**Appendix iv**

This schedule sets out the consultation responses received for the Frome Neighbourhood Plan, public consultation date held between

28th October 2013 – 31st December 2013.

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| Respondent/organisation name | Unique Ref No | Section/  Policy No. | Response |
| Greenslade Taylor Hunt  Representing – The Diocesan Board of Finance | 01 | 4.0 Housing | Support the continued allocation of land on the eastern outskirts of Frome which will assist in meeting the housing needs of Frome as identified within the plan |
| Neil Howlett | 02 | 4.0 Housing  Policy 4.2 | Suggests adding “demonstrate how the development integrates within the town centre and local centres, education and leisure resources without the use of cars”. Although there is provision for this in H4 it should also be included here. |
|  |  | 4.0 Housing  Policy H4 | Has very serious reservations about the value of travel plans. Suggests that it should be a requirement that Travel Plans are :-  a) Made public  b)Published under Creative Commons Attribution  c) Include a planning condition that the developer pay for the cost of evaluating the effectiveness of the travel plan against goals and publishes the results within a specific time period with a penalty if not. |
|  |  | 4.0 Housing  Section 4.4 | What if the code level is not raised, e.g. because the Treasury sees it as a barrier to economic development? Can the plan impose these standards locally? If so it should. |
|  |  | 5.0 Business  & Employment  Section 5.1 | a)Does not understand the actual requirement for employment land  b) Is the application for Wessex Fields referred to under recommendations already granted? |
|  |  | 5.0 Business  & Employment  Section 5.4 | Suggests adding “demonstrate how the development integrates within the town centre and local centres, education and leisure resources without the use of cars”. |
|  |  | 6.0 Town Centre  Section 6.3 | a)Why does the border of the Saxonvale & Kingsway not extend down to the river edge? Although part of the area is covered as POS a large section north of the MDC & M&S car park  b) The targets for Saxonvale here and in 5.3 are not consistent, also there is no clear hierarchy of targets  c) Policy TC4 & TC5 should be aimed at increasing the number of visitors, footfall and dwell time in the town centre |
|  |  | 7.0 River Corridor & POS  Section 7.3 | POS should have a target and policy that it encourages social interaction between and is inclusive of diverse community groups |
|  |  | 8.0 Transport  Section 8.2 | The cycle path should refer to the links to Sainsbury too |
|  |  | 8.0 Transport  Section 8.3 | Add note on travel plans |
|  |  | 8.0 Transport  Policy T2 | Remove “where appropriate” plans should take into account their impact on safe routes to school even if the development is not likely to create more school places. Any interference with them must be justified e.g. if it increases vehicular traffic across such routes |
| Frome & District Civic Society | 03 | General comments | Numerous references are made in the Neighbourhood Plan to non-compliance being ‘refused’. We question this wording as the NP will be Supplementary Planning Guidance only and Frome Town Council have no power to refuse an application and therefore the wording could be challenged by applicants. The wording could be changed to ‘resisted’.  The NP contains statements and policies that duplicate draft Local Plan policies. These should be omitted to simplify the NP and avoid potential conflicts in wording. |
|  |  | 4.0 Housing  Policy H2 | a) The draft Local Plan DP11 ( para 6.1.04) requires developments of 7 or more to provide affordable homes on site. The requirement in H2 for applicants for 10 or more houses to ‘explain’ how they address affordable housing need is  irrelevant. The wording should be strengthened from ‘explain’, implying a written report, to ‘demonstrate’ which implies a demonstration of compliance in the design.  b)We support the last item regarding ‘appropriate space standards’ but these should be identified and quantifiable to have any meaning. Reference could be made to compliance with “Building for Life 12” standards which are also referenced  from the Draft Local Plan. |
|  |  | 4.0 Housing  Policy H3 | We support Objective 3. Urban design is implicit in ‘quality of design’. To enhance the town, housing developments must have good pedestrian access to the town centre and facilities. This could be specifically identified in H3 as it may exclude sites otherwise included. |
|  |  | 4.0 Housing  Policy H4 | a) note typo on second line ‘regarded at a community asset’ should be ‘as’ .  b) Reference to Frome’s housing target should refer to the ‘current Local Plan requirements’ rather than the ‘2300 units by 2028’ which may be varied by the Government Inspectors report, as recently encountered by Wiltshire and BANES.  c) Reference to Southfield Farm should include a “pedestrian and cycle link across the river to Adderwell, and a major contribution to a riverside path from Adderwell to The Retreat ” . This is critical to avoid this site being developed as an isolated housing estate unconnected to Frome.  d) Under provision for self build and custom build housing the 5% requirement appears to be tokenism and will not have a noticeable impact. A 20% or higher figure would be appropriate to redress the balance in the overall provision of custom  housing in the town.  Note \*1 “..direct or indirect influence” - We are concerned that this definition is too weak and will be circumvented by speculative developers. For example the development could comply if buyers choose kitchen fittings and floor finishes which  is common practice. This could be strengthened by substituting the words for “..significant.. |
|  |  | 4.0 Housing  Policy H5 | We support Objective 5.  Item f - We support the requirement but the wording prescribing the only legal vehicle as a ‘trust’ is restrictive, whereas the objective could be satisfied by substituting this with the words “in perpetuity” |
|  |  | 5.0 Business & Employment | a) 5.1 - Context: Fig.9 - Saxonvale has not been included but is the largest employment site in the historic core of the town.  b) item18 identifies T.H.White site as \*\* employment, but this site already has outline permission for housing, and should not be included as valuable employment. |
|  |  | 5.0 Business & Employment  Policy BE1 | a) We support Objectives 1 & 2, but it is not clear how policy BE1 will be implemented.  b) We do not support the policy of expanding Frome without a clear identification of specific sites. |
|  |  | 5.0 Business & Employment  Policy BE2 | a)The sites identified in Fig.9 should be cross checked against the SHLAA to ensure the objectives of housing and employment land are fully co-ordinated.  b)The requirement in exceptional circumstances that “equal provision is made elsewhere in Frome “ - it is unclear how this can be enforced as no other potential employment land within Frome has been identified other than under Fig.9. |
|  |  | 5.0 Business & Employment  Policy BE3 | We support Objectives 4,5 & 6. |
|  |  | 6.0 Town Centre  Section 6.3 | Town Centre Policies- Fig. 15 plan boundaries appear to be inconsistent with the Conservation Area Character Area 1. For consistency these should be harmonised |
|  |  | 6.0 Town Centre  Policy TC1 | We support Objective 1. The last line of the policy should be reworded from “Are” to “Where proven”. |
|  |  | 6.0 Town Centre  Policy TC2 | The requirement of “4% of the total retail units” should be harmonised with the draft Local Plan DP21 which has a more sophisticated measure of core frontages. There is no reference to A3 uses which should also be controlled. |
|  |  | 6.0 Town Centre  Policy TC3 | Reference that The Westway centre “looks dated” is self evident. All buildings look dated. The reference appears to infer the character of the development is inappropriate, but the original elevation to Cork Street has notable design qualities  appropriate to the street context. The poor design elements are the Victorian-style ‘makeover’ which was a 1990s attempt to change the character of the Westway, and recent inappropriate signage and images. TC3 objective 3 should be amended to clarify the character statement. |
|  |  | 6.0 Town Centre  Policy TC4 | We support Objective 4. |
|  |  | 6.0 Town Centre  Policy TC5 | Saxonvale - We object to the statement that the “Town Council… will seek to refresh and redefine the Brief and consider the commercial viability and delivery mechanisms..” on two counts:  1. The Brief sets out the framework for sustainable development over the long term, at least over the Local Plan period. It should not be ‘refreshed’ and there is no democratic method identified in the NP to alter the supplementary Planning guidance it contains.  2. “Commercial viability” is not a matter for Planning Policy or SPG such as the Neighbourhood Plan. Planning Policy defines permitted uses which in turn affects the value of an area of land along with other factors. Commercial viability is primarily dependent on land value. Saxonvale is an area of contaminated  industrial land which is partially in the floodplain. The land value should reflect this to ensure commercial viability.  TC5 makes no mention of office space. The Draft Local Plan CP6 requires at least half the 11,500 sqm of office & studio space requirement for Frome at Saxonvale/  Westway.  TC5 makes no mention of ‘long life, loose fit’ units that are key to the Development  Brief and the long term sustainability of any development of Saxonvale. |
|  |  | 7.0 The River Corridor  POS1 & POS2 | We support the Key Objectives .  Fig 31 contains duplicate labels identified as 7 & 13 in the key. |
|  |  | 8.0 Transport  Section 8.3 | We would suggest Frome Railway Station is identified as the integrated transport hub. |
|  |  | 8.0 Transport  T1 & T3 | We support the Key Objectives. An addition to Policy T1 should be to protect Bus, Coach and Taxi parking including adjacent to the Westway Centre. |
|  |  | 9.0 Design  Section 9.1 | a)“Conservation” and heading “D1 Conservation” should be renamed “Design” as they refer to design issues and Policy D1 is entitled “Design ..”  b)Para 3 stating “All major developments should be referred to a Design Review Panel for advice and Guidance” should be a Policy and include “All major developments should be assessed against “Building for Life” criteria” |
|  |  | 9.0 Design  Section 9.2 | Gateway Sites should include gateway sites and landscape corridors at the edge of town, not just gateways to the historic core. These should be identified in the NP. |
|  |  | 9.0 Design  Section 9.3 | 9.3 - We support Policy D3. |
|  |  | 9.0 Design  Section 9.4 | We support Policy D4 but the policy should go further. Hedges & hedgerows should also be protected. New development should also be required to establish boundary planting of hedges at back edge of pavements wherever possible. |
| Laila Jhaveri | 04 | 3.0 Visions & Core Objectives  VC01 | Need more clarity as to what type of community consultation exercise is required and when. |
|  |  | 3.0 Visions & Core Objectives  VC02 | Do not agree with comment- “the neighbourhood plan seeks to create opportunities for people to make choices….” Think this is misleading.  The principle as articulated is stating the obvious. I think this principle is about strengthening the community. Is there a danger that in providing more houses we lose community spaces/buildings or employment space? How do you measure a proposed development against this principle? Think more clarity is needed. Would like to see a commitment to plan for the delivery of more housing/new major development- involve the community in decisions as to where the new housing/major development is to be delivered- so new development is plan led. |
|  |  | 4.0 Housing  Policy H1 & H2 | a) Need to make clear how many new houses are to be delivered in Frome and over what period? Also to state that the target will be set in the Core Strategy to be adopted by Mendip District Council. I know this appears in introduction but think it would be helpful to restate in this section. H1- should we not through the plan be identifying the sites where the number of houses to be delivered can be delivered? Saxonvale and Southfield have already been identified. What are the other possible sites? My understanding of neighbourhood planning was that it was meant to give the community the opportunity to influence where new development comes forward. I would like to see more possible sites identified in this plan. I do not agree with H1 as worded and think the Council should only be supporting new housing at sites which have been identified through the neighbourhood plan process. At present policies H1 and H2 read much like the policies you would expect to see in the Core Strategy.  b) Where are to be the proposed exception sites? Can sites suitable for community housing also be identified now? |
|  |  | 6.0 Town Centre  Section 6.3 | It is hazardous crossing the Market place and top of Bath Street. I support any proposal to make crossing these streets safer. It was not clear to me from the proposed remodelling drawing where the new crossings are. Better more convenient crossings need to be provided. I do not agree that keeping the town also car friendly is necessary to support businesses. The Town Council should be making the argument for better public transport and look at how a park and ride scheme, to take traffic out of the centre, can be delivered. |
|  |  | 6.0 Town Centre  Policy TC2 | I support the proposed Article 4 direction policy |
|  |  | 6.0 Town Centre | I would like to see a policy included which is along the lines of the Council supporting a mix of uses and protecting community spaces in the centre. I am thinking of the United Reform Church Hall Building on Zion Lane which is the subject of a planning application to convert to residential. If the Council is truly committed to vitality and social integration then it should be adopting policies which support the protection of community spaces (particularly community spaces which are in the town centre). The use of the hall by the Frome Textile Workshop is providing a significant social value to many residents in Frome. It is very disappointing that to date the Town Council has shown so little interest in helping to protect this resource. |
| Daniel Murguialaday | 05 & 06  Letter duplicated | All Sections | Supports all sections & Policies in the plan, has commented on 6.0 Town Centre |
|  |  | 6.0 Town Centre  Section 6.2 | “To make the main visitor car parks more attractive […]”. In the case of the main car park between the Cheese and Grain and Frome library, this is not ambitious enough. Ideally this car park should be moved elsewhere (keeping it within walking distance, or underground?). To have a car park as the geographical/psychological/urban centre of Frome is…a tragedy! A welcoming area for pedestrians of all ages in such a space would make Frome centre worth visiting. |
| Natural England | 07 | General comment | Protected Sites-  Given that the Mells Valley Special Area of Conservation (SAC) and Vallis Vale Site of Special Scientific Interest (SSSI) are located just to the west of Frome (just over 0.5km west) there would need to be assessment made of any impacts upon the European site under the Habitats Regulations as a result of any of the policies set out within the NP and subsequent development that occurs within it’s framework. |
|  |  | General comment | Protected landscapes-  Given that your neighbourhood planning area is adjacent (3km North West) to the Cranborne Chase & West Wiltshire Downs Area of Outstanding Natural Beauty (AONB), we advise that you take account of the relevant AONB Management Plan for the area. For Areas of Outstanding Natural Beauty, you should seek the views of the AONB Partnership. |
|  |  | General comment | Protected species-  You should consider whether your plan or proposal has any impacts on protected species. To help you do this, Natural England has produced standing advice to help understand the impact of particular developments on protected or Biodiversity Action Plan species should they be identified as an issue. The standing advice also sets out when, following receipt of survey information, you should undertake further consultation with Natural England. |
|  |  | General comment | Opportunities for enhancing the natural environment-  Neighbourhood plans and proposals may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment, use natural resources more sustainably and bring benefits for the local community, for example through green space provision and access to and contact with nature. It is good to see that the NP proposes to open up and enhance the river corridor for wildlife and to create a network of open spaces within Frome. The intention (within Section 7) to produce a Green Infrastructure strategy is welcomed and should be seen as a key element in creating the corridors within the town that will benefit both wildlife and the residents in Frome. |
|  |  | 7.0 POS2 | The mention that developments of over 100 new houses will be required to provide evidence of plans for the management and maintenance of open space into the future, including for wildlife could be expanded to include development of a lower number in order to ensure that new housing estates or buildings converted for residential use also take account of the environment around them and further afield. |
|  |  | General comment | Opportunities to incorporate features into new build or retro fitted buildings which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes should also be considered as part of any new development proposal. |
| Robert Bendy | 08 | 5.0 Business & Employment | Happy to see that local government is actively seeking to improve employment prospects, however requests that Employment site No9 – Butts Hill Motor Works is removed from the list as it will “diminish its attractiveness for development” (summary - see letter for full text) |
| Steve Bury  Butler Tanner & Dennis Ltd | 09 | 3.0 Vision & Core Objectives | Has indicated general support with no additional comment |
|  |  | 5.0 Business & Employment | Has indicated general support with no additional comment |
| Luke Wilde | 10 | All Sections | General comments of support are provided for sections3.0, 4.0, 5.0,6.0 & 7.0 (see hard copy for full comments) |
| Helen deeming | 11 | All Sections | Has indicated support for all sections with no additional comment |
| Sandra Clark | 12 | All Sections | Has indicated support for all sections – general comments of support are provided for sections 03, 04, 05 & 06 (see hard copy for full comments) |
| Mendip District Council  Planning Team Manager  (note it was requested that the pre-consultation response be revisited as part of the formal consultation reponse) | 13 | General comments (pre-consultation response) | In many places, it is unclear whether particular passages of text are intended to be vision, objectives, policy or explanatory text. To aid clarity in this respect, it would help if a consistent approach were adopted throughout the Plan setting out objectives, context/reasoned justification and then a policy. |
|  |  | General comments (pre-consultation response) | The Plan also, in several places, refers to “development plans” when presumably it means planning applications. Suggest these are amended as development plans have particular connotations. |
|  |  | General comments (pre-consultation response) | Similarly, many policies refer to proposals “not being supported”. This is far too vague a concept – the NP needs to make clear to the decision maker whether a planning application should be refused. Suggest re-wording relevant policies to say either “Development of ….. will be permitted only where ….” or “Planning permission will not be granted for proposals which ….” etc. If the sentiment being expressed by the Plan is about “support” in a contextual way, this should not appear in the policy itself but in the explanatory text or objectives. |
|  |  | General comments (pre-consultation response) | It may be helpful if the plan explains its role and status more clearly, The ‘policy’ format creates an expectation that town council are determining proposals (e.g. H2) |
|  |  | General comments (pre-consultation response) | Para 2.2 - It would be wise to refer to the fact that the overall aim of the three strands identified in the NPPF is to achieve sustainable development. |
|  |  | General comments (pre-consultation response) | When referring to Mendip’s responsibilities, suggest you refer to setting local policy rather than “regional”. (The word “regional” has particular unhelpful connotations). Also, need to make clear that MDC determines most (but not all) planning applications. |
|  |  | General comments (pre-consultation response) | Suggest clarifying status of the emerging Mendip Local Plan by adding something along the lines of “The draft Mendip Local Plan is emerging and subject to change through the forthcoming public examination”. |
|  |  | Policy VCO1 | See general comment on clarity of policy wording. The process for determining planning applications is set in legislation and a plan cannot require standards in excess of those. Suggest this policy be converted into background text with general encouragement for local consultation. However, there are no guidelines giving information on the type/level of consultation that is expected for different types of development. Should a householder planning application in Frome have to be accompanied by a consultation statement? If so would the level of community consultation be the same as for redevelopment of a brownfield site for 200 houses? |
|  |  | Policy VCO2 (pre-consultation response) | a)This does not read like a policy – convert to explanatory text?  b)What does it mean/is trying to achieve? Is it referring to the neighbourhood plan/local plan?  c) Do you require applications to demonstrate social and economic benefit, if so how will this be done? |
|  |  | Policy VCO3(pre-consultation response) | How is this expected to be achieved? Without setting criteria of what development is expected to deliver and how, this is toothless. |
|  |  | 4.0 Housing  Policy H2 | This is seeking to introduce a local validation requirement which is not the role of a NDP. Furthermore, there is no policy basis at present to require affordable housing needs to be addressed for 10-14 dwellings and the appropriate space standards which new housing should meet is not clear. |
|  |  | 4.0 Housing  Policy H4 | There is no policy or legislative basis to impose requirements on schemes for 100+ dwellings and there is an unresolved access issue with the Wallbridge site which will be addressed through the consideration of a current application. |
|  |  | 4.0 Housing  Policy H5 | The Council has yet to decide whether to introduce CIL and the policy is therefore premature. Notwithstanding, Building Regulations comes after the planning process so it would be too late to negotiate CIL, and it should be the local planning authority who decides whether to waive CIL if it were required. |
|  |  | 4.0 Housing  Policy H7 | This is far too vague as a policy, and should therefore be reflected in the written statement instead. The NPD cannot impose additional requirements to that in the Local Plan. |
|  |  | 5.0 Business & Employment Policy BE2 | This is too onerous given the National Planning Policy Framework (NPPF). It is unreasonable to require alternative and equal provision made elsewhere in Frome in every case. |
|  |  | 5.0 Business & Employment Policy BE3 | A requirement to comply with the principles of One Planet Living is excessive and unreasonable as it includes non-planning matters. |
|  |  | 6.0 Town Centre  Policy TC2 | It does not need a policy to say that an Article 4 Direction will be applied for. In any case, the LPA is unlikely to advance an Article 4 direction which is labour intensive and time-consuming when there is no compelling evidence to demonstrate that A2 – which is defined in the NPPF as a main town centre use – is harmful. Policy DP21 in the Draft Local Plan seeks to ensure that primary frontages are A1 (two thirds). Notwithstanding, the Government have liberalised change of use that is permitted development, so changes away from retail may not be controlled in any case. |
|  |  | 6.0 Town Centre  Policy TC3 | This policy is unnecessary as planning permission has now been granted. |
|  |  | 6.0 Town Centre  Policy TC4 | This is a matter between Frome TC and the Council as landowner, which is not relevant to planning. |
|  |  | 6.0 Town Centre  Policy TC5 | Policy TC5 – This is not consistent with the Local Plan. It is also contradictory as it seeks redevelopment in accordance with the 2005 brief but then says that the brief needs to be refreshed, which may result in fundamental changes to the 2005 brief. |
|  |  | 7.0 Public Open Space  Policy POS1 | There may be opportunities to improve the River Corridor environment but they may not meet CIL tests and could therefore not be secured through the planning permission. As such, proposals could not refused in such circumstances. |
|  |  | 7.0 Public Open Space  Policy POS2 | What is the justification for refusing the development of open space, which is not related to public land and buildings? There is no problem with a requirement for future management and maintenance of open space, but only where it is provided (not necessarily for 100 homes). Also, why would public open space be required with commercial floorspace? |
|  |  | 8.0 Transport  Policy T2 | The threshold for travel plans is onerous. It should be for development that generates significant car traffic, and the Department of Transport has set thresholds for when a travel plan is required. |
|  |  | 9.0 Design  Policy D3 | It is too onerous and ambiguous to require a visual assessment of skyline impact. Tree works cannot be included. |
|  |  | 9.0 Design  Policy D4 | Loss of trees may be outweighed by other considerations, and it would be onerous to require a tree survey for every development proposal. The requirement for new trees is unreasonable, onerous and unjustified. Tree planting is not always necessary to make development acceptable, and off-site planting would not relate to the development. |
|  |  | General comment | Given these comments, officers could not recommend that the Plan be endorsed at present. |
| Origin3 Planning.Design.Development | 14 | 4.0 Housing  Policy H7-POS2 | a)Planning permission for 54 dwellings was granted at the Mount in August 2013. The Neighbourhood plan appears to designate this as a protected site for Public Open Space which is inconsistent with the current planning position. (summary see hard copy for full text)  b) The Mount site is needed for housing now and should be designated as a committed housing allocation in the local plan |
|  |  | General comment | The NP is required to be in conformity with the Local Plan, which is not currently adopted. Therefore the NP is premature (summary see hard copy for full text) |
| Alex Hart | 15 | All Sections | Has indicated support for all sections with no additional comment |
| Jonathan Simcox | 16 | All Sections  TC3, TC4, D3 & D4 | Has indicated support for all sections with additional comment of support, in particular for sustainability, TC3 Westway, TC4 Cheese & Grain car park, improvements to the River Corridor and D3 Skyline developments , D4 Tree planting (summary see hard copy for full text) |
| Madeleine Mauwer | 17 | All Sections | Has indicated support for all sections with additional comments in particular for support of Vision & Core Objectives, H3 good building design, H5 energy efficient homes, H6 Self build. 5.0 flexible work space, 7.0 Enhancement of River corridor , 5.0 flexible work space, 8.0 prioritisation of pedestrians & cyclists & 9.0 attractive skylines(summary see hard copy for full text) |
| Adam Boyden  MDC & FTC Councillor | 18 | 3.0 Vision & Core Objectives | Support. Please just reword statement to remove reference to the political control of Town Council, or amend to say ‘currently’ independent or ‘elected in 2011’ as this is a long-term plan that needs to be relevant after 2015. |
|  |  | 4.0 Housing | Support with modifications.  Why does policy H3 apply only to developments over 10 houses? Mendip’s Pre-Submission draft Local Plan (policy DP11) requires affordable housing (or contributions to) for developments of 7 or more dwellings. |
|  |  | 5.0 Business & Employment | Support.  A planning application for residential development has been submitted in 2013 for the Police Station site, which is proposed to be protected as an employment site in policy BE2. |
|  |  | 6.0 Town Centre  Section text 6.2 | Support strongly with mods. 6.2: Car parks should indeed allow pay on exit, but also allow payment by mobile phone, to allow text reminders and extensions to stays, which is worth a mention. |
|  |  | 6.0 Town Centre  Policy TC1 | Policy TC1 should aim to achieve the objectives of proposed town centre improvements, with a range of measures to achieve them, and not tie everything to achieving only Option 3 of the Remodelling study, as that may not be approved by Somerset Highways and may not all be achievable. |
|  |  | 6.0 Town Centre  Policy TC2 | Policy TC2 should be checked against Mendip Local Plan draft policy on retail frontages/Use Classes, which is more sophisticated |
|  |  | 7.0 River Corridor & POS  Policy POS2 | Support strongly with mods. Policy POS2 should state if areas shown in Figure 31 are protected by the policy. Figure 31 needs to differentiate between POS and other open spaces (not public spaces), and potential POS; some are not accessible by the public. The old Showfield is shown (key states not); uses include cricket and football clubs but not rugby. Selwood Academy playing fields are not POS. A small play area at Acacia Drive, the Millennium Green, and green walkway routes through Stonebridge and Mendip Drive, etc., are POS and should be shown. Site 6 is not POS but a closed privately owned sloping site off Rodden Rd: is it a target for potential POS? If so, Rodden Lake Stream Meadows should also be shown (as FTC applied to Mendip for ACV status) as a ‘potential POS’, perhaps with the former allotments owned by Mendip (by the Police Station) which are disused |
|  |  | 8.0 Transport | Support, subject to comments on earlier sections where relevant. |
|  |  | 9.0 Design | Support with mods. Policies should also refer to need for improvements to gateways to the town that are outside the Town Centre as well. |
| Frome Cohousing CIC | 19 | 4.0 Housing  Policy H4 | We suggest that ‘at least 5%’ is increased to ‘at least 15%’  because a target of only 5% will not enable a community housing project to be viable. Cohousing projects need about 15-25 household to be able to afford some of the essential elements of cohousing. The Plan should make it a clear rule that for any development that is for community housing, self build or cohousing, the commissioning body should be a not-for-profit community organisation or a Housing Association (or a partnership between such organisations). This should included the plots on the major developments at Saxonvale and Southfield Farm that are to be made available, which I have suggested should be set at 20% of the total housing numbers, not the 5% figure in the draft document. |
|  |  | 3.0 Vision & Core Objectives | we welcome the development of this document and fully support the aims and objectives of the Neighbourhood Plan, particularly the three golden threads VCO1, 2& 3. |
|  |  | 4.0 Housing  Policy H6 | Point f: This needs to be clearer and read:  ‘The land should be held in perpetuity by a Community Land  Trust.’ |
|  |  | 6.0 Town Centre  Policy TC5 | We strongly support this and consider it to be a core element of  the Neighbourhood Plan. It is essential for this area close to the  centre of the town to have an integrated development plan to  maintain the character and DNA of Frome. |
|  |  | General comment | In surveys with our members we have identified a strong demand for live/work properties. These can be provided in community housing projects but could also form a part of market housing by conventional developers if they are given an ‘encouraging steer’ which this Neighbourhood Plan could provide. |
| Jeremy Wire | 20 | All Sections | Support is given for all Sections – see hard copy for additional comments of support |
| Sue Everett | 21 | 3.0 Vision & Objectives | I do not support limiting the benefits to ' the needs of residents' . The vision needs to be widened to include the needs for protecting/restoring environment and heritage of the town and its surrounding area. This would be defined as  • archaeological, cultural and architectural heritage  • nature  • water resources  • air quality  • soils.  Suggested text - To improve  • social and economic wellbeing of the town and its population  • environment and heritage of the parish  (this is a summary of the response – see hard copy for full text) |
|  |  | Policy VC03 | I support this approach. However, I have some concerns relating to the wording under the individual themes listed.  **Zero carbon**  Current wording: Use of green infrastructure and renewable technology to generate and maximise use of energy and heat in buildings.  Preferred wording: Reduce Frome's carbon footprint through an energy reduction programme; support the use of renewable energy technology where this is appropriate and cost-effective.  **Natural Habitats & Wildlife**  I OBJECT to the current wording. Current wording: Promoting biodiversity through appropriate land use. Planting trees and edible landscapes in public areas  Proposed changed wording: Protect land and heritage of existing importance for nature; identify opportunities for improving other land for wildlife, for example through Biodiversity Offsetting and developer contributions. Support the provision of opportunities for people to enjoy the natural environment.  **Local and sustainable food**  •Add “and encourage Community Supported Agriculture initiatives”  •Move the item on edible landscapes from 'nature' to this section.  (this is a summary of the response – see hard copy for full text) |
|  |  | General comment | Fully supports the policies for 4.0 Housing, 5.0 Business and employment & 6.0 Town Centre |
|  |  | 7.0 River corridor & POS | Suggested amendment to text on page 33: The river corridor will be seen as the central open space in the town’s network of green infrastructure, providing with a string of interconnected  open spaces for visitors and residents to enjoy. |
|  |  | 7.0 River corridor & POS  Section 7.2 | I OBJECT to the wording as it is and propose the following.  •To ensure the green infrastructure associated with the Frome River Corridor is maintained and enhanced, for benefit of people and wildlife  •To improve access in a way compatible to protecting the river environment, that will enable residents to walk or cycle in relative peace and safety through the town  Comment on implementation:  I OBJECT to implementation delivered unquestionably through the River Corridor Strategy as it currently stands.  Proposed new wording: I therefore propose that implementation re the River Frome Corridor should be informed by the Strategy with details subject to input and approval from the Environment Agency . (as the water park idea could be related to S106 money in the near future it is important that the details of this idea are thrashed out sooner or later).  (this is a summary of the response – see hard copy for full text which includes detailed reasons for the proposed changes) |
|  |  | 7.0 River corridor & POS  Section 7.3 | Please add Tower View Public Open Space to the map as a priority area for play and recreation. I suggest that there are other currently undeveloped areas within the bounds of the bypass and railway line that are and will be important as open spaces. These include the Rodden Stream Lake meadows and all other land east of the town and bordered by the railway, excluding the area earmarked for the Southfields Farm development. Some of these ought to be designated as Local Green Spaces.  (this is a summary of the response – see hard copy for full text which includes detailed reasons for the proposed changes) |
|  |  | General comment | Food and FARMING  This is ignored other than in the sustainability section and then only mentioned in relation to allotments and access to food growing, but the undeveloped parts of the parish are actively farmed and there are many issues to consider and need addressing relating to this, notably the interface between the farming community and public use of land (dog walking), intensive agriculture and pollution of the river (there is an active Catchment Sensitive Farming project just gone passive due to lack of front end funding), and a need to consider agricultural management of larger open spaces such as is done in other areas (e.g. Hungerford, Berkshire). Much of open space of interest and used by people in Frome is actively farmed and is privately owned. |
| Ben Meynell | 22 | 5.0 Business & Employment  Policy BE2 | a)Firstly, having regard to the adopted Mendip Development Local Plan (2002-2006), it is clear at paragraph 6.17 that the reuse of employment premises for alternative uses can bring positive and welcome benefits. This is not recognised in the draft Neighbourhood Plan Policy BE2.  b)Having regard to the evidence supporting this Neighbourhood Plan we see nothing which explains or justifies the T Bos site from being a ‘valuable employment site.’  c)Given the site’s location within an established wider residential area and the other Frome employment areas which are better suited to the requirements of existing businesses, we feel it sensible to reconsider the suitability of this site and it’s allocation.  We therefore request that this suitable site be identified for residential development to help support the district’s housing needs and requirements  d)You will also be aware that a planning application has been submitted to Mendip Council for residential development on the site, which further highlights the site as a residential site rather than employment. |
| Dan Harper | 23 | 6.0 Town Centre  Policy TC5 | The idea of yet another supermarket slap in the middle of town. I have yet to meet anyone who likes the idea and it spoils the whole notion of our local produce , shops and alternative supermarkets |
| Environment Agency | 24 | General comment | a)Our environmental maps indicate varied environmental constraints in the Frome area. The primary constraint is the functional floodplain (flood zone 3B), flood zone 3A (high risk) and flood zone 2 (medium risk) caused by river flooding. The primary area of floodplain is found adjacent to the River Frome and its tributaries. We actively discourage the majority of development proposals in such areas and recommend development such as housing is allocated sequentially to areas of low flood risk (flood zone 1).  b) We recommend that the draft Neighbourhood Plan references the Strategic Flood Risk Assessment (Level 1) produced by Mendip District Council. Its inclusion within the Evidence Base (Section 2.6) would serve to strengthen its position as a material consideration in the development management process. |
|  |  | Check where this is referenced | We are pleased to see that surface water flood risk issues for proposed development have been highlighted. We encourage the promotion and use of sustainable drainage systems (SuDs). SuDS are an approach to managing surface water run-off which seeks to mimic natural drainage systems and retain water on or near the site as opposed to traditional drainage approaches which involve piping water off site as quickly as possible. SuDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands. SuDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge, and improving water quality and amenity. |
|  |  | 7.0 River Corridor & POS  Section 7.2 | It is encouraging to see reference to making planning gain from development proposals through S106 and CIL. Where justified, opportunities to add to the environmental fund should be fully exploited. Planning contributions can help maintain essential environment services such as drain maintenance or fund flood alleviation infrastructure projects in areas such as Wallbridge that are prone to flooding events.  The objective of opening up the Frome River corridor for greater amenity and biodiversity value is encouraged. We would request early consultation as more details come forward as we have valuable input to make in the formation of a Green Infrastructure Supplementary Planning Document. |
| F.R.O.G.s | 25 | 7.0 River Corridor & POS  Section 7.3 | a)We would like to see more emphasis on protecting all existing open spaces as well as the river.  b)The Old showfield site was not specifically mentioned, yet this site should be protected as a priority  c)We would like to see alternative uses for the open spaces being encouraged. Ones that immediately come to mind are:- Incredible Edible, A Frome Orchard, just empty spaces, there doesn’t have to be planned activity in every area |
| Mr R H Minty | 26 | 5.0 Business & Employment  Policy BE2 | Strongly objects to any proposals to include his land (Employment site 03) as a valuable employment site.  The business is over 100 years old and it is intended that the family continue to run the business. “as the nursery has an agricultural holding number, you cannot change the structure of the land because it is zero rated” (This is a summary of the response – see hard copy for full response) |
| David Gosling | 27 | All Sections | Support is given for all Sections – see hard copy for additional comments of support |
| Charles Wood  Vision 4 Frome | 28 | General comment | Front Page - Vision for Frome were party to the consultations, and the Frome Community Plan is a document of significance to the Neighbourhood Plan (NP). It would be nice to have this V4F association acknowledged on the Front page too. |
|  |  | 3.0 Vision & Core Objectives  Section 3.1 | Page 3/Page 10. There should perhaps be an upfront recognition that the physical make up of the town and its character is influenced strongly by its geography of hills leading down to a river, and how the town has been built around this in different ways through the ages. The townʼs history, and associated past development in many of its locations, now places significant constraints and challenges on such things as building and design  options, road and car parking layout, and traffic management not least public transport options. |
|  |  | 3.0 Vision & Core Objectives  Section 3.2 | Leisure facilities (see page 11 VC0 2) are also an important part of the Frome life and built environment. They should be included in the second bullet between “offices” and “other development”. |
|  |  | 2.0 The Planning Framework  Section 2.6 | “Vision for Frome” should be included in the heading paragraph as neither the Town nor District Council (although the latter were participants) produced the referenced Frome  Community Plan 2008 - 2028. V4F did. - The title of the community plan is quoted here and several places elsewhere as the “Vision for Frome Community Plan (2008-2028), and later as the “ Frome Community Plan 2008 - 2028”. The second version is both more accurate, better, and should be used consistently in the NP, as, although V4F produced it, we do not have sole  ownership - we are the current custodians but it is a plan owned by the whole community. |
|  |  | 3.0 Vision & Core Objectives  Section 3.1 & 3.2 | a)In the first paragraph I see no relevance to this plan that the Town Council is run by a politically “Independent group, which in any case could change over the life time of this Plan. A suggested revision would be: “Frome.....past achievements, the town supported by its Council is today forward  looking....self-reliance. It supports many independent shops .....people.”  b)In the third paragraph, the population must surely be different to and more than 25,710. If this figure is taken from some reference source, then what year it relates to should be  stated, as we are now somewhat on the way towards the 25% increase.  c)Page 11 - 3.2. VCO 1. Participation. In the entry in the shaded box “participation” should be used not “consultation”, to be consistent with the words above.  d) getting the One Planet Living definitions right, with the inclusion of any development of heritage buildings as well as new builds in the aim to reduce energy use/carbon generation etc; |
|  |  | 4.0 Housing  Policy H2 | The 3rd paragraph is rather limiting in scope in saying “young people and working families” (which may in some cases be the  same). The words should encapsulate the need to provide suitable accommodation for all parts of the community e.g. (a bit wordy, but just to show the point): “Central to the strategy to support a healthy and balanced population will be the need to provide accommodation suitable for the whole community, from single young people, to families, to the retired and elderly, and including larger houses for those that need or want them.” |
|  |  | 4.0 Housing  Policy H5 | a)- Is the aim for zero carbon builds by 2016 realistic? - I would guess not.  b) - 5th para. Delete “Vision for”, see earlier comment on the Planʼs title and the V4F role. |
|  |  | 5.0 Business & Employment  Section 5.1 | Context. 3rd column, line 4. Is the quoted land adjacent to  Wessex Fields really to the West? It doesn’t look so on the map. |
|  |  | 6.0 The Town Centre  Section 6.1 | In the policy box, acknowledge the particular problem public transport presents (taxis and buses). Suggest put “public transport” before “other motorised vehicles”. |
|  |  | 6.0 The Town Centre  Section 6.3 & Policy TC5 | Town Centre. Saxonvale. Policy Box TC5. The second paragraph talks of refreshing and redefining the Saxonvale 2005 Planning Brief. It would certainly be a good thing to do, but isnʼt this overtaken by events? It only becomes a viable action if the  Frontier proposals are ultimately turned down, and the whole future of the site, and the current Terramond and Town Council plans for their parts of the site, are put on hold. See  also the relevant “Matrix Policy Box” on Page 53. |
|  |  | 7.0 River Corridor & POS  Section 7.3 | Numbers 16, 24 and 26 are missing, and there are 2xNo.19.  - Should the current No.6 on the map be 16 - Millenium Green?  - Should a new No.6 be tagged against the meadow North of the river?  - The second No.19 looks as if it should be No.26.  - No.24 should be squeezed in at the Redrow Estate. |
|  |  | 8.0 Transport  Section 8.1 | a) Buses have been mentioned in the “Context”. They are a significant contributor to the congestion in the Town Centre (and perhaps a bit elsewhere in the town), brining a need  for a revision of bus stop layout, or indeed a form of “bus station”; this is most definitely a “Transport” need. A review of routings and particularly timing would also help, but this is  outside the scope of the NP. - Concerns about the routings of the likes of HGVs through the town were particular comments in the Frome Community Plan.  b)There is very much a need for a review of routes and roads through and around the town, to produce an up to date “Transport Plan” which will inform new developments and generate additional traffic solutions as demanded both now and to serve new developments. |
|  |  | Supplementary report on housing  Page 47 | Case for Self-Build Housing. Second column. Last but one para. Not sure how viable Saxonvale is now as an “exemplar project”, given the split of uncoordinated developments between the Town Council, Frontier and Terramond. It might be best to  leave it out as an example, pending better sight of where it is going. |
|  |  | General comments | Summary Matrix  - Page 51. 5.0. Last Policy Box. Is it 500m2 or 1000m2?. I think 1000, as per the main plan.  - Page 54. 7.0 River Corridor. Evidence Box. There were a re number of requirements for river corridor development in the Frome Community Plan. |
| Nick Ray | 29 | All Sections | Has indicated support for all sections with no additional comment |
| Anna Francis | 30 | All Sections | Has indicated support for all sections with no additional comment |
| Kathleen Knecht | 31 | 3.0 Vision & Core Objectives  General comment | Has indicated support – commented, keep Frome Local! Not big supermarkets |
|  |  | 4.0 Housing  General comment | Has indicated support – commented, Housing should in keeping with local, sustainable and in the public interest and not in the interest of property developers pockets! |
|  |  | 5.0 Business & Employment | Has indicated support – no additional comment |
|  |  | 6.0 Town Centre  General comment | The saxonvale site should not support further supermarkets which will wreck the town’s unique feel and independent shops. It needs to encourage social cohesion and support local trade and businesses |
| Rose Heaword | 32 | 6.0 Town Centre  General comment | I am appalled that Frontier have gone back on their original proposal to make Vicarage Street free of service traffic for local supermarkets. The axle loading of the HGVs is dangerously high for a winding road designed for 19c. traffic The size of these HGVs is such as to cause traffic tailbacks. Manoeuvreing these monsters causes traffic to use the only pedestrian pathway in the street. Apart from hazards to pedestrians, there is damage to pavements containing access to service points (electricity, gas, water). Cracks in the pavement are particularly noticeable outside 11-15 at the top of the hill..  Why does M&S have to use such huge delivery vehicles? Of course, it keeps prices down. Why should the occupants of this area pay the price for this "benefit"? |
| Alex Malcolm | 33 | 3.0 Vision & Core Objectives  Section 3.1 | there must be mention that Frome is an historic medieval market town with narrow streets nestling in a river valley surrounded by hills. The plan layout of the town has evolved within these constraints without thought or consideration / anticipation of the residential expansion and consequential commercial requirements now demanded of it in terms of providing local jobs and infrastructure to facilitate viable and sustainable expansion for a future very much dependent on low mileage commuting as well as localised energy and food production. |
|  |  | General comment | the economic and commercial environment assumptions supporting the 2005 Planning Brief have changed dramatically with the on-going financial crisis and emergence of the Internet and all that it now facilitates in growing competition with traditional town centre services, commercial opportunities and values. |
|  |  | 6.0 Town Centre  General comment &  Policy TC1 | a)Traffic congestion in the town centre and immediate surroundings has to be reduced or eliminated for any future town centre development to be successful and this must be a condition of any future development.  b)The only way to do this is by making underground or multi-storey parking facilities available with a bus terminal nearby and convenient road and path access so that the town centre can become a pedestrian area only. This means that a new town transport plan catering to these needs is essential.    c)In my opinion we need to articulate and establish:  1. Purpose  2. Context  3. Establish desired outcomes ie: articulate the scale and scope of the community’s vision for the future, differentiating and highlighting what we need from what we want which are not always the same thing.  4. Highlight and prioritise those projects that are essential to the town’s future development in order to provide focus and establish where resources can best be applied in the long term interests of the community.  5. Establish what the community's planning and development dependencies and conditions for development are.  6. Establish Outline Planning Permission prerequisites and the scale and scope for development within the town and the town centre in particular.  (this is a summary of the comments, see hard copy for full details |
| Vivienne Vowell | 34 | 3.0 Vision & Core Objectives | Has indicated support |
|  |  | 4.0 Housing | Housing is to be thought of as not for one group i.e young and working families but for independent old people who have been born and lived in Frome all their lives, also feel that middle aged peoples need have been overlooked. |
|  |  | 5.0 Business & Employment | Support’s with modifications – I support the ideas in Frome for creating new jobs, but if the existing shops are to withstand competition there are some issues as to whether they will remain in business as most are struggling as it is we don’t need more shops standing empty |
|  |  | 6.0 Town Centre | Frome Market place and existing shops are limited to mostly charity shops and not very helpful in the way of DIY and bargain stores. In todays current financial climate these are things that would please most of Fromes residents who haven’t got transport to go to towns outside of Frome e.g Trowbridge & Warminster |
|  |  | 7.0 River Corridor & Public Open space | The river Frome has been neglected and left in a real mess, there is no form of attraction at all. The upkeep needs to be addresses as a matter of keeping Fromes visitors. I feel is looking very tatty. |
|  |  | 8.0 Transport | Has indicated support |
|  |  | 9.0 Design | Has indicated support |
| Josephine Marsden | 35 | 6.0 Town Centre  General comment | a)Would like to see a wider variety of shops, naming several suggestions.  b)stated the town centre has declined due to unsuitable development and parking is too expensive.  This is a summary of the response – see hard copy for full text |
| Gerlinde Rambausek | 36 | 3.0 Vision & Core Objectives  General comment | Clear comprehensive vision based on extensive consultation and in put of expert studies. The core objectives are sound and reflect those expressed in FTC’s strategic planning documents as well the V4F Community Plan 2008 -2028 |
|  |  | 4.0 HOUSING  General comment | While much of the new build housing quota imposed by MDC, has already been build, it is desirable that future housing developments are environmentally sustainable, imaginative and cost effective.  It is particularly commendable that low impact, self-build solution are sought to meet housing needs. Collaborative, community based developments are to be welcomed. |
|  |  | 5.0 BUSINESS & EMPLOYMENT  General comment | This section reflects the aspirations of enhancing employment and business opportunities in Frome. The emphasis on attracting high value businesses and creation of high worth employment opportunities, which complement existing ones, is to be welcomed.  I would like to see a closer collaboration between regional universities and the town, in particular starting a dialog regarding locating spin out business and incubation units in Frome. |
|  |  | 6.0 THE TOWN CENTRE  Policy TC5 | It is essential that the Saxonvale development compliments and enhances existing provision, particularly in terms of providing high quality employment, leisure and business opportunities. This site is a key element in providing connectivity to Garsdale and the Frome Station complex. The provision of public space both along the river and the centre of the site, is essential to enhance social interaction opportunities. It must function as an extension to the existing town centre, which is integrated into the proposed plans to remodel the town |
|  |  | 7.0 River Corridor & POS  General comment | In addition to the proposed access to the river, it would be desirable to create a platform/ beach area to enable the river to be used for wild swimming. |
|  |  | 8.0 TRANSPORT  General comment | I would like to see and electric powered land train to carry visitors, residents and their shopping/ luggage to Frome station as well as park and ride car parks. This might ease traffic congestion in the town centre, be fun for adult and children to ride on and enhance pedestrian friendliness.  Land train stations could be sited in Saxonvale, and Market Yard as well as gateway points, such as Gorehedge, Badcox car park etc. |
|  |  | 9.0 Design  General comment | An imaginative, ambitious proposal, which should enhance the Frome’s build environment. |
| Rachel Bodle | 37 | 3.0 Vision & Core objectives  VC01 | Suggest stronger wording 'Planning applications for development should be supported by evidence of appropriate engagement with local people during community consultation.' |
|  |  | 3.0 Vision & Core objectives  VC03 | The principles of One Planet Living as given here are not the same as those on the website http://www.oneplanetliving.net/what-is-one-planet-living/  I'm particularly concerned that you have 'culture and heritage' in place of 'culture and community'; and 'equity and fair trade' in place of 'equity and local economy'. These changes seem to undermine the role of the Neighbourhood Plan in encouraging development that supports building community resilience - as described in your Foreword. Figure 6 needs to be modified and the management model adapted accordingly. It would also be useful to make reference here to the appropriate application of the principles of OPL to assess development affecting heritage buildings as well as new development. |
|  |  | 4.0 Housing  Section 4.2 &  Policy H4 | There's an ambiguity around the phrase 'community development' which is used here in conjunction with cohousing and then later in policy H4 in relation to any development of more than 100 homes. I wonder if it would be useful to spell out what is meant in each case: for example for major projects developers should show that they have considered opportunities for community interaction, including play or hang-out spaces, growing spaces, 'corner shop', or other community amenities as well as links to the town centre, health facilities, schools, railway station, river, countryside ... |
|  |  | Section 4.3 & Policy H7 | I suggest something be included about managing the balance between housing and employment development during the period of the plan. It may be useful to be able to ensure that housing growth does not get too far ahead of employment. |
|  |  | 5.0 Business & Employment  Section 5.2 | Objective from 5.2 'to reduce the environmental impact of travel to work' ... should 'by identifying options for getting to work other than by car' then appear under 5.3? |
|  |  | 6.0 The Town Centre  Section 6.2 | Key objective 'To support independent retailing ... to enable people to source local produce' is problematic. The two are not necessarily connected. The availability of premises appropriate for independent retailers is a development, use class and rating issue. Encouraging and supporting all kinds of local producers is about promoting the town to producers, business support, training, and business-to-business services |
|  |  | 7.0, 8.0 & 9.0 | Has offered support for these sections |
| Ian Pearce  Frome Town Football Club | 38 | 7.0 River corridor & POS  General comment | I must admit for a document that is for the long term development of the town itself it was disappointing that there was no mention within the document about the role sport plays within the town. Development of sporting facilities for varying clubs I thought may well have been included as there is a chronic shortfall of availability for many sports – especially our own interests of football. The young people of the town, who are the town’s future, are currently woefully uncatered for in terms of fitness and sport (so much so that our own under 18’s are now training on a quarter of a pitch with 20/30 young adults!!). For too long sport in the town has been overlooked |
| The Coal Authority | 39 | All Sections | Frome is outside of the defined coalfield and therefore The Coal Authority has no specific comments to make |
| Peter Macfadyen | 40 | 3.0 Vision & Core Objectives | Front cover – can it show the period of the plan i.e. 2014 - 2028 |
|  |  | Section 1.0 | Supports with modifications.  Forward change Frome community energy company to co-op |
|  |  | Section 2.3 | Supports with modifications “local” in twice in first sentence twice |
|  |  | Section 3.1 | a)Should name the Carnival  b)Can we state population & household numbers on background |
|  |  | Section 3.2  VC01 | Can we strengthen recommendations from “appropriate” – or define what this means |
|  |  | 4.0 Housing  General comment | Supports with modifications.  a)Page 14 needs darker print – true of other pages as well  b) 4.4 – is the 70.% increase correct, seems very high  c) I worry that there is not enough ref to the need for more linkage to more shops, schools etc… how does all this housing get serviced? |
|  |  | 5.0 Business & Employment  General comment | a)Table on page 21 – rationale for grading?  b)BTD now has a new name (in table & Text)  c)Police station, TH Whites, BTD have applications/consents, should the figures be adjusted (1.6ha or more less) |
|  |  | Section 5.2 | Would be good to know the current employment |
|  |  | Section 5.3 | Frome Energy Co is Coop and is supported by not in partnership with |
|  |  | Section 5.4  BE3 | Priority to one planet living applications? First come first serve? How will that work? |
|  |  | 6.0 Town Centre  General comment | Supports with modifications  a)What are comparison goods?  b)Cheap Street needs a mention, and why not ban A Borads? |
|  |  | Section 6.2 | a)We need to relax laws  b)last point doesn’t make sense…. or needs more explanation….homeworking & cycles/showers |
|  |  | Section 6.3  Policy TC2 | TC2 something about “affordable” – we risk gentrification  This is not a restaurant quarter |
|  |  | Section 6.3  Policy TC5 | I have no idea how you will reconcile this with the Frontier application if this get to decision before Frontier |
|  |  | 7.0 River Corridor & POS  POS1 | Supports with modifications:  Also a really important corridor of biodiversity |
|  |  | 7.0 River Corridor & POS  POS2 | What’s the Neighbourhood Park? |
|  |  | 7.0 River Corridor & POS  POS3 | ‘priority site’ – how decided? Actually came from working party, might be worth showing another layer of public engagement in the process |
|  |  | 8.0 Transport | Supports with comment:  Page 38 Architects picture shows tree older than plan period |
|  |  | 9.0 Design  General comment | Pictures on page 43 too dark, surely there is a better picture of St John’s |
|  |  | 9.0 Design  Policy D4 | Better if the council always decide where and council should decide species otherwise could be a real mess |
| Mr Roger Bremson | 41 | 3.0 Vision & Core Objectives  General comment | Supports with modifications:  a)Frome has plenty of trees already, most of which lack proper maintenance. The planting of trees is an easy way for politicians to grandstand themselves without making provisions for future costs.  b)I would like to see existing allotments at ‘other Rodden Meadow’ brought back to use |
|  |  | 4.0 Housing  General comment | Supports with modifications:  Frome desperately needs a central multi storey car park (or two) and a central police station & ambulance station. I fundamentally oppose the use of Saxonvale area for housing. Shops and small businesses need this space. My late father was the 1st employee of knots industries and walked to work his whole life. Housing to the Mount instead. |
|  |  | 5.0 Business & Employment | a)Protection of employment land at BT&D and TH white required immediately.  b)Notts & Beswicks sites, if not a multi storey car park should be protected for employment land. Lower car dependency means walk to work employment. |
|  |  | 6.0 Town Centre  Section 6.3 – TC1 | Option 3 is the same tires old gentrification/pedestrianisation model which has ruined so many other places. A pointless waste of public funds. Extending the cobbling which will only be patched with tarmac  (this is a summary of the response see hard copy for full comment) |
|  |  | 7.0 River Corridor & POS  POS2 | Build a wide cycle path from ASDA to lower Innox beside the Frome (not cobbled). Protect Fromefield form further encroachment.  (this is a summary of the response see hard copy for full comment) |
|  |  | 8.0 Transport  General comment | Supports with modifications:  a)Renew vehicular bridge (repeatedly promised) into Cattle Market yard in place of footbridge.  b)Calm the traffic with lights – controlled crossings.  c)Desperate need for increase in car parking |
|  |  | 9.0 Design  General comment | a)Cobbled pavements to be listed. All cobbled areas to be brought under control of FTC.  b)Street furniture, Cockey Lamps & iron street name-signs.  c)Enforce Liseted building maintenance standards.  d)Listed status for Victoria Hospital |
| Jo Hanstead | 42 | 3.0 Vision & Core Objectives  VC03 | I am pleased that one planet living is central to the Neighbourhood Plan. How will you make sure that developers deliver on community facilities, links, access, good mix on site.  (this is a summary of the response – see hard copy for full response) |
|  |  | 4.0 Housing  Policy H4 | I support self-build & community housing being enshrined in the Neighbourhood Plan. Model housing/communities will be an asset to the whole town, and can provide vision and learning for the whole town. |
|  |  | 5.0 Business & Employment  General comment | a)2700 jobs ( a large supermarket won’t do this)  b) support for local agriculture initiatives could be part of this and would support self-sufficiency and low food mile etc. |
|  |  | 6.0 Town Centre  General comment | a)I agree we should restrict car use in daily life, but realistically I think Frome business would be better supported if there was free parking for ½ or 1 hour. This could be arranged if you had pay on exit.  b)Saxonvale – care needs to be taken so that reprioritising traffic does not mean some of the small or residential roads become too full |
|  |  | 7.0 River Corridor & POS  General comment | A river corridor will strongly support Frome remaining the 6th coolest place to live. It only lacks the sea! |
|  |  | 8.0 Transport | A more evenly distributed bus service would support the aims of the Neighbourhood plan |
| Christine O’Keeffe | 43 | All Sections | Has indicated support for all sections – with additional comments of support (see hard copy for full response) |
| Chris Smaje | 44 | 3.0 Vision & Core Objectives  General comment | I strongly support your core vision but I’d like to see you carry through some of the implications more fully in the subsequent sections. You emphasise ‘local & sustainable food’ and ‘diversity of trade & employment’ but your subsequent analysis of local food basically amounts only to domestic production within the town. I’d like to see you make a stronger commitment to engaging with the productive possibilities of the town’s rural surroundings for sustainable food production. As a local market gardener with my employment site just outside Frome but with all of my customers within your jurisdiction, I’ve had a hard fight with Mendip DC for planning permission to make my business viable. It could be a great help if you made a stronger play for supporting local COMMERCIAL agricultural ventures in relation to you OPL goals(Continue on separate sheet if necessary) |
|  |  | 4.0 Housing | As per my comments above, it would be good if you specifically identified your support for people making genuine applications for residential dwellings in support of rural businesses, as provided for by Mendip DC’s policy DP13 in its draft plan. Mendip’s policy is OK on paper, if not ideal, but my experience in practice is that like many LAs it interprets it very restrictively. There won’t be much of the ‘local and sustainable food’ you’re seeking in Frome unless DP13 is interpreted sympathetically in the case of small, labour-intensive, sustainable and locally-oriented businesses. It would help if you made that point explicitly. Certainly, it dovetails with many of your other aims.  Also, there’s a potential conflict between protecting the historic character of housing and improving its environmental performance – some comments on that could be helpful. |
|  |  | 5.0 BUSINESS & EMPLOYMENT | Has indicated support with no comment |
|  |  | 6.0 THE TOWN CENTRE | Has indicated support with no comment |
|  |  | 7.0 RIVER CORRIDOR & POS | Has indicated support with no comment |
|  |  | 8.0 TRANSPORT | Has indicated support with no comment |
|  |  | 9.0 Design | The ‘clear intention to protect natural landscapes both within & surrounding the town’ is fine, but the devil is in interpreting what ‘protection’ means. This could easily become a NIMBY’s charter to prevent rural developments on the basis of a historically mistaken view that the ‘natural landscape’ is one devoid of people working in labour intensive agricultural industries. Again, some reference to the changing labour needs of the agricultural economy and the importance of supporting sustainable agricultural development, including residential development (see for example the recommendations in DEFRAs ‘Fruit and Vegetables Taskforce Report’) would be appropriate. |
| Highways Agency | 45 | 3.0 Vision & Core Objectives  VC03 | We note your intention that all future development in Frome will be informed by the principles of One Planet Living, as set by the charities Bioregional and the Worldwide Fund for Nature. The Agency welcomes this challenging objective. It is in line with OfT Circular 02/2013, and in particular paragraphs 28 to 32, which highlight the importance of travel plans and demand management. Paragraph 33 states that, in respect of proposed developments, only after travel plan and demand management measures have been fully explored and applied will capacity enhancement measures be considered. |
|  |  | 4.0 Housing  Policy H1 | The Agency has been engaged with Mendip District Council in its role as local planning authority relating to the preparation of the emerging Local Plan for the district. We have been able to support the principle of the scale of growth proposed in the Local Plan for Frome. Whilst I would not expect there to be any unresolvable impacts on the A36(T) from this scale of growth, developers will still need to provide sufficient transport evidence with planning applications to identify impacts on the trunk road. If impacts are severe, developers may be required to fund works to mitigate the impact.  Policy H1, as drafted, appears to support any proposal that addresses current and future housing need within the plan period (2006-2028) in the plan area, without any caveats. The Agency is concerned that this policy as currently drafted may:  • cause the neighbourhood plan to not be in conformity with the local plan, in terms of scale of development; and  • not identify instances when other planning factors could make the housing development unacceptable (which would arise from their transport or environment impacts, for example).  Whilst the Agency is supportive of growth and meeting housing needs, the impact of this policy on transport infrastructure cannot be quantified unless a the number of dwellings (or a range of dwellings between upper and lower limits) is established. Without this information, the Agency is unable to say whether a larger amount of development would require improvements to junctions on the trunk road, for example. It should be pointed out that the transport impacts forecast to arise from a larger amount of development than that set out in the emerging local plan will not have been tested by the County Council or Highways Agency.  Reference is made in Appendix B to an objective of supporting plans for the development of a  further 1000 new homes within the Plan period (i.e by 2028). Is this the amount of development which Policy H1 is seeking to support and thus reflecting the emerging local plan? If this is the case then this and 'new homes' should be defined.  The Agency therefore considers that the policy should be re-drafted to be clear about the number of dwellings that are proposed for Frome during the neighbourhood plan period. If the number of dwellings is greater than proposed in the emerging Local Plan then the Agency would need to see the transport impacts of that amount of development on the A36(T) assessed to an appropriate degree before it can form a definitive view on its acceptability. Failing this, in the absence of an assessment of the transport impact likely to arise from higher (than local plan) numbers of dwellings, then the policy should outline the approach and issues that will need to be addressed by development proposals which would exceeding the quantum currently expected. |
|  |  | 4.0 Housing  Policy H4 | At present the local plan (still in preparation) intends that Frome will accommodate  2,300 dwellings during the plan period and sufficient employment development to generate 2,700 jobs over the same period. We note that planning permission has been granted for 1,300 of these 2,300 dwellings. Your draft plan mentions that the bulk of the remaining 1,000 dwellings will be on two major sites as follows:  • Saxonvale, situated in the town centre and subject to an adopted development brief;  and  • Southfield Farm, situated to the east of the town, allocated in the adopted District Local Plan 2002-2011, with the intention for the allocation to be rolled forward into the emerging plan  These sites have been brought forward from previous plans and the Agency is satisfied that the principle of development on them is appropriate and well-established. Planning applicants seeking to develop the sites will still need to undertake transport assessment to identify the transport impacts arising from them, and mitigation schemes, if required, in line with draft local plan policy DP9. |
|  |  | 5.0 Business & Employment  Policy BE1 | BE1 Supply of Suitable Land & Buildings  The Agency notes the intention of the district and town councils to identify and allocate an additional 5ha of employment land during the plan period. Greater clarity is required on this, as follows:  •Is the 5ha intended to be additional to the employment land set out in the emerging local plan?  • The 5ha does not appear to have been allocated or identified on the map on p21. How and when will the identification process be undertaken?  •Much of the employment land in the emerging local plan identified to meet Frome's needs during the plan period is at Commerce Park, which falls outside of your parish and .in neighbouring Berkley. The fact that this land does not form part of the neighbourhood plan is not clear in the text or on the map on p21 and should be spelled out clearly in both. |
|  |  | 8.0 Transport  Policy T1 & T2 | The Agency welcomes draft policies T1 (Integrated Transport Strategy) and T2 (Travel  Plans). |
| Wessex Water | 46 | 3.0 Vision & Core Objectives  VC03 | New development will be served by separate system of drainage provided by the developer to adoptable standards in accordance with the Water Industry Act 1991. Agreement, as necessary, will be required between Wessex Water and the developer where downstream capacity improvements are necessary to accommodate development flows.  The submitted Mendip Core Strategy (Infrastructure Delivery Plan Nov 2013) supports these arrangements in 3.25: Development schemes will need to demonstrate satisfactory proposals for foul and surface water drainage. This is normally secured through a requirement for a drainage strategy as part of an application or developed during masterplanning….  The draft Neighbourhood Plan supports the principle within VCO03 “Sustainability”; sustainable water; Using water efficiently and taking measures to prevent local flooding and pollution.  We support these principles and encourage continued consultation with Wessex Water to ensure early consideration of drainage strategy for new developments. |
| Network Rail | 47 | General response | Noted receipt – no further comment received |
| English Heritage | 48 | General response | We are pleased to see that the draft Plan is well informed by an understanding of the heritage interest of Frome and that its protection and enhancement form part of the document’s objectives. |
|  |  | 9.0 Design  Policy D1 | We note that much of the evidence on the town’s historic environment and the identification of the issues and aspirations associated with it derive from the Town Design Statement which in turn has been informed by the conservation area appraisal and management plan. While this has been used to underpin policy D1 explicitly we would encourage consideration of whether this provision in isolation and the source of evidence on which it is based is sufficient to protect and enhance the historic character of Frome and its impressive estate of heritage assets generally. |
|  |  | 4.0 Housing  Policy H6 | Such consideration would be particularly useful given the range of intended development scenarios which the Plan identifies throughout the town, and the prevailing absence of the stated need to protect and enhance relevant aspects of local historic character as a specific provision or qualification within relevant policies. We would want to ensure that selected development sites which may affect heritage assets – positively or negatively - have taken account of such impact and tested their suitability against appropriate sustainability criteria. As an example, policy H6 caters for the natural but makes no mention of the historic environment. |
|  |  | General comment | The identification of issues as opportunities for enhancement and tackling aspects of any local Heritage At Risk can also inform the preparation of the CIL and may highlight potential areas of investment beyond the public realm and traffic management proposals which the Plan contains. |
| Keep Frome Local | 49 | 3.0 Vision & Core Objectives | The "Three Golden Threads" are a fine trio of principles, setting a high bar for the evolution of our town. The underlying community-building spirit that runs throughout the proposed Neighbourhood Plan (NP) is a good fit with KFL's aspirations for Frome. KFL also thinks the Vision and Objectives can easily be used to refresh the Saxonvale Brief and be used to benchmark planning applications. |
|  |  | 4.0 Housing | The overall aspiration for a good quality mix of housing reflecting future needs is good. An additional aspiration that KFL would like to see is that new developments are ‘tenure blind’ – i.e. by looking at property it should not be possible to tell if the house is owner occupied, private rented or public rented.  KFL does not believe that the Policies to achieve this in the NP are at present robust enough to ensure the aspirations can be delivered. |
|  |  | 4.0 Housing  Policy H2 | Policy H2 –“Planning applications for 10 or more homes should explain in their submission how they:  - Address affordable housing need and housing demand.”  We would prefer: “Planning applications for all houses need to demonstrate how they contribute in numerical terms to meeting Frome’s housing demands but specifically how they address the need for affordable homes (low cost market, shared ownership, social rented and self build) New homes proposals should be of a size that meets local need and be built to Lifetime Homes standards to help ensure adaptability to an ageing population. Proposals for developments of more than 10 homes will be obliged to make formal provision for social rented houses at a percentage level to be set out in the emerging MDC Local Plan”. |
|  |  | 4.0 Housing  Policy H3 | H3 requires compliance with the Town Design Statement. Whilst this is generally OK it could diminish creativity in design. KFL therefore would prefer the statement to seek compliance with the Town Design Statement, however where it doesn’t, it should provide a justifiable architectural statement to support its variance.  The Town Design Statement needs to be part of this Neighbourhood Plan and/or be adopted by Mendip District Council as a material planning consideration. |
|  |  | 4.0 Housing  Policy H4 | a)KFL is pleased to see Saxonvale confirmed as a major opportunity to deliver a significant number of homes built to the highest standard. We must make the obvious point, not spelled out in the NP, that land available for dwellings at Saxonvale will be limited by land allocated for other uses and in particular for a supermarket and attendant delivery and parking areas.  We urge FTC to specify at this point in the NP the number of dwellings to be delivered at Saxonvale, as has been done for Southfields Farm ("around 400"). This should be based upon robust estimates for deliverable housing densities. At present the numbers for Saxonvale appear optimistic in view of previous applications and relies heavily on an updated Planning Brief without itself setting out a detail of housing types and styles.  b)Further, we argue against greenfield incursion at "a contingency site to the South of The Mount" (as suggested by Mendip District Council) as this could be used to excuse developer plans for fewer homes at Saxonvale. An additional policy is required to protect Frome being held to ransom by developers who could delay development of core sites as a means of demonstrating non-delivery and increase pressure for new Greenfield site. An additional policy along the following lines is sought:  “H4a – The NP will not seek to endorse any future development of Frome for housing until Saxonvale has been comprehensively developed for a mix of uses and Southfields Farm has also been developed. Delivery of these planned sites is crucial to how the town will grow and the Town Council and District Council will seek to use its Statutory Powers to ensure delivery of these sites before further expansion of the urban areas for housing” |
|  |  | 5.0 Business and Employment | a)There is no allocation of commercial or office use in Saxonvale – missed off both the map and analysis and yet KFL maintains this kind of use within Saxonvale will benefit the Town Centre.  Edge of town 'office parks' can be low density with extravagant landscaping and can be wasteful of greenfield land. Periodic bus services notwithstanding, travel to and from these locations is largely dominated by the car. Few people are seen out and about at such locations so they lack vitality. Whilst the ambition is good to increase employment uses in Frome the NP needs to be more robust in the overall layout and mix of these places along the following lines;  b)“Employment space should be planned in such a way that the mix of uses is controlled and the balance between employment in B1, B2 and B8 uses is strictly controlled to prevent quasi retail and hospitality uses being used and justified as being employment and in creating jobs. New employment spaces need to create ‘destinations’ of character and ‘place’ that give them distinctiveness, promote collaboration and interaction between businesses and which promote ‘value’ as a consequence in the long term.”  c) KFL argues that mixed development at Saxonvale, skilfully planned, could provide much of the perceived need for employment space within the town centre. The workforce, with access to local amenities would contribute to the vitality and sustainability of the town centre, rather than fuelling the competing retail development on the outskirts. |
|  |  | 5.0 Business and Employment  General comment | KFL would like to see the engagement, upskilling and re-skilling of Frome’s population to be able to compete for local jobs and reduce the amount of travel needed out of and into Frome. As a consequence KFL calls for an additional policy in the Business and Employment Section.  “All new developments of a scale of 5 houses or 1000 sq ft or more of commercial floorspace must be accompanied by a Skills and Training Plan. This must demonstrate how during construction apprentices will be engaged, a commitment to engage someone currently unemployed and on-site training opportunities will be given to ensure that the whole workforce gains additional creditable skills throughout the life of the development. The amount of apprentices etc. shall be in accordance with Construction Industry Training Board (CITB) guidance as a minimum. Planning proposals without this will be refused.”  KFL encourages a much greater collaboration between the college, schools, employers, work programme providers and Job Centre Plus in developing a skills plan for Frome that shows how future business needs will be met and prepared for by local training providers. |
|  |  | Town Centre  Specifically Saxonvale  Policy TC | We agree with all of the Key Objectives listed in section 6.2 and because the positive re-development of Saxonvale is KFL's primary focus we are particularly encouraged to read bullet point 5, "To promote a comprehensive and sustainable regeneration plan for Saxonvale".  KFL’s interpretation of "comprehensive and sustainable regeneration" is strongly influenced by Mendip District Council's 2005 (confirmed 2009) Planning Brief for Garsdale Saxonvale. This Brief strongly favours a whole site plan for Saxonvale in order to resist incompatible schemes from different developers that fail to deliver overall gains for the town.  KFL argues with the NP's assertion that Saxonvale, having "lain idle for many years" is of widespread public concern. Having consulted extensively, KFL finds that most Frome residents are unaware even of Saxonvale’s exact location and are more concerned to see a high quality development there than an early one.  Saxonvale is largely visible only when actually on the site, it is not an eyesore in need of urgent action. KFL urges FTC to take its time to get Frome's last major regeneration opportunity right and not to be rushed by developers whose plans are neither comprehensive nor sustainable and are actually driven by landowners price aspirations and out of town developers profit requirements.  KFL supports the NP comment "Plans for the redevelopment of Saxonvale should seek to achieve the overall vision for the redevelopment of the site based on the 2005 Planning Brief”. KFL agrees wholeheartedly with this approach and it is good to see the figure of 300+ new energy efficient homes in Policy TC5. TC 5 needs to go further in specifying how movement and transport linkages within the site will be set out, most particularly in the case of development proposals for part of the area rather than the whole.  The riverside and tree covered area from the M+S Car Park to Rivers Reach is not identified as Open Space. This area is crucial in providing physical and visual links between Saxonvale and other parts of the Town Centre. There is some confusion between Public Open Space and Open Green Areas. TC 5 is largely silent on its approach to retail. KFL believes that Saxonvale requires leadership and should be driven not by the commercial aspirations of landowners but by what is right for Frome. A huge foodstore is not required nor does it provide a sufficient ‘destination’ development that will ensure long term economic growth. The NP should be more robust in resisting this and supporting community led regeneration of the site.  KFL, while supporting the spirit of Policy TC5, calls on Frome Town Council to specify the size and nature of retail that the Neighbourhood Plan envisages at Saxonvale.  KFL's concerns about an over-large supermarket as currently proposed on the Saxonvale site are many and varied. One of the key issues is that a dominant large supermarket would squeeze out opportunities for genuinely mixed development, reducing, for example, the space available for "an urban park alongside the river" to little more than a pathway and could sterilize land around the supermarket reducing the ability to provide other uses in the numbers and quality envisaged. It particularly reduces opportunities for overlooking of public spaces and vital night-time uses on the site to improve the economy and safety of the neighbourhood.  KFL asserts that if Saxonvale in its entirety is to truly become “an exemplar model of low impact and low carbon living” this must apply equally to all end users – artisan, business, creative, hotel, housing, leisure and retail.  Policy TC5 places too much emphasis on “refreshing and redefining” the Planning Brief but if the neighbourhood plan retains this element it should include a timescale for undertaking this work. This also needs to be reflected in Mendip District Council’s Local Development Scheme (LDS) and programmed accordingly. KFL is concerned that too much reliance is placed on this process when the NP itself could be a much clearer voice and policy framework for how that site should be developed. KFL feel there is a risk in asking the town to vote on a plan, as a plan, which says it will come up with a plan at some point. |
|  |  | 9.0 Design | a)Saxonvale should be included as a Gateway site. As a town centre car park and arrival point it is a Gateway to the Town Centre and should be a key role for the site.  b)The tree planting aspirations in D4 are overly ambitious and when considering how this would be implemented for Saxonvale it should be included in any reviewed Planning Brief. This number of trees (c1500) would reduce overall site density or require extensive off site provision, which in itself may further complicate delivery of this development. |
| Alder King on behalf of Hallam Land Management Ltd | 50 | 4.0 Housing  Policy H1 | A fundamental requirement of the Framework is to 'boost significantly the supply of housing' (the Framework, para 47). On this basis Hallam Land are supportive of the proactive approach the Town Council are adopting to address the serious issue of housing need. |
|  |  | 4.0 Housing  Policy H4 | This policy currently requires that for proposals over 100 units developers set out a Management Plan detailing how members of that community will interact with each other and the wider Frome population. Planning centres on managing the use of land and not the management of social interactions. The Framework recognises that social cohesion should be achieved through the delivery of a highly accessible and a quality built environment and states that the purpose of the planning system should be on: ' ...supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of the present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's need and support its health, social and cultural well-being; (the Framework, para 7).  3.4 Further, aside from the fact that a Management Plan as envisaged by the FNP is not required by Mendip District Council to support major planning applications, it is also not considered that the content or requirements of such a document could be delivered. Regulation 122 of The Community Infrastructure Levy Regulations (2010) ('CIL Regs'), amongst other things, requires any planning obligation to be, 'necessary to make the development acceptable in planning terms' therefore given that any Management Plan would fall beyond the scope of the planning system any requirements contained therein would fail the requirements of the CIL Regs and be rendered unlawful.  3.5 Whilst the aspiration to build sustainable communities and foster community cohesion is admirable, such an aspiration should be delivered through adherence to development policy within the framework of the planning system. Accordingly it is considered that references to the need for a community Management Plan should be deleted from the policy and supporting text in their entirety.  3.6 Policy H4 as well as the supporting text makes reference to "the wider Frome population".  The extent of the 'wider Frome population' and who it is intended to include is has not been clearly defined. Whilst deletion of this reference within Policy H4 is recommended, it is considered important that this term is clearly defined so that there is clarity in any resultant policy.  3.7 It is noted that the fourth criterion of this policy includes a requirement that any proposed development at Southfield Farm must include a pedestrian link across the river to Adderwell. Firstly, the existing adopted local plan allocation does not require this pedestrian crossing. Secondly, whilst the emerging local plan allocation states that footpath links crossing both the river and railway are required, this has been queried in earlier representations to the emerging local plan. In these previous representations it was highlighted that the need for such links (including the requisite footbridge) is not identified within the Council's Infrastructure and Delivery Plan, which therefore raises questions as to the need for such infrastructure. It was also highlighted that this pedestrian crossing may not be deliverable so the representation suggested that in the first instance, delivery should be explored as part of the technical investigations to support a planning application.  3.8 The ability to deliver pedestrian crossings over the railway and river has been explored as part of the application, however it has been demonstrated that in the first instance such connectivity is not required. A Walking Route Plan has been submitted as part of the application (see Appendix 2) which demonstrates that a link over the river via Adderwell to the Town Centre would in fact take a similar time to walk and is of a similar distance to the current proposed walking route through the site which meets up with existing pedestrian and cycle ways. Furthermore, a cycle route completing the national cycle route 24 will also be delivered as part of the development.  3.9 It should also be noted that the practicalities associated with the delivery of a footbridge are likely to render the development undeliverable. Due to the topography of the site construction would be difficult and costly. It would involve complicated negotiations with third parties and other landowners. This would significantly delay or altogether prohibit delivery of the development which would be contrary to the Framework.  3.10 Hallam Land are firmly of the view that a pedestrian link across the river and railway is unnecessary. There is currently no need for such a link and there has been no change in circumstances to justify this requirement. Therefore any references to the need for this pedestrian link should be deleted. The FNP recognises the importance of opening up the River Frome corridor for amenity and wildlife benefits, which is an approach that is supported, and is a strategic objective that should be the focus of any river corridor strategy. The planning application proposes opening up the river corridor, delivering 6ha of green infrastructure and recreation space as well as creating pedestrian links through the site to connect to existing footways to the town centre.  3.11 The final criterion of policy H4 requires that 5% of total housing is allocated for self-build and custom build projects. It is considered that this specific requirement does not conform to either the existing or emerging local plan allocation policies. If there is demand for self-build housing, then its delivery could be secured under the provisions of the policy's third criterion which requires the delivery of a variety of housing, or alternatively under the provision of policy H6. For these reasons this criterion should be deleted.  3.12 Accordingly Policy H4 should be amended as follows:  Any planning application development which, as a whole or by the sum of parts prO'Iides proposes over 100 houses shall be regarded at a community development, and as such developers will be required to set out a management plan detailing how members of that community will interact with each other and the wider Frome population.  Planning applications will be expected to include:  • A clear statement of the intended composition of the proposed community and a future asset management plan.  • A Clear and deliverable objectives in terms of meeting the town's sustainable objectives of One Planet Living (as outlined in VC03 of this Plan).  • A variety of housing in terms of size, form and tenures including provision for home-working.  • A statement on access and integration that shall include pedestrian and cycle links between proposed development and the existing town centre. community and neighbourhood facilities. (In the case of Southfield Farm, this must include a pedestrian link across the river to Adderwell).  • Provision for serviced plots to be made available for self build or custom build housing\*1 equivalent in number to at least 5% of the total housing numbers.    \*1 (as defined as a development where the future owner or occupier has a direct or indirect influence on the design, planning and construction of the property.)  4 CONCLUSION  4.1 The legislative requirement for neighbourhood plans is that they should conform with national and local planning policy. In its current iteration, some policy requirements, especially with respect to policy H4- delivering major projects fall outside of the parameters of the planning system, do not reflect national planning policy and also that contained within the adopted and emerging Development Plan.  4.2 Hallam Land recognises and endorses the work undertaken by Frome Town Council in producing the FNP. It is clear that the Town Council wish to ensure that sustainable development is delivered at Frome, which is a shared aspiration of Hallam Land, as evidenced by the works currently being undertaken as part of the Southfield Farm planning application.  4.3 It is considered that the suggested amendments to the draft policy will assist in producing a more balanced and ultimately robust neighbourhood plan which will help deliver the strategic vision of both the emerging local plan and also Frome Town Council. |
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**Separate Section**

Add Corrections picked up in plan

Add comments from John Sneddon

Add comments from David Parkes

NEIGHBOURHOOD PLAN - EDITORIALS

Page 17 - 4.4. H4.

- Typo - second para 3rd line “use” not “us”.

- In the shaded box last bullet and note, just use the asterisk as the figure “1” is

unnecessary and a bit confusing.

Page 18 - 4.4. H5. and many other places in the Plan

- 5th para. Delete “Vision for”, see earlier comment on the Planʼs title and the V4F role.

Page 20 - 5.1.

- 2nd para, line 4 - delete the first “is”.

- 4th para, lines 5/6 - delete the second “in”.

Page 29.6.3. Policy Box. 4th bullet, “of” should read “or”.

Page 39. Second Policy Box T2. Should there be a “than” before ʼ10 units”?

Page 44. Second Policy Box D4. First line - delete the first “be”.

Page 46.

- First column, last para “Beckington” not “Bickington”.

- Second column, subpara 1. “One Planet” not “Plant”.

Page 47. First column. Last but one para. Insert “showed” between “Council” and “strong”.

Matrix

- General. Need a consistent title for the Frome Community Plan in the various “Evidence”

boxes.

- Page 48. 3.0. First “Policy” box.Delete “ofevidence”. Change “consultation” to

“participation? (see earlier comment).

- Page 49. 4.0. Last 2 Policy Boxes. Delete “1” see earlier comment.

- Page 51. 5.0. Last Policy Box. Delete “withcomply”.

- Page 55. 8.0. Last Policy box - insert “than” before “