

4: FROME - TOWN RESPONSES									
Rep No	ID	issue ref	Contact Name	Company / Organisatio	Policy	Matter	Issue summary	Changes sought to the Pre-Submission	MDC response
100	6164	1	Aaron Andrews	N/A		sports provision	With housing numbers increasing there is no additional provision for sport, football in particular and current facilities are not adequate.	Include policy for additional sports provision.	Policy DP16 in LPP1 makes provision for sports and recreation facilities. There is no need for further policy in LPP2.R28.
101	6165	1	Gary Collinson	Frome Town Football Club	sport	sports provision	With housing numbers increasing there is no additional provision for sport, football in particular and current facilities are not adequate. Developers should include facilities in development proposals, including green space and sports facilities.	Include policy for additional sports provision requiring developers to provide facilities.	Policy DP16 in LPP1 makes provision for sports and recreation facilities. There is no need for further policy in LPP2.
103	6167	1	Tracey Eames	N/A		sports provision	The plan should include new provision for sport, football in particular and current facilities are not adequate. Health and fitness is a government priority.	Include policy for additional sports provision.	Policy DP16 in LPP1 makes provision for sports and recreation facilities. There is no need for further policy in LPP2.
123	6182	1	Kevin Connor	N/A		sports provision	Additional sports provision should be made, including sports pitches. This is important for the health and wellbeing of residents.	Include policy for additional sports provision.	Policy DP16 in LPP1 provides for sports and recreation facilities. There is no need for further policy in LPP2.
710	3092	11	Jane Llewellyn	Frome Town Council	DP16	sports provision	There is a lack of indoor and outdoor sports facilities. Protect green spaces for play and identify new spaces the additional provision. New housing will need new provision for outdoor space and sports facilities.	Include sports and play strategy.	Policy DP16 in LPP1 makes provision for sports and recreation facilities. There is no need for further policy in LPP2.
259	2097	1	Rick Swan	Frome Civic Society		space standards	There should be a policy following recently published government guidelines.		Publication of Nationally Described Space standards make a policy unnecessary. No change to the plan.
259	2097	4	Rick Swan	Frome Civic Society	housing allocations	site allocations	Fields should not come forward in a piecemeal fashion, but as a comprehensive development which safeguards little Keyford and Keyford House, and Blatchbridge, with riverside amenity areas and comprehensive infrastructure.		Sites FR3, FR4 and FR5 should be combined to support a masterplanned approach.
097	6162	3	Roger Saunders	Fair Housing For Frome	housing policy	self build	Supports the plan where it recognises the interest in self build.	None.	Support is noted.
097	6162	12	Roger Saunders	Fair Housing For Frome	housing policy	self build	A substantial number of residents have put their name on the self build register and adequate land should be identified.	Identify land for self build.	2 sites have been identified for self build in Frome.

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717	6597	6	Neil Howlett	Frome and District Chamber of Commerce	SA	SA09	Out commuting continues to be high. Difficulty in identifying employment land makes this a more pressing issue. Loss of more employment and in the town centre will undermine the viability of the centre. Out commuting creates environmental issues.	Recognise the issues created by out commuting and the impact of loss of employment land on the viability of the town centre.	SA09 recognises that additional housing could result in additional out commuting and is scored with a double negative. SA10 recognises the potential impact of redevelopment on employment land on the town centre and has a negative score. These issues have been properly accounted for in the SA process. No change to the plan.
717	6597	5	Neil Howlett	Frome and District Chamber of Commerce	5.4	SA	Employment enhances the economic viability, sustainability and vibrancy of town centres and conflicts with SA objectives 1, 2 8, 9 and 10.	Recognise the value of employment sites in the town centre in the SA objectives.	Paragraph 5.4 relates to the designation of local green spaces. Sustainability objectives recognise the value of employment and SAO 1 is "promoting a strong, thriving and diverse local economy and SAO10 is "maintaining and enhancing the vitality of town centres". SA objectives recognise the value of employment sites and town centre sites are assessed against the full range of objectives.
605	6526	1	David Wilson Homes	agent, Hannah Bizoumis, Peter Brett Associates	DP16	recreation site	Boundary of this site should be compatible with planning permission 089846/015 so as not to conflict with the approved housing scheme.	Ensure playing field boundary has been correctly identified.	The boundary is compatible with planning application 089846/015.
164	6209	1	Chris Lilley and Marc Lilley	Lilley's Cider	mixed use site omission	mixed use allocation	Lilleys Cider wish to use land at packsaddle for cider production including orchards and a cider factory, with housing on site for security, and to create a local cider attraction.	Allocate land at packsaddle for cider production, small scale housing and visitor facility.	These are countryside uses and could be accommodated outside development limits (subject to a satisfactory planning application). No allocation is required. No change to the plan.
097	6162	4	Roger Saunders	Fair Housing For Frome	housing policy	mixed use	Supports inclusion of policies that address the need for mixed use development, recognising the need for employment development as well as housing.	None.	Support is noted.
097	6162	7	Roger Saunders	Fair Housing For Frome	housing policy	housing policy	There are new powers for Local Authorities to expedite stalled developments and these should be used to bring forward stalled sites such as Western Vinyl, Butler, Tanner and Dennis and Saxonvale.	Include measures to bring forward stalled sites.	This is outside the scope of LPP2. No change to the plan.
097	6162	9	Roger Saunders	Fair Housing For Frome	housing policy	housing policy	Ensure all new developments integrated into the town.	Include measures to ensure all new developments are integrated into the town.	All site allocation policies include provision for access and sites have been assessed in the light of accessibility by sustainable means. Detailed design issues will be further considered at planning application stage.
214	3084	1	Veronica Birch	N/A	housing policy	housing policy	Building housing estates on greenfield on the edge of Frome will affect the character of Frome and brownfield sites should be used instead. More consultation should be carried out.	Delete greenfield housing sites.	The planning system should be plan led. LPP1 sets out strategic policies for the distribution and scale of development in settlements and identifies broad locations for future growth. LPP2 sets out non-strategic policies to deliver the strategy. The overall approach set out in LPP1 does not form part of this plan making process. No change to the plan.
214	3084	2	Veronica Birch	N/A	housing policy	housing policy	Large areas of paving will create additional flood risk. This could affect Willow Vale.	Delete greenfield housing sites.	LPP1 policy DP23 sets out requirements for managing flood risk locally and NPPF para 103 sets out national guidance on ensuring flood risk is not increased off-site. There is no need for additional guidance in LPP2. No change to the plan.

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232	6249	1	Chris Smaje	Vallis Veg	housing policy	housing policy	Agricultural land will be lost to development and will be needed for food production. Small holdings and the potential for agricultural productivity should be included into any green field development sites and better use made of brownfield.	Re-draft housing policy to allow for food production.	The planning system should be plan led. LPP1 sets out strategic policies for the distribution and scale of development in settlements and identifies broad locations for future growth. LPP2 sets out non-strategic policies to deliver the strategy. NPPF para 112 sets out the weight to be given to preserving best and most versatile agricultural land. This guidance has been fully considered in putting forward housing allocations, and there is no need to repeat the guidance in LPP2. No change to the plan.
232	6249	2	Chris Smaje	Vallis Veg	housing policy	housing policy	Not much housing is truly affordable and the policy should be more specific on how it intends to provide for local housing need.	Re-draft affordable housing policy.	Policy DP11 of Part 1 sets out the Council's requirements for affordable housing. National guidance is provided in the NPPF. Requirements for affordable housing are set out for each housing allocation where this is appropriate. No change to the plan is needed.
232	6249	3	Chris Smaje	Vallis Veg	housing policy	housing policy	Hilltop locations have the potential for visual impact. Ley Vale estate demonstrates to impact of poor hilltop locations and the plan should ensure that future developments are less obtrusive.	Ensure hilltop locations are controlled.	Landscape impact is one of the criteria in the Sustainability Appraisal and has been fully considered for each allocation put forward. Landscape impact is addressed by policy DP4 of LPP1 and in national guidance. There is no need for further guidance in LPP2. No change to the plan.
238	6254	1	Gloria Wingrove	N/A	housing policy	housing policy	Additional housing will mean loss of wildlife and flooding. Frome does not need so many houses. There is no employment locally meaning commuting.	Exclude greenfield land from development.	The planning system should be plan led. LPP1 sets out strategic policies for the distribution and scale of development in settlements and identifies broad locations for future growth. LPP2 sets out non-strategic policies to deliver the strategy. The overall approach set out in LPP1 does not form part of this plan making process. Flooding and wildlife value are safeguarded within the plan. No change to the plan.
238	6254	2	Gloria Wingrove	N/A	housing policy	housing policy	Build more 1 and 2 bedroom houses as these would be less appealing to weekenders and buy to let investors.	Exclude greenfield land from development.	The planning system should be plan led. LPP1 sets out strategic policies for the distribution and scale of development in settlements and identifies broad locations for future growth. LPP2 sets out non-strategic policies to deliver the strategy. The overall approach set out in LPP1 does not form part of this plan making process. Guidance on the mix and type of new housing is provided by LPP1 policy DP14. No change to the plan.
238	6254	3	Gloria Wingrove	N/A	housing policy	housing policy	Pedestrians should be considered. The B3092 is dangerous and should be 1 way.	Exclude greenfield land from development.	Sites FR3, FR4 and FR5 should be combined to support a masterplanned approach, including the provision of road infrastructure.
238	6254	4	Gloria Wingrove	N/A	housing policy	housing policy	Save green land for agriculture. Use brownfield first.	Exclude greenfield land from development.	The planning system should be plan led. LPP1 sets out strategic policies for the distribution and scale of development in settlements and identifies broad locations for future growth. LPP2 sets out non-strategic policies to deliver the strategy. NPPF para 112 sets out the weight to be given to preserving best and most versatile agricultural land. This guidance has been fully considered in putting forward housing allocations, and there is no need to repeat the guidance in LPP2. No change to the plan.

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359	510	3	Mark and Deborah Fox	N/A		housing policy	Brownfield should be promoted and greenfield allocations restricted. The overall amount of land allocated should be reduced. Interrelationships between sites and infrastructure requirements have not been properly considered. Loss of best and most versatile agricultural land should be minimised.	Reduce overall land allocated in Frome.	The planning system should be plan led. LPP1 sets out strategic policies for the distribution and scale of development in settlements and identifies broad locations for future growth. LPP2 sets out non-strategic policies to deliver the strategy. The overall approach set out in LPP1 does not form part of this plan making process. No change to the plan.
368	6349	1		N/A	housing policy	housing policy	Over expansion is leading to encroachment on greenfields, insufficient infrastructure and traffic congestion.	Reduce overall housing numbers to be built in Frome.	The planning system should be plan led. LPP1 sets out strategic policies for the distribution and scale of development in settlements and identifies broad locations for future growth. LPP2 sets out non-strategic policies to deliver the strategy. The overall approach set out in LPP1 does not form part of this plan making process.
368	6349	2	Susan Danby	N/A	housing policy	housing policy	Any necessary development should be directed to the north of Frome, where the landscape is more conducive to development.	Direct development to the north of Frome.	All the sites put forward for development have been assessed. However, only a very small site to the north of Frome was put forward for housing and is not a preferred option. Land to the north west at Packsaddle is not a preferred option. No change to the plan.
616	1474	4	Terramond ltd	agent, Peter Roberts, Barton Willmore	3.64	housing numbers at Saxonvale	The suggestion that housing development has not been discounted on the land currently promoted for commercial development is inexplicable. Residential development of the site has been granted on appeal. This is evidence that residential development is deliverable. This site also appears on the brownfield register and confirms that the site is deliverable for housing led development. There is no doubt that housing is deliverable on the site.	Amend table 1 section 3 and para 3.64 to confirm that housing is deliverable on the site.	A change is proposed to para 3.64 to read "Land at Saxonvale has recently been acquired by the Council. Mixed-use redevelopment proposals are expected to come forward in early 2019."
097	6162	1	Roger Saunders	Fair Housing For Frome	housing policy	housing numbers	Supports the addition of 580 homes to the overall target of 2300 in Part 1.	None	Support is noted.
259	2097	2	Rick Swan	Frome Civic Society	housing policy	housing mix	Higher density one and two bedroom houses should be close to transport nodes.		The planning system should be plan led. LPP1 sets out strategic policies for the distribution and scale of development in settlements and identifies broad locations for future growth. LPP2 sets out non-strategic policies to deliver the strategy. The overall approach set out in LPP1 does not form part of this plan making process. Guidance on the mix and type of new housing is provided by LPP1 policy DP14. No change to the plan.
259	2097	3	Rick Swan	Frome Civic Society	housing policy	housing mix	Care home and sheltered housing should be integrated into larger housing sites to avoid the elderly being isolated.		NPPF para 50 deals with planning for a mix of housing based on demographic trends, including housing for older people. In a plan led system, LPP1 sets out strategic policies for the distribution and scale of development in settlements and identifies broad locations for future growth. LPP2 sets out non-strategic policies to deliver the strategy. LPP1 does not make separate provision for housing for older people and there is no need to repeat national guidance which provides an adequate policy steer.

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717	6597	2	Neil Howlett	Frome and District Chamber of Commerce		3.4 Housing market Area	Somerset wide study shows Frome to be part of the West Wilts functional housing market area and areas north of Frome to be part of the BANES functional housing market area. Frome is also part of the Trowbridge commuting zone. Frome is part of the Trowbridge travel to work area, unlike the rest of Mendip.	Reconsider the way that housing market and commuting areas are shown for Frome.	Links between Frome and West Wiltshire will form part of ongoing duty to co-operate between planning authorities. No change to Plan.
558	6492	1	landowners of Selwood garden village proposals	agent, Matthew Kendrick, Grass Roots Planning	housing allocation omission	housing allocations omission	Promoting Selwood Garden Village - extensive submission provided!	Selwood Garden Village.	The Selwood Garden Village (SGV) proposals submitted for a substantial extension of the town (1500+ dwellings) are considered premature. There has been limited consultation and engagement on this proposal to date, no detailed sustainability appraisal or discussion of infrastructure implications. Other proposals have been put forward for extensions to Frome and these should form part of future engagement on options for Frome after Local Plan Part II.
093	6155	1	M and Mrs Lucey	N/A	housing allocation	housing allocation omission	A significant increase in housing numbers will be required in Mendip up to 588 per annum. The current local plan consultation suggests a figure 40% above part 1 requirements. There is a need to identify more sources of supply to ensure a 5 years housing land supply is maintained. Delivery in Frome as set out in the Pre-Submission draft depends heavily on large sites with a long lead time and additional flexibility is required in the supply pipeline. Allocation of a portfolio of smaller sites which are easily deliverable, introduce more flexibility into the supply.	Designate a site for 4 houses at Highfield, Gypsy Lane, or include the site within development limits.	The planning system should be plan led. LPP1 sets out strategic policies for the distribution and scale of development in settlements and identifies broad locations for future growth. LPP2 sets out non-strategic policies to deliver the strategy. The overall approach set out in LPP1 does not form part of this plan making process. No change to the plan.
093	6155	2	M and Mrs Lucey	N/A	housing allocation	housing allocation omission	The Housing White paper indicated a need to diversify the housing market and increase the role of SME builders. Allocation of unconstrained small sites would encourage this diversity.	Designate a site for 4 houses at Highfield, Gypsy Lane, or include the site within development limits.	The planning system should be plan led. LPP1 sets out strategic policies for the distribution and scale of development in settlements and identifies broad locations for future growth. LPP2 sets out non-strategic policies to deliver the strategy. The overall approach set out in LPP1 does not form part of this plan making process. No change to the plan.
093	6155	3	M and Mrs Lucey	N/A	housing allocation	housing allocation omission	Allocation of land at Highfield would be a logical extension to the built up area of Frome as it adjoins the development limits.	Designate a site for 4 houses at Highfield, Gypsy Lane, or include the site within development limits.	The site would extend development into open countryside north of gypsy lane. The land here is open and rural in character with just a scattering of houses and other green uses (rugby pitches). Gypsy Lane is a natural boundary to the urban area and marks the top of a ridgeline, before the land falls away to the north. No change to the plan.
093	6155	4	M and Mrs Lucey	N/A	housing allocation	housing allocation omission	Safe access to the site can be achieved despite concerns about speeds on Gypsy Lane, access from Gypsy lane and the Junction of Gypsy Lane with Bath Road. There may be opportunities to improve the junction with Bath Road if further development land become available north of Gypsy Lane.	Designate a site for 4 houses at Highfield, Gypsy Lane, or include the site within development limits.	The site would be extended development into open countryside north of Gypsy Lane and is not appropriate for allocation. Further highways assessment would be needed to establish whether a safe access could be achieved. No change to the plan.

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544	6483	5	Land Value Alliances	agent, Alex Bullock, Pegasus Group		housing allocation omission	Consider that the residual requirement for Frome is too low in the light of the new standardised methodology for OAN and 640 dwellings should be allocated. The Plan relies on large sites and brownfield land, which take time to come forward. More small sites which allow greater flexibility should come forward. Site at Marston Lane should be allocated. The site does not impinge on the skyline and would not have a landscape impact and could be developed for 10-15 dwellings.	Allocate FRO212 for 10-15 dwellings.	Site is unsuitable for allocation due to its landscape impact, primarily due to its prominent location on the western escarpment. It is also distant from many facilities and services. No change to the plan.
619	6531	2	Chris Minors	Persimmon Homes		housing allocation omission	Site would make a logical addition to the portfolio of sites proposed. It is allocated as an established employment site, but is vacant with no employment premises. It could accommodate around 30 units and is immediately deliverable. It is sustainably located. Employment uses should not be protected long term where there is no prospect of the site being used for employment.	Allocate site FRO218, Adderwell Road for housing.	This site is not considered suitable for housing in principle as it is an established employment site. It is identified under policy DP25. No change to the plan.
619	6531	1	Chris Minors	Persimmon Homes	housing policy	housing allocation	Revised standardised methodology indicates that an additional 67 dwellings pa will be needed. Housing allocations in Frome rely on allocations south and west of the town, self build sites and windfall. Self build and custom build may not be deliverable. Additional sources of supply should be identified to ensure flexibility should self build sites not deliver at the expected rate.	Allocate additional sites in Frome.	New government targets will affect Mendip in 2020 when a new national formula to calculate district housing requirements known as Local Housing Need (LHN) will set the basis of plan making and national housing supply/delivery tests. This is currently estimated to be 575 dwellings a year. The scale of housing growth and policy changes in the latest NPPF can only be addressed through a comprehensive review of Local Plan Part I. Changes are proposed to Table 1, updating housing numbers to reflect a proposed change to delete site FR6, which is the largest self build site proposed in Pre-Submission consultation. Table 1 demonstrates that sufficient allocations are being made without including site FR6. A small self build site remains at FR7.
710	3092	12	Jane Llewellyn	Frome Town Council	strategy approach	Frome - overall approach	Connectivity of new allocations to the town has not been considered and provision of infrastructure and employment to go with the uplift in housing numbers is not considered. There is a need for investment in all infrastructure including a new middle school, medical facilities, leisure facilities, highways network.	Take a more strategic approach to infrastructure and employment and housing.	The planning system should be plan led. LPP1 sets out strategic policies for the distribution and scale of development in settlements and identifies broad locations for future growth. LPP2 sets out non-strategic policies to deliver the strategy. The overall approach set out in LPP1 does not form part of this plan making process. No change to the plan.
717	6597	3	Neil Howlett	Frome and District Chamber of Commerce	employment land	employment land	Failure to provide sufficient employment land in Frome has a cross boundary implication as it will result in more out commuting. North eastern villages have been targeted for housing developments designed for those commuting to neighbouring regions.	Provide for more employment in Frome.	The Local Plan gives more recognition to existing employment sites and identifies further allocations and future growth areas.

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717	6597	4	Neil Howlett	Frome and District Chamber of Commerce	4.12	employment land	Housing targets have been exceeded whilst employment land stocks have reduced. There is a lack of detail on how employment land targets will be achieved. There is evidence of strong demand in the town centre. SPD has been ineffective. In the past, employment sites have not been effectively defended. Brownfield register will increase this likelihood. LPP2 does not contain sufficiently robust policy to prevent the use of employment land for housing.	Revise policies retaining employment land.	The planning system should be plan led. LPP1 sets out strategic policies for the distribution and scale of development in settlements and identifies broad locations for future growth. LPP1 includes policy DP20 which set out the Councils approach to the re-use of employment sites. LPP2 sets out non-strategic policies to deliver the strategy. The approach set out in LPP1 does not form part of this plan making process. Former employment sites have been carefully considered and only 1 site in Frome, at Saxonvale, has been allocated for a mix of uses including housing in LPP2. No change to the plan.
717	6597	1	Neil Howlett	Frome and District Chamber of Commerce	1.16 and 1.18	duty to cooperate	Without cross boundary working Frome will continue to be dormitory with residents working in Bath and other centres.	Consider the need to rebalance housing and employment.	The Council have an ongoing duty to co-operate with neighbouring planning authorities and to assess cross-boundary impacts including transport. However the Council must plan to meet its housing needs in its area. No change to the plan.