



The countryside charity
Somerset

Email: planning@cpresomerset.org.uk
www.cpresomerset.org.uk

President
Mariella Frostrup
Chair
Hugh Williams
Planner
Fletcher Robinson MSc Planning

Reasons why CPRE Somerset is going to object to 2023/0864/FUL- 74 dwellings, Packsaddle Fields- Speaking Notes, 8pm Frome Rugby Club, June 1st, 2023.

I am Fletcher Robinson, a planner and trustee for CPRE Somerset. CPRE is the national charity for the protection of the countryside, and we are the county branch. I have been asked to come along this evening and outline the main reasons why we are going to object.

1. Meaning of the Local Green Space designation

While we believe there are strong landscape reasons to object let me start by saying that this is not just about harm to landscape - as was the case with the Marston Lane appeal in Frome back in February*. You will remember that in that case the appeal inspector dismissed the appeal for 150 houses, due to harm to the landscape and character and appearance of the area. I will come back to that case in a moment.

There is an even more important issue at stake here. Packsaddle Fields has been a highly valued community asset for the last 50 years and in 2022 was added to the Local Green Space audit by Mendip District Council. In the normal course of events it will therefore be added to the list of designated Local Green Spaces in the emerging local plan of Somerset Council. This Local Green Space designation carries legal protection which is equivalent to Green Belt protection and which, as we know, is the highest form of planning protection against inappropriate development .

In the applicant's Planning Statement [at para 7.4] we can see that LiveWest is trying to discredit this Local Green Space designation. They say it was only granted because residents made representations to the council when they found out about the potential for development on the site, and that the council then awarded the designation without making any proper analysis of whether it met the criteria to qualify as a Local Green Space. In fact the designation was only introduced into national planning policy relatively recently, and quite naturally residents asked for a LGS designation for a space they have used for fifty years. There is nothing untoward in that.

Furthermore there was a thorough examination by Mendip DC to ensure that the necessary criteria were met. At the last objectors meeting I attended here I heard a councillor suggest that this designation process somehow ' may not have been valid '. In point of fact there is not a shred of evidence produced in the planning application to suggest that the designation process followed by Mendip DC was anything other than rigorous and lawful.

Just to remind you- the purpose of the Local Green Space designation is explained in national planning policy guidance as follows: it is to protect locally valued areas of green space from inappropriate use, and it conveys the same legal protection as applies to green belt land.

2. Meaning of the Asset of Community Value designation

The site is a designated Asset of Community Value. To get that designation you have to show ' that the land's main use has been to further the social well-being of the local community and could do so in the future'. Well, it has furthered the social well-being of the local community for the last 50 years, and it should do so for the next 50 years.

It is outrageous that these hard-to-get designations have been ignored by the developer who has just ploughed on regardless and shown utter contempt for the local community. The fact that it is an ACV is not mentioned once in the planning application documents. The recent so-called consultation by LiveWest was clearly a sham and I hope you will make your feelings very clear in your objections about the value to yourselves of this local green space, and the benefits of having such a place for recreation. There is a shortage of recreation places in the area. Concreting over recreation space used and valued for 50 years is poor design, harmful to the quality of life and harmful to physical and mental well-being. The offer of a tiny amount of recreation space in the planning application is no compensation for the loss of these fields.

3. Effect in planning terms of Local Green Space and Asset of Community Value designations

In planning terms, in our opinion, the adverse impacts of granting permission on this designated Local Green Space significantly and demonstrably outweigh the benefits of the additional housing, including the benefit of the proposed house for use by disabled children. The Planning Statement claims [at para 7.17] that this ' bespoke children's facility will meet an identified need and accordingly there is a pressing need for this type of development '. In fact, it could be located in a house or other premises elsewhere in Frome or in the wider local area.

4. Harm to Ecology and Biodiversity

The applicant claims in the Planning Statement [6.31] that the baseline ecological case is that: 'There are several areas of scrub along the boundaries'. In our view the applicant's assessment of low ecological value cannot be credibly relied upon as almost the entire site apart from the hedges was bulldozed by the council while the first stage of the ecological survey was underway. The ecologists were therefore unable to do a proper seasonal survey later in the year, as the ecological value had been badly degraded. No weight should be given by Somerset Council's case officer in the planning balance to the applicant's low assessment of its ecological value.

In terms of biodiversity, from November 2023 all planning applications will need to show a 10% improvement to a site's biodiversity. The application falls far short of this level. Although the legal requirement doesn't come into effect until later this year, it would be reprehensible if the LPA did not insist that it was met anyway, particularly when the Council is the landowner. The Council should be leading by example, not finding chronological loopholes to avoid doing what it should to help biodiversity.

5. Harm to Landscape and to the character and appearance of the area

Whilst the application site is set back from the ridge, rather than spilling down the slope into the valley (as was the case in the recent Marston lane appeal in February*), nevertheless there would still be considerable harm to the character and appearance of the area. An examination of the Frome map shows that Packsaddle Fields is one of a number of green countryside wedges that come into the town. For example, another green wedge comes into the town to the east from Gipsy lane, and there are others on the west side of town eg at Whatcombe farm, Egford Hill farm and Whitemill farm. These locally distinctive green wedges give local area character to the town edges. Simply concreting over Packsaddle Fields would be harmful to the character and appearance of the town's edge at this location and not respect its distinctive landscape features.

There would also be loss of existing hedges on the site which define the smaller fields. These small historic fields are a valuable and key characteristic of the landscape. The existing hedges have landscape value because they define historic field boundaries. On our site visit we also saw 18thc field boundary walls which are non-designated heritage assets. Their loss should also be placed in the planning balance. In our view all these distinctive landscape features in open countryside on the town edge should be conserved for future generations to enjoy. They are what gives the town edge at this location its distinctive character and appearance.

6. Harm to the setting of a Heritage Asset

On our site visit we noticed that there is an attractive period farmhouse prominently located on the west side of Packsaddle Fields- Packsaddle farm, on Packsaddle Way. This is a 'non-designated heritage asset' that is not referred to at all in the applicant's heritage statement. Its setting is Packsaddle Fields, and the settings of heritage assets (including old buildings like Packsaddle farm that are not listed) receive a measure of protection in law. This proposed development would sever the building's connection to the fields and harm its heritage significance as a former farmhouse in this landscape.

7. Poor Design

We consider that the proposed design is a poor one and is simply trying to cram as many houses onto the site as can be fitted in. For example, the layout bears no relation to the density of the existing adjacent houses, and there is only a tiny provision of accessible green space. In no way does this tiny public open space [POS] that is offered compensate for the loss of the recreation value of the existing fields.

8. Conclusion

The so-called 'tilted balance' that has arisen due to the temporary loss of a five year housing land supply in Mendip district does not, and cannot, justify development that will obliterate a valuable local green space of 50 years enormous use and value to the local community.

I have asked Toby to circulate these thoughts to anyone who would find them useful. Obviously, when putting in an objection, it will be good to describe in your own words why this local green space is of such value to the area and to yourselves, and what its loss would mean to you. All members of the family that have benefitted from Packsaddle Fields should individually describe their thoughts about that.

FR-31.5.23

*see Planning Inspectorate website- APP/Q3305/W/22/3306827- reference Mendip DC planning application no. 2022/0616/OUT

