

Frome Town Council
Frome Town Hall
Christchurch Street West
Frome
BA11 1EB

Simon Trafford
Team Leader – Development Management
Mendip District Council
Cannard's Grave Road
Shepton Mallet
Somerset BA4 5BT

13 February 2020

2019/1180/OTS – Saxonvale, Frome

Dear Simon

OBJECTION

This response sets out Frome Town Council's response to published amendments to the Saxonvale outline planning application 2019/1180/OTS. It follows the Town Matters Committee on 12 February 2020 at which amended plans and documents were considered and our response agreed.

Whilst some welcome amendments have been made to the plan, Frome Town Council continues to object to the outline planning application.

The following represents our detailed response:

Residential/Commercial Mix

Whilst we are aware that the disposition of uses parameter plan has been amended to show a potential zone for flexible uses on Garsdale Avenue which is a step forward, we are disappointed that not more commercial and other non-residential floorspace has been identified in the plans. We **strongly object** for the reasons stated in our response dated 20/06/19 and wish to make clear that we require more non-residential floorspace to be included in the plans. We also wish to express our disappointment that rigid zoning is still proposed. Our response on 20/06/19 stated:

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 the 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.

With regard to the proposed zone for flexible uses on Garsdale Avenue, we wish to ensure that anyone who wanted to use a lower floor for commercial or retail purposes would not need to apply for planning permission for these purposes as this would present a barrier. One solution could be to apply a condition to those properties identified by the parameter plan, that effectively provides permitted development rights to be used for retail and commercial uses. This could include a set of codes to set operating times and types of uses i.e. non noise generating.

This would also include the right to return the property to a residential use without the need for consent, therefore making them truly flexible. It would need to be made clear from the outset to purchasers that the properties could be used for retail and commercial uses.

With regard to the former Western Warehouse, whilst it is clear that there is a proposal to retain it and its retention is shown on the Disposition of Uses Parameter Plan, we would like to see some notation that recognizes the potential for its re-use for a cultural or commercial purpose.

Access

We welcome the proposed changes to Garsdale Avenue which provides a more pedestrian friendly layout with seating areas and more landscaping, contributing to the absorption of carbon and providing a pleasant environment for residents. The pedestrian crossing points together with the median strips and 20mph speed limit will also make the area safer. We also welcome the use of 'Bartons' as a local character feature but seek clarification regarding the use of 'Bartons' and priorities given to pedestrians where side roads meet Garsdale Avenue.

As confirmed in our earlier response, the provision of a footbridge between the application site and Willow Vale is an essential part of the 'access.' It will encourage more people to walk and cycle rather than drive. We seek confirmation that a footbridge in this location will be built.

Affordable Housing

The percentage of affordable housing is still not provided. We reiterate our previous comments that we would expect to see a minimum of 30% affordable housing.

Design Review

We are pleased that the proposals were submitted to the Design Review Panel and that their recommendations have been considered through the revised plans. Particularly the landscape changes adjoining the Fishers Brook area with the boundary landscaping, maintaining more of a green boundary to the area and retaining more of the existing trees. We also welcome the proposed area for the relocated bat roosts.

Landscaping Principles


We welcome the principles for Tree and Landscaping set out in the Matthew Wigan/Nash Partnership document dated October 2019 and would like to see these conditioned as part of any approval.

The indicative Green Infrastructure Plan and revised Masterplan, shows more tree planting throughout the site, which we are pleased to see, however we are concerned the trees that were previously shown alongside the M&S building and the steps to the Kingsway have been removed. With the exception of the tree in the public square there will be no trees in this key area linking the Saxonvale area with the existing town centre.

Transport Assessment

We have noted the response to the Transport Assessment Modelling Review, and the proposed Gorehedge improvement opportunity but we withhold our support until there is more clarity and have had an opportunity to review the comments of the Highway Authority. Any improvement to Gorehedge should be secured through a S106 agreement.

Yours Sincerely

A handwritten signature in black ink that reads "Peter Wheelhouse". The signature is written in a cursive style with a large initial 'P' and a horizontal line underneath the name.

Peter Wheelhouse
Deputy Town Clerk