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To : Tracy Aarons, Deputy CE MDC (Tracy.Aarons@mendip.gov.uk)
Copied to Andre Sestini, (andre.sestini@mendip.gov.uk)
Jo Milling Planning Policy (Jo.Milling@mendip.gov.uk)

4th November 2019

Dear Tracy

The Chairs of Rode, Beckington and Norton St Philip are writing to you as we continue to have very great concern over the LPP2 Inspector's proposals to allocate a further 505 dwellings in the North East of the District.

The Council's present position appears to be to allocate as many of these as possible around Midsomer Norton and then to distribute the balance in the 3 primary villages of the North East that we represent. We fear that you will be responding to the Inspector in such terms shortly.

As we have indicated on several occasions, and you and your officers have accepted, this is in direct conflict with MDC's adopted Spatial Strategy as set out in LPP1.

We are quite sure that we are not alone in our concerns about your intended response to the Inspector. It may well be that the residents and Councils of Midsomer Norton and Radstock will find this proposal extremely unwelcome. B&NES have already resisted development in this area, being able to meet their housing need themselves.

Local Plan Part 1 is quite clear that development should be focused on the main towns. In the North East this makes Frome the focus as it is the key town. Directing further development at such a sustainable location would satisfy both the policies of LPP1 and Para 72 of the NPPF:

72. The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy - making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should :

- a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;*
- b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self - containment) , or in larger towns to which there is good access*

It seems that the LPP2 allocations in and around Frome are quite limited in scale. It is a thriving town and has excellent transport links. It has the infrastructure to support a larger population.

We suggest that the most sustainable approach in accordance with spatial strategy is for MDC to look at either the potential to expand current allocations on the edge of Frome or consider a new strategic site. This would clearly satisfy the criteria and objectives as clearly set out above in the NPPF.

We have looked at sites put forward previously and would ask you to reconsider sites around Frome such as Selwood Garden Village or Rodden Farm (FRO210M). The latter appears to be in one ownership (which will aid deliverability) and has existing direct links to shops and the nearby train station, including via an existing underpass under the A361. It has the potential to link with development to the west of the A361, including the new housing with associated public open space. It appears to have the infrastructure in place to support links to the wider network. At 72 ha it has the capability to become a sustainable urban extension with limited visual/landscape impact together with the potential for a number of benefits for existing and future residents of Frome. This site was rejected by MDC at the site selection stage on the basis that it was a strategic site. We submit that such a strategic site is what is now required.

We acknowledge that the Inspector has identified areas to the north of Frome for the '505'. We consider this a far less sustainable location, being further from the train station/other town centre facilities and thereby encouraging the use of the private car (which we note is also the case in the rural villages). You will also have seen our representation to the Inspector concerning his reasoning for this, related to the strategy set by LPP1. We have suggested to him that he leaves the allocation to the Local Plan Review, which will come forward during the current Plan period. We trust that he will consider our suggestion and if he rejects it, give his justification for doing so.

We would ask that MDC also consider this representation. Making further allocations in the 3 villages which have seen disproportionate levels of growth already in the Plan period will be extremely unwelcome. Our historic villages now need a period in which to adjust to their increased size and assess the need for further development through a plan led system. These proposed allocations are Inspector led; MDC risk making allocations against their own Policies in a great hurry without the full consultation process. It seems possible that some of these allocations will be on sites that have previously been considered unsuitable for development. In NSP, for instance, we understand that you are considering 2 greenfield sites. One is the Mackley Triangle which was found unsuitable for development following a comprehensively dismissed Appeal in 2015, the Inspector concluding that development would be disproportionate and "*cause substantial harm to the character and appearance of the area*". The other site is the field adjoining it which was not even put forward at the "Issues and Options" consultation or been subjected to a strategic appraisal. In Beckington an extension of the Redrow site was dismissed at Appeal, the Inspector noting that "*..under the plan - led system the approach is that there should be proportionate growth at the same level across all primary and secondary villages rather than concentrations at only a few*".

We would suggest that rather than accept the Inspector's suggestion that you allocate these 505 dwellings in the North East your response could be to offer other options, such as deferral to the Single Plan review or a single strategic site around either Midsomer Norton or Frome, whether this be a sustainable urban extension or a new garden village.

Yours

Clive Abbott
Chair, NSP PC

Mark Wilson
Chair, Beckington PC

Peter Travis
Joint Chair, Rode PC

Terry Morrow
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