



CPRE SOMERSET – THE CASE FOR A YEOVIL GREEN BELT

***A Discussion Paper to be tabled by CPRE at a meeting with
South Somerset District Council ('SSDC') on 29 March 2016***

Why is a Green Belt needed and why now?

1. Yeovil (an historic town) has faced significant growth in the last few years. Under SSDC's previous Local Plan 1991 - 2011 a number of Key Sites were identified for both housing and commercial development. Most of these key housing sites have now been built or are being built: Lufton (696 houses), Brimsmore (830 houses) and Wyndham Park (757 houses), giving Yeovil a further 2,283 houses.
2. The new 2015 Local Plan (made in March 2015, running to 2028) provides for two large Sustainable Urban Extensions ('SUEs') at Upper Mudford (approximately 765 houses on 51 hectares (126 acres) of green fields to the north east of the town) and Keyford (approximately 800 houses on 42 hectares (104 acres) of green fields to the south). A combined total of some 1,565 houses for which outline planning applications have already been submitted to SSDC. In addition to the houses on each SUE, there will be supporting development such as a primary school, health centre, neighbourhood centre and other infrastructure.
3. The 2015 Local Plan (to 2028) proposes 7,441 new homes for Yeovil (which figure includes the 1,565 houses of the Mudford and Keyford Sustainable Urban Extensions, with the balance of 5,876 destined for the "urban framework" of the town).
4. Yeovil has therefore faced and still faces substantial housing growth, with thousands of houses built or planned. Yeovil had a population of over 45,000 people in the 2011 Census.
5. Yeovil is seen by SSDC as being the town to grow in South Somerset. This is made clear in the 2015 Local Plan and in the Council's 'Yeovil Vision' document. At the same time the 2015 Local Plan recognises that the town is "located in an attractive rural setting, within a sensitive landscape defined by escarpments to the north and south, which act to 'cradle' the town."
6. The town is surrounded by a series of attractive villages: Mudford, Barwick and Stoford, East Coker (including North Coker), West Coker, Odcombe (Upper and Lower) and Chilthorne Domer. Not

The Somerset Branch of the Campaign to Protect Rural England exists to promote the beauty, tranquility and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

forgetting the smaller settlements at Brympton, Lufton, Thorne Coffin and Yeovil Marsh. Slightly further out are Hardington Mandeville, Hardington Moor, East Chinnock, Montacute and Tintinhull. They all sit in very attractive landscape and contain important heritage: a “rich historic environment” as the 2015 Local Plan says, a conclusion based on the heritage and landscape studies produced by SSDC.

7. All of these villages and settlements face the prospect of becoming part of ‘Greater Yeovil’ in the next few decades unless a planning marker is established now to prevent such urbanisation (e.g. 100 years ago historic Preston Plucknett was a separate village, now effectively part of Yeovil). Were this to happen, not only would the valued landscape of South Somerset suffer, but both country and town dwellers would lose their amenity access to these beautiful areas.
8. It is arguable that Yeovil’s growth has become unbalanced. Most of it has taken place to the north of the town (e.g. Lufton, Brimsmore, Wyndham Park), and with protected countryside in the other directions there are limits to how far it can grow sustainably.
9. CPRE does not think that existing planning policies, local and national, provide sufficient protection for this important landscape. A Green Belt would help SSDC resist inappropriate development while ensuring that this landscape could continue to be enjoyed by everyone in Yeovil and elsewhere, not forgetting visitors to the area who are of local economic benefit.
10. In short a Green Belt benefits both town and country. It stops creeping urbanisation impacting on the surrounding villages, but it also provides Yeovil with a much needed ‘green lung’ for townsfolk to use.
11. SSDC is committed to an ‘Early Review’ of its’ 2015 Local Plan by March 2018. The review will follow a timetable set out in SSDC’s adopted Local Development Scheme (‘LDS’) (August 2015). Although the Early Review was initially meant to be limited in scope (housing and employment provision in Wincanton), we now understand from the LDS that work will also be done on a Site Allocations Development Plan Document for Yeovil SUEs and Market Towns’ ‘Directions of Growth’, and that SSDC may take this as an opportunity to widen the topics to be reviewed.¹ An up to date evidence base will be required for this Review and we note that one of the documents to be prepared is a Landscape Strategy. CPRE suggests that either as part of this Landscape Strategy or as a stand-alone document in its’ own right, a Yeovil Green Belt should be promoted by SSDC with the necessary work being done to support this. In short CPRE asks that a Yeovil Green Belt should form part of the Early Review of the Local Plan.
12. CPRE has so far obtained the ‘in principle’ support for a Yeovil Green Belt of 5 out of the 7 parish councils surrounding Yeovil: Brympton, East Coker, Mudford, Odcombe and West Coker. Yeovil Without Parish Council does not support (though clearly has concerns about growth)², and nothing has been heard from Barwick Parish Council or Yeovil Town Council. All these ‘satellite’ parishes are the most directly affected by Yeovil’s growth. Other parish councils further out from Yeovil (but for which Yeovil is still the main local town) have also been notified of CPRE’s campaign.

¹ “...other issues may be considered depending upon the evolving and emerging evidence base generated by the Council, and the monitoring of delivery against the Local Plan policies.” E-mail dated 13 March 2016 to Nicholas Whitsun-Jones, CPRE from Paul Wheatley, Principal Spatial Planner, SSDC.

² Yeovil Without said “... whilst [the Council] have no desire for unrestricted sprawl of large built-up areas, they felt that it was not in the interest of their parishioners to support the Campaign. Yeovil Without consists mainly of housing that lacks facilities – new developments that could possibly be planned on the outskirts of our parish could bring a benefit to the residents that live within our parish.”

13. CPRE has also organised an online petition calling for a Yeovil Green Belt, which has so far attracted over 300 signatures. This can be viewed at: www.change.org

The NPPF Tests

1. The Five Purposes of a Green Belt

These are set out at paragraph 80 NPPF as follows:

- to check the unrestricted sprawl of built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Green Belts do not necessarily have to fulfil all of these five purposes, and they can sometimes surround some fairly small towns. For example, Burton on Trent has a Green Belt and a population of only 72,000. Admittedly this is larger than Yeovil's population of c.45,000, but we say that this is a case where size does not matter so long as one is looking at a clear urban conurbation (like Yeovil) and its' surrounds, and not a rural settlement. Further, the first two purposes of a Green Belt - sprawl and merging - are in practice more important than the others in deciding whether the designation is justified.

Numbering the above bullet points 1 - 5, CPRE is of the view that there is evidence to support 1, 3, 4 & 5.

Purpose 1 (sprawl): this is shown by what has happened to Yeovil over the last 25 years or so, and even further back in time. New 'Key Sites' for both housing and commercial in the last Local Plan and two SUE's in the current Local Plan with probably more to come in the future (as seems to be suggested in the current LDS at 3.2, viz. "... to provide the additional detail on proposals for 'Sustainable Urban **Extensions**' in Yeovil [*our emphasis*]).

Purpose 2 (coalescence or merging): CPRE agrees that this cannot be demonstrated in terms of towns, only villages. Our argument is that it is the immediately surrounding villages that are in danger of merging with Yeovil (as happened to Preston Plucknett). These villages are very important in landscape character terms.

Purpose 3 (countryside encroachment): CPRE thinks this can be demonstrated. For example, both Yeovil SUE's are within the parish boundaries of surrounding villages – East Coker and Mudford (both Local Plan designated Rural Settlements). The approved residential development of some 80 houses atop Bunford Heights is within West Coker Parish (another Rural Settlement). Lufton Key Site is being developed on former open countryside within Brympton Parish (a Parish partially rural in character, with the hamlets of Brympton D'Evercy, Lufton, Thorne Coffin).

The proximity to Yeovil of the Dorset AONB to the south also needs to be remembered; the setting of its' high quality countryside needs protection from encroachment. A Yeovil Green Belt will be an additional policy tool to help achieve such protection.

Purpose 4 (preservation of setting and character of historic towns): CPRE thinks this can be demonstrated indirectly. Yeovil is an historic town but any historic character was severely damaged in the 20th century (especially post Second World War) by inappropriate development. Early photographs of the town show this only too well. CPRE says that preserving the (current) setting of the town in the surrounding landscape contributes to that landscape by ensuring that such setting does not grow larger and encroach on to the surrounding countryside. So preserving the setting (Purpose 4) has an indirect consequence that fulfills Purpose 3.

Purpose 5 (urban regeneration): CPRE considers this can be demonstrated. As an example, reference is made to the very large former Cattle Yard site in the middle of Yeovil that has stood empty and derelict for years. This site is 1.5 ha or 3.7 acres. Despite an extensive planning history³ no re-development scheme has yet come to fruition. As SSDC knows (it is an SSDC document) there is a Market Area Development Brief (June 2007) that covers this site.⁴ Earlier than that there was the SSDC approved Yeovil Urban Development Framework (2005)⁵, part of which covered the Cattle Market site (described as “strategically significant” in the ‘Introduction’ at 1.4).

There is a current planning application to use the Cattle Market for “temporary car parking”, hardly a long-term solution. CPRE has just made a representation on this application saying that the site should be put to a more socially beneficial use (e.g. mixed housing/commercial), as it is classic brownfield land and its use would take the pressure of greenfield sites. This is just one example of a brownfield site in Yeovil but one of the - perhaps the - largest. CPRE does not know how much brownfield land there is in Yeovil as it is not easy to find out; the new brownfield land register will eventually help in this. But in our view a Yeovil Green Belt will stimulate the re-use of brownfield or PDL land by constraining development on greenfield land around the town not otherwise allocated for development in the Local Plan.⁶

CPRE therefore considers that, given the demonstrable evidence for 4 out of 5 of the Green Belt purposes, there is sufficient evidential weight to proceed with a Yeovil Green Belt.

2. Establishing a New Green Belt

NPPF paragraph 82 (quoted below (italicised)) sets out five ‘tests’ the LPA should take into account if planning a new Green Belt:

82. The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. If proposing a new Green Belt, local planning authorities should:

- *demonstrate why normal planning and development management policies would not be adequate;*
- *set out whether any major changes in circumstances have made the*

³ <http://www.southsomerset.gov.uk/planning-and-building-control/view-a-planning-application-online/?keyword=cattle+market>

⁴ https://www.southsomerset.gov.uk/media/202678/final_developmentbriefmarketstreetjune07.pdf

⁵ <http://www.southsomerset.gov.uk/media/228172/yeovil%20urban%20development%20framework%20report.pdf>

⁶ See CPRE’s latest research on brownfield land development: <http://www.cpre.org.uk/media-centre/latest-news-releases/item/4257-brownfield-sites-developed-six-months-faster-than-greenfield-sites>

adoption of this exceptional measure necessary;

- *show what the consequences of the proposal would be for sustainable development;*
- *demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and*
- *show how the Green Belt would meet the other objectives of the Framework.*

Note paragraph 82 does not say that all these tests need to be satisfied. CPRE says that they do not, and that some may be given more weight than others in the fact specific circumstances of a particular case. But we concede that the majority need to be satisfied ‘on a balance of probabilities’ before a new Green Belt policy justification is satisfied. We say that this can be shown for a Yeovil Green Belt.

We also say that the ‘**exceptional circumstances**’ required by NPPF paragraph 82 are to be found in the particularly high levels of growth that Yeovil has faced and is facing, which cannot be sustained without urban sprawl, loss of historic and landscape-valuable countryside, and encroachment on to or towards nearby nationally designated areas. This is exacerbated by the requirement to have a 5 year housing land supply under NPPF paragraph 49, which SSDC cannot currently show. The tendency of planning inspectors on appeal - not just in South Somerset but throughout the country - is to weigh the planning balance in favour of allowing an appeal for housing even if there are clear NPPF or local plan policies favouring protection and constraint of landscape assets.⁷ It is not known when SSDC will again be able to show a 5 year housing land supply – it could be a long time.⁸ If this policy requirement is maintained by Government, SSDC faces development decisions by appeal on unallocated sites (as it has faced already). A Yeovil Green Belt would add another layer of policy protection to existing Local Plan Policy EQ2 (General Development)⁹, which says that development proposals will considered against (amongst other things) “conserving and enhancing the landscape character of the area”.

3. NPPF Paragraph 82 Criteria for a Yeovil New Green Belt Considered

Test 1 – Demonstrate why normal planning and development management policies would not be adequate

- (a) In CPRE’s view having a Green Belt will provide SSDC as the LPA with another very important layer of policy constraint to inappropriate development in Yeovil’s surrounding open countryside, countryside that is currently threatened with so called ‘sustainable’ planning application on unallocated sites. In terms of present Government policy as set out in the NPPF, SSDC’s current lack of a 5 year housing land supply has exacerbated the situation. It is not known when and if SSDC will again be able to demonstrate compliance with paragraph 49 NPPF (the policy requirement to demonstrate a 5 year housing land supply) but the omens are not good (see above and footnote 8). This lack of supply has serious consequences in terms

⁷ CPRE ‘Targeting the countryside’: <http://www.cpre.org.uk/resources/housing-and-planning/housing/item/download/3729>

⁸ CPRE ‘Set up to fail: why housing targets based on flawed numbers threaten our countryside’: <http://www.cpre.org.uk/resources/housing-and-planning/housing/item/download/4307>

⁹ Policy EQ2 is set out in full in the Appendix.

of the ability of the LPA to resist speculative planning applications because of the NPPF deeming provision in paragraph 49 that housing supply policies in an adopted local plan should be considered to be out of date if the latter supply cannot be demonstrated.

- (b) A problem for LPAs is in defining a housing supply policy, which has led to much litigation and many court judgments, often confusing. Clarifying guidance from the Court of Appeal has just been given in a judgment on 17 March 2016.¹⁰ This should now be considered to be definitive, representing the correct legal position. Properly applied, it will help LPAs. For example, there seems to have been doubt within SSDC about the nature and effect of Local Plan Policy SS2 (Development in Rural Settlements).¹¹ It is now clear from what the Court has said that it is for SSDC as the decision taker LPA to decide whether or not a restraint policy such as SS2 is a housing supply policy for the purposes of NPPF paragraph 49. But even if it is deemed to be a housing supply policy, the weight to be given to the policy will depend on a number of factors, including (see judgment paragraph 47):

“... the extent to which relevant policies fall short of providing for the five-year supply of housing land, the action being taken by the local planning authority to address it, or the particular purpose of a restrictive policy – such as the protection of a “green wedge” or of a gap between settlements. **There will be many cases, no doubt, in which restrictive policies, whether general or specific in nature, are given sufficient weight to justify the refusal of planning permission despite their not being up-to-date under the policy in paragraph 49 in the absence of a five-year supply of housing land. Such an outcome is clearly contemplated by government policy in the NPPF [our emphasis].** It will always be for the decision-maker to judge, in the particular circumstances of the case in hand, how much weight should be given to conflict with policies for the supply of housing that are out-of-date. This is not a matter of law; it is a matter of planning judgment”.

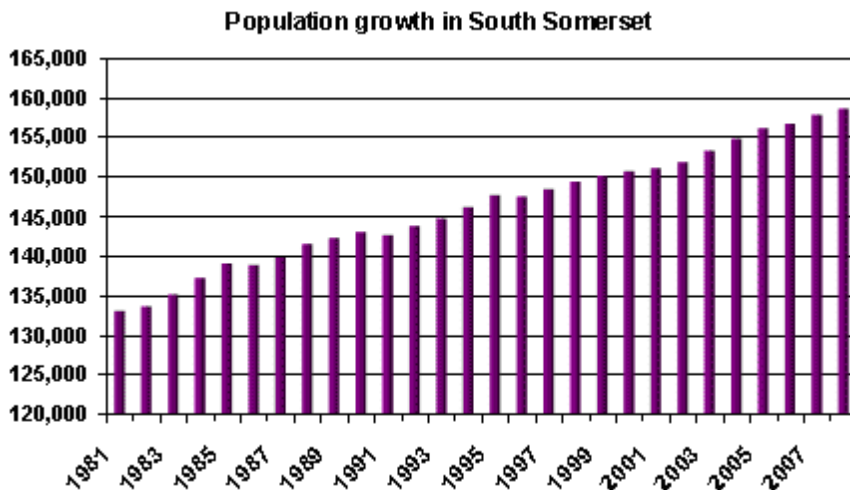
- (c) So there is nothing to stop SSDC now saying “Yes SS2 is a housing supply policy but it is so important - in terms of providing for appropriate, commensurate development within rural settlements with (generally) community support following robust community engagement for such development - that the Policy attracts considerable weight notwithstanding no 5 year housing land supply”. CPRE suggests that SS2 is a clear example of localism and SSDC is to be congratulated for having it in its’ Local Plan. It should support and defend its’ own Policy.
- (d) Why this is important for the present discussion is that Rural Settlements are of a type that would be situated within a Yeovil Green Belt. Although a Green Belt would not preclude appropriate development within Rural Settlements taking place under SS2 (the Green Belt would not necessarily cover the village unless it was of an “open character” falling within paragraph 86 NPPF), a Green Belt designation would bolster the case for not allowing inappropriate development that might damage the landscape within and without the Rural Settlement.

¹⁰ Suffolk Coastal District Council v. Hopkins Homes Limited & SSLG and Richborough Estates Partnership LLP v. Cheshire East Borough Council & SSLG (joined appeals) [2016] EWCA Civ 168. See: <http://cornerstonebarristers.com/news/>

¹¹ Policy SS2 is set out in full in the Appendix.

Test 2 - Set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary

- (a) In CPRE's view the "major changes in circumstances" are (a) population growth and (b) development pressures as a consequence of such growth resulting in the allocation of two Sustainable Extensions ('SUEs') at Keyford and Upper Mudford in the current SSDC Local Plan 2015. This is in addition to the development that has taken place under the previous Local Plan policies at the 'Key Sites'. See the 'Introduction' above for more information about this.
- (b) CPRE says that all this existing and proposed development, when combined with SSDC's view as to the strategic growth of Yeovil, provides the justification for the "exceptional measure" of a Green Belt.
- (c) The Table below is striking, showing a steady population increase for the District over nearly 30 years:



Source: ecogen 'Yeovil Economic Profile' March 2010:

http://www.southsomerset.gov.uk/media/463344/102._yeovil_economic_profile.pdf

- (d) The same ecogen report - from which the above Table is taken - says (page 10):
- "Yeovil is the largest population centre in South Somerset with a population of just under 45,000. The town has experienced rapid employment growth over the past eight years, and has marginally increased its share of the District's total population. Yeovil benefits from a larger than average working age population, which has experienced significant growth, particularly in comparison to the District. In line with District and Regional trends there has been a large decrease in residents aged 25-34, linked to the out-migration of younger generations to larger more urban areas with a broader range of employment opportunities. Yeovil has also experienced an increase in the retired population, although this age group continues to account for a smaller proportion of the total population than in the District and the Region. South Somerset has ambitious population growth aspirations, with projections showing the population increase continuing to exceed both regional and national trends. Within this there is expectations that the working age population will continue to increase, although there is also expected to be a much more significant increase in the retired population. The population projections have implications for economic performance, workforce availability and*

development as well as raising more practical considerations such as the need for housing growth. The ageing population may present challenges for local services and place additional pressure and dependence on the economically active population.”

- (e) So Yeovil will continue to grow. What is needed is to ensure that the right balance is struck between such growth, whether strategically planned or unplanned, and protection of the surrounding landscape for which this part of South Somerset is rightly famous, situated as it is right on the edge of the Dorset AONB.

Test 3 - Show what the consequences of the proposal would be for sustainable development

- (a) The term ‘sustainable development’ for the purposes of the NPPF means (see paragraph 6 NPPF) the policies in NPPF paragraphs 18 to 219 taken as a whole. This somewhat unhelpful, very wide statement says, in effect, that the entire NPPF equals sustainable development. Some elucidation is provided by NPPF paragraphs 7 & 8 which, in terms, say that there are three dimensions or roles to ‘sustainable development’: economic, social and environmental, and that none of these should be “undertaken in isolation” being “mutually dependent”, with the achievement of sustainable development occurring when all three dimensions/roles are “sought jointly and simultaneously through the planning system.” Paragraph 9 states that sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life.
- (b) Therefore, because of what NPPF paragraph 6 says, it must follow that paragraphs 79 to 92 covering Green Belts demonstrate ways in which sustainable development may be achieved – and, in the present context, paragraph 82 dealing with new Green Belts. Thus one way of achieving or ensuring sustainable development is to create a new Green Belt subject to the criteria stated in paragraph 82.
- (c) In terms of what the consequences of the proposed Yeovil Green Belt would be for sustainable development, the answer must be that it would contribute to its’ attainment, primarily by protecting highly valued landscapes around the town and ensuring that there were development constraints in place to ensure such protection over and above Local Plan constraints, thus bolstering the latter.

Test 4 - Demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas

- (a) CPRE considers that the necessity for a Yeovil Green Belt has already been stated above.
- (b) In terms of consistency with local plans in adjoining areas, the only relevant local plan is that for West Dorset District Council. This is the adopted West Dorset, Weymouth and Portland Local Plan 2015 (‘WD Local Plan’).
- (c) To the south of Yeovil and within sight of it, just over the county boundary with Dorset, is land within Dorset designated as AONB. WD Local Plan Policy ENV1 (Landscape, Seascape and Sites of Geological Interest), says:
- “i) The plan area’s exceptional landscapes and seascapes and geological interest will be protected, taking into account the objectives of the Dorset AONB Management Plan and World Heritage Site Management Plan. Development which would harm the character, special qualities or natural beauty of the Dorset Area of Outstanding Beauty or Heritage Coast, including their characteristic landscape*

quality and diversity, uninterrupted panoramic views, individual landmarks, and sense of tranquillity and remoteness, will not be permitted.

ii) Development should be located and designed so that it does not detract from and, where reasonable, enhances the local landscape character. Proposals that conserve, enhance and restore locally distinctive landscape features will be encouraged. Where proposals relate to sites where existing development is of visually poor quality, opportunities should be taken to secure visual enhancements. Development that significantly adversely affects the character or visual quality of the local landscape or seascape will not be permitted.

iii) Appropriate measures will be required to moderate the adverse effects of development on the landscape and seascape.

iv) Development should maintain Regionally Important Geological and Geomorphological Sites (RIGS) for their scientific and educational value. Development that significantly adversely affects local geological features will not be permitted unless comparable sites can be identified or created elsewhere or the impact adequately mitigated through other measures.

(d) A Green Belt between Yeovil and the county boundary will be fully consistent with and support such AONB status and Policy ENV1. This AONB land to the south of Yeovil is also subject to Policy SUS2 (below).

(e) To the east of Yeovil, over the county boundary, are various attractive rural settlements (such as Trent) and similarly attractive open countryside also subject to Policy ENV1 (above), although not within the AONB. WD Local Plan Policy SUS2 (Distribution of Development) says (as it relates to the rural countryside east (and south) of Yeovil within Dorset):

"j)

• Development in rural areas will be directed to the settlements with defined development boundaries, and will take place at an appropriate scale to the size of the settlement. Settlements with no defined development boundary may also have some growth to meet their local needs.

ii) Within the defined development boundaries residential, employment and other development to meet the needs of the local area will normally be permitted.

iii) Outside defined development boundaries, development will be strictly controlled, having particular regard to the need for the protection of the countryside and environmental constraints, and be restricted to:

- agriculture, forestry or horticulture or related enterprises such as farm diversification and equestrian development;*
- alterations and extensions to existing buildings in line with their current lawful use, including their subdivision or replacement;*
- new employment, tourism, educational/training, recreational or leisure-related development;*
- affordable housing;*
- rural workers' housing;*
- open market housing through the re-use of existing rural buildings; • sites for gypsies, travellers and travelling showpeople;*
- the replacement of properties affected by coastal change in a location identified in an approved local development document;*
- proposals for the generation of renewable energy or other utility infrastructure;*
- flood defence, land stability and coastal protection schemes;*
- local facilities appropriate to a rural area or close to an existing settlement;*
- specific allocations in a development plan document and associated landscape and infrastructure requirements."*

- (f) CPRE considers that a Yeovil Green Belt would also be full consistent with Policy SUS2.
- (g) In short, CPRE does not see that a Yeovil Green Belt will conflict with the adopted WD Local Plan.

Test 5 - Show how the Green Belt would meet the other objectives of the Framework

The following Table indicates the ways in which a Yeovil Green Belt would meet other NPPF objectives:

1.	Building a strong competitive economy	The longevity of Green Belt policy, together with certainty about appropriate areas for future development, will support long term employment, housing growth and urban regeneration within Yeovil (SSDC's website says "A wide range of regeneration projects are planned to take place in Yeovil over the next 25 years").
2.	Ensuring the vitality of town centres	A Yeovil Green Belt will complement SSDC's 'Yeovil Vision' objectives, particularly the objective of "... enhancing [the town's] close relationship with the country park and the countryside beyond". The Local Plan refers at paragraphs 6.9 and 6.10 to the 'Yeovil Vision' and endorses specific projects mentioned in the earlier Yeovil Urban Development Framework document (2005). The relationship of town to country is well illustrated by the 'Yeovil Vision' strap line "Yeovil; the heart of the country ... and the mind of a city". A Green Belt should be an integral part of this vision.
3.	Supporting a prosperous rural economy	The NPPF requires local planning authorities to plan positively for the beneficial use of land in the Green Belt once boundaries have been set. A Yeovil Green Belt will help safeguard the extensive high quality agricultural land around Yeovil. ¹² The planning policy certainty provided by a Yeovil Green Belt will encourage local food production and local markets, increase farm business viability and food security. It will be consistent with and complement Local Plan Policies EP4 (Expansion of Existing Businesses in the Countryside) and EP5 (Farm Diversification). ¹³ A Yeovil Green Belt will be consistent with SSDC's green infrastructure aspirations mentioned in Local Plan Policy HW1 (Provision of Open Space (etc.)) ¹⁴ which aims to promote locations for recreation, nature conservation and access to the countryside. Farm businesses growing food for local markets can provide similar benefits, such as nature conservation and educational visits.
4.	Promoting sustainable transport	Green Belt can help direct development to more sustainable locations where public transport links can be provided economically. As an example, the existing Yeovil Junction is situated a considerable distance from the town, beyond comfortable walking distance, and requiring private car, taxi or bus access. The recently announced enhanced rail service between Yeovil Junction and Yeovil Pen Mill Stations is an illustration of what can be done to improve sustainable transport, and in existing locations, (although Pen Mill is still not in close proximity to the town).
5.	Supporting high quality communications infrastructure	Communications infrastructure in the Green Belt is not always inappropriate development.
6.	Delivering a wide choice of high quality homes	NPPF paragraph 52 says that new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of

¹² See SSDC's composite map of agricultural land classification around Yeovil:

http://www.southsomerset.gov.uk/media/633385/135_agricultural_land_classification_around_yeovil.pdf

¹³ Policies EP4 & EP5 are set out in full in the Appendix.

¹⁴ Policy HW1 is set out in full in the Appendix. It says (in part) "Green Corridors, Public Rights of Way, Civic Spaces, Cemeteries, Private Open Space and Community Allotments are other aspects of Green Infrastructure, which need to be given full consideration. Open space is defined as informal recreational open space, formal parks and gardens, country parks, natural open space and woodlands".

		Garden Cities. Local Plan Policy YV2 is an example; it provides for two Yeovil Sustainable Extensions ('SUEs') at Upper Mudford (to the north-east) and Keyford (to the south). Both are required to be developed to (Policy YV2) "... the highest sustainability objectives and garden city principles, subject to viability", with a target or aspiration of 40% site greenspace ("... in keeping with the 'Yeovil Vision' and the high quality urban edge landscape of Yeovil" ¹⁵). NPPF paragraph 52 also says that LPAs should consider whether it is appropriate to establish a Green Belt around such new development. A Yeovil Green Belt will enhance and complement the environmental and landscape qualities of the new SUEs and, properly planned, will still allow for any necessary future expansion of the town. Such planned expansion can use a variety of policy and development control tools to ensure environmental benefits, e.g. Local Green Space, Green Gaps or Buffers and other Green Infrastructure. Combined with a Green Belt, these will all promote sustainable forms of development that will deliver high quality homes and living environments.
7.	Requiring good design	Green Gaps, Green Infrastructure and similar policies available to SSDC as the LPA promote sustainable forms of development that will deliver high quality living environments and require high quality design.
8.	Promoting healthy communities	NPPF paragraph 81 says that once Green Belts have been defined, LPAs should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged or derelict land. Experience shows that, on the basis of a comparison of Green Belt land with similar urban edge land without the designation, Green Belt designation encourages higher levels of nature conservation and countryside access. ¹⁶
9.	Protecting Green Belt land	There is currently no Green Belt in Somerset, so a Yeovil Green Belt will not protect any other Green Belt, being the first in the County. However, there is extensive land designated as AONB just over the County boundary with Dorset, to the south of Yeovil. A Yeovil Green Belt would relate well to that AONB, both being designations designed to protect important, visually attractive landscape.
10.	Meeting the challenge of climate change, flooding and coastal change	The protection of open countryside from built development will safeguard open land that can accommodate landscape schemes for climate change adaptation, flood water alleviation, surface water absorption, rainwater capture, aquifer and water catchment protection. In terms of energy generation, inappropriate development in the Green Belt must demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable resources, depending on site specific circumstances.
11.	Conserving and enhancing the natural environment	Green Belts provide opportunities for improving the environment around towns by providing land for recreation and access to the countryside, tree planting, habitat creation, and landscape restoration in line with landscape character assessments. There is evidence that Green Belts have been shown to be effective in terms of their primary purposes, and the land within them has also gained a range of environmental benefits. ¹⁷

¹⁵ Local Plan paragraph 6.26

¹⁶ 'Green Belts: a greener future': <http://www.cpre.org.uk/resources/housing-and-planning/green-belts/item/download/465>

¹⁷ *Ibid.*

12.	Conserving and enhancing the historic environment	A Yeovil Green Belt would support and reinforce the protection afforded to listed heritage assets by existing designations such as conservation area, listed buildings, registered parks and gardens, and ancient monuments.
13.	Facilitating the sustainable use of minerals	It is not thought that any mineral reserves would be affected by the creation of a Yeovil Green Belt. In any event, mineral extraction is not necessarily inappropriate development in the Green Belt, depending on site specific circumstances.

Conclusion

CPRE considers that there is sufficient demonstrable evidence to justify SSDC proceeding with work to designate a Yeovil Green Belt. 'Exceptional circumstances' exist. CPRE urges SSDC to seize the initiative and factor in to future strategic planning for the Yeovil area an environmental planning policy with teeth, which already has the support of the majority of parish councils surrounding Yeovil and many people. Properly envisaged and drawn up a Green Belt policy will not be a bar to plan-led, controlled growth of the town, but it will stop sporadic development on unsuitable sites to the detriment of the attractive landscape in which Yeovil sits.

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APPENDIX

TEXT OF SSDC LOCAL PLAN POLICIES MENTIONED ABOVE

POLICY EQ2: GENERAL DEVELOPMENT

Development will be designed to achieve a high quality, which promotes South Somerset's local distinctiveness and preserves or enhances the character and appearance of the district.

Development proposals, extensions and alterations to existing buildings, structures and places will be considered against:

- Sustainable construction principles;
- Creation of quality places;
- Conserving and enhancing the landscape character of the area;
- Reinforcing local distinctiveness and respect local context;
- Creating safe environments addressing crime prevention and community safety;

- Having regard to South Somerset District Council's published Development Management advice and guidance; and
- Making efficient use of land whilst having regard to:
- Housing demand and need;
- Infrastructure and service availability;
- Accessibility;
- Local area character;
- Site specific considerations

Innovative designs delivering low energy usage and/or wastage will be encouraged. Development must not risk the integrity of internationally, nationally or locally designated wildlife and landscape sites. Development proposals should protect the residential amenity of neighbouring properties and new dwellings should provide acceptable residential amenity space in accordance with Policy HW1.

POLICY SS2: DEVELOPMENT IN RURAL SETTLEMENTS

Development in Rural Settlements (not Market Towns or Rural Centres) will be strictly controlled and limited to that which:

- Provides employment opportunities appropriate to the scale of the settlement; and/or
- Creates or enhances community facilities and services to serve the settlement; and/or
- Meets identified housing need, particularly for affordable housing.

Development will be permitted where it is commensurate with the scale and character of the settlement, provides for one or more of the types of development above, and increases the sustainability of a settlement in general.

Proposals should be consistent with relevant community led plans, and should generally have the support of the local community following robust engagement and consultation.

Proposals for housing development should only be permitted in Rural Settlements that have access to two or more key services listed at Paragraph 5.41.

[Paragraph 5.41 says: It is important to ensure that the occupiers of new homes in Rural Settlements are able to live as sustainably as possible by having easy access to basic facilities that provide for their day to day needs. Therefore, new housing development should only be located in those Rural Settlements that offer a range (i.e. two or more) of the following services, or that provide these within a cluster of settlements:-

- local convenience shop;
- post office;
- pub;
- children's play area/sports pitch;
- village hall/community centre;
- health centre;
- faith facility; and
- primary school.]

POLICY EP4: EXPANSION OF EXISTING BUSINESSES IN THE COUNTRYSIDE

Proposals for the expansion of existing businesses in the countryside will be permitted where:

- The business has been operating successfully for a minimum of 3 years, and is a viable business;

- It is demonstrated that the proposal is needed in this location;
- The proposal is of a scale appropriate in this location and appropriate to the existing development;
- Existing buildings are reused where possible;
- Firstly, use is made of land within the curtilage of the development where possible, and outside of the curtilage only where it is demonstrated that additional land is essential to the needs of the business;
- There is no adverse impact on the countryside with regard to scale, character and appearance of new buildings and/or changes of use of land;
- There is no adverse impact upon designations for wildlife and conservation reasons, at either local, national or international level; and
- The proposed development ensures that the expected nature and volume of traffic generated by the development would not have a detrimental impact on the character or amenity of the area and would not compromise the safety and/or function of the road network in terms of both volume and type of traffic generated.

POLICY EP5: FARM DIVERSIFICATION

Proposals for development for the purpose of farm diversification within established agricultural holdings will be permitted if they comply with the following criteria:

- The character, scale and type of proposal is compatible with its location and landscape setting;
- A development will not be allowed to proceed unless it can be demonstrated that it will not result in any adverse impacts to the integrity of Natura 2000 sites and other national and international wildlife sites and landscape designations;
- They form part of a comprehensive farm diversification scheme and are operated as part of a viable farm holding and contribute to making the holding viable;
- Appropriately located existing buildings should be re-used where possible; and
- Where new or replacement buildings are required, the proposal is in scale with the surroundings and well related to any existing buildings on the site.

POLICY HW1: PROVISION OF OPEN SPACE, OUTDOOR PLAYING SPACE, SPORTS, CULTURAL AND COMMUNITY FACILITIES IN NEW DEVELOPMENT

Where new housing development generates a need for additional open space, outdoor playing space, local and strategic sports, cultural and community facilities, provision/contributions will be made as appropriate. The need for additional open space may be required due to the proximity to sensitive (internationally-designated) conservation areas, so as to alleviate potential development-related pressure on those sites.

Housing provision consisting of sheltered housing, rest and nursing homes, special needs housing will be exempt from these standards with exception of informal recreational open space.

Developments of one bedroom dwellings will not be required to provide equipped play provision and youth facilities but will be required to provide for other open space and outdoor playing space.

Dependent upon the size and layout of the development, the provision of open space, outdoor playing space, local and strategic sports, cultural and community facilities, may be required on site or may form part of a contribution towards off site provision of either new or improved facilities. In such circumstances off-site provision towards local facilities should be made in a location, which adequately services the new development and a planning obligation may be used to secure this.

Provision should be made for future maintenance to ensure the continued availability of the facilities.

Green Corridors, Public Rights of Way, Civic Spaces, Cemeteries, Private Open Space and Community Allotments are other aspects of Green Infrastructure, which need to be given full consideration.

Open space is defined as informal recreational open space, formal parks and gardens, country parks, natural open space and woodlands.

Outdoor Playing Space is defined as playing pitches, equipped play areas and youth facilities.

POLICY YV2: YEOVIL SUSTAINABLE URBAN EXTENSIONS

The Yeovil Sustainable Urban Extensions should be located in two areas to the south and north-east of the town and should provide the following:

The south area:

- Approximately 2.58 hectares of land for economic development;
- Approximately 800 dwellings;
- One Primary school;
- A health centre; and
- A neighbourhood centre.

The north east area:

- Approximately 2.58 hectares of land for economic development;
- Approximately 765 dwellings;
- One Primary school;
- A health centre;
- A neighbourhood centre; and
- Landscape mitigation to address:
 - Potential massing effects across the site's northward face; and
 - Potential visual dominance at the site's edge and skyline.

The Yeovil Sustainable Urban Extensions will be developed to the highest sustainability objectives and garden city principles, subject to viability.

Development within the Yeovil Sustainable Urban Extensions will be permitted where features supporting bat movement are not severed and that access between feeding areas and roosts is maintained unless it can be proven that there would be no significant effect by the proposal on such features.