

**2<sup>nd</sup> June 2025**

Our Ref: 397/A3/MJK

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01179300413

Andrew Luke  
Environmental Services  
The Planning Inspectorate  
Operations Group 3  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Dear Mr Luke,

**Re: Town and Country Planning Act 1990 - Section 77 and Town and Country Planning (Inquiries Procedure) (England) Rules 2000**

**Site Address: Land to the South of Frome, West of The Blatchbridge Road, and East of the A361/Marston Road, BA11 5BE**

We write in connection with the above SoS Call-In and in direct response to your letter dated the 31<sup>st</sup> March 2025, which was in response to our Regulation 25 request in receipt of the above proposals.

We now enclose the revised ES which seeks to cover the matters raised in your letter. We hope this addresses these in full and for ease of reference we briefly explain how the ES has been amended in response to the various points (requested information in *italics*):

- *An assessment of likely significant effects to/from Climate Change including Greenhouse Gas Emissions or explanation as to why it has been scoped out of the ES* – The ES now includes an assessment of this issue as part of Chapter 14: Climate Change. The Socio-Economic Chapter (No.13) has also been amended to remove reference to any energy efficiency and climate change issues so as to avoid any potential confusion.
- *Baseline Review* – we have undertaken a review of the baselines of various chapters as requested as follows:
  - Transport – in addition to a review of the relevant policy updated traffic surveys were undertaken to assess if the previously assessed baseline has changed significantly. These surveys, and a review of the 2020 data previously used against projected peak hour traffic flows, has established that the data used remains valid when applying the ‘Goodness of Fit’ formula (see section 5.4.22-26 of ES Chapter 5 for more details);
  - Ecology – updated bat surveys, as well as site visits to reassess the land use and management baselines that underpin the BNG calculations that support the application have been undertaken. A meeting with Natural England has also been held to explain what has been done so as to reconfirm and agree the baseline in respect of the nearby SACs;
  - Hydrology and Flood Risk – The policy framework has been updated slightly and a review of the recently updated flood mapping and other relevant data has been undertaken,

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however the data suggests that the baseline is effectively unchanged and that, on balance, the flood extents have reduced;

- Ground Conditions – as there have been no material changes to the site in terms of land use or agricultural operations undertaken on it the baseline established in 2022 remains valid;
  - Air Quality – the baseline has been reviewed by the relevant specialists, including the traffic data update mentioned above, and the ES Chapter updated to reflect this and to reconfirm the previously assessed baseline and conclusions remain valid;
  - Noise – the relevant consultants have considered the baseline, and in particular the updated traffic data, and confirm no changes to their assessment result from this;
  - Heritage Assets – the baseline element of the chapter has been amended to take into account updated policy and to recheck the site condition and cumulative impacts to reconfirm that the baseline remains relevant; and
  - Socio-Economic – Where updated census or other data that was previously used is available the new chapter has been updated to reflect this.
- *Methodology for selection of Cumulative Schemes* – chapter 2 has been amended to set out what was agreed with the council at scoping/screening stage and how this has been monitored so as to ensure no additional schemes need to be added to the cumulative assessment. In terms of whether these were agreed specifically with relevant consultees there is nothing to confirm this in writing available from the Council who confirmed the scope, however the applicant made the reasonable assumption that given the assessment process has been ongoing since 2020, with many meetings, emails and calls with various consultees undertaken since that time, that they would have made it clear if the cumulative schemes thus far assessed needed to be supplemented. Accordingly, we consider that the methodology for identifying these cumulative schemes is appropriate and robust.
  - *Definition of Significance of Effects* – We note the comments made in respect of the need for consistent terminology in respect of defining effects that re considered to be significant. The terminology used throughout the ES has therefore been updated and both in Chapter 2: Scope and Methodology, and in each individual chapter, it has been made clear what constitutes a significant effect in EIA terms for each discipline. Broadly, residual effects that are moderate or major are considered to be significant in EIA terms. We hope this is now clear but if not please get in touch with us to discuss any further amendments that might be required.
  - *Revised NTS* – This has been updated to reflect the above and includes a redline boundary to make the site easy to identify, and is provided in the documentation provided.
  - *Summary Tables* – these have been provided for each technical chapter.

For robustness we are also liaising with Somerset Council to ensure that all Statutory Consultees are provided with the updated ES and have made it clear that any comments should be directed to the Planning Inspectorate to inform the forthcoming Inquiry and the assessment of the planning application by PINs, and subsequently the SoS.

Finally, on preparing the update to the ES and also in drafting our proofs of evidence in advance of the Call-In Inquiry it has come to light that the description of development incorrectly refers to 6.7ha of employment land, rather than the 6.9 hectares which is the correct quantum set out on the Parameter Plans and Design Principles Framework.

For the avoidance of doubt it can be confirmed that the ES and relevant technical assessment work has assessed a quantum of floorspace that correlates with the 6.9 hectare figure and therefore remains unchanged.

The updated ES has corrected this typographic error and now refers to this correct quantum (6.9 hectares of Use Classes E, B2 and B8), and we have informed the Council of this, as necessary we will also update the application forms and any other relevant documents and ensure that these issued to PINs imminently.

Yours sincerely



**Matthew Kendrick**  
**Director**

CC

– Paul Tucker KC, Kings Chambers  
Gwilym Jones, Case Officer, Somerset Council  
Simon Trafford, Team Leader, Somerset Council  
James Tizzard, LVA