

FROM CIVIC SOCIETY'S COMMENTS ON PROPOSALS FOR GARSDALE, FROME

Application Number: 071064/007

NB: In the following, 'Garsdale' refers to Land off Garston Road, Frome

Introduction: The Civic Society supports a mixed use regeneration of Garsdale as set out in the Council's adopted Planning Brief, however, we strongly object to two aspects of the layout, namely the location and size of the Park and the narrow, confusing and comparatively treeless spine road. We also have serious concerns about employment, sustainability and frontages to streets.

We are concerned that Bloor Homes have not taken account of any of these comments, despite us having made them to Bloor Homes, following the one day public exhibition at the Cheese and Grain on 1 July 08. Essentially, the planning application is almost identical to the scheme on public exhibition and consulting with the public has had very little effect on the developers proposals.

Location of Park and Play Area: We understand that an earlier scheme shown to the South West Design Review Panel, located the park on the southern edge of the development in the position given in Mendip District Council's adopted Planning Brief, but that on the advice of the Panel, the park has been moved to the northern edge of the development, adjoining the freight rail line, where there are some existing trees and so that houses can front onto Garston Road.

An additional reason for this relocation is given on page 17 of the Design and Access Statement, which says, "following detailed discussions with the Council it has been agreed to relocate the open space to the northern boundary in order to take advantage of the views along the River Frome from the boundary with the existing railway line". This implies, inaccurately, that Council officers are in agreement with the relocation. Council officers do not have the authority to vary the Council's Planning Brief without seeking committee approval. It is Bloor Homes decision to disregard the Planning Brief and accept the Design Panel's views.

The reason given in the Council's Planning Brief (page 122) for locating the park on the southern edge of the development is to "provide a much needed green lung for the land off Garston Road and existing residential area to the south. It is required to be directly accessible from new streets and overlooked by the new development, but also visible and accessible to the surrounding residential areas. The location of the park adjacent to Garston Road allows the new open space to form a central linking feature that will integrate the new residential development around it with the existing residential neighbourhood of Garston Road."

By relocating the park on the northern edge of the new development it is:

- Isolated from the existing residential areas to the south,
- It will become "territorial" to the new development, and
- It will not help to "integrate the new residential development with the existing residential neighbourhood"
- Its value to the existing community will be substantially lost.

With respect to the Design Review Panel, the adopted Planning Brief, which was the result of many months of detailed survey, discussion and public consultation with the local community, must take precedence over the comments of the Panel.

We believe that the real reason for the relocation is that it is in the financial interest of Bloor Homes to locate the park on the northern edge of the site.

Size and shape of the park: The shape, size and usefulness of the park are also relevant. In the adopted Planning Brief the park is a rectangular shape, about 64m x 49m (3,140sqm), whereas in the planning application, the park is quite narrow and long, about 93m x 23m (2,140sqm). This is only two thirds the size of the park in the Planning Brief, but more importantly, is a much less useful shape.

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It is crucially important that Bloor Homes appreciate the importance of the Council's adopted Planning Brief resulting from very extensive public consultation, and the social importance of the park to both the existing and new residents. They should revert back to their original scheme, with the park located on the southern edge of the development, adjacent to Garston Road, where it can serve both communities equally and be a much more useful shape. We believe this to be absolutely essential.

Access Spine Road: One of the key urban design features of the adopted Planning Brief for Garsdale is a tree lined boulevard winding through the whole length of Garsdale from Wallbridge to Rivers Reach, giving it a sense of unity and a very strong sense of local distinctiveness and character, combined with clear legibility. This is well illustrated on pages 7 and 173 of the Brief, and there is a cross section on page 108, showing the spacious quality of the street, which measures about 16-18m wide between building frontages. On page 108 the text says that the street should have "near continuous tree cover through an avenue of formal street trees interspersed with on-street parking. These should be planted as semi mature trees on approximately 12m centres to ensure a continuous canopy". This type of tree-lined avenue will create a very strong uniting and distinctive character, special to Garsdale.

The spine road shown in the planning application, creates a much harder, narrower street with very few trees and four right angle bends. There is no sense of a tree-lined boulevard as defined in the adopted Planning Brief for Garsdale. The street varies between 11-14m wide between building frontages, instead of 16-18m, and is bare of any trees, except where it passes through a wider space or alongside the park. It will not create a sense of local distinctiveness, special to Garsdale, in the way that a tree lined boulevard would do, and with 4 right angle bends, it will confuse people from finding their way around. That is, it lacks legibility.

Interestingly, the Victorian terraces in Victoria Road, Avenue Road and Wallbridge Avenue are about 17m between building frontages, almost the same as the width of the spine road in the Planning Brief.

It has been suggested that the straighter spine road shown in the Planning Brief could encourage speeding, and that shorter lengths of roads with right angle bends, as in the planning application, will reduce speeding. The spine road in the Planning Brief (see the cross section on page 108), provides on street parking on both sides, plus a two lane road. The spine road in the planning application provides a two lane road, with no special provision for on street parking. As on street parking is very likely to occur anyway, this will create a more congested road, similar to Wyville Road, where emergency vehicles have difficulty gaining access. If speeding on a straighter spine road is seen as a problem, then raised crossing tables, or chicanes, as in Home Zone layouts, could be introduced to calm traffic speeds. In Victoria Road, which is a straight road 180m long, with on street parking, speeding is not a problem. The four right angle bends in the planning application could be dangerous for pedestrians/children crossing the road near a blind corner.

In the Statement of Community Involvement, Bloor Homes say that "there is limited scope to incorporate a continuous tree lined road without losing a considerable number of houses". We believe that a 4-5m increase in width of the spine road to accommodate tree planting, as required in the Planning Brief, can be easily accomplished without the loss of houses. It just requires more work to redraw the plans.

We strongly believe that Bloor Homes should comply with the requirements of the Council's Planning Brief, and make the spine road less contorted, more generous in width and tree-lined with semi mature trees, as described in the Brief, so that it can be a distinctive feature at the heart of Garsdale, making it different from other housing schemes. In a competitive economic situation, this could also help marketing Garsdale to future home buyers. There is no substantive reason for deviating from the Planning Brief.

On Street Parking: None of the streets provide designated areas for on-street parking, which could count towards the parking provision needed, although on street parking is likely to occur anyway.

Employment: On pages 23, 58,167 and 169 of the adopted Planning Brief, the importance of including a mix of uses is emphasised, in order to achieve the objectives of the Brief for a mixed use development. Page 167 refers to the need for community/retail facilities to be located adjacent to the Park, plus ground floor employment uses at the eastern end of the block, near the entrance from Wallbridge. Page 169 refers to the potential for employment uses in the area constrained by noise from converging lines of two railway tracks.

In the planning application, seven live/work units, plus one shop have been shown. The conclusion must be that employment activities are virtually non-existent, and that for all practical purposes, this is a single use residential development. This is not in the spirit of the Planning Brief.

In the creation of new sustainable communities, a reasonable element of employment activity is essential, and we consider that, despite Roger Tym & Partners pessimistic outlook, Bloor Homes should reserve some

land on this on this site, which is former 'employment' land, for the development of employment uses at a future date.

Sustainable Development: Pages 42-43 of the adopted Planning Brief sets out the importance of sustainability in the design and construction of buildings. In the accompanying text to the planning application, there is no direct commitment to achieving a specific level in the 'Code for Sustainable Homes, other than that social housing will achieve Level 3 (D & A Statement page 35, Sustainability Site Evaluation page 16). The features then listed in the accompanying text are mostly current good practice, rather than achieving higher standards.

In order to meet the government's targets to reduce energy consumption and carbon emissions, and to comply with the requirements of the District Council's Local Plan Policy ER1, it is essential that all dwellings, meet the appropriate level of the Code for Sustainable Homes. Level 3 is mentioned for Social Housing but by the time this area is developed, the aspiration of homebuyers, the local Planning Authority and responsible developers are likely to be at least Code 4.

The accompanying text makes no reference to on-site renewable energy, although this is referred to on Page 43 of the Planning Brief. Provision for on-site renewable energy should be included in the scheme.

Perimeter Blocks and garages on street frontages: On page 54 of the adopted Planning Brief it says that "proposals are required to utilise the concept of perimeter block development". This is based on continuous building frontages to all streets and the avoidance of ground level blank walls and edges, and garage doors. The interpretation of this principle has not been successfully achieved.

The planning application shows a much more fragmented frontage, even more fragmented than the pre-application public exhibition, with frequent breaks in building frontage, particularly where ends of terraces present blank rear garden walls to streets. This problem occurs thirteen times on Plots 5, 16, 22, 27, 37, 41, 52, 61, 72, 77, 85, 102 and 170. The introduction of flats on these corners would solve this issue.

Garage blocks facing the street also present blank frontages and interrupt the continuity of houses facing the street. This occurs on garage blocks 4, 5, 6, 22, 26, 27, 36, 37, 39, 40, 51, 52, 61, 143, 144, 145, 170, 171, 172, 173 and 174. This is poor urban design.

Garage doors on the ground level front elevations of houses create a blank or 'dead' frontage, which is unacceptable. This occurs on 34 plots of House Type 3306, namely, plots 16-21, 41-45, 68-72, 77-85, 102-107, and 140-142. This is an excessive number of garage doors facing main streets and this house type should be changed to provide habitable rooms facing streets at ground level.

Garage doors fronting the street are a particular problem in the following areas. 1: The two key pedestrian linkages from Garston Road through to the children's play area. 2. Fronting onto the western side of the childrens play area. 3. Along the main access into the site from Wallbridge. 4. At the termination of the axis of the main approach into the site from Wallbridge. In addition to blank garage doors, all 34 of these plots also have continuous lines of forecourt parking facing the street, which will create particularly unattractive street environments, dominated by cars. This is particularly inappropriate for the two approaches to the childrens play area.

Street Elevations: Street elevations are very helpful in gaining a proper understanding of the relationships of different house types, and how together, they create a street. The planning application includes nine street elevations, but seven of these are for the western half of the site and only two are for the eastern half. At least a further six street elevations are needed, particularly for the eastern half if a proper understanding of the appearance of the scheme is to be achieved.

Affordable Housing: The Statement of Community Involvement includes the Minutes of the meeting of the East Mendip Community Partnership held on 3 June 2008. On page 5 it is mentioned that 40% of the housing will be affordable, comprising 22% rented and shared ownership and 18% low cost. In the planning application, 22% of the accommodation is referred to as 'affordable'. No explanation is given on where the low cost homes will be located or what they will comprise. The provision of 'affordable housing' should be in line with the policy contained in the emerging LDF – Core Strategy, which will be applicable by the time this site is developed. The Council's 'Issues and Options' paper, which will set out emerging proposals for affordable housing will be published on 4 December 2008, and should be used in this development.

Apartments: Of the 187 dwellings, only 30 are flats, 22 in flat blocks A, B, and C, (all for social housing), plus 8 flats over garages. This seems a very meagre provision of flats. The rear elevations of social Flat

Blocks A, B and C are very grim and unattractive. Flats on Plots 10 and 30 are single aspect and only have north east facing windows. The flat on Plot 94 could have bigger south facing windows.

Garston Lane Footpath from Garston Road: The paving of the existing Garston Lane footpath from the western end of Garston Road through to Garsdale Road is in very poor condition and should be improved as part of the development of Garsdale.

Pedestrian linkage to east: The opportunity should be taken to negotiate a wayleave from the eastern end of the site, for a footpath to be provided between the converging railway lines, to link through to the existing public footpath that runs along the River Frome valley, between Wallbridge and the town centre.

Turning corners: Generally the scheme layout provides special house types for turning corners, and this is commendable. Exposed gable end walls do occur on corners of Plots 6, 72, 77, 85 and 102, and towards the railway line on plots 149, 151, 152, 166, 181 and 187. Wherever possible, these should have more than a token window in the gable end wall. Plots 97, 122 and 167 could usefully have side windows inserted into their blank gable walls.

Gardens: Generally the scheme provides good sized gardens, averaging between 8-10 metres in length.

Protection from railway noise: We note that Hydrock Consulting state that noise from trains will affect homes along the eastern boundary of the site and that mitigation measures will be needed to achieve acceptable levels of protection from excessive noise. We are surprised that they say there is no problem with excessive noise affecting homes along the northern boundary, facing the mineral freight railway line.

From our own observation, diesel locomotives that haul the very long freight trains are very powerful and extremely noisy and at the sharp curve where these trains join the main line, the steel wheels of the freight wagons emit a high pitched squealing noise that is most unpleasant. The freight trains are believed to run four times each 24 hours, and some of the trains run at night. None of this appears to have been recorded in Hydrock's report.

In their conclusions, Hydrock say that the varying topography precludes the use of a sound barrier along the eastern boundary, but no mention is made about the need for a sound barrier along the northern boundary to protect the housing from the noise of the freight trains. It is interesting to note that a new housing scheme built on former sidings, just east of Salisbury Station, is protected by a high sound barrier from the noise of trains using the main line. At the meeting of the East Mendip Community Partnership on 3 June, it was stated that an 'acoustic fence' will be provided along the boundary with the railway, but this now appears to have been deleted from the scheme.

Building for Life- Government Standard for PPS 3: The scheme does not meet 6 or 7 of the 20 criteria set out in the government endorsed Building for Life standard established by CABI and the Home Builders Federation (see www.buildingforlife.org), which aims to help councils meet the aspirations for housing quality set out in PPS 3.

1. The confusing and contorted spine road does not meet Criteria 4: 'Do the buildings and layout make it easy to find your way around?'
2. The houses and streets dominated by forecourt parking (as in House Type 3306 in the streets approaching the childrens play area) do not meet Criteria 8: 'Is the car parking well integrated and situated so it supports the street scene?'
3. Garage doors on the streets approaching the childrens play area (House Type 3306) do not meet Criteria 10: 'Are public spaces and pedestrian routes overlooked and do they feel safe?'
4. The childrens play area at the back of the site by the railway line is badly located and less accessible to the existing community and thereby does not meet Criteria 12: 'Is space well designed and does it have suitable management arrangements in place?'
5. The lack of commitment to attain Level 4 of the Code for Sustainable Homes does not meet Criteria 13: 'Do buildings or spaces outperform statutory minima, such as Building Regulations?'
6. We are unable to determine whether the scheme meets Criteria 18: 'Is there a tenure mix that reflects the needs of the local community?' and Criteria 19: 'Is there an accommodation mix that reflects the needs and aspirations of the local community?'