing to reduce light scatter is used. Maximum permitted colour temperature of light sources to be 3000K, ideally light switching to be via Passive Infra-Red (PIR) detectors with daylight sensing.

Whilst CPRE Somerset recognises that South Somerset can only identify a 4 year housing supply , should the case officer be minded to approve this application then CPRE Somerset requests that South Somerset insists that development is restricted 35no. dwellings to the area identified in the HELAA and Peripheral Landscape Study, and that the dwellings should be for identified local rural need, satisfying the 35% affordable housing target.

In summary, CPRE Somerset considers this outline application to be contrary to NPPF definition of previously developed land, NPPF para 117, 118, 170(b), 180, policies SD1, HG2 and HELAA assessments.

Yours sincerely

Judith Chubb-Whittle MA