



The countryside charity
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SSDC

6 February 2022

Dear Sirs,

PLANNING APPLICATION REF: 21/03664/FUL- erection of new food production and food storage /delivery building (use classes B2/B8) , erection of food production /office building (use classes B2/E) and associated access and landscape works (revised proposals to those approved under 20/01357/FUL)

CPRE Somerset wishes to OBJECT to this proposal:

1. The previous application 20/20/01357/FUL was supported by the case officer (and by CPRE Somerset) on the grounds that the proposed buildings would provide ‘ *a supporting role to operations across the estate including food production for restaurants, events and hampers sold at the Newt* ’ (Officer’s Report). He added that: ‘ The close proximity to the point of sale makes the development sustainable, despite its rural location’ [Emphasis added]. However, the new proposals are of an entirely different nature, as the scale of food production now proposed is much larger, being aimed also at ‘ *outward distribution*’ and ‘ *regional and national markets* ’ (Planning Statement). The point of sale would no longer be predominantly in close proximity to the site, and in our view the proposal is unsustainable development.
2. The land is not allocated under the Local Plan for industrial use. The nearest large settlement is Ansford/ Castle Cary. Policy LMT 1: Ansford and Castle Cary states that ‘ the direction of strategic growth (for housing, employment and education) will be north of Torbay Road and east and West of Station Road ’, not along the A359.
3. The planning application provides an entirely inaccurate characterisation of the A359 as ‘ *very much a productive corridor of mixed employment and large format buildings interspersed with clustered houses*’ (Planning Statement, para 2.1). In fact, its character is over-

whelmingly rural for almost the entirety of its length until it approaches Sparkford, where Cadbury Business Park and the Haynes Museum are located, as is evident on the attached map (Appendix 1).

4. The nearest rural settlement is Galhampton. As we noted on our site visit 6 February 2022, Avalon Farm is in an elevated and highly prominent position in the landscape and dominates the skyline above this village. The applicable LP policies for rural settlements/ open countryside are SD1 and SS2. Policy SD1 states that rural settlements such as Galhampton will be considered as part of the countryside to which national countryside protection policies apply, subject to the exceptions identified in Policy SS2.
5. The proposal does not comply with Policy SS2: it does not create or enhance community facilities and services to serve the settlement; it does not increase the sustainability of the settlement in general; the harmful impacts to landscape character when viewed from Galhampton due to the introduction of large scale industrial activity/ erection of large buildings/ office block in a prominent position on the skyline above the village outweigh the benefits of a small number of potential jobs for village residents having meat-processing/ butchery skills etc; it is not consistent with community led plans; and there has been no 'robust engagement or consultation' with the parish council or with village residents.
6. The Planning Statement at para 5.3 relies on NPPF 2019 (which pre-dates NPPF 2021) and refers to the chapter entitled Supporting a Prosperous Rural Economy, to justify an industrial operation/ large office block in open countryside.
7. However, NPPF para 85 also emphasises the importance of ensuring that business premises development in rural locations should be sensitive to its surroundings, which in this case are entirely rural. The para 85 text prioritises both the use of previously developed land for this purpose, and sites that are physically well related to existing settlements. The site when seen from Galhampton direction now barely resembles a farm. The previous application 20/01357/ proposed two buildings. The first building (butchery/charcuterie/food storage/ delivery) had a total square metre size of 1917 sq m, which will be increased to 2135 sq m (this building as consented already appears to have been built, so will be extended if permission is now given); the second consented building (warehouse/offices), which had a total square metre size of 1424 sq m and has not yet been built, is now proposed to be a food production/offices building and to be increased by a massive 39% to 1980 sq m. Of particular concern is an increase in the 'ancillary offices' part of this building from 186 sq m to 626 sqm, an increase of 236%.
8. We note with concern that the Landscape sections drawing LNEWTI-ADP-00-ZZ-DR-L-1901 shows a large office block building, which would be more appropriate in a town, and is plainly insensitive to its rural surroundings. The proposal is non-compliant with LP EP2: Office De-

velopment, which calls for office development on this kind of scale to be firstly located within town centres, or if no suitable, available and viable site can be found, on the edge of town or in out of centre sites with good access to sustainable transport nodes and located next to compatible uses.

9. The proposal would not be sympathetic to local character, including the surrounding farm buildings, neighbour's cottages, and landscape setting, thereby also running contrary to NPPF para 130.
10. Furthermore, in this out of town location, the site is not physically well related to Castle Cary/Ansford, and it would be dangerous for workers to walk to the town along the A359, which has no walkway. This is not a sustainable location for expansion of industry.
11. The proposal is not compliant with LP Policy EP4, Expansion of Existing Businesses in the Countryside. Supporting text 9.40 to this policy states: *'it is clear from the settlement strategy that away from Yeovil and the strategic employment sites located in the market towns, opportunities for significant job growth are likely to be generally more limited to a level of provision that supports the role and function of settlements'*. Only half the employees of the estate live within 10 miles and local residents have pointed out that the estate is buying local properties at an alarming rate to accommodate its workers. This does not support the role and function of residential villages such as Galhampton, and the situation would be worsened by expansion of the estate's industrial/office activities in this rural location.
12. The proposal does not comply with LP Policy EP5 Farm Diversification. Supporting text para 9.48 emphasises that in encouraging economic diversity and agricultural diversification, it is important that the countryside is not spoilt by *'unfettered development of an inappropriate and unwarranted nature'*. We do not accept that large scale industrial activities / large office block of the kind now proposed at this rural location, aimed at regional and national markets, rather than predominantly at the restaurants and farm shop of the Emily Estate, would be capable of satisfactory integration into the rural landscape.
13. LP EP5 Supporting text para 9.50 says that *'proposals must be accompanied by a comprehensive farm diversification plan which indicates that 'new uses' will assist in retaining the viability of the farm and the agricultural enterprise'*. It has not been shown in the planning application that the buildings already consented in the 2020 application are insufficient or inadequate to make the estate viable.
14. LP EP5 also highlights the importance of having regard to the amenity of neighbours that may be adversely affected by new types of on-farm development. In this case, the LVA Addendum Table 1.2b states that the magnitude of impacts on Marl Pitt cottage will be *'medium-substantial adverse'*. Following our site visit 5 February 2022, we would disagree that

these effects will reduce to low/ medium after 15 years, as claimed. The previous planning application, which we supported in our letter 1 June 2020, claimed that 75% of the site would be landscaped. In the new application, the majority of the site will be covered by hard surfacing/ car parking/ buildings/office block.

15. We are also concerned by the applicant's lack of provision of information regarding the extent and duration of night time activities on the site. The Planning Statement does not clearly explain that activities will be 24/7 but the Noise Assessment is based on that premise. The text of the Noise Assessment is unhelpful in that no explanation is provided in non-technical language to show what the cumulative impacts on the neighbouring properties will be at night, when the road is quiet, of fan noise, condenser noise, refrigeration noise and vehicle movement noise. It is good practice, and often seen in such reports, to explain what the anticipated decibel levels mean in terms of equivalent noise (eg spoken conversation), but no such guidance has been provided. As the stated objective of the applicant is to expand into regional and national markets, success in that regard will likely result in night time van and/or HGV movements in order to collect stock for distribution centres for supermarkets, or to deliver food for processing, as is common with larger regional and national scale food producers. This distinct possibility has not been referred to in the application documents, nor the further adverse impacts that would ensue on neighbour amenity.
16. The Planning Statement states that as the site is not an abattoir, carcasses will be brought to the site. This surely means that they could equally be brought to a more appropriate alternative site where night time operations and vehicle movements are not going to impact neighbours, nor the village of Galhampton at the foot of the slope. Such alternative sites would include allocated employment land/ business parks, including Cadbury Business Park which is nearby.
17. The buildings occupy a prominent site overlooking Galhampton and it is inappropriate for security lights/ vehicle movement lights to be in such a dominant position in the rural landscape. The LVA Addendum at para 6.72 refers to PIR sensors that would light up when there are vehicle movements. This type of security light may save energy, but the intermittency and randomness of these lights is visually harmful. It is entirely inappropriate for lighting from industrial units to impact rural villages where typically residents place a high value on dark skies and the absolute minimum of light pollution.
18. The LVA Addendum give an inadequate account of the impact on walkers of the extensive and highly popular footpath network around Galhampton (see map in Appendix). The physical extent of the heightened and extended first building / enlarged warehouse/office block second building yet to be built is not indicated on viewpoint images in the LVA, contrary to usual practice. Emphasis is placed on the low impacts on walkers on a footpath to the west of Galhampton (WN 6/10), but (for example) the impacts on walkers on two key footpaths

climbing northwards from the village towards the site will be considerable. Viewpoints 7aii, 7aiii and 8 in the original LVA (the latter viewpoint taken at the junction of PRow 19/3 and Smallway Lane) all clearly confirm that a greatly enlarged new food production building/ office block (relative to the original scale of the then proposed warehouse /offices) will be highly visible in their prominent elevated position dominating the village. This complex of buildings and its huge office block, if approved, will plainly not in any way resemble farm buildings.

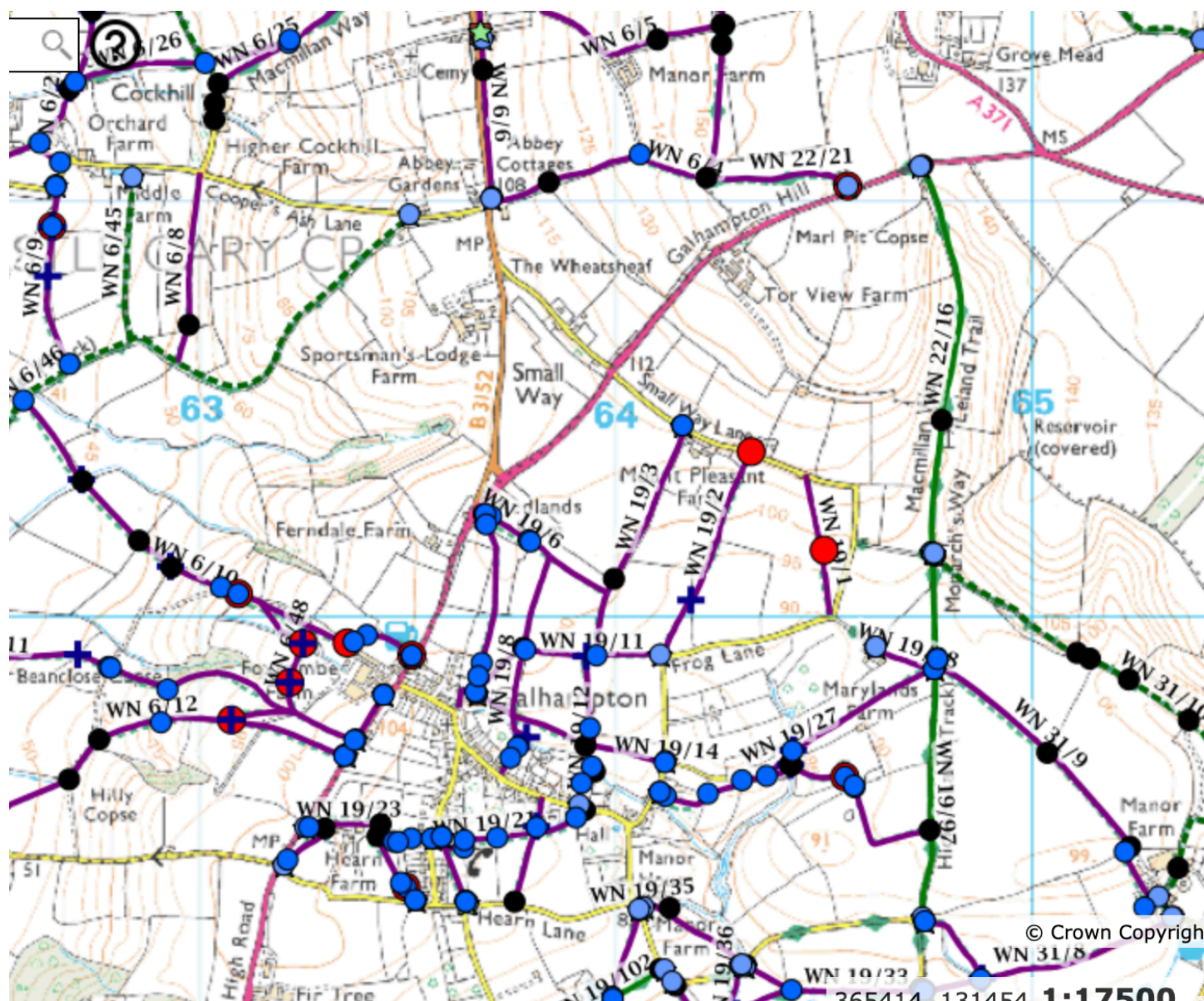
19. With walkers having a high susceptibility to change, the proposed development would appear in stark contrast to the existing rural outlook, from multiple viewpoints in the wider landscape in and around Galhampton. The proposed development would appear as a prominent addition to the surrounding landscape which would further erode the rural character of this side of the village.

20. We conclude that the proposal would fail to reinforce local distinctiveness, fail to respect local character, fail to respect local context and would be harmful to the character of the surrounding area as well as the wider landscape. As such, it would be in conflict with LP Policies SS2, EQ2, EP2, EP4, and EP5; and run counter to NPPF 2021 paras 85 and 130.

Yours sincerely

Becky Collier
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CPRE Somerset

Appendix-Map



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