

FROM CIVIC SOCIETY'S COMMENTS ON TERRAMOND'S PROPOSALS FOR SAXONVALE
Outline Planning Application Numbers: 120416/004 **28 October 2009**
This refers to the revised Outline Application plans registered on 16 September 2009.

Introduction

Civic Society members have looked carefully at this application. The Society strongly supports the need for a mixed use development of Saxonvale and also supports Mendip District Council's adopted Planning Brief prepared by their consultants Gillespies, which sets out detailed quality guidelines for a good development of the area.

However, we **OBJECT** to:

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We **WELCOME** the improvements that Terramond have made to the scheme as a result of discussions they have had with MDC officers, Frome Town Councillors and Frome Civic Society, including:

- The reduction in height of Plots I and R.
- The remodelling of Plot I to introduce roof landscaping.
- The inclusion of flexible floorspace in Plots K, L and G for the growth of commercial uses.
- Improvements to the level of Mill Square to make it more usable, and

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- Setting Plot T (Cooper Bussmann warehouse) at a lower level.
- A pedestrian linkage across the public Car Park to the Riverside Park.
- Additional parking spaces in the public Car Park.
- Additional street tree planting and additional trees in the public Car Park.
- The reinstatement of the Play Area in the Riverside Park.
- Improvements to and alongside the east/west access road to make it more pedestrian friendly.
- The extension of the Kingsway frontage to terminate Saxonvale (a separate application).
- The one storey high extension of Plot H further south and the removal of the mini roundabout.
- The deletion of the servicing area on the east/west pedestrian area south east of Plot I.

OBJECTIONS

1. The lack of adequate pedestrian improvements in the Gorehedge Junction Design

Drawing SK25 shows proposals for very extensive, 'off-site' highway works at the Gorehedge/Wesley Slope junction. We strongly oppose the limited objectives on which these proposals are based. They do nothing to improve the life threatening difficulties for pedestrians attempting to cross Wesley Slope or the south end of Bath Street, at the Bath Street/Christchurch Street West junction.

If limited Section 106 funds really need to be spent on this junction, and we doubt that they really do, then the primary objective must be to improve pedestrian movement and safety. Potential traffic congestion should be a secondary objective. The Civic Society would prefer to see **a simple, four way, traffic light controlled junction between Christchurch Street West and East, Wesley Slope and Bath Street**, with pedestrian refuge/crossings on each of the four arms of the junction. We have drawn out this proposal, and tabled it at a meeting on 14 January 2009 between Frome Town Council and representatives of Somerset Highways, at which MDC officer, Katy Graham was present.

If this junction really needs to be improved, we wish to have a wider debate on the objectives for the improvements, and to have alternative proposals properly considered and for public consultation to be carried out on the proposals. This is a major junction at the heart of the town, it is not just 'off site highway works'

2. Small Size, overshadowing and management of the Public Square

The Public Square constitutes the heart of Saxonvale and will create a new public venue for markets, events and celebrations, free of traffic intrusion. It is a very important part of the scheme, a major aspiration for Frome and in Mendip's officers' view, **a destination node for pedestrians. The size of the public square should not be eroded below that shown in the Planning Brief.**

At the presentation of the second draft scheme it was claimed that the square had been increased to match approximately the area of the square in the adopted Planning Brief. In fact, in Terramond's Outline Application the square measures roughly 930sqm (approx. 30m x 30m) and falls very far short of the square shown in the Planning Brief, which measures about 1,500 sqm. (approx. 42m x 35m). **The public square in the Outline Application is only 60% of the size of the square in the adopted Planning Brief.** The claim made at the presentation was not true.

The public square is one of the key parts of the Saxonvale project and must not be eroded. **It is essential that the square shown in the adopted Planning Brief is retained at its full size.** To achieve this, the western façade of Plot I will have to be moved further east, and the pinching of the northern end of the square will need to be opened up.

Overshadowing of the Public Square

The buildings framing the eastern and western sides of the square are both between 12.65m and 12.9m (41-42 feet) high. They will overshadow the new square during the morning and afternoon and make it unattractive to be in. As recommended by Mendip's officers, **a shadow analysis is needed** to assess how the height of buildings around the public square will impact upon the space. In addition, **a wind study is needed** to ensure that the square will not be uncomfortably windy. More sections through the Square are needed. None of this information has been provided in the latest submission.

Lack of information about the management of the Public Square and other public realm

The creation of a new public square where markets, events and celebrations can be held will be a great benefit to the town, but no information has been provided on who will be responsible for managing and

maintaining the new public square and other public realm, and whether there will be constraints on what is allowed to be organised in the square. The Civic Society is very aware of the lack of events in the Westway Shopping Centre and the negative attitude taken by the Westway management to the holding of events and the provision of public seating in the Centre, and would not want to see a repeat of this in Saxonvale. **We need reassurance that the new Public Square will be easily available for community events, markets, etc. to benefit the life and activities of the town** .

3. The location of the main Access Road which constrains long term retail growth in Frome

Mendip officer's, commenting on the first draft scheme, said in their letter to Terramond dated 15 February 2008, that the retail/commercial area was defined and constrained by the location of the main vehicular access road. In the second draft scheme, the north/south element of the access road was moved east by about 8 metres, and aligned on a diagonal axis, thereby increasing the footprint of retail Block I from about 1,300 sqm to about 1,600 sqm. This in itself has done nothing to answer the basic issue raised by Mendip officers that **retail/commercial uses are defined and constrained by the access road**. They still are.

The diagonal access road is fundamentally different from the adopted Planning Brief, which located the access road further away from the retail area and provided flexibility in the amount and speed of retail/commercial growth in Blocks IJK, CDFH and GTVL of the Planning Brief (see page 51 of the Design and Access Statement September 2009, or page 19 of the planning Brief). **This flexibility is lost by locating the access road along one edge of the retail area** and it predetermines at the outset of development, the ultimate amount of retail that can be provided, negating any future opportunities for retail growth. This is not in the best interests of the Council or the town.

The active frontages required by the Planning Brief on all roads is very unlikely to happen on the **diagonal part of the access road** in Terramond's application (the eastern ground floor of Plot I), unless the flexible ground floor space on the opposite side of the street (Plot K) is also occupied by retail uses. If this does not happen, the eastern ground floor of Plot I is likely to result in blind rear walls of shops whose entrances are on the south or west elevations of Plot I. If this occurs, **the diagonal road will be an unpleasant part of the scheme, windowless and doorless, and not overlooked at ground level**.

It remains our strong opinion that the main access road through the site should be retained in the location shown in the adopted Planning Brief, as this provides flexibility for retail/commercial growth, avoids bisecting Block IJK and provides access for everyone to enjoy the riverside park, even if this does mean that the occasional service vehicle has to pass through the car park. This latter point should not present a problem and is common in many other places.

Terramond's reasons for not positioning the access road in the location shown in the Planning Brief, is that it will be longer, that it will divide the housing from the riverside park and that it will need to traverse the car park. They prefer an alignment that defines and separates the retail from the residential, despite the lack of flexibility that this imposes on the future growth of retail in the Saxonvale area. **Terramond have never publicly demonstrated on a plan of their scheme the implications of the alignment shown in the Planning Brief, or any other of a number of possible options**.

In April 2009, the **South West Design Review Panel** expressed concerns that the location of the main access road was divisive and suggested that the road be moved further north, and designed as a slow speed street, articulating a series of spaces. Terramond's consultants produced a sketch drawing of a possible alignment. However, this proposal was not developed further. The alignment further north would have helped to integrate Plot I with the housing to the east, by eliminating the sweeping curve of the diagonal road which the Panel did not like.

If the access road is located in the position shown in the Planning Brief, there will be a small amount of extra road surface, but it will provide easy access to the riverside park for events, as well as the housing which fronts onto it, in much the same way as Willow Vale on the other side of the river. It will also avoid bisecting Block IJK, separating retail from residential, it will avoid creating a street with the blind backs of shops only on one side and residential on the other, and it will provide flexibility for retail growth. All these benefits far outweigh any benefits arising from the diagonal location.

On these grounds, **Mendip District Council should not accept a change in the location of the main access road**, but should adhere to the location shown in the adopted Planning Brief, which will be so much better for the long term future of Frome.

4. Lack of sufficient Retail/Commercial floorspace

The retail/commercial element and its related parking are acknowledged as the most important part of the regeneration of Saxonvale, but many of the key issues raised by Mendip District Council's officers in their report attached to their letter to Terramond dated 15 February 2008, have still not been addressed.

Mendip District Council's officers said in their letter that the **Local Plan** identifies a need for 5,500-7,000 sqm of new retail by 2016 when Saxonvale should be completed, and **LDF** studies identify a need for 7,500 sq m of new offices. Terramond's outline application provides between 2,500-4,500sqm of retail, or between 45%-64% of Mendip's forecast, and between 2,000-,5,000 sqm of offices, or about 27%- 60% of Mendip's forecast. This still falls significantly short of the needs of the town by 2016. There is clearly a strong case to provide more retail and office space in the Saxonvale scheme than is currently shown in the outline application, and we are of the opinion that **Terramond's application should be fully in line with Mendip's figures, even if this means a reduction in housing numbers.**

In paragraph 6.9 of Technical Appendix 10.1 concerning retail calculations, Terramond's consultants say "by meeting almost 50% of the identified capacity at 2016, the development at Saxonvale will go a considerable way to meeting the estimated requirements, whilst at the same time enabling other sites to come forward in the town centre to meet any outstanding capacity". **We do not consider that Terramond has gone far enough to meet the retail and office needs of the town by 2016,** and no other sites in the town centre have been identified to meet this shortfall.

5. Lack of a pedestrian/cycle bridge over the River Frome

Paragraph 4.3.1 of Mendip officers' letter dated 15 February 2008 gives detailed and strong support for a pedestrian/cycle link over the River Frome, from the National Cycle Route in Willow Vale, into the Saxonvale development. This has long been an aspiration of Frome residents and is even embedded in the adopted Local Plan. Its realisation as part of the Saxonvale project is essential, and would be a great contribution to the town enabling residents from Rodden Road and other areas to the north and east , to access the town centre on foot or cycle along the valley of the River Frome.

Historical Ordnance Survey maps contained in Technical Appendix 14.1 show a footbridge across the River Frome opposite the western edge of No. 5 Willow Vale, which existed until a flood in 1932. The southern end of the bridge connected to a footpath up the western side of the listed Courthouse and Iron Gates.

We welcome the fact that Terramond have agreed to fund the costs of a study for a new footbridge, but the Civic Society strongly supports the view that **the construction of a new pedestrian/cycle bridge over the River Frome should be funded through Section 106 contributions.**

6. The lack of energy saving targets and a detailed consideration of sustainability

We are very concerned that environmental sustainability and energy conservation targets have been given little attention in the design drawings or written reports forming this Outline Application, and also that there appears to be no way of adequately addressing this issue later at Reserved Matters stage.

PPS1 states that the core principle of good planning is sustainable development. This is to be achieved through good design^[1], which includes addressing,

'on the basis of sound science, the causes and impacts of climate change, the management of pollution and natural hazards, the safeguarding of natural resources, and the minimisation of impacts from the management and use of resources'.^[2]

Local authorities are expected to use objective methodologies, 'as a filter to assess whether new developments;

-are adapted to current and potential future climate impacts.

-mitigate greenhouse gas emissions.^[3]

Authorities are also required to take account of emerging national, regional, and local policies. Mendip's emerging Local Development framework and Core strategy are consistent with the national framework

under which developments will be required to be Code Level 4 by 2012, and Code Level 6 by 2016.

Applications considered now should take account of Mendip's emerging policies.

In addition saved policy ER1 of the adopted Local Plan states "*development will only be permitted where all practicable measures for the conservation of energy have been included in the design, layout and siting of the proposal*". (Building Regulations only ensure that **minimum** legal requirements are achieved and do not cover the range of topics addressed in BREEAM and the Code for Sustainable Homes).

This application fails to demonstrate how even the present required standard of Code Level 3 of the Code for Sustainable Homes is to be achieved. The various categories; from, *1: Energy and Carbon Dioxide emissions*, to *9: Ecology*, are not discussed. **These issues cannot be cost-effectively addressed later in the process** as 'tack-ons', and we fear that the issue of cost will then be used as an excuse for failing to meet the required standards.

The CABE advice regarding D&A statements requires that even an Outline Application should include information on design and should answer the question, *Is the design good enough?* 'Design' in this context also covers issues of sustainability. **We believe that the Saxonvale site offers ample opportunities at the design stage to deliver zero or very low energy buildings** for all the uses proposed and to minimize the amount of CO2 emitted by the development, the cause of global warming.

Achieving sustainable development is a primary function of planning and Mendip should be requiring that the standards already embodied in their present and emerging policies be met, and should request additional information to show how this will be achieved. At the very least **specific conditions should be attached to any outline approval requiring the development to achieve the CfSH standards which apply at the time of construction, and preferably those which will apply in less than 7 years from now.**

These standards are practical and achievable on this site* and will ensure that the 'aspiration' set out in the D&A statement is achieved in compliance with clear government guidance and local environmental sustainability planning policy.

We acknowledge that development on this site offers economic and social benefits, but this should not be traded-off against the impact of the development on environmental and resource considerations. If Mendip consider in this case that these benefits outweigh environmental considerations then this needs to be clearly stated and compensating measures identified. PPS1 states:

"In some circumstances, a planning authority may decide in reaching a decision to give different weight to social, environmental, resource or economic considerations. Where this is the case, the reasons for doing so should be explicit and the consequences considered. Adverse environmental, social and economic impacts should be avoided, mitigated, or compensated for."

^[1] DCLG Circular 01/2006 *Guidance on Changes to the development control system*, para.59, (see also para.53).

^[2] PPS1 para.27 (x)

^[3] http://www.odpm.gov.uk/pub/498/ThePlanningResponsetoClimateChangeAdviceonBetterPracticePDF1234Kb_id1144498.pdf see section on Appraisal. Suitable methodologies include BREEAM, and Ecohomes, (which is now replaced by the Code for Sustainable Homes).

7. Proximity of the new extension to Notts Mill to a listed warehouse (Application 120416/002)

In Terramond's Outline Application, the Grade II Listed building located immediately to the east of the Silk Mill is proposed to be converted into flats and a new first floor extension is to be built on the southern end of Notts Mill. **This new extension is only 0.5m away from the northern façade of the listed building and will obscure the pattern of fenestration on the north elevation of the listed building.** The design of the extension, although a reserved matter, appears to be very unsympathetic to the character and setting of the listed building (see South-East elevation on drawing number P18 Rev D). The new extension to the Notts Mill only provides accommodation for one 2 bed flat and **it would be very desirable to omit the extension** as this would enhance both the setting of the Listed building and Notts Mill.

The **in-line car parking in the pedestrian/cycle route, just to the south of the Listed building detracts from the setting of he Listed Building,** and should be relocated elsewhere.

8. Lack of a stated Long Term Commitment by Terramond to this project

In successful mixed use developments, such as Princesshay, Exeter, or Broadmead (Cabot Circus) Bristol, the developer, Land Securities, has been committed from the start to a long term involvement with managing, maintaining and letting the property in which they have invested considerable time, money and expertise to get right. No indication has been given that Terramond, whose website www.terramond.co.uk; shows that they are almost exclusively concerned with industrial developments, or the consortium of landowners they represent, has a similar approach or **long term commitment** to developing Saxonvale.

We are concerned that without such assurance, Terramond's strategy, following outline planning approval, will be to sell off parcels for others to develop. These developers will almost certainly want to negotiate significant variations to the approved scheme to the likely detriment of Frome and the District Council, who will find it difficult to refuse. Consequently, without such assurance, we have very real fears that a high quality sustainable development of Saxonvale will not be achieved and that we will end up with a series of poor quality, disjointed developments of no distinction. **A developer with a track record mostly concerned with industrial development, presumably selected by the industrial landowners, is not the best choice for regenerating Saxonvale.**

CONCERNS OVER A NUMBER OF KEY ISSUES:

A. Need for improved Pedestrian Linkages from the Town Centre

There is a crucial need for **good pedestrian linkages from the Market Place to ensure a successful Saxonvale.** These linkages are outside Terramond's control. The improvement of existing linkages, such as a **new shared surface in King Street**, the **repaving and tree planting of Kingsway** and a **new shared surface from Cheap Street along Church Street**, or the creation of a new linkage, such as through the former Woolworths, **will require the initiative of Mendip District Council working with Somerset Highways.** **Good, well designed, pedestrian linkages are an essential requirement to ensure successful trading in the new shopping area, which is 160m from the Market Place. To date, nothing is being done to achieve these improved linkages.**

B. Curved Plot H and views of rear service yards of properties in Church Street/Kingsway

(a) Screening the rear service yards of properties in Church Street/Kingsway

The shape and positioning of Plot H where it wraps in a curve around the listed Silk Mill is still unsatisfactory. Plot H faces outwards onto a retained length of the old Saxonvale road, and looks across towards the messy rear service yards of buildings that front onto Church Street and Kingsway. This is still an unresolved part of Terramond's scheme and unless it is resolved in a better way, the exposed service yards will present an uncontrolled and unsightly view, just where pedestrians from the town centre arrive at the public square. **This will seriously detract from the quality required of a new shopping area for the town.** The proposed small extension of the Kingsway frontage does not adequately resolve this problem.

A possible solution might be to relocate Plot H further west as a "U" shaped building, so that it screens the rear service yards, and extends the original historic building line of properties in Church Street (and also Kingsway), and presents a frontage looking towards the Silk Mill. The new offices on Plot R do much the same by presenting a frontage to the new square and screening the ugly side elevation of Marks and Spencers. Access to the rear service yards of properties in Church Street could be taken through the building from Saxonvale. This arrangement would also have the benefit of **creating a vista along Kingsway towards the listed Silk Mill as a landmark feature of the town.**

The Design Review Panel also have concerns about the geometry and sweeping curve of Plot H, which allows enclosure of the Public Square to leak away to the south, and suggest that the Silk Mill should be more of a focal point. We agree with this view.

(b) View of the Silk Mill from Kingsway and increased height of Plot H

In the revised outline application, **the curved part of Plot H has been increased by one storey**, so that it is now 3 storeys above a plinth, about 16 metres, or 53 feet to the ridge line above Kingsway (see Section L-L, Drawing P24 Rev D). Section B-B on Drawing PO9 Rev A shows the original 2 storey version. **A view of the listed Silk Mill along Kingsway would be a great asset to the town**, and some way of adjusting the profile and height of Block H to achieve this would be highly desirable.

(c) The height of Plot H and its relationship to St John's Church

The proximity of the southern end of Plot H to St John's Church raised concerns, and the latest changes to the plans has resulted in a reduction in height of the southern end of Plot H from 3 storeys to 2 storeys. This is most welcome. However, the southern end of Plot H is only 23m from the east end of St John's Church (Grade I listed), yet **no sectional drawings have been provided to show how the height of the new building relates to the height of the east end of the church or to the retaining wall of the churchyard.** This information is essential in order to assess the impact of the scheme on the church. Section M-M on drawing P24 Rev D (and Section B-B on drawing P09 Rev D) shows the southern end of Plot H to be 6.6m high (from existing ground level), plus a 3.5m high pitched roof. A drawing showing how this relates to the church is needed.

A mini roundabout originally shown at the junction of Church Street and Saxonvale for refuse vehicles approaching down Vicarage Street to turn round has been amended to a raised platform shared surface. A single storey extension has been added to the southern end of Plot H to narrow the access into Merchants Barton, to make it more similar to its historic width. These are both welcome improvements.

C. Windowless bulk of Office Plot R

Plot R has been reduced in height from 4 storeys to 3 storeys, and is now 14.1m (46 feet) high to the eaves from the public car park. We welcome this change. Nevertheless, it will present **a very high, long, windowless wall** over the roof of Marks and Spencers when approaching from the west along Kingsway or when seen over the Marks and Spencers service yard (see Section L-L Drawing P24 Rev D). Such a long, high windowless wall is out of character with the Frome town centre Conservation Area and **could do real harm to the character of the Conservation Area** and the nearby Grade II* Iron Gates and The Court House. **The treatment or articulation of this high windowless wall needs urgent consideration.**

The height and impact of Block R (and H) on the Conservation Area is also of particular concern to English Heritage who say that "these blocks will act as a visual barrier from the west.... and could also have irreversible damage on the townscape in this part of the town, hindering the successful integration of this development with the existing urban fabric".

There is a 2 metre wide gap between Plot R and Marks and Spencers which could be a most unpleasant place. Can more effort be made to **remove the need for this dark alleyway.**

D. Lack of detail in the Riverside Park and lack of a Childrens Play Area (LEAP)

Paragraph 4.26 of the Environmental Statement says that "an informal riverside walkway will be provided adjacent to the River Frome as shown in Figure 4.1. **No informal riverside walkway/cycle way is shown in Figure 4.1** or any other drawings. Apart from the current lack of a riverside walkway/cycle way, and a pedestrian/cycle link over the river, the riverside park appears to offer a very attractive new public space for the town, which will be a great asset. However, **it is essential that the large green area north of Rivers Reach, which is outside Terramond's control, is integrated into the Riverside Park** to achieve a more useful size of open space. Will this be done?

Paragraph 4.28 of the Environmental Statement says that "all trees and vegetation within the open area adjacent to the River Frome will be retained and enhanced where possible". The tree survey plan and table in the Arboricultural Report indicates that about 50% of these trees are poor with a minimum of 10 years useful life and about 50% are fair with a minimum useful life of 20 years. **The future of the riverside trees needs to be clarified. More information is needed on the landscaping that will be provided in the park** and how the embankment between the park and the terrace of housing will be handled.

Lack of a Childrens Play Area (LEAP) in the Riverside Park

The Council's Planning Brief, adopted after many consultation meetings with the public included the **requirement for a Childrens Play Area (LEAP) in the Riverside Park** (see pages 63 and 120). We understand that in recent discussions with officers, **the developer has been asked to delete this provision**, because of perceived dangers represented by the River Frome and the current view of officers that the District Council does not wish to fund the maintenance of a LEAP. The revised Outline Application no longer includes a LEAP Play Area.

Officers have no authority to amend an adopted Planning Brief without further public consultation. The omission of a LEAP Childrens Play Area provided by the developer is to be greatly regretted. Children will still be able to play in the Riverside Park, but no organised LEAP Play Area will now be provided by the developer and maintained by the District Council. **The Leap Childrens Play Area should be reinstated, as required in the Planning Brief.**

We welcome Terramond's willingness to reinstate a Children's Play Area in the Riverside Park, but as this will not be a LEAP Childrens Play Area, **it is unclear who will be responsible for ensuring its design, equipment and maintenance.**

E. Lack of sufficient floorspace for FETE (Frome Enterprise Training & Employment)

In Malcolm William's letter to Terramond of 15 February 2008, considerable emphasis is given to the importance of identifying a location in the Saxonvale development for FETE. In Terramond's Outline Application the ground floor and upper ground floor of Mill 1 (Plot T – Cooper Bussman Mill) measuring approx. 325 sqm net, has been assigned to FETE, but it is understood that their needs are for a much larger floor area.

FETE is an important multi-agency educational initiative that will benefit the future economic prosperity of the town very considerably. **It is essential that FETE's requirements for space in Saxonvale are fully met, even if this means fewer flats in the Mill.**

F. Need for further improvements to the two Mills and Mill Square

(a) Notts Industries Mill (Plot F, Mill Two-Building 2A)

On page 149 and 155 of the Council's adopted Planning Brief, the northern end of Notts Mill (a local historic building) is identified as a 'Landmark Building' to be seen from Kingsway across the new Public Square (see also the aerial perspective on page 143). We note that in the revised outline application the northern wall of the modern wing roofed extension to the Mill building in **Plot F** has been moved further south to restore the view of Notts Mill as seen from Kingsway (Drawing P02 Rev C). This is a very welcome amendment. The Landmark Diagram on page 67 of the Design and Access Statement (April 2008) does not show the Notts Mill as a landmark. The Mill building is part of the history of Frome and needs to be able to fulfil its role as a Landmark building and make a positive contribution to the regeneration of Saxonvale, **and it is important that the modern wing roofed extension to the Mill does not obscure it from Kingsway. The design of the modern extension to the Notts building must be very sympathetic to the historic building.**

We also welcome the amendment in the revised plans **to lower the level of the Public Square from 66.68 to 66.23** (a drop of 0.45m or 18 inches). **This has reduced the depth of the sunken area around the north end of the Notts Mill Building** from a previous 1.6m deep (5ft 3in) to 1.11m deep (3ft 7in), see drawing P18 Rev C. The adopted Planning Brief shows the north end of Notts Mill as an active mixed use frontage facing the new Public Square (page 155), so **opening out the sunken area level to the public square with steps and ramps is needed.**

The Notts Mill building is only 8.5m from the overhanging part of the 4 storey façade of **Plot I**. The level of the eaves of Notts Mill is about 76.56, whereas the level of the eaves of Plot I is 79.13m, which is 2.57m higher than Notts Mill. **A section should be provided showing the relationship of the two buildings.**

Paragraph 4.1.37 of Technical Appendix 13.1 proposes **the removal of the 20th century render** to reveal the original brick and stone façade. Table 13.1 on page 193 of the Environmental Statement says "alternative façade treatment will be required if render removal causes too much damage to the fabric". We support careful removal of the render, and as suggested in paragraph 4.1.37, trial areas should be undertaken first, before undertaking the complete removal.

(b) Cooper Bussman Mill (Plot T, Mill One-Building 3A)

Since the original Outline Application was submitted in April 2008, the Cooper Bussmann Mill has been demolished following an arson attack in July 2008. The proposal to rebuild the Mill is welcomed. The decision to lower the Mill Square by the Cooper Bussman Mill from 68.4 to 66.26 is also welcomed and the latest revised plans that show the floor to floor heights reduced from 3.83m to 3.0m is a further bonus, as this will create a more similar replacement of the lost building.

However, the proposed fenestration (Drawing P22 Rev C) is unsympathetic to the adjoining Notts Mill, and very different from the original Cooper Bussmann Mill. Compare the original drawings (Section C-C

drawing P10 Rev A, and section J-J drawing P12 Rev A), with the revised drawings (P10 Rev D and P12 Rev D) to see the difference in appearance of the current proposed fenestration.

Paragraph 13.23 of the Environmental Statement Addendum March 2009 says **“it is recommended that the massing, proportions, height and scale of the original building be maintained”. A replacement building with a pattern of fenestration closer to the original should be provided.**

The proposal to create **a single wide opening** on the ground floor north elevation of this Mill detracts from its character as a local historic building (see drawings P12 and P22). Alternative and **more sympathetic ways of opening up this elevation should be explored.**

(c) Lack of active frontages to ‘Mill Square’ (Warehouse Square)

On pages 116-117 of the adopted Planning Brief, the Mill Square is shown with active retail frontages for cafes, restaurants, small shops, etc and with hard paving for outdoor eating. We welcome the latest proposals to make the square level, instead of sloping, as this will encourage active frontages, but **some way of opening out the sunken area around the north end of the Notts Building with steps and ramps should be explored**, as it is 1.11m (3ft 7in) below the level of the Mill Square and will not encourage the creation of an active frontage along the west side of the square. Drawing P02 and Figure 4v on page 70 of the Design and Access Statement (September 2009) shows **much of the square covered with grass**, which is contrary to the spirit of the adopted Planning Brief.

G. Need for further improvements to the housing provision

(a) Housing Types and the need for more 1 bed flats

Terramond’s Outline Application is intended to provide “up to 350 residential units in a mixture of dwelling types ranging from 1 and 2 bed flats and sheltered accommodation for the over 55s to 3 and 4 bed houses”. The actual number of each type of dwelling is not specified, but from our calculations, the **332 dwellings shown on the drawings** are made up of 79 townhouses, 26 one bed flats, 149 two bed flats, 4 three bed flats, 6 live/work units, 24 one bed sheltered flats and 44 two bed sheltered flats. **Given the need for start up homes for young people, we consider that more than 26 one bed flats are needed in Saxonvale**, and these could be provided if the 149 two bed flats were reduced.

(b) Lack of information on the distribution of Affordable Housing

Mendip officers mention that affordable housing quotas, which are currently 22%, are likely to rise to between 30-40% by the time this housing is built. Paragraph 4.8 of the Environmental Statement says that “at this stage it is expected that approximately 40% of the residential units will be allocated to affordable housing with a 40:60 split between rented and shared equity tenures, however, this is subject to negotiation with MDC”. **It is very important that to avoid the creation of ‘ghettoes’, it is essential to ensure that the affordable dwellings are evenly distributed throughout the site and not concentrated into one or two areas.** This issue needs to be clarified. As the affordable housing may be managed by Mendip Housing, it could be very relevant to consult with them on the content and layout of the housing for which they will be responsible.

H. Need for further design improvements to the housing areas

(a) Housing Layout: massing, height, overshadowing and overlooking

The 4 storey high east-west terraces of flats in **Plots J and K** will create overshadowing of the internal courtyards. The 4 storey flats in **Plot J** are parallel to and only 10 m from the 3 storey town houses in **Plot K**. This will create a metropolitan feeling, very alien to Frome. **No section has been shown through the housing in Plots J and K and this should be provided.** We consider that it would be immeasurably better to revert to the adopted Planning Brief, by **combining Plots J, K and I into one perimeter block, with a larger, more open, internal courtyard as shown in the Planning Brief.**

Flats in **Plots J and K** rely on **corridor or balcony access**. This is much less attractive than flats grouped around a series of vertical access cores. Throughout the housing area, there is a general problem of **overlooking the private rear gardens of townhouses**. This is most noticeable between **Plots G and V**, where the equivalent of a 5 storey block of flats is parallel to and only 12m away from the south facing windows of 3 storey townhouses (see Section C-C on drawing number P10 and the section shown on page 78 of the Design and Access Statement: September 2009). Serious overlooking of private rear gardens also occurs between Lidl’s car park and the townhouses in **Plot O**.

(b) Plot V and double deck car parking

Page 78 of the Design and Access Statement (September 2009) shows two levels of car parking below the flats in Plot V, whereas Section C-C on Drawing number P10 shows a double height area of parking. There does not appear to be any means of accessing a higher level of parking in Plot V, but **this issue needs to be clarified.**

NB: Plot V is shown as 2 storeys on Section C-C drawing P10 Rev D, but as 3 storeys on drawing P23 Rev D. Which is correct?

(c) Lack of creating continuous street frontages as in ‘Perimeter Blocks’

The layout of the adopted Planning Brief is strongly based on the historic pattern of development in Frome whereby buildings generally front onto public streets and enclose and screen rear private areas, creating a layout known as ‘perimeter blocks’. Whilst the proposed scheme loosely follows this pattern there is a marked tendency to create parallel terraces and not to enclose internal courtyards with buildings facing the street. This is particularly evident on the west side of the ‘Green Boulevard’ (or ‘Willows’ linear park), the east side of the diagonal access road and the east side of the public car park, but is also present in the residential areas south of the main access road.

The result is to fragmentise street frontages and to begin the reversion back towards housing layouts favoured by volume house builders. This situation can be avoided by filling in the fragmented perimeters of some of the blocks, particularly **Plots J and K**, but also some of the plots south of the access road.

Creating a more continuous street frontage is important to achieve if development is to be better related to the historic character of Frome and avoid being like any other housing development.

(d) Lack of adequate width for the ‘Willows’ linear park

The ‘Willows’ linear park shown in Terramond’s Outline Application varies in width from 24-34m wide between converging lines of buildings, but only between 4.5-13m of this width is actually grassed landscaping. **The soft landscaping gradually gets squeezed down by roads, parking and footpaths to only 4.5 wide towards the northern end of the ‘linear park’.** 4.5m width for a linear park is really inadequate and it needs to be much wider at the northern end. By comparison, the adopted Planning Brief suggests a linear park about 40 m wide between buildings, of which a continuous width of about 17m would be soft landscaping. This is a much more realistic width for a Linear Park.

This linear park, running in part along the original course of the River Frome, before it was diverted, will provide the main connection for pedestrians from the town to reach the Riverside Park. In the adopted Planning Brief, the north-south alignment of the Willows watercourse was used as the basis for the alignment of the Linear Park and the watercourse was retained and enhanced to provide an ecological corridor. In Terramond’s Outline Application, the alignment of the Linear Park does not follow the alignment of the watercourse, the watercourse has been put into a land drain and all the willow trees will be removed. All the trees shown on the plan will be newly planted.

In Terramond’s Outline Application **the townscape quality of this link is further reduced by the end-on street parking** which will create a linear car park along the pedestrian route. The adopted Planning Brief indicated single carriageways both sides of the park with in-line parking along the kerb, allowing for easy pedestrian crossing. Terramond’s Outline Application shows a 2 lane road, which with end on parking and footways adds up to a 12m width of continuous hard surfaces. This will look very unattractive and cannot reasonably be called a Linear Park. It is more akin to **a linear car park**. By comparison with Drawing PO2 Rev A and PO2 Rev D, four street trees have now been lost, probably as a result of Somerset Highways.

(e) Fragmented frontage to west side of Linear Park

In addition, the housing on the western side of the Linear Park presents **a very fragmented frontage**, consisting of two blocks of 4 storey flats, two gable end walls of 3 storey townhouses a 10m wide side road and two lengths of 4m high garden walls (see Section E-E on drawing number P11). **This is the very opposite of Frome’s traditional perimeter block treatment**, and the intentions of the adopted Planning Brief, whereby streets in Saxonvale should have a continuous frontage of buildings. The same comment about fragmented frontages applies to the western side of **Plots J and K** where they provide a frontage to the public car park and the diagonal access road.

In the earlier Drawing PO2 Rev A, a couple of small 1 metre wide overhanging buildings were included. This has now dramatically increased in Drawing PO2 Rev D to four overhanging buildings, two of which **overhang the linear space by 3 metres. This will noticeable encroach on the visual spaciousness of the Linear Park** (see Section G-G in Drawing P12 and Drawing PO5)

(f) Plots Q and J/K entrance archways and flats spanning across roads

Section F-F on drawing P11 shows the entrance archway into the internal courtyard of **Plot Q** to be 8.4m wide and 5m high with a 2 bed flat spanning over this wide opening at second floor level. This is an excessively wide and high opening and **will look ugly and very out of scale with the area**, particularly with a flat at second floor level spanning the opening. It would be better to omit the flat and have a clear break between the adjoining buildings as in Plot L.

A similar situation occurs on the western elevation between **Plots J and K** where a 10m wide east-west road is spanned with a 2 bed flat at second floor level (Section E-E drawing P11). This will appear **very incongruous and not at all in character with Frome. This would be better omitted.**

(g) Plot O, and the former old orchard area

We are pleased to note that the 3 storey terrace close to the rear gardens of houses in Vicarage Street in Plot O, have been reduced to 2 storeys in the latest revised plans. However, the revised plans also show that there will be **very significant excavation work** undertaken to level the steeply sloping orchard. **Where will this large amount excavated material be transported and deposited?** Cross Section N-N on drawing number P24 shows a very different slope to the rear gardens of these terrace houses than is shown in Cross Section C-C in Drawing P10. These sections are drawn in the same place, **so which is correct?** Another cross section is needed at the western end of the internal courtyard to show the angle of slope here.

The plan contained in the Arboricultural Report indicates that almost all of the trees (eight in number) along the western boundary of **Plot O** are of Fair quality with a minimum life of at least 20 years, and the Plan on drawing P03 appears to design the layout of the housing to retain these trees. However, the Note of the Meeting with Mendip's Tree Officer on 1 April 2008 (included as the final page in the Arboricultural Report) says "it was felt that the proposed scheme would benefit from the retention of the birch and maple tree on the western boundary of 'The Orchard' and that new tree planting in this area could reflect the orchard theme. **Does this mean that all the existing trees in the Orchard, except two, are to be felled?** If this is the case, it appears to us to be unnecessary to lose an established natural habitat that has a reasonable length of future life.

Paragraphs 12.57, 12.77 and 12.88 in the Archaeology Chapter of the Environmental Statement refers to **the Orchard as being the area that "offers the best chance of survival of buried archaeological remains within the proposed development"** and says that this may necessitate a geophysical survey and targeted trial trenching within the orchard area, prior to any demolition or construction activities. This needs to be undertaken before any trees are felled in the Orchard and before any of the extensive excavation work, mentioned above, is undertaken.

The stepped pedestrian linkage from Vicarage Street along the eastern edge of **Plot O** should be combined with **a ramp for cycles and buggies**. It is not clear on drawing number PO3, whether this has been provided. The same comment applies to the stepped pedestrian linkage either side of **Plot L**.

I. Lack of Community Provision within the Section 106 agreement

Paragraph 4.3.6 e & f of the Design and Access Statement (March 2009) lists potential Section 106 contributions. It includes contributions to community services such as libraries, sport and youth services, and open space and play areas, but not a community centre. Paragraph 4.10 of the Environmental Statement says than "no more than 500sqm will be provided for education or community use within the western part of the development. This presumably refers to the 325sqm provided for FETE on the ground and upper ground floors of the Cooper Bussman Mill (Mill One – **Plot T**).

Paragraph 10.46 (page 121) of the Environmental Statement says that the 350 dwellings on Saxonvale could accommodate about 820 people, and Paragraph 10.51 (page 122) says that between 300-600 people are expected to be employed on the site. Although no specific provision was included in the Planning Brief for a new community space, the western (commercial) part of Saxonvale would seem to be a very appropriate location for **a new community centre to meet the needs of these new residents and employees**, as well as other existing residents and employees in and near Frome town centre. **We believe that this additional requirement should be included in the development as part of the Section 106 agreement.**

J. Off-Site Highway Works

In addition to our first point of Objection, concerning the lack of pedestrian improvements in the Gorehedge junction design, we note that in the revised plans, the original proposal to create a traffic light controlled junction at the junction of Christchurch Street East, Vicarage Street, Portway and Garsdale has been dropped in favour of retaining a mini roundabout involving reductions in the width of some footways. We have no comment to make on this change, but **regret the apparent need to reduce the width of footways.**

The drawing on which the above proposals are shown, SK24, also shows proposals for **a Puffin Crossing** in front of No. 32 Christchurch Street East with **new extended kerb build outs.** We see no reason for this change, and no reason appears to have been given, and **we strongly prefer the retention of the existing crossing and pavement build outs which works well.**

K. Paving to the Public Square and Mill Square

On page 114 and 116 of the adopted Planning Brief it says that the new Public Square and the Mill Square (Warehouse Square) are expected to be paved with natural stone. Paragraph 4.30 in Terramond's Environmental Statement says that permeable paving, incorporating lined sub-base storage, will be used in the Public Square to reduce the rate of surface water discharge. **Does this mean that neither the Public Square, nor Mill Square, will be paved with natural stone as described in the adopted Planning Brief?** If this is the case, it is a retrograde step, aimed at cost cutting. **Natural stone surfacing is needed in these main public spaces, as required by the Planning Brief and should be reinstated in the scheme**

John Peverley
Chairman Frome Civic Society