

Further Issues and Options Consultation December 2008

Consultation Response Form

This form should be used to comment on the Mendip Sustainable Community Strategy and Core Strategy further Issues & Options paper which is currently out for consultation. The consultation period runs from 4 December, 2008 to 29 January 2009. **Comments must be received by 5pm on 29 January, 2009.**

Once completed the form can then be handed into any of the Council Information Points or alternatively it can be posted to the Council Offices at the following address:

Mendip District Council
Cannards Grave Road
Shepton Mallet
Somerset. BA4 5BT

The Consultation Paper is available through the 'Time to Plan' link on the Council's website: www.mendip.gov.uk. Here you will be able to give us your views through an online questionnaire. This is the Council's preferred method of receiving comments as it helps us to manage your responses quickly and efficiently.

If you require further information please contact us via our customer services team on (01749) 648999 or customerservices@mendip.gov.uk

<p>Name: ___John Peverley (Chairman)_____</p> <p>Organisation:___Frome Civic Society (if applicable)</p> <p>Address: ___Whitemill_____</p> <p>___Marston Lane</p> <p>_____</p> <p>Frome</p> <p>_____</p> <p>Postcode: _BA11 4DG_____</p> <p>Email: ___john@peverley.org_____</p> <p>Tel: __01373-462644_____</p>	<p><i>If you have appointed someone to act as your agent please give their contact details. All correspondence will be sent to the agent:</i></p> <p>Company Name: _____</p> <p>Contact Name: _____</p> <p>Address: _____ _____ _____</p> <p>Postcode: _____</p> <p>Email: _____</p> <p>Tel: _____</p>
<p>Please tick if you prefer to be contacted by email <input type="checkbox"/></p>	<p>Please tick if you prefer to be contacted by email <input type="checkbox"/></p>
<p>Signature:</p>	<p>Date:</p>

Any written comments you make will be analysed to inform and produce the Mendip LDF Core Strategy and Mendip Sustainable Community Strategy. A summary of these responses will be published at a future stage of the process but will not contain any personal information including names, addresses or contact details. Freedom of Information requests may

arise from the LDF Core Strategy and Sustainable Community Strategy process. Where copies of responses are requested, personal information will be removed from copies prior to their release.

Please use the space below to concisely set out your comments on the consultation paper.

Question Number	Comments
1a	We agree with the Key Issues for Mendip , but under “Sustainable Construction” (p.7) we suggest rewording to say “Current procurement of development leads to poor quality design and wasteful and unsustainable methods of building, giving rise to high carbon emissions both during construction and in life long energy consumption.”
1b	Under “Developing a more local food economy” (p.9) add, “There is an acute shortage of land for allotments and support is needed for local food production” There are <u>two</u> additional Key Issues that should be added: -Depletion of Resources: There is a need to conserve existing energy resources, and to plan for a reduced level of resources such as oil, local stone quarrying, etc. -Sole Traders and the Self Employed: Support needs to be planned for the increasing number of sole traders and self employed people working independently.
2a	New Vision for Mendip: Add to the sentence “Homes have high levels of energy efficiency, helping people to stay out of fuel poverty and new homes have zero carbon emissions”(p.12) Add after the above sentence (p.12): “A high proportion of homes take maximum benefit from energy resourced on site”. Add under the Environment Vision (p.12):”Depletion of natural resources by 2026 will have significantly changed our way of living”.
2d	We agree that if Mendip changed to make the draft Vision a reality it would be a good place to live.
3a	Objective SO9 (p.16, 17, and 22): Rephrase the end of the objective to say: “...that supports sustainable construction, innovation and local distinctiveness”.
3b	Objective SO14 (p.18, 20): Rephrase the end of the objective to say: “...and includes low cost market housing, self build and co-housing as part of the housing mix”.
4a	Under the ‘Skills for Life’ component on p.15, adult education is not referred to. Add a new objective saying: “Provide education for self fulfillment and life long learning.”
4b	Under Objective SO25 (p.23): Rephrase to say: “Promote renewable energy production and develop an action plan for reduced energy consumption”.
5a	Our judgement between the options of 415 or 450 net additional homes per annum is that 415 is more likely to be correct, on the basis that past trends cannot be relied on and patterns of living are likely to be different in the future to reflect changing global conditions, plus the fact that growth should be concentrated around the larger settlements such as Bath and Bristol, but see also Question 8a.
5b	See Question 8a.
6a	Key Issues for Frome: Rephrase the second bullet point (p.33) to say: “Need to provide more jobs locally and expand local skilled based industries to reduce...etc” Then add an additional sentence: “Develop a better understanding of how the varied skill base in Frome translates into land needs”.
7a	Rephrase the last bullet point: “There is a shortage of land for allotments and more land is needed”. The reference to a hotel in the 4 th paragraph on p.34 could refer to a range of prices, not ‘budget’.
X	Objectives for Frome: The 3 rd bullet point about employment land (p.35) should be extended to say: “...to support and expand the current diversity of employment and skills based jobs.” The 7th bullet point (p.35) refers to a foodstore. Any needs for additional food retail should be located in the town centre to help support town centre trade, and this needs to be clearly stated here.
8a	In the 3 rd paragraph on p.36, we seriously question the validity that “2,580 new homes can be accommodated on suitable sites within the existing built up area of Frome”.
8b	Housing in Frome: In Question 8a, the wording between Option 2a and 2b is confusing to understand, but our view is that Option 2b which provides for 1,500 additional homes in Frome, rather than 2,500-2,600, is preferable as this would achieve a greater reduction in commuting and would imply a greater proportion of jobs per head of population.
8c	We would favour “measures to control the release of brown field sites within the town” (Option 2b, p.36) to avoid ‘town cramming’ and retain gardens and open land within the town and when it becomes necessary, we would accept that further needs for development should be accommodated on a ‘greenfield strategic site’. Of the 5 Strategic Site Options on p.50 we prefer Site F3 (see question 22a)
9a	Employment in Frome: We would prefer Option 3a, followed by Option 3b (p.38)
9b	Develop employment in villages and give greater support to sole traders and self employed people.
9c	Starter units should always be included in mixed use housing developments, such as the Weston Vinyls site, Saxonvale and land off Garston Road. On the latter site, the Council’s Planning Brief asked for these, but none have been provided, despite the fact that it is former employment land.
10a	Business Support & Local Skills: FETE should be accommodated in Saxonvale, and Business Link should be accommodated at Weston Vinyls, the Cheese & Grain, or the town centre.
10b	Frome can be described as a ‘very distinctive and attractive town with many creative activities and opportunities’.
11a	Tourism in Frome: The pattern of mediaeval streets, a wide range of independent shops, a thriving market, music and media activities, and a thriving artistic and creative community.

11b	Lovers of quirky towns
11c	The Angel Public House King Street, or the development of Saxonvale could accommodate a hotel .
12a	The Saxonvale development could and should provide more retail . The current planning application provides less than the Council Brief required and has no flexibility for expansion, as required. Further retail should be located in the town centre by a more intensive redevelopment of the Westway site.
12b	Saxonvale, or a redevelopment of Westway could accommodate a medium sized food store .
12c	Any new food retailing should be located in the town centre.
13a	We agree that office uses should be promoted in Frome town centre.
13b	Probably yes.
14a	Entertainment & Leisure in Frome: There is a shortage of public hire venues. New types of leisure uses needed are youth clubs, youth café, community centres, bowling alley,. The cinema in Westway needs supporting and retaining in any future redevelopment.
15a	The removal of traffic could be a long term aspiration, but in the short term, closure of the Market Place on market days between 10-4 (except buses and taxis) is more realistic. However, this is a very controversial and emotive issue, and creating a shared surface in King Street/Church Street/Kingsway for market activities would be a better first step and would help to link to the new Saxonvale retail area.
15b	Rerouting traffic to the west via Whatcombe Road, Welshmill Lane and Welshmill Road and traffic to the east via Rodden Road.
15c	Improving priorities for pedestrians and shoppers by introducing more crossing points in the Market Place and Bath Street, moving parking around Boyle Cross to Bath Street and creating a shared surface in King Street/Church Street for a market (see question 15a) as proposed by the Civic Society.
15d	Some additional intensification of market activities in the Market Place around the Boyle Cross are acceptable in principle, but if buses and taxis have to continue to pass through the Market Place, then the option described in 15a will provide a more extended area for market activities.
15e	See the response to question 15a and 15d above.
15f	See the response to question 15a and 15d above
15g	The Westway shopping centre and its very large service yard and the adjoining Cork Street car park together cover an extensive area that could be more efficiently used to provide additional retail floorspace. It is a reasonable but rather dated shopping environment.
15h	The historic buildings in the town centre are greatly improved as a result of a succession of heritage funding programmes. Where improvements are still required, the Town Council and Chamber of Trade could together be proactive.
15i	We would support measures that improved the appearance and use of the river corridor .
15j	In addition to the 1990's proposals which provides access for people to get nearer to the river water level, this could be extended in both directions to provide a footpath at water level along the length of the deep channel and provide access nearer to (or under?) the Town Bridge, one of only a few bridges with buildings still on top, but little known about, even by local people.
15k	We would support a redevelopment of the wider area around the Westway Centre at the appropriate time, depending on the scheme being of high quality and that well designed public spaces are created.
15l	A comprehensive redevelopment of the Westway could also provide a new river crossing for vehicles, an enhanced river frontage with a riverside footpath at river level, new public squares and tree planting.
17b	Higher Education: Through a linkage to, or in partnership with, one of the Bath Universities.
18a	There should be a distribution of doctors' surgeries around the town, possibly within the identified Local Centres, so that they are easily accessible to everyone and to those least able to travel.
19a	Locations for future allotments should be adjoining new mixed used developments; in the field opposite the Farmer's Arms, Spring Gardens; generally distributed on sites within the town (including the former MDC allotments between Broadway and Oakfield Road); on the Buckland Dinham Road (adjoining site FRO003); on the southern edge of the greenfield strategic site F3; and on nearby farmland leased or sold for this use.
20b	New areas of open space could be created by purchasing the water meadows on the south side of the River Frome, opposite to Rodden Meadows, to create a large riverside open space in the centre of the town. Additional public open spaces could be related to the River Frome corridor to create a continuous necklace of open spaces and a riverside walkway extending to Spring Gardens.
20c	Frome Showground needs improvements to create a more family friendly park with a variety of different environments and experiences. MDC's Welshmill playground also needs improvement.
19d	Welshmill weir and the area of the River Frome corridor around the former Gas Works site, and below Lower Innox needs improving. Currently, the cleaning of the river stops at the weir. The footpath under the railway bridge between Lower Innox and the recreation field south west of the former Gas Works has been unnecessarily blocked by the Network Rail security fence. The river corridor between the eastern end of the Dippy Valley (the former Cuprinol site) and The Retreat/Wallbridge area also needs improving.
19e	An Action Plan supported by the District Council and the Environment Agency.
21a	We support the establishment of Local Centres , but they need to be physically enhanced and of a much better quality, providing a wider range of services. This should not preclude isolated corner shops in residential areas.
21b	Local Centres could provide a post office/people's bank, doctor's surgery, pharmacy, pub, community centre, a small public space, as well as a few shops.
21c	These are good locations for Local Centres, but Keyford might also suitable as a Local Centre.

21d	Local Centres should be within 8 minutes walking distance of surrounding residential areas, but also have space for a limited amount of short term free parking
22a	Strategic Site Option F1 is on the north facing slope of an attractive valley with a strip field pattern and is not suitable for a greenfield expansion of the town. Site F2 is an enclosed valley with only one means of access, possibly liable to flooding, hemmed in on two sides by railway embankments, and traversed by three high voltage overhead electricity lines. It is not very suitable for housing and would be more suitable as allotments. Site F3 has only one means of access, but that is already created; it is also bounded by railway lines, but is well drained, in spite of fronting onto the River Frome in two places.. It is within the Local Plan 'town boundary', but new footpath links to the west and north west will be needed. It is the best option. Sites F4 and F5 should be considered as one area. Neither site has a naturally defined edge and could continue to grow south-east and south-west. The sites are on the south facing slope of a wide valley with a strip field pattern and any development will be very visible from the bypass. It is the furthest of all the sites from the town centre. Site F5 has a mature landscape and rural character.
78, 79, 80	Whilst we cannot opt for any of the 9 Village options, there are opportunities for significant development in some of the villages to help sustain patterns of rural living and rural employment, but this needs to be very carefully assessed and managed in order to avoid creating dormitory settlements. Developments in villages should support mixed uses and include local facilities, community centres, workshops, etc.
81	Releasing large tracts of land to one developer, or one developer acquiring rights over a large tract of land, has in the past resulted in very poor development. The preferred model is to prepare a Masterplan (perhaps through competition), then allocate plots within the site to a variety of developers.
82a	We agree that there should be no threshold on the number of homes proposed before a contribution towards affordable homes is sought.
82b	There should be no exemption, as this will provide a loophole for unscrupulous applicants.
82c	We think that a tariff should be set, based on a sum to be paid per home
82d	We do not think that the threshold should be set at a level where on-site provision can be achieved, but we do believe that even small sites should provide affordable homes on site, wherever feasible.
82e	There should be flexibility to consider each case on its merits.
90	We do not agree with either MDC's approach to maintaining employment , measured by the number of jobs retained on a site, or the RSS's sequential policy. In MDC's case, developers of large employment sites may only have to provide a small piece of land in order to retain the same number of jobs that currently exist on a site, while redeveloping the remainder of the site for high value housing. In many instances, large sites are needed for new employment uses, and the objective in any case, should be to provide for growth of employment activities, not just replacement. It should be made clear to owners of employment land that the Council intends to retain all existing employment land for future employment activities and that alternative uses for the site are unacceptable.
91	The Frome retail area shown in Appendix 2 should be extended to include the future retail area to be provided in the Saxonvale development and to include the shops on the corner of Willow Vale and North Parade, as well as Frome Museum opposite. Should the car parking areas associated with the retail areas also be included?
92	No existing primary retail frontages in Frome should be deleted, but the Primary retail frontages should be extended to include King Street, Kingsway and Church Street (which will provide the key linkages to the new retail area at Saxonvale) as well as Stony Street and Catherine Hill
93	We strongly believe that there is ample evidence to support the case that Mendip should set its own locally specific levels for sustainable construction . In the case of residential development, these should be based on the introduction of higher Code levels in the early years than is currently proposed, based on the Code for Sustainable Homes.
94a	We agree that the BREEAM assessment method is the most suitable for non-residential development.
94b	Given the ongoing depletion of natural resources, non residential development should always be designed to achieve an Excellent BREEAM rating.
94c	The AECB Carbonlite Standards may be a possible alternative in the case of residential development.
95i	Technologies include gasification, biomass and micro-hydro generation, and suitable locations could be identified using a partnership approach with selected energy companies undertaking a survey.
95ii	Like the Code for Sustainable Homes, there should be a phased introduction of increasing percentages of energy generation from on site renewable sources . The Planning and Energy Act 2008, provides a statutory framework (see www.opsi.gov.uk/acts/acts2008/ukpga_20080021_en_1)
96	SUDS should be applied in all appropriate locations, but some locations (eg near watercourses) may not be appropriate.
97	Improving air quality may be adequately covered through other policies in the Consultation Paper, but air quality does need to be regularly monitored.
98	Improving biodiversity in Strategic Nature Areas might be achieved by ensuring that there is always a continuous, uninterrupted green corridor between areas.
100a	We agree that the Special Landscape Features should continue to be protected.
100b	The southern side of Orchardleigh Lake, including the area around the church should be protected as a Special Landscape Feature.
100c	The fields sloping down to the River Frome from the north east side of Whatcombe Road create a dramatic hillside of 'visual significance' that should be protected. Similarly, the hillside sloping down to the River Frome from the Mount Estate should be protected.

101a	We strongly support the establishment of a Local List throughout the District. Our reasons can be summarised by a number of statements by heritage bodies. English Heritage says in the preamble to paragraph 1 of 'Conservation Principles, Policies and Guidance (2007) that "people may value a place (or building) for many reasons: its distinctive architecture or landscape, the story it can tell about its past, its association with notable people or events, its landform, flora and fauna, because they find it beautiful, awesome or inspiring, or for its role as a focus of an established community. In paragraph 52 they say "the fact that a place does not meet current criteria for formal listing, does not negate its value to particular communities". Paragraph 23 of the Executive Summary to the DCMS White Paper on Heritage Protection for the 21 st Century (March 2007) says "local designation has an essential role to play: local designation provides a means for local communities to identify and protect the buildings, sites and spaces that matter to them. It helps to build a sense of local identity and distinctiveness, a sense of history, place and belonging". These are the reasons we believe that Local Listing is so important.
101b	The selection criteria established by MDC's Local Listing Forum, with support from MDC's Conservation Officer identifies the criteria of the type of buildings and structures to be included in Local Listing. We support this selection criteria. Basically, the types of buildings and structures that should be included in a Local List are those of local historic interest that are valued by the local community.
101c	Protection from demolition is the key issue, but additional controls, similar to those applying to Conservation Areas, or the application of Article 4 Directions in particular cases, would be beneficial.
101d	Owners of buildings identified for Local Listing should be notified, and provided with a guidance leaflet explaining the benefits of Local Listing, and their right of appeal.
102a	We believe that all new housing developments (over 10 dwellings) should be assessed against the Building for Life standard. We agree with the draft RSS for the West Midlands that includes a commitment that all new housing schemes reach the BfL 'Good' standard (score 14/20). Schemes should be scored by MDC's accredited Building for Life Assessor.
102b	Village or Town Design Statements , if written as guidance documents are acceptable, although they do take a very considerable amount of time and energy to prepare. Absolute policies arising from such documents could be too restrictive. Those developers guided by Design Statements need to have good design skills within their teams, and these can only be monitored by a qualified Design Review Panel , the need for which the Consultation Paper does not refer to.
102c	Any District wide Design Guide would need to recognise that design style within the District varies, and for this reason, it may be difficult to produce design guidance. What would be much more useful would be a Design Advisory Panel , aware of the District's variety of design, to review major planning applications and applications in sensitive locations and also be consulted at pre-application stage.
103a	The efficient use of land for housing is an integral part of the Building for Life assessment. MDC's accredited Building for Life assessor should be able to make this judgement.
103b	There is no correlation between high density and good design. However, it is even more important that all schemes of high density are of a very high quality of design in order to make the high density of development comfortable to live in.
104	We strongly support a more community based approach to public transport , such as a move away from large buses, except for fast direct services between towns, towards smaller vehicles that can accommodate 5-10 people, car sharing, and an easy method of 'licensing' private cars for carrying paying passengers.
105	A co-ordinated effort needs to be made by MDC and SCC to complete the national cycle (and walkers) route through Frome and on towards Longleat. The completion of the route through Frome has been waiting for years and now needs to be given top priority. Walking and cycling routes are not the only issue. There needs to be a cultural change in thinking, planning and provision, to give walkers and cyclists priority over vehicles by creating continuous joined up footpaths, cycleways, and easy and frequent crossing points over major roads.
106	The current Local Plan policy for retaining community facilities in villages is very important and must be retained.
107	We support Option 19b for securing developer contributions , but Option 19c may possibly provide more flexibility for providing on-site facilities, providing it is not too confusing to operate successfully.
108a	We agree that the list represents the types of community infrastructure needed, but we are concerned that developer contributions are not siphoned off to fund regional infrastructure, such as hospitals, waste facilities, etc. which should be funded from other sources.
108b	Funding for Community Centres, Village Halls and Renewable Energy should be added to the list and funding for pedestrian and cycleway infrastructure should be near the top of the list.
108c	To keep it simple the Community Infrastructure Levy should be a standard charge across the District
109d	If a Tariff is set, the simplest, most logical, and least likely to lead to abuse, is a cost per square metre.
110a	Types of development that should be exempt from making contributions are Community Centres, Sports buildings, Village Halls, Schools and similar community buildings.
110b	There should be some limited flexibility to negotiate the best outcomes.
111a	The collected contributions should be spent within the settlement where they are generated.
111b	Under the Sustainable Communities Act, a Panel of Local Representatives , should be established and this could oversee the allocation of funds. ie. the local community should be involved in helping to decide what the contributions are to be spent on. This does not feature in the Consultation Paper.
111c	A time limit of 10 years for spending contributions would be reasonable. END

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