

Agenda item 3

For Decision – Response to pre-application consultation, Selwood Garden Community
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Summary

This report provides a summary of the work to date that Frome Town Council have done in response to the Selwood Garden Community consultations and includes a summary of the feedback from residents at the previous meetings. The report sets out that before we are able to support or object to this in any way, we have to be able to justify that support or objection in terms of the benefits such a development will bring or identify that the benefits are not sufficient.

The proposed response to the latest consultation, identifies some changes that we would like to see happen before the outline application is submitted to Mendip District Council.

Description of proposal

A mixed-use development to the south of Frome, that will comprise around 1,700 new homes (including 30% affordable dwellings), employment land, a local centre and other social and physical infrastructure. A potential Solar Farm on land to the east of the main residential development to generate renewable energy to power the new homes.

Process so far

The first public consultation carried out by Land Value Alliances (LVA) ran from 9 December 2019 - 10 January 2020.

The South West Design Review Panel (DRP) were engaged by LVA to review the proposals. This process included the Town Council, Mendip District Council and Somerset County Highways, who over a three-stage process have provided input into the scheme presented in the second public consultation. The recommendations of the DRP will be a material consideration against which the planning application will be determined.

The second public consultation by LVA, ran from 25 September 2020 - 18 October 2020, this was an online consultation due to the Covid restrictions, although arrangements were in place to make an appointment to view the plans at Rook Lane Chapel.

The Town Council's comments in response to the first public consultation were based on the vision, core objectives and policies contained within the Frome Neighbourhood Plan. A full copy of the response is attached as [Appendix 1](#).

In advance of considering the Town Council's response to the second public consultation, we wanted to ensure that people were informed about the proposals and that we were aware of

how residents feel, as all comments in response to the consultation are submitted directly to LVA.

Two meetings were arranged, the first was an online presentation of the proposals by LVA, with a Q&A session at the end. This meeting was attended by 40 people and the recording of the presentation is available to view on YouTube, this has been viewed 140 times to date.

The second meeting was the engagement meeting. Attendees were asked to join breakout rooms to discuss various themed topics based on the consultation boards, but most people expressed their views on the proposals as a whole.

We heard very clearly that most people felt that this proposal was too big, and that Frome does not need this amount of new houses. There was concern over the loss of biodiversity, ecology and a large amount of green fields. There was also a lot of concern over the impacts of additional traffic on the existing road network. A full summary of the feedback received is attached as [Appendix 2](#).

Housing numbers

It is the statutory duty of the District Council to set out how many houses each town will be required to provide during the life of the Local Plan, which currently runs until 2029. I have asked Mendip District Council to confirm where we are in relation to the number of houses that Frome will have to accommodate up to 2029.

Frome Housing Supply (figures supplied by MDC)

1	Monitoring against adopted local plan requirement as of 1st April 2020			
				Dwellings
	Minimum level of dwellings over plan period		2006 - 2029	2,300
	Completed net additional dwellings to date		2006 - 2020	1,647
	Sites with permission (started/ not started)		31.03.2020	390
	Shortfall against the local plan part 1		31.03.2020	263
2	Supply of sites without planning permission (allocations) as at 1 st April 2020			
	Saxonvale	FR1		250
	Land N and S of Sandys Hill Lane	FR2		250
	Land south of Little Keyford & The Mount	FR3a		325
	Little Keyford	FR7		20
	Total			845
	Overall 'planned' growth based on Local Plan Part 1 and 2			2,882

The overall figure of planned growth of 2,882 includes the additional number of houses required for Frome up to 2029 using the Government's new standard method of calculations for housing need. Mendip emphasised that the numbers set out in the local plan are expressed as a "minimum".

So whilst it is correct to say that there is no evidence based on the Local Plan figures that Frome needs any more housing, we need to be aware that this does not mean that Frome will be in a position to defend against any further housing due to MDC not being able to demonstrate a 5 year land supply. As a result of the new calculation method, in addition to the number housing allocated to all the towns and villages in Mendip, Mendip are now working to a government 'imposed' figure of 600 houses a year. They also stated that this will be an important consideration in determining a planning application.

This means that over the next 10 years Mendip will need to find land for approximately 1,680 homes across the District that it has not planned for and 3,360 over the next 20 years. As a result, Mendip Council will find it difficult to resist applications for piecemeal development across the district. This could be a particular problem for Frome, where there is good access to jobs, services, and public transport links.

The danger of piecemeal development that we are already experiencing, occurring on a 'field by field' basis, is that little thought will be given to wider infrastructure, such as new roads and ecological improvements, which puts pressure on existing roads and biodiversity and offer little in the way of community benefits, including employment opportunities.

Bearing the above in mind our response is as follows:

Proposed consultation response:

Whilst Frome Town Council is not fundamentally opposed to a town extension that creates an opportunity to provide much needed facilities and infrastructure for the town. Before we are able to support or object to this in any way, we have to be able to justify that support or objection in terms of the benefits such a development will bring or identify that the benefits are not sufficient. There is a lot more work that needs to be done before we can fully understand the impacts and potential benefits.

From the discussions we have had with residents there is genuine concern that the Town's infrastructure is not capable of coping with such a development therefore we would like to arrange specific meetings with key service providers to understand their thoughts and requirements over the next decade, these would include -

- Medical Centre
- Schools
- Youth and young People
- Jobs
- Friends of river Frome and other Environmental organisations

We also need to be able to fully evaluate all the issues that were raised as part of the engagement feedback. A lot of this information will not be available until the Outline application is submitted to MDC, at which point detailed ecology surveys, traffic impact assessments and modelling, details of the Design Codes, plus much more information will be available to scrutinise.

As this proposal is still at the pre-application consultation stage, we have an opportunity now to help shape the proposals before they are submitted to MDC. This is in line with our

approach to all new developments throughout the town, working with all individuals and developers/promoters to influence any proposals before the final plans are submitted. By doing this we are not saying we support the proposals, but, because it is always possible that applications could be approved by MDC, our aim is to work with developers to ensure that that all development benefits the town.

The approach to transport needs to be far more radical, this proposed development should be both anticipating the change in how people travel in the future and promoting it. At the moment, we feel the masterplan is based around car use with active travel infrastructure being an add on. The approach to transport therefore needs to be around providing easy walking, cycling and public transport opportunities while making car travel more of a challenge. We also feel now is the right time to undertake a comprehensive transport assessment of the town and hope that together with our Mendip and Somerset Cllrs we can ensure this happens. We are keen to work with LVA to explore how this might be achieved.

We are particularly concerned with the access along Little Keyford and in line with our response on the allocated Keyford sites, access should be from the B3092 Blatchbridge Road. Promoter/developers should be making financial investment in public transport not leaving it to the bus companies alone. Foot/cycle links over/under the bypass should be provided and there must be an active travel route to the train station, not just an aspiration for one. The whole site should be completely permeable to walking and cycling by the shortest routes, including links with the allocated Keyford sites.

There should be adequate employment provision such that all residents could potentially work on the site (i.e. no net increase in commuting elsewhere), but we support Selwood Parish Council in their view that the land on the west side of the A361 or anywhere outside the Frome By-Pass, should not be developed as this will eventually lead to “development creep”. Zoning should be less rigid - there should be more mixing up of activities and house types etc (as in the older parts of Frome).

This proposed development has the potential to set a new standard in build quality, all buildings should be built to the highest environmental standards (such as Passivhaus) without the possibility of watering down. We should not be needing to retrofit in 20 years’ time to meet zero carbon targets.

<p>Recommendation</p>
<p>Cllrs agree the above as a formal response to the pre-application consultation</p>