

## Agenda Item 4

### For Decision - Mendip District Council Local Plan Part 2 consultation response

Author: Jane Llewellyn; Planning & Development Manager

#### Summary

The purpose of this report is to set out the recommendations of the Planning Advisory Group, and the reasoning behind them, in response the consultation on Part 2 of the Mendip District Local Plan.

#### Introduction

The Mendip District Local Plan Part I: Strategy and Policies was adopted December 2014. It provides an overarching framework for the future of the Mendip district to 2029 and comprises a long-term spatial vision, strategic objectives and spatial strategy. It also contains strategies for the principal towns and local development policies used to assess planning applications.

Part 2 of the Local Plan allocates additional sites for housing, employment and community facilities across Mendip. There are additional policies identifying local green spaces and existing employment sites. The plan contains a draft policy to promote self and custom build housing.

#### Housing, mixed-use and employment allocations

The consultation documents set out the change in planned housing growth by settlement compared with minimum requirements in the adopted Part I Plan. Frome is considered to be the most sustainable of the towns in Mendip, due to its transport links and has the highest level of growth reflecting the availability of preferred options and other sites. In Part 1 of the Local Plan the minimum requirement for Frome is 2300 dwellings. Part 2 proposes a further 640 dwellings, taking the total to 2776 dwellings.

The employment land requirement set out in Part 1 of the Local Plan is 20.02ha. Considering gains and losses to date and the proposed employment land allocations in Part 2, the total amount of employment land will be 23.72ha.

Part 2 of the plan proposes to allocate the following sites for development in Frome, the sites are shown on the plan attached at Appendix 1.

The inset plans and polices specific to each site are shown at Appendix 2 (if you would like a printed copy please request one).

- FR1 - Saxonvale (HELAA site FRO009) – mixed use
- FR2 - Land E and W. of Sandy's Hill Lane (HELAA site FRO152) – mixed use
- FR3 - Land at Keyford Field (HELAA site FRO001) - housing
- FR4 - Land South of Keyford Field (HELAA site FRO150a) - housing

- FR5 – Land East of The Mount (HELAA site FRO150) - housing
- FR6 - Land at Innox Hill (HELAA site FRO061) – self & custom-build housing
- FR7 - Land at Little Keyford (HELAA site FRO004) – self & custom-build housing
- FR8 - Marston Gate (HELAA site FRO012M) - employment

The Planning Advisory Group meeting on 22 January was attended by 50 people, mainly residents concerned about the allocation of sites at Innox Hill and Keyford. The meeting was also attended by Andre Sestini; Principal Planning Policy Officer for Mendip District Council, who provided advice on the Local Plan process and answers to specific questions relating to allocations.

The residents' concerns are set out below for the specific sites and have been taken into consideration in the recommendations for each site. The recommendations have also considered the response from Fair Housing for Frome who welcome the proposed increase in housing numbers and that the plan addresses the need for genuinely affordable housing, although they also have concerns about the delivery of affordable housing.

It is also important to remember that one of the key reasons for allocating sites for development is to enable the Local Planning Authority (i.e. Mendip) to demonstrate that there is a 5-year land supply for housing. If this cannot be demonstrated, the relevant policies for the supply of housing would not be considered up to date, could be challenged and overturned and the National Planning Policy Framework (NPPF) policy will then apply as the default planning policy.

The NPPF paragraph 14 contains the presumption in favour of sustainable development; this implies that sites that have not been allocated and are less suitable for development could be brought forward without specific conditions or policies to control the development.

The need for further growth in Frome could add pressure on to those brownfield sites within the town currently or last used for employment use to be redeveloped for housing. This could have an impact upon the vitality and viability of the town centre.

#### FR1 – Saxonvale

The site is 5.49ha of brownfield land, allocated for a mixed-use development. The proposed policies clearly set out the requirements for the redevelopment of the site, except for defining the upper levels of housing and employment. Representation was received at the PAG meeting from a business in the Silk Mill who feel that it should be more specific to ensure that there is sufficient business space within the development. The importance of car parking for the site was also raised.

Given the complexities and sensitivities of the site it was felt that a new masterplan for the site is needed, however, the masterplan does not have to wait for Part 2 to be adopted.

### Recommendation for FR1

Additional policies are required that:

- Clearly set out the percentage of land required for both housing and employment
- Identify the need for a car parking review of the town centre to ensure that there is adequate parking for the proposed development and the existing town centre businesses.
- Identify the need for an up to date Masterplan/Design Brief
- Pre-application advice from a Design Review Panel will be required

### FR2 - Land E and W. of Sandy's Hill Lane

The site is 12.4ha and an undeveloped area adjoining the Wessex Fields trading estate and extending further south adjoining Sainsbury's. It lies outside but adjacent to development limits. It is allocated for mixed use, including at least 4.5ha for employment use.

The Planning Advisory Group noted that this is the only area of land adjoining the existing Marston Trading Estate where the employment use could be extended, this combined with the lack of any other employment land coming forward, led to concern that the minimum amount of employment use is not enough.

There was also concern that the employment use class is not specified and if retail use is permitted this could significantly impact on the vitality of the town centre.

There was concern about the impact of additional traffic from additional employment and housing on the existing highway network around the lanes in the Keyford area and the Sainsburys roundabout.

### Recommendation for FR2 - Land E and W. of Sandy's Hill Lane

Development requirement 1. should be amended to allow for a greater area of employment use. A viability study should be carried out to determine the amount of housing that is required to make the employment element deliverable and to ensure the maximum amount of employment land is provided.

To ensure that the vitality of the town centre retail is not affected by further retail uses at the Marston Trading Estate, the employment should be restricted to B1 & B2 uses.

The site and the potential access routes are near the proposed housing sites FR3, FR4, FR5 & FR7, therefore there should be a requirement for these sites to have a masterplan approach.

*"A masterplan approach should be taken to provision of infrastructure for this and adjoining sites, including those east of the B3092", should also be included as a policy requirement for FR2.*

FR3 – Land at Keyford Field (HELAA site FRO001) - Housing  
FR4 - Land South of Keyford Field (HELAA site FRO150a) - Housing  
FR5 – Land East of The Mount (HELAA site FRO150) – Housing  
FR7 - Land at Little Keyford (HELAA site FRO004) – Self & Custom-build Housing

The above sites were considered as one item for the discussion. Residents of the area raised concerns around flooding, the impact on the character of the area, the loss of prime agricultural land and the sustainability of the locations. Some residents did not feel that Frome needs any more houses. Another concern raised was that the plan has increased the allocation of housing numbers but not employment land allocation, to match the increase in housing numbers.

The Planning Advisory Group acknowledged that there is a need for more housing but noted that there needs to be a balance between housing and employment land to ensure that Frome does not become a dormitory town. Most of the issues raised by residents would have to be addressed at the planning application stage. However, to properly deal with the provision of infrastructure these sites, including FR2 (Sandys Hill Lane) would need to be analysed through a master planning process. The requirement for master planning is included for these sites, however, the quality of design is not addressed.

#### Recommendation for FR2, FR3, FR4, FR5 & FR7

The master planning for sites FR2, FR3, FR4, FR5 & FR7, should be comprehensive and include local design guidance. As these areas are currently undeveloped they were not included within the Frome Town Design Statement, adopted October 2015. The adoption of local design guidance is strongly advocated in the Housing White Paper.

#### FR6 - Land at Innox Hill (HELAA site FRO061) – self & custom-build housing

The site is 2.98ha and is on the edge of the built-up area. The site is being promoted for an exemplar scheme providing self-build plots, market housing with linked units in a business hub and market/affordable units to meet local needs.

The concerns of the Packsaddle residents were read out by a representative. A petition was signed by 400 people in 2015 opposing the development of the site.

Issues of concern raised included:

- Mendip's own sustainability report describes the site as unsuitable
- Housing will breach ridge line
- Distance to the designated school (Oakfield) is nearly 2 miles away
- No bus service
- Distance from the nearest shop at Fromefield
- Additional traffic along packsaddle (200 car users)
- Wildlife in field
- Flooding occurs at the lower end of the site

The text accompanying the proposed allocation states:

“The site is not a preferred option arising from the sustainability appraisal but the nearest alternative site (FROo05) may be needed to meet medium to long term educational needs in Frome. This site provides an opportunity to deliver self-build and address specific housing needs which meet objectives in the Frome Neighbourhood Plan. The allocation is also justified through local evidence and work undertaken by the Town Council to promote self-build and co-housing in Frome.

Highways comments, “There is an access option off Packsaddle Way. An access from Innox Hill is unlikely to be suitable.” Consideration needs to be given to the fact that this site will contribute to the aspirations of the Frome Neighbourhood Plan to provide self-build, co-housing, live work units and affordable housing. However, the sustainability and viability of the site is a concern”.

The allocation policies deal with the issue of the site’s sensitive location, site layout including building heights, habitat and drainage. All of which will be considered further at the planning application stage.

As the landowner is promoting the site and the scheme has been out to public consultation which includes a site layout and house types, an element of viability work must have been carried out”.

#### **Recommendation for FR6 Land at Innox Hill (HELAA site FROo61) – Self & Custom-build Housing**

The Town Council are concerned that the sloping nature of this site will make it difficult to develop and would not want to see a viability assessment that shows the affordable element of the scheme will not be achievable. The developer should have carried out some viability work to get to this stage of promoting the site. A viability assessment should be submitted and assessed by the District Council’s independent advisor before any allocation is made.

There are further concerns around the sustainability of the site, the policy requirements for the site should be strengthened to clearly set out how sustainability should be addressed, ensuring that a suitable transport plan is in place and possibly some services provided on site.

The Town Council needs assurance that the viability and sustainability issues can be addressed before this site can be supported for allocation.

#### **R8 - Marston Gate (HELAA site FROo12M) - Employment**

The site is 1.46ha and is on the edge of the built up area adjoining Sainsbury’s, south of the Marston trading estate. It adjoins but is outside development limits. It is at the extreme southern edge of the town and is distant from many facilities. The allocation also proposes an extension of the town development boundary.

This site already has a current outline consent for a family friendly public house. The PAG are concerned by the policy text in the allocation which advises: “The site has access onto Marston Road. The access point will need to meet highways standards on width and visibility. A right hand turn lane should be considered”.

This would require the road to be widened, if this cannot be achieved there is a danger that following the development of site FR2 (Sandys Hill Lane) the traffic generated by this site would put further pressure on the Sainsburys roundabout.

#### Recommendation -R8 - Marston Gate (HELAA site FRO012M) - Employment

Further thought should be given to the access for this site if it is not possible to meet the recommendations of the Highways Authority. Access to this site using the Sainsburys roundabout in conjunction with the additional traffic generated by the development of FR2 should be avoided.

#### Established and future Employment sites – New policy DP25

Part 2 of the plan proposes a new employment policy DP25, which is intended to give weight to maintaining an appropriate mix of job opportunities on individual sites and clusters of business premises. Maps of the sites for Frome are attached at Appendix 3

Established sites:

- Marston Trading Estate/ Wessex Fields
- Commerce Park
- Staplemead (north Frome)
- Vallis Way Trading Estate
- Former T H White site, Vallis Rd
- Frome Station

Future employment growth area:

- Land East of Commerce Park

#### Recommendation for Policy DP25

Frome Town Council supports the inclusion of Policy DP25 and the proposed sites. We would like the Welshmill Hub and the Silk Mill to be considered for inclusion as established sites both being clusters of business premises.

Whilst we welcome the future allocation of land at Commerce Park we would not want the area to be included in any future calculations for employment provision in Frome, due to its location and poor connectivity to the town. The units at Commerce Park serve a particular need providing large, expensive units. Frome Town Council's employment land survey indicates that there is demand for smaller cheaper units.

## Open Space – Local Green Spaces & DP16

The District Council has undertaken a review of all open spaces in the Part I Plan designated under Development Policy 2: Open Areas of Local Significance (OALS). Additional sites promoted through the consultation process were also assessed and a number of Local Green Spaces (LGS) have been designated across the district. The LGS designation offers a higher level of protection than an OALS. When Part 2 of the plan comes into force, the OALS designation will no longer exist. The LGS are shown on the map at Appendix 1.

Policy DP16 of the adopted Local Plan Part I covers open spaces and green infrastructure. These areas are identified on the adopted Local Plan Part I policies map. 12 additional recreation grounds have been identified as a result of consultation with Town and Parish Councils. Two additional sites in Frome have been designated under DP16:

- Feltham Lane playing fields
- Allotments, North Parade

As part of the consultation, various sites were put forward by FTC for inclusion as LGS and DP16. We have received a separate response from MDC detailing why not all the sites put forward have been designated, mostly because they did not meet the relevant criteria. However, it was noted that St Johns Church Yard had not been considered as it was not put forward.

At the PAG meeting a request was made by Simon Keyes on behalf of Friends of the River Frome, that the area of Green Space between Wallbridge and Adderwell is considered for designation as a LGS. Simon has agreed to help provide a proposal for why the site should be designated (plan to be provided).

As part of Policy DP16 relating to open spaces, recreation spaces and spaces used for sporting activity, the District Council is preparing a strategy for play and sporting provision. The recommendation below responds to the proposed strategy.

### **Recommendation: Open Space – Local Green Spaces & DP16**

FTC are pleased to see 23 green spaces in Frome proposed for designation as Local Green Spaces. We request that the area of green space between Wallbridge and Adderwell is also considered for designation, a proposal to support its designation will be submitted. St Johns Church yard should also be assessed for designation to be consistent with the designation of all the other churchyards in Frome.

We would ask that both Egford Lane playing fields and the former Broadway Allotments are reconsidered for designations as a LGS, proposals will be submitted to support their designation.

We are concerned that the Local Plan Part 2 is being consulted on without a play and sporting provision strategy being in place. Frome has an active Sports Forum which meets regularly and has identified a lack of indoor and outdoor sporting facilities for several years now. Members of the Forum are very proactive and keen to see this situation improved. We would therefore urge that green spaces are protected for play and that further spaces are identified that can be used for the development of new facilities. As Frome continues to grow and expand, and the knowledge and awareness of the population increases in terms of the positive impact sport and physical activity has on their physical and mental health and wellbeing, there will be a need for any new housing developments to include provision of outdoor spaces and sports facilities that enable them to engage in these activities.

### **Self & Custom-Build Housing – New Policy DP24 Single-plot Exception Sites for Self & Custom-Build**

There is an exception to normal policy for the provision of housing set out in Core Policies 1 and 2, e.g. permission may be granted for single affordable self-build and custom build dwellings in locations adjoining rural settlements.

The Frome Neighbourhood Plan includes an exception policy for Community Housing, including Self & Custom Build sites. The proposed policy DP24, appears to only make provision for Village locations.

### **Recommendation - Self & Custom-Build Housing – New Policy DP24**

The proposed policy DP24 should be clarified as the wording “locations adjoin rural settlements” implies that this will only apply in village locations. It is equally important that self-build opportunities apply to the towns as well.