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Anna Penn
Senior Planning Officer
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Council Offices, Cannards Grave Road
Shepton Mallet, Somerset
BA4 5BT

05/05/2022

Dear Anna

2022/0616/OUT | Outline planning application (with all matters reserved except for access) for the demolition of existing outbuildings and erection of up to 150 residential dwellings including affordable housing with the provision of vehicular, cyclist and pedestrian access onto Marston Lane alongside public open spaces, community space, children's play, sustainable urban drainage systems, hard and soft landscaping, infrastructure and earthworks. | Land At 376568 146739 Marston Lane Frome

The above application was discussed by Frome Town Council's Planning Committee on 28th April 2022. The meeting was attended by 35 people with an interest in the Marston Lane proposals. It was clear from the discussions that they were all very strongly against the proposed development.

The Committee agreed unanimously to object to the proposals for the following reasons.

The proposed development is located outside the development limits of Frome as set out in the Mendip District Council Local Plan Part 1. We acknowledge that as Mendip cannot currently demonstrate a 5-year land supply that the National Planning Policy Framework (NPPF) applies with presumption in favour of sustainable development. We do not agree that these proposals are sustainable either socially, economically or environmentally.

It is not socially sustainable as the indicative layout shows a lot of cul-de-sacs, dividing the site into individual areas that are poorly connected. The community hub is also disconnected from most of the site and the play areas are not integrated. We acknowledge the proposed 30% affordable housing provision, but do not feel that this outweighs the overall harm of the development.

It is not economically sustainable, offering little infrastructure that does not support the growth and innovation of the town or provide any local employment opportunities.

It is not environmentally sustainable, the proposal does not protect or enhancement the natural or built environment. The proposals will involve the destruction of a large area rich in wildlife including several protected species. Replacing it with a small area of allotments and replacing it with new habitat does not outweigh the damage. We realise that an outline application is the obvious choice for the applicant, however it is not possible to accurately assess the impact of this development on biodiversity and ecology, a full application should be submitted.

Local services such as schools, sports facilities, the train station, and local health care are not easily accessible from this site.

This has been clearly demonstrated by the Civic Society in their comments –

“A primary issue is that the proposed housing is too far from the town’s major facilities to be generally walkable:

Town centre retail, leisure, community services: 1.2 miles (25 minutes)

Railway station: 1.4 miles (30 minutes)

Medical practice and health centre: 2.0 miles (40 minutes)

First and middle Schools: 1 mile (20 minutes, along a lane partially without footways). The only upper school/sixth form college is 2.2-miles (45 minutes).

These distances do not take into account the hilly terrain between the site and these destinations, which is an additional deterrent to both walking and cycling. In order to mitigate the effects of the site slope, which varies from 1:12 to 1:6, the access road has to be long and tortuous, and even so will be a daunting climb for cyclists, pushchairs, the elderly or those with mobility issues.

This makes the apparent proximity of retail facilities (supermarket, home store) on the Marston Trading Estate much less accessible than the plans would suggest. The only public transport available is the D2 bus service along Marston Lane, which is a half-hourly service at best, and more limited at evenings and weekends.”

Future residents will use their cars to access these and other town centre services. Being dependent on vehicle usage is not part of a sustainable development. There are no active travel links to the site and the proposal does not include any options for green travel. The proposed footpaths within the site would provide no benefit for pedestrians or cyclists travelling north or south along Marston Lane

The approach to the town along Marston Road, adjacent to the site, marks a Frome Gateway location. This is shown on the map on page 52 of the Frome Design Statement. Para 453 states that these locations “highlight key gateways into the town from the north, east, south and west.

These areas signify a sense of arrival and physical point of entry into the town”. To develop the proposed site would blur this edge as it acts as a clear boundary to development within the town. As a result of the above, the Frome Design Statement states that any further development to the western side of Marston Lane should not be permitted as it would be detrimental to the setting of Frome and its visibility from the surrounding countryside.

The Mendip Landscape Character Assessment (2020) reinforces this, rating the landscape character of this edge of Frome (Marston Gate to Egford Hill, Area B2.1) as “High/Very High”. This is the only area of the six landscape areas surrounding Frome that is rated High/Very High.

The Frome Neighbourhood Plan considers the views from the A361 Marston Road to Critchill as a skyline site (site B) worthy of protection. This includes the land within the proposed site. Policy D3 in this document states that “applications for new buildings in the skyline areas identified in Figure 37 will be required to demonstrate that there will be no unacceptably detrimental impact on the skyline in these skyline areas”.

Due to the steep topography of the site, it is likely that a significant amount of engineering and terracing will be required. This would demonstrably alter the rural character of the area and its recognised landscape value.

Any development of this site would have a significant detrimental impact on the local and wider context of the area, and the landscape setting that gives the locality its identity and distinctiveness. Mendip District Council has previously rejected a proposal to allocate a development site on Marston Lane, due to its prominence on the western escarpment of Frome and this application should be refused for the same reason.

Policy DP27, set out in the Local Plan Part 2, highlights concern regarding traffic levels in Frome, as well as the wider cumulative impacts that will result. This proposal raises concerns due to the high volume of traffic that will be generated and the significant impact it will have on the surrounding highway network, particularly Marston Lane which is often busy (serving as an alternative route into the western areas of Frome) and narrow in places. Policy DP9 states that development proposals will only be supported where they make safe and satisfactory provision for all forms of transport.

In summary, this development is not sustainable, it is contrary to the Mendip Local Plan and will have an irreversible impact on the significant landscape character of this edge of Frome. For these reasons, the application must be refused.

Yours Sincerely



Jane Llewellyn
Planning & Development Manager