

Agenda Item 3

For Decision: Saxonvale formal planning consultation response

Author: Jane Llewellyn; Planning & Development Manager

Summary

This report sets out the town council's formal response to the outline planning application for Saxonvale, Frome.

This response takes into account the town council's position statement agreed by councillors at Town Matters Committee on 19/09/17, previous pre-application consultation responses and feedback from the public meeting on 13 June 2019.

Whilst it is positive that a comprehensive scheme has come forward that would deliver a range of uses, it is recommended that FTC objects to the application for the following reasons:

- The lack of commercial space proposed at 4,181m² (45,000ft²). We have previously stated we would want to see as close as possible to 7432m² (80,000ft²) provided.
- The access arrangements and the spine road would cause a barrier to pedestrian permeability and divide the site into residential and commercial zones.
- The pedestrian bridge across to Willow Vale needs to be included in the access arrangements and agreed at the outline stage.
- The traffic assessment and the surveys carried out are not adequate and there is concern over the assumptions made by the assessment.
- The amount of affordable housing to be provided needs to be clarified with a minimum of 30% provided, including social rented and shared equity housing.

It is recommended that MDC are requested to reduce their profit from the sale of the land to enable more commercial space and affordable housing. We ask that the scheme is submitted to a Design Review Panel to help improve the quality of the scheme. We are also requesting a further meeting with Acorn and MDC to discuss S106 agreement contributions.

Background

This is an outline application with some matters reserved; the only matter that will be approved at this stage is access. Then subsequent reserved matters applications will be required to approve the detail such as landscaping, layout, appearance and scale.

The illustrative masterplan shows the access to the site (to be approved now) and how the scheme could be laid out. In addition to this the developers have also produced some "parameter plans." These will set the key principles and parameters of any outline planning permission that is granted, and conditions will be used to ensure any reserved matters applications are in line with those plans.

The parameter plans submitted cover:–

- Building heights
- Public realm
- Disposition of uses – sets out the commercial, residential, key public open spaces, live work and café areas
- Building line position (the distance between new dwellings and existing dwellings (Fishers Brook & Silk Mill))
- Demolition plan
- Parking plan

All the other information in the design and access statement that shows how things could look is illustrative only and not for approval. The response below concentrates on the detail of the application to be considered at this outline stage.

Application description

Application for Outline Planning Permission with some matters reserved for the Retention of the 'Western Warehouse' and attached infill buildings, demolition of other existing buildings and mixed-use development for residential dwellings (C3) including flexible live/work accommodation, residential care accommodation (C2) and mixed workspace/retail/cafe/restaurant/bar/public/house/community/cultural/leisure uses (B1, A1, A3, A4, D1, D2), including an element of flexible use, and associated infrastructure, with details of access.

Formal Consultation Response

We are pleased to see that a positive and comprehensive plan has come forward for the redevelopment of Saxonvale following all of the pre-application discussion and meetings. We support the fact that the proposals make provision for a mix of commercial, cultural and residential uses. However, we have the following objections to the application.

Objections

Residential/Commercial Mix

The disposition of uses parameter plan shows that there will be 4,181m² (45,000ft²) of non-residential floor space, 27,000 for office space and 18,000 for other uses including workspace and cultural uses. The town council's response to the pre-application consultation on 7/03/19 stated the site should deliver as close as possible to 7432m² (80,000ft²) of non-residential floor space.

Saxonvale is designated in the Local Plan as a Town Centre site. Policy CP6 sets out various allocations for town centre uses, including 5,760m² (62,000 ft²) of B1 (office) space and at least 6968m² (75,000 ft²) of non-food retail. This designation includes the Westway Centre. However it is difficult to see how any further development will take place there. Even allowing for a reduction in retail demand, the current proposals do not provide enough commercial and non-residential workspace. We need to defend the long-standing employment use at the Saxonvale site against the implied priority given to housing in the government's National Planning Policy Framework.

The current Mendip District Local Plan states that Frome needs to create 2700 new jobs by 2029, 850-900 of these jobs are allocated in the Local Plan to Frome Town Centre. That

means that Saxonvale has to provide most of this employment land. The current application appears to only allocate enough land for 300 jobs; this is a net loss of 550-600 jobs. Therefore, it is crucial that the maximum amount of workspace is provided, and the balance of the land use is adjusted to achieve this.

Saxonvale should be developed as a dynamic mixed-use scheme avoiding segregated zoning for residential and commercial. This is more appropriate for town centre development and very much in line with the historic use pattern of Frome. We do not feel that the current proposal delivers this.

Live-work and flexible uses will help deliver more non-residential floor space and integrate the residential and commercial areas, meeting the aim for mixed use dynamic streets like the existing town centre streets. Page 52 of the Design & Access statement sets out the benefits of flexible units and how they could work within the Saxonvale development, by allowing the users to decide how they use the properties that will have active frontages at street level.

Figure 16.11 in the Design & Access Statement shows a potential zone for the flexible units outlining the active frontages in orange. These flexible uses are a key part of the development and should be identified on the disposition of uses parameter plan, to ensure that they are set as a key principle at the outline stage. The amount of live-work and flexible uses should be significantly expanded from the amount currently proposed. They could also contribute to the reduction of car ownership and the need to travel.

The provision of cultural and community space is also key to the success of this mixed-use scheme, therefore more certainty is required to ensure that this is delivered. The Weston Warehouse should be identified for this use on the disposition of uses parameter plan, to ensure that it is set as a key principle at the outline stage.

Access

The current masterplan divides the site into zones for residential and commercial and is not conducive to permeability for people and living streets. The current proposal for the spine road coincides with the primary walking route from the commercial area to the more residential.

This presents a perceived barrier to pedestrian permeability and provision needs to be made for suitable pedestrian crossing points. The street at this point would be far better conceived as a mixed-use street with a dynamic mix of residential and commercial, drawing people beyond the limits of the commercial area. The street could be a lively interesting area both day and evening similar to Catherine Hill or Cheap Street rather than a street divided by traffic movement such as the existing Market Place.

One of the key drivers of the Masterplan is the integration of Saxonvale with the existing town centre. Page 23 of the Design and Access Statement sets out the importance of pedestrian and cycle permeability. None of this is disputed and that is why the provision of a bridge across to Willow Vale, that links up with the existing cycle path network and the town centre is so important to the successful development of Saxonvale.

The Somerset Ecology Officer has raised concern that the bridge will only be acceptable if its design does not interfere with the Bats and other wildlife in the area. This means if a suitable bridge cannot be provided this would have a huge impact on the accessibility and permeability of the site and may require a redesign on the layout. The bridge is a key element of the development particularly in relation to the riverside open space and play area.

If there is no bridge access this could encourage more people to drive to the site rather than walk. The bridge is part of the “access” to the site so it must be secured at the outline stage. Then any additional costs associated with providing a suitable design can be allowed for. If it is found that it is not possible then an alternative location can be considered before any development takes place that could hinder a bridge coming forward.

The access parameter plan shows a proposed pedestrian & cycle bridge, with the final location subject to ongoing study & detailed design to be agreed as a reserved matter. The bridge must be considered as part of the access and be set out at the outline stage.

Traffic & Transport

We support the reduced provision of parking spaces and the aim of encouraging less dependence on cars which is in line with the climate emergency declared by Frome Town Council.

Whilst reduced parking will help to minimise traffic generation, we are nonetheless concerned over the impact that the increase in traffic will cause to already congested junctions in terms of further congestion, air pollution and noise.

We question how realistic some of the assumptions made in the traffic assessment are, i.e. that during peak hours only 20% of households will use a car and only 15% of employees will travel to work by car. The transport assessment clearly states that the traffic calculations showed that there would be significant increase in peak hour traffic volume at the Christchurch Street East/Gorehedge and Wesley Slope junction complex as well as the Garsdale/Vicarage Street junction, and that capacity would be breached.

The traffic assessment also states that, the development could create a worsening in the performance of the junction but would not be so great as to breach the threshold of “severe” as identified by the NPPF. Therefore, it is crucial that the assumptions made are scrutinised by SCC Highways to ensure that the increase in traffic will not in reality be “severe”.

The surveys carried out to support the assessment appear to have been one-day surveys. This type of survey is inadequate as evidence on such a major scheme. Surveys should cover all days of the week including market days. Given Frome’s vibrant tourist economy, they should also cover weekends and ideally be repeated at different seasons.

Many of the junctions are already difficult to negotiate for cycling and walking and need improvement. The increase in traffic will have an impact across the town and require a town-wide solution. However, it would be unreasonable to expect the applicants to come up with a

town wide strategy to address the traffic generated by recent developments and allocated sites to be developed in the future.

The development at Saxonvale should limit its impact on the town's road infrastructure as much as possible with concrete measures not just wishful thinking. Maximising the provision of workspace, particularly live work opportunities, will help mitigate the traffic impacts.

Affordable Housing

The percentage of affordable housing to be provided is not mentioned anywhere within the application and supporting documents. As set out in Frome Town Council's position statement and pre-application consultation responses, we would expect to see a minimum of 30% affordable housing, including social rented and shared equity housing.

The success of this scheme is dependent on the viability. We understand that the two limiting factors to the viability are the developer's profit and the District Council's profit. Given that Mendip's profit is public money, we recommend that MDC consider reducing their profit requirement to enable more commercial space and affordable housing to be delivered.

Design Review

Given all of the above concerns, we would urge you to consider submitting the application to a Design Review Panel. Design Review is focused on outcomes for people. It explores how a building or place can better meet the needs of the people who will use it and of everyone who will be affected by it. It does this by constructively endeavouring to improve the quality of architecture, urban design, landscape and highway design. We are also aware that there are concerns about the impact of the application on the residents of Rivers reach and Fishers Brook, the Design Review process could also help address their concerns.

Planning Contributions (S.106)

The planning statement that accompanies the planning application sets out the S.106 contributions that the development will make. These are affordable housing, education, off-site highways works for the Garsdale Junction, provision of a footbridge and management of public open space.

We would like the opportunity to have a further meeting with Acorn and Mendip to discuss additional S.106 contributions for the development.

Recommendation

To submit the above response to Mendip District Council