

## **13.0 CHAPTER 13: SOCIO-ECONOMIC EFFECTS**

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### **13.1 INTRODUCTION**

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- 13.1.1 This section of the ES describes the social and economic (socio-economic) baseline conditions and potential socio-economic effects of the proposed Selwood Garden Community (SGC) development.
- 13.1.2 It addresses the relationship between the economic activity that will be generated by the new development and the social impact on the local community. In particular it assesses the impact of the proposed development on the local population, considering the quantum and type of housing, education, health facilities, community facilities and infrastructure, as well as the direct and indirect employment impacts.
- 13.1.3 Within this Chapter, the anticipated environmental effects are identified and where appropriate, suitable mitigation for each of the identified anticipated impacts is proposed. Mitigation can be applied at both the operational stage and during the construction phases of the proposals.
- 13.1.4 The chapter describes the legislative and policy background, methods used to determine the effects, the baseline conditions currently existing on the application site; likely significant effects of the proposed development, the mitigation measures required to prevent, reduce or offset any significant adverse effects and the likely residual effects after these measures have been employed.

#### **About the Author**

- 13.1.5 This Chapter has been prepared by Matthew Kendrick, a Director of Grass Roots Planning Ltd, who has over 19 years' experience in planning consultancy and the preparation of Environmental Statements in support of Environmental Impact Assessment (EIA) Applications. Both are full members of the Royal Town Planning Institute (RTPI).



## 13.2 POLICY CONTEXT

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13.2.1 A full review of the relevant planning policy is set out in Chapter 1 of this ES and within the Planning Statement which accompanies the planning application. However, a summary of those policies most relevant to this chapter is set out below.

### Development Plan Policies

13.2.2 Those of most relevance to socio-economic considerations from the Mendip District Local Plan Part 1 (LPP1), adopted December 2014, and Part 2 (LPP2), are as follows:

- Core Policy 1 (Spatial Strategy)
- Core Policy 2 (Supporting the provision of New Housing)
- Core Policy 3 (Supporting Business Development and Growth)
- Core Policy 8 (Frome)
- DP7 (Design and Amenity of New Development)
- DP11 (Affordable Housing)
- DP14 (Housing Mix and Type)
- DP16 (Open Space and Green Infrastructure)
- DP19 (Development Contributions)
- DP21 (Managing Town Centre Uses)
- DP25 (Employment Land)

13.2.3 The Frome Neighbourhood Plan (adopted December 2016) and Saved Local Plan policies (adopted 2002) have also been taken into account.

13.2.4 The NPPF is a material consideration, and sets out the Government's presumption in favour of sustainable development, of which there are three overarching objectives:

- An economic objective;
- A social objective; and
- An environmental objective.

13.2.5 Section 5 supports the Government's objective of "*significantly boosting the supply of homes*". Section 6 summarises how planning decisions should help to build a strong competitive economy and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

13.2.6 Section 7 seeks to support the role that town centres play at the heart of local communities.

- 13.2.7 Section 8 aims to achieve healthy, inclusive and safe places, which promote: social interaction; are safe and accessible; and enable and support health lifestyles. It notes the importance of access to a network of high-quality open spaces and opportunities for sport and physical activity.

### **13.3 CONSULTATION**

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- 13.3.1 The potential for socio-economic impacts of the development was included within the EIA Scoping request with MDC, but no specific response has been received in respect to socio-economic matters.

### **13.4 ASSESSMENT METHODOLOGY & SIGNIFICANCE CRITERIA**

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#### **Assessment Methodology**

- 13.4.1 The first step is to establish the socio-economic baseline position, which comprises: the local population; employment opportunities, the local labour market; local economic conditions; housing supply; access to education, health, religious and community facilities; access to parks, recreation and sports facilities.
- 13.4.2 In order to assess the impact of the proposed development on the local population, the study area has been established to include the built-up area of Frome, to the north of the proposed SGC development (which includes the wards of Frome College, Berkeley Down, Keyford, Frome Park, Market, Oakfield and Highpoint) and the ward of Beckington and Selwood (within which the site is located).
- 13.4.3 This Chapter will assess the potential effects of the proposed development, both during the construction phase and the operational phase of development.
- 13.4.4 This assessment has included numerous visits to the town and application site and a review of relevant information sources to establish the exiting baseline conditions, including:
- a. The 2011 Census
  - b. NOMIS (official labour market statistics provided by the Office for National Statistics (ONS))
  - c. Mid-year population estimate series
  - d. The English Indices of Deprivation
  - e. DEFRA's "MAGIC" mapping software

- f. A review of online mapping to identify concentrations of local businesses
- g. Review of the Local Plan

13.4.5 Statistical data prepared by the ONS is usually presented in different layers. Middle-Layer Super Output Areas (MSOAs) are geographical areas with a typical population of 7,000-10,000 people. There are 7,201 MSOAs in England and Wales. The site is located within the Middle-Layer Super Output Area (MSOA) of Rode, Mells & Woodlands with the reference Mendip 001, which covers a large area surrounding Frome.

13.4.6 The Lower Layer Super Output (LSOA) is a smaller area with between 1,000 and 3,000 people, the site is located within LSOA Mendip 001D.

13.4.7 The southern and central areas of Frome are located within Frome South & East MSOAs Mendip 007 and Frome North (western section) Mendip 004, and Frome North (eastern section) Mendip 003.

### **Significance Criteria**

13.4.8 There are no generally accepted standard criteria for assessing the significance of socio-economic effects, so the scale of any impacts is assessed based on the magnitude of change against the sensitivity of the baseline position established. In some cases, this cannot be quantified or measured, so the nature and context of the impact is considered more generally.

13.4.9 The assessment results are presented as impacts of major, moderate, minor or negligible significance using the criteria described in Volume 1, Chapter 2: Scope and Methodology. In summary, this is based on an assessment of magnitude and significance, as follows:

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#### **Impact of magnitude**

- High (i.e. the total loss or major/substantial alteration to key elements/features of the baseline conditions and the development will fundamentally alter the character/composition/attributes of the baseline conditions).
  - Medium (loss or alteration to one or more key elements/features of the baseline conditions to materially change the character/composition/attributes of the baseline conditions).
  - Low (a minor shift away from baseline conditions, so a change will be discernible or detectable but not material. The underlying character/composition/attributes of the baseline conditions will be similar to the pre-development situation).
  - Negligible (barely noticeable change to the baseline conditions).
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- No impact – no change.

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#### **Determining Sensitivity**

- High (the receptor/resource has little ability to absorb change without fundamentally altering its present character, or is of international importance).
  - Medium (the receptor/resource has moderate capacity to absorb change without significantly altering its present character, or is high importance).
  - Low (the receptor/resource is tolerant of change without detriment to its character, is of low or local importance).
  - Negligible (the receptor/resource is highly tolerant of change).
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13.4.10 The EIA significance criteria to assess the environmental effects, and as detailed throughout the ES, are as follows:

- Major significant adverse/beneficial impact
- Moderate significant adverse/beneficial impact
- Minor significant adverse/beneficial impact
- Negligible Significant Impact
- No impact/change

13.4.11 The assessment considers the impact during the construction phases and through operation. The assessment of impact considers the duration of the socio-economic effects and whether the effects are temporary or permanent. When effects are likely to be temporary, an assessment will be made as to whether these are short term (i.e. less than 5 years), medium term (i.e 5-10 years), or long term (i.e. more than 10 years).

13.4.12 The sensitivity of the receptor is also taken into account, with some receptors being able to easily adapt to change (i.e. having a low sensitivity to change) and others unable to adapt easily (i.e. high sensitivity to change).

13.4.13 The direct and indirect cumulative effects arising from other “reasonably foreseeable” developments nearby, which includes those with planning permission, or which are under consideration or likely to come forward in the near future, is also considered as part of this assessment; the aim being to establish whether the cumulative effects, when considered together, could have a significant environmental impact.

#### **Assumptions and Limitations**

13.4.14 This assessment is based on the likely development form and mix of uses proposed, as well as the development cost and works programme as provided.

13.4.15 Limitations include a reliance on external data sources, which we have not been able to verify. Likewise, some of the latest available data is some years old, and there may have been changes since it was published. For example, we know that the 2011 Census data is now 9 years old and is due to be updated later in 2021.

### **Cumulative Impacts**

13.4.16 We have considered the cumulative impact which may arise from other nearby developments, to ascertain whether the combined impacts from the proposed scheme and other developments, which together might be considered to have a significant impact that requires mitigation.

13.4.17 Consideration has therefore been given to the potential for the cumulative impacts of the sites which are allocated within the emerging LPP2, some of which are subject to recent planning permission and/or live planning applications.

## **13.5 BASELINE CONDITIONS**

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### **Population**

13.5.1 The total population of Mendip District Council in 2019 was 115,600. Between 2018 and 2019 there was a 0.6% increase in population, which related to a range of factors, including birth and death rates and inward and outward migration.

13.5.2 The average household size in 2011 in Mendip was 2.3 people. One person households account for 30% of the total, with 13% of these being over the age of 65. Family households, with or without children, account for 64% of total households. Households with dependent or non-dependent children account for 38% of total households.

13.5.3 The 2011 census identified that the population for the main built-up area of Frome (See Figure 13.1) was 26,203, made up 49% males and 51% females. Children between the ages of 0 and 19 accounted for just under 25%, with those over the age of 75 accounting for just over 8% of the total population. The demographic is predominantly white (97%) with 94% of residents born in the UK and 90% in England. Just under 97% of households have English as a main language. 60% of residents are religious, with 58% identifying as Christian, and small numbers (ranging from 0.7-0.1%) identifying with another religion. 32% of residents are not religious.

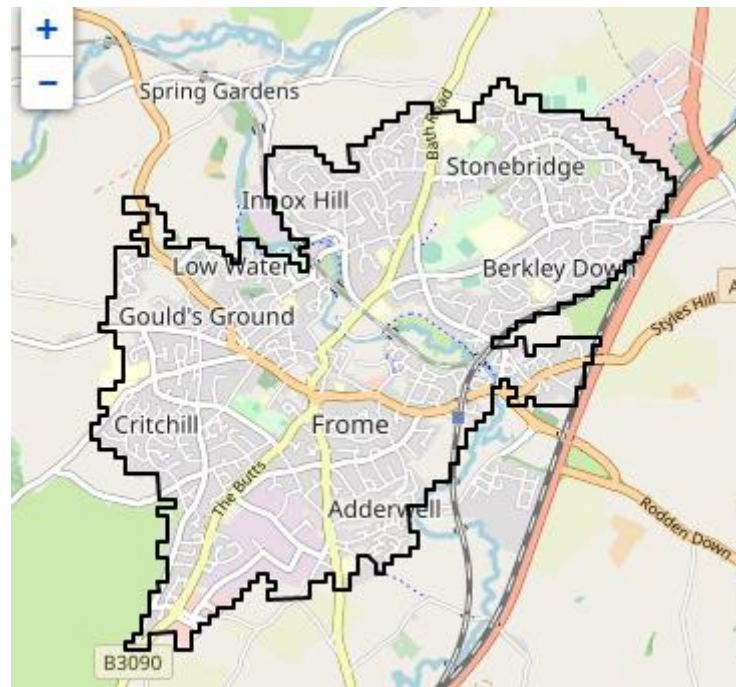


Figure 13.1. extent of Census 2011 "main built-up area of Frome"

(Source: Nomisweb.co.uk)

13.5.4 Between 2018 and 2019, the highest level of out-migration from Mendip to the surrounding districts was to South Somerset, closely followed by Wiltshire, and Bath & North-East Somerset (B&NES). The highest level of in-migration was from B&NES followed by Wiltshire and South Somerset.

13.5.5 The UK Index of Multiple Deprivation, 2019 (IMD) uses a number of datasets to classify the relative deprivation of small areas of the UK. Out of 317 local authority areas, Mendip ranks at 170 (with 1 being the most deprived, and 317 being the least deprived). Across Mendip, out of the 66 LSOAs, there is some variation, with 2% of LSOAs falling within the 10% most deprived areas, and 6% falling within the top 10% least deprived areas. Since 2015, most LSOAs within Mendip have seen an increase in ranking.

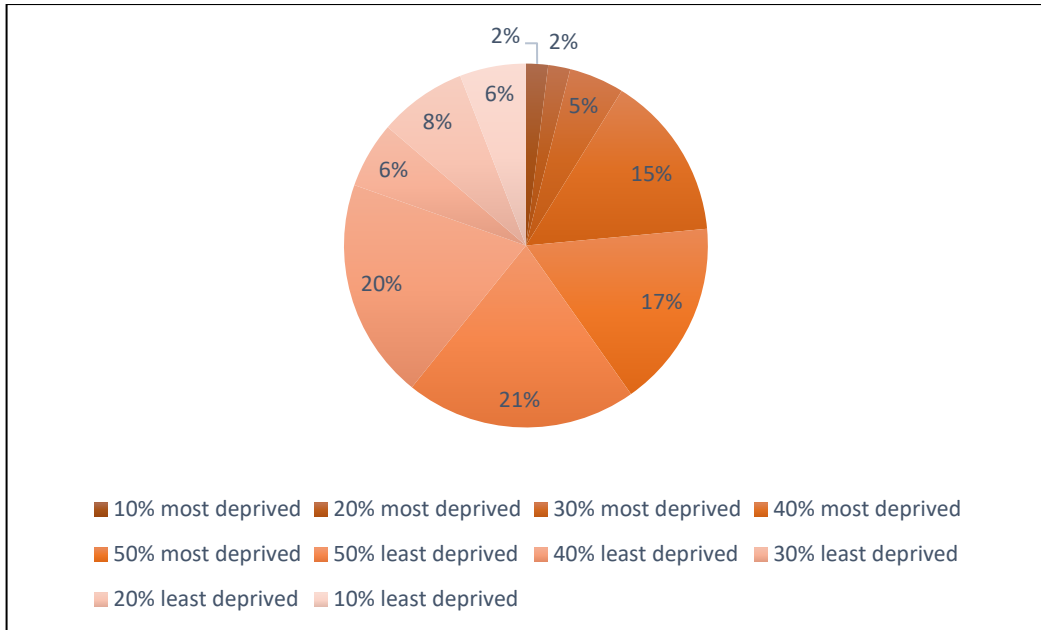


Figure 13.2: Percentage distribution across Mendip of LSOAs falling within each of the with Mendip of each decile of the IMD

- 13.5.6 The District as a whole falls just within the top 50% of more affluent local authority areas (rising from just below 50% in 2015). The site is located within LSOA Mendip 001D, which covers a large area surrounding Frome. It is predominantly a rural area that is ranked 14,474 out of 32,844 LSOAs in England (with 1 being the most deprived) in 2019. In 2015 the area was ranked 13,658 out of 32,844, amongst the 50% more deprived neighbourhoods in England.
- 13.5.7 There is some substantial variation across the built-up area of Frome, with some LSOAs falling within the 10% most deprived neighbourhoods and others within the most affluent, (as shown in Figure 13.3 below). In terms of Wards, parts of Frome Berkley Down in the north-east of Frome is amongst the 10% least deprived and Frome College in the north is amongst the 30% least deprived. The north-western part of Frome Market ward falls within the 50% most deprived, with the eastern part of the ward falling within the 40% most deprived and part of the centre-western part within the 20% most deprived, whereas the eastern part is within 50% of the least deprived areas. Central Frome, including the western part of Frome Keyford adjacent to parts of the north-east boundary SGC site, falls amongst 40% of the most deprived. Frome Park to the north of the site is amongst the 50% least deprived.



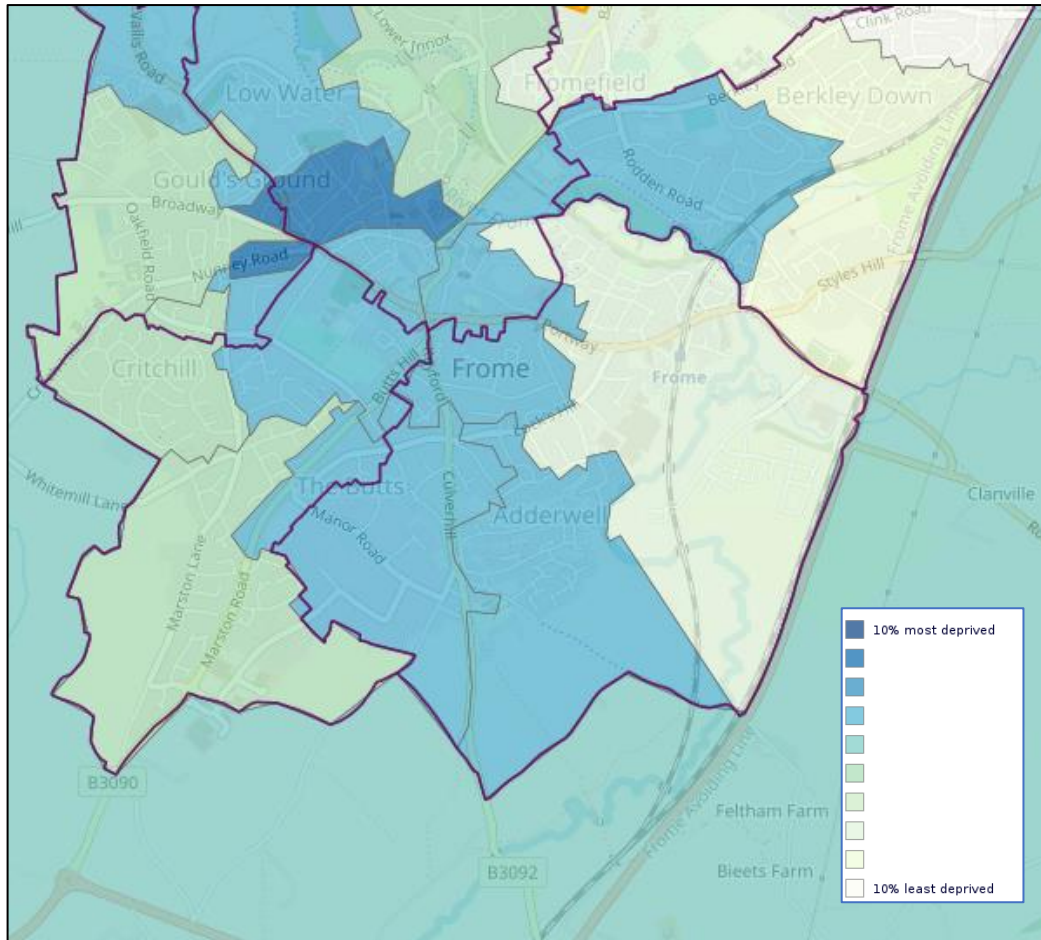


Figure 13.3: Plan showing Indices of Deprivation for Frome<sup>1</sup> (purple lines distinguish the wards)

13.5.8 Car ownership is high, with only 18% of households having no car/van. More than 30% of households have access to 2 or more cars/vans.

### Housing

13.5.9 The 2011 Census identified that there were 11,807 dwellings within the main built-up area of Frome, with the mix split as follows:

- Detached house/bungalow – 20%
- Semi-detached house/bungalow – 29%
- Terraced house (including end of terrace) – 34%
- Purpose built flat/maisonette – 13%
- Converted flat/maisonette – 3%
- Flat/maisonette in commercial building – 1%

13.5.10 According to the 2011 Census, Frome has a large number of number of properties that are owner occupied (69%), with almost 33% being owned outright. Social rented

accommodation accounts for 14% and private rented accounts for 16%. A small proportion (less than 1%) live rent free.

13.5.11 The LPP1 was based on a housing requirement of 420 per annum, but it has been recognised that this requirement is out of date, and has been for some time. Since the LPP1 is overdue for review and out of date, MDC has been using a district-wide Local Housing Need of 604 dwellings per annum for monitoring purposes (applied since December 2019 when the plan became out of date).

13.5.12 The Standard Method now applies to determining housing requirements in MDC and this indicates that a minimum of 595 dwellings per annum should be planned for, before other economic or social factors are taken into account. For example, this might include uplifts required to meet acute affordable housing demand and / or a lack of supply.

13.5.13 MDC's five-year housing land supply position was last assessed in March 2022 and this assessment concluded that the council could only demonstrate a 4.11-year supply, and a shortfall of 531 dwellings. In this context paragraph 11(d) of the NPPF outlines permission for housing developments should granted permission unless:

*i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed <sup>[footnote 6]</sup>; or*  
*ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

13.5.14 In respect to affordable housing need, Somerset Homefinder data provided by MDC confirms that currently 1,921 people are registered for affordable housing in the District, and 593 of these are looking for housing in Frome. This need has increased from the previously available figures which were 1,627 and 520 respectively, underlining the urgent need to deliver affordable housing in the district to meet immediate needs.

13.5.15 According to the MDC Housing Needs Assessment undertaken in 2011 the total net affordable need in MDC was calculated to be 743 affordable dwellings per annum when the LPP1 was adopted. Paragraphs 2.27 and 4.38 of the LPP1 concluded that the Council cannot hope to meet all of the affordable housing need arising in the District via new development, and connected S106 obligations, alone. It does however assume that 2,500 affordable homes would be delivered by the plan towards the acute need identified, so 109 per annum. This is significantly below the much larger level of annual need that the evidence base identified.

13.5.16 The Homefinder data presented above also represents a snapshot in time and does not project affordable housing needs across the lifetime of the SGC development. Accordingly, Pioneer was instructed to assess this issue in more detail and their report is included as Appendix 13.A. Pioneer’s assessment conclusions contain the following salient points relevant to the consideration of the baseline:

- The annual affordable need based on the 2011 Housing Needs Assessment and annualising current needs over 5 years equates to 738 homes per year;
- Based on the 2016 SHMA and annualising current needs over 25 years results in a need of 240 affordable homes per year – but spreading current needs over such a longer period is inappropriate and conflicts with the government policy aimed at dealing with 5-year housing supply;
- If the above figures are updated to reflect the updated NPPF’s Affordable Housing definition (i.e. to include private renters aspiring to purchase), a net annual need of between 378-612 is identified (based on current affordable housing need being annualised over 25 years and 5 years respectively). Even based on the lower figure (378), these figures recognise that as a minimum, 50% of net affordable need is for affordable home ownership;
- Analysis based on the SHMA, and with current needs annualised over 5 years, suggest that needs specific to Frome equates to between 126-145 dwellings per annum, or 190-191 if the adjoining rural sub-area is also taken into consideration;
- In terms of shortfalls against affordable housing requirements the position is summarised as follows:

	District: Implied Annual Shortfall	Frome: Implied Annual Shortfall	Frome & East Rural Sub-Area: Implied Annual Shortfall
<b>Based on Net Annual Completions 2011 to 2020</b>			
Against LPP1 Affordable Housing Target (2500 for the 2006 to 2029 period)	-9	n/a	n/a
Against HNA11 Net Affordable Housing Need <small>Figure 7.17</small>	-738	-140	-226
<b>Against Net Annual Completions 2016 to 2020</b>			
Against SHMA16 Net Affordable Housing Need <small>(see footnote to Figure 4.2.1 in this report)</small>	-127	-12	-33
<b>Against Net Annual Completions 2019 to 2020*</b>			
Against Adjusted SHMA16** Net Affordable Housing Need Over 25yr Period	-269	-.38 to -52	-.74 to -77
Against Adjusted SHMA16** Net Affordable Housing Need Over Initial 5yr Period	-503	-.86 to -105	-.146 to -147

13.5.17 Therefore, it is apparent that against any measure of affordable housing there has been a consistent and continuing shortfall which will have exacerbated affordability issues.

## **Employment**

- 13.5.18 The 2011 Census indicates that across the Mendip local authority area, there is reasonable level of people traveling into the area to work, but more people travel out than come in, giving a net difference of 4,587 jobs. The biggest inflows come from B&NES (2,900), South Somerset (2,038), Sedgemoor (2,023) and Wiltshire (1,828). The biggest outflows are to B&NES (4,285), Wiltshire (3,121), South Somerset (2,252), City of Bristol (1,369) and Sedgemoor (1,247).
- 13.5.19 While we do not have the data that relates directly to Frome, it is likely that where there is inflow, this is more likely to be directed towards the larger settlements, such as Frome. However, the Local Plan recognises that out-commuting from Frome is significant problem and that Frome is a net exporter of labour.
- 13.5.20 According to the 2011 Census, within the built-up area of Frome, 74% of residents are economically active, with 12,811 residents (69%) in employment. Economically inactive residents account for 26% (4,878), which includes those that are retired, students etc. unemployment is currently at 3.9%. 25% of households have at least one person in the household with a long-term health problem or disability.
- 13.5.21 Almost 32% of residents are educated to GCSE level, with 25% having some level of further education.
- 13.5.22 Residents tend to work in a range of sectors, with biggest sectors being manufacturing accounting for 11%, wholesale/retail trade or motor vehicle repair accounting for 16%, 12% working in education and 12% working in human health/social work-related activities.
- 13.5.23 The median gross weekly pay (before tax and contributions) within Mendip is £556 (gross) per week (obtained from the ONS annual survey of hours and earnings).
- 13.5.24 Mendip's Economic Development Strategy 2017-2020, notes that the Mendip economy has sustained overall employment growth consistently for the past 15 years. In 2015, there were a total of 45,000 employees in employment, which represents an increase of 3,000 since 2010 and 8,500 (23.3%) over the fifteen years since 2000. Mendip's overall rate of employment growth has outperformed the national trends since 2003 and exceed the regional rates of growth since 2010 (page 15). In terms of key sectors, it outlines that the Mendip economy has a strong presence of employment in Wholesale/Retail (19.4%), Finance & Business Services (16.7%), Education and Health & Social Work (both 11%).

While the data excludes farm-based agriculture, it is also expected to be strong locally. Although relatively small in overall employment terms, Food & Drink processing in Mendip is three times the national average level of employment, making it locally significant. Other sectors above the national and/or regional levels include Wholesale/Retail (reflecting the regional significance of the market towns as well as specialist outlets including Clarks Village), Education (reflecting Mendip's strong independent schools), Construction and Mining & Quarrying (reflecting local resources) (para 17).

- 13.5.25 The existing site currently comprises predominantly agricultural land, which the Agricultural Land Quality survey which accompanies the planning application confirms is mainly Grade 4 agricultural land (poor quality), with some Grade 3b (moderate quality). This means that none of the site area is classed as the "best" or "most versatile agricultural land".

### Retail/Town Centre Impact

- 13.5.26 Frome Town Centre, including the designated Town Centre Primary Frontage on Catherine Street, is located approximately 2km from the proposed SGC development site, as identified within the Local Plan Proposals Map (see extract in Figure 13.4 below).

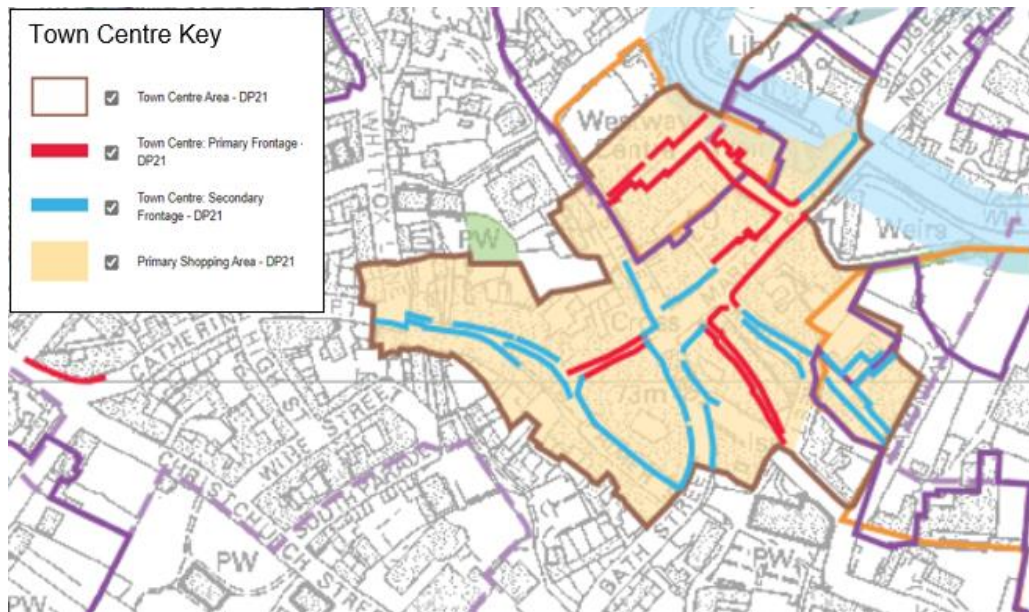


Figure 13.4: Extract from Local Plan Proposals Map

- 13.5.27 To the north/north-east of the SGC site there is the out of centre retail (and employment area) area of Wessex Fields/Sandy's Hill/Manor Road, which comprises a Sainsbury's supermarket and a number of bulky goods shops, including Homebase, Topps Tiles, carpet shops etc.

- 13.5.28 Mendip Council's Economic Development Strategy 2017-2020 acknowledges that Frome is a vibrant and historic market town, which has a strong artisan and independent retail sector *"with the thriving area of St Catherine's Hill and its highly successful Frome Independent Market often cited in travel guides and the broadsheets"*. The 2010 Mendip Town Centre Study includes a Town Centre Health Check of Frome, which notes an increase in the number of occupied units and a reduction in vacant units since the previous Health Check (in 2005), noting that there were fewer vacancies (at the time, which was soon after the 2008 recession) within the town than during the pre-recession period of economic growth. The assessment notes that Frome *"compares favourably to those in Mendip and fares well with other similar sized towns in the South West"*. Likewise, the emerging LPP2 recognises Frome as *"...a vibrant town offering a good range of services and shopping, including a strong independent retailing sector"* (para 10.1.1).
- 13.5.29 While we have not undertaken a full health check of Frome Town Centre, it is clear that the town continues to be a thriving and healthy town centre with low vacancy rates. While there may be some change following the Covid-19 pandemic, this is not likely to be significant.

#### **Agricultural Land**

- 13.5.30 A semi-detailed survey, which was undertaken to the north of the A361 by ADAS in 1997 (and is available at [www.magic.gov.uk](http://www.magic.gov.uk)) confirms that the site consists of agricultural land which is mainly Grade 4 agricultural land (poor quality) and some Grade 3b agricultural land (moderate quality). A further survey of the land not previously surveyed was commissioned and accompanies the planning application (and is included at Appendix 13.B) and confirms that, due to wetness, the remaining site area consists of Grade 4 land).

#### **Education**

- 13.5.31 Education provision includes early years, the three-tier school system (primary, middle and upper school) that operates in Mendip, post-16 and further education.
- 13.5.32 Somerset County Council (SCC) is the Local Education Authority and has a statutory duty to ensure the provision of sufficient childcare and school places.

#### *Early Years Provision (EYC)*

13.5.33 Based on the SCC’s “Childcare Sufficiency Assessment” (2019), in the Frome and Shepton Mallet EYC, based on GP registrations (January 2019) there is estimated to be around 3,328 of 0-4-year olds.

13.5.34 There is some early years childcare provision provided by the Council, but the majority is provided privately. Based on national usage rates, the provision at all ages is considered to be sufficient. However, in Frome, it is identified that there is sufficient provision for 0-2 year olds (all-year around) and 3-4 year olds (within the Autumn), but insufficient provision for 3-4 year olds in the Spring and Summer. The statement confirms that to ensure sufficient childcare in Frome, existing provision will need to be maintained and supported, with childminders actively promoted.

*School Provision*

13.5.35 Based on the SCC School Place Planning Infrastructure Growth Plan (2019), the net capacity for the Frome School Organisation Place (FSOP) area is set out in Figure 12.5 below, which shows that there is capacity at all levels (with the exception of the all-through school, which is not currently operating at capacity).

	<b>Provision</b>	<b>Net/Pupil Capacity</b>	<b>Number on Roll (Oct 18)</b>	<b>Surplus capacity +/-</b>
<b>First (urban)</b>	<b>5 schools inc. 1 academies</b>	<b>1414</b>	<b>1293</b>	<b>+8.56%</b>
<b>Primary (urban)</b>	<b>1 school inc. 0 academies</b>	<b>210</b>	<b>185</b>	<b>+11.90%</b>
<b>First (rural)</b>	<b>7 schools inc. 2 academies</b>	<b>568</b>	<b>466</b>	<b>+17.96%</b>
<b>Middle</b>	<b>2 schools inc. 2 academies</b>	<b>1400</b>	<b>1273</b>	<b>+9.07%</b>
<b>All-through</b>	<b>1 school inc. 1 free school</b>	<b>390</b>	<b>394</b>	<b>-1.03%</b>
<b>Upper</b>	<b>1 school inc. 0 academies</b>	<b>1,515 (inc. 6<sup>th</sup> form) 1,098 (Yrs 9-11)</b>	<b>1,099 (inc. 6<sup>th</sup> form) 811 (Yrs 9-11)</b>	<b>+27.46% +26.14%</b>

Figure 12.5 Breakdown of net capacity and number on roll for Frome SOP

13.5.36 Taking into account planning applications registered by the end of March 2019 (and the associated housing demands/child yields), the FSOP notes that capacity within the Frome SOP area is as follows:

- First school places - sufficient capacity within first schools to meet the demand for first school places over the next ten years.
- Middle/upper school places - sufficient capacity within first schools to meet the demand for first school places over the next ten years.
- All-through provision – the all-through Steiner Academy has relocated to its permanent base on Frome and currently operates a capacity of 390. When all year groups are full, the Academy will offer up to 624 places (as per the Funding Agreement).

13.5.37 The report does note that if all the housing developments come forward in the SOP area, there would be shortfall in middle school capacity. Discussions held to date with Somerset's Education department have identified that SCC does not currently know whether additional school provision will be required in Frome until an Infrastructure Growth Plan (IGP) is published. Therefore, it is unknown whether wider education provision is to be delivered via the expansion or reordering of existing schools within the town or through the provision of a new school.

13.5.38 Because of this it was assumed that a primary (first) school would likely be required to serve the development, and any further provision would be dealt with via off-site financial contributions. If that changes, the applicants have options that can be explored further with Somerset's Education Department.

### **Health and Well-Being**

13.5.39 Based on the 2011 census, 46% of residents were considered to be in very good health, 36% in good health, 13% in fair health and 4.9% in either bad or very bad health.

13.5.40 Within Frome there are two main Doctor's Surgeries:

- Frome Medical Centre: according to the NHS Digital website<sup>ii</sup>, it has just over 29,000 patients registered, and according to the Practice website, 19 GPs are listed as working at the surgery. This is an average of 1,541 patients per GP, and according to the NHS website, the practice is accepting new patients.
- Beckington Family Practice, which has a site in Frome and one to the north of Frome (in Beckington) is also accepting new patients. It has 10,768 patients and it has 11 GPs listed on its website. This is an average of 979 patients per GP.

13.5.41 Pre-application discussions with the Somerset Clinical Commissioning Group (see Appendix 13.C) identified that Frome Medical Centre has physical capacity for expansion. In addition, Frome residents have access to other GP surgeries in the local area outside of Frome.

13.5.42 The average number of FTE GPs per 1,000 patients per practice in England is 0.58, so 1,420 patients per GP, although in some areas of the country, this rises to an average of 2,900 patients per GP. NHS England recommends up to 1,800 patients per FTE GP should be planned for. While it is likely that a number of GPs listed will work part time, both of



the closest GP practices are accepting new patients, so there does appear to be capacity within the system.

- 13.5.43 There are a number of dentists in Frome, including NHS dentists, as set out in table 13.1 below.

Table 13.1: Table of Dentists in Frome

Location	Accepting NHS?
MyDentist, 32 Rodden Road	Yes
Welshmill Dental Practice	No (private practice)
Portway Dental Practice	Children only
Catherine Court Dentistry	No
Grants House Dentistry	Private

#### Open Space

- 13.5.44 Mendip District Council's Open Space Study was published in 2012. It notes that Frome has a total open space provision of 66.47ha, and while there is adequate provision across the town, based on 2008 population projections, some wards have a deficit in provision, as Figure 13.6 below shows.

Town	Ward	Population	Open space Requirements	Open Space Provision	Amount of Surplus/Deficit
Frome	Frome Berkley Down	4,502	10.80	12.93	2.13
	Frome College	4,493	10.78	29.49	18.71
	Frome Keyford	4,601	11.04	6.76	-4.28
	Frome Market	5,088	12.21	5.79	-6.42
	Frome Oakfield	2,732	6.56	5.4	-1.16
	Frome Park	4,770	11.45	6.1	-5.35
	<b>Totals</b>		<b>26,186</b>	<b>62.84</b>	<b>66.47</b>

Figure 13.6: Open Space Requirements, provision and surplus deficit, based on 2008 population projections (extract from MDC Open Space Study)

- 13.5.45 While Frome has an overall surplus, it has a deficit in designated play space, informal play space and playing fields and pitch provision of 2.62ha, 0.54ha and 2.78ha respectively (para 4.15).
- 13.5.46 In particular, the south of the town lacks playing field provision. Likewise, many of the parks and those areas with a surplus are located in the northern part of the town.
- 13.5.47 The Study also notes that some of the poorest quality sites were the smallest sites, often on housing estates. The highest quality and the better used sites tended to be the more central, town parks.

### **Community Facilities**

13.5.48 There are a number of community facilities in Frome, which include:

- Frome Youth & Community Centre, Vallis Road
- The Bennet Centre, Vicarage Street
- RISE Community Centre, Whittox Lane
- Welsh Mill Hub (shared workspace and community venue)
- Cheese & Grain (live performance venue)
- Frome 1<sup>st</sup> & 7<sup>th</sup> Scouts
- Rook Lane Chapel

13.5.49 There is also a museum (Frome Heritage Museum), a library, a leisure centre, a number of gyms and fitness clubs, and a number of churches and places of worship.

### **Energy and Carbon Emissions**

13.5.50 Currently the majority of Frome's housing and employment space is powered via the national grid which relies on fossil fuels to satisfy demand.

13.5.51 The Frome Renewable Energy Co-Op (Freco) is making some progress in the delivery of renewable energy projects in the town with the provision of solar arrays at Frome Medical Centre, Frome Town Football Club and the rollout of the Solar Streets project with Frome Town Council installing solar PVs on local homes.

13.5.52 Freco is looking at larger scale renewable energy projects to provide a greater proportion of renewable energy for the town, along with opportunities for local people to invest in and benefit from ownership of the local energy system. We had previously been working with Freco in respect to the Solar Farm project, however this has ended because of the withdraw of that application in light of the landscape concerns raised. We will continue to liaise with Freco to hopefully secure their involvement in the delivery of Solar Power within the commercial elements of the SGC development.

13.5.53 Part L (Conservation of Fuel and Power) of the Building Regulations seeks to conserve the use of fuel and power. It is split into four parts which covers new dwellings, existing dwellings, and new and existing buildings other than new dwellings. It provides guidance on limiting heat gain and losses, providing building services that are efficient and information on boiler productivity, insulation regulations, boiler productivity, lighting, storage techniques. Further information covered includes fixed standards for Carbon Index ratings, solar emissions, heating and ventilation systems etc.

13.5.54 In February 2019, MDC declared a Climate and Ecological Emergency, pledging to make best endeavours to enable the District to be carbon neutral by 2030. Somerset County Council and Frome Town Council has also declared the same, highlighting the desire to tackle this issue across all tiers of local government.

### **Cumulative Baseline**

13.5.55 To establish the cumulative baseline, we have taken into account nearby planned developments, including a number of sites allocated within the emerging LPP2` all of which will add to the local population and work force, provide employment opportunities and other financial benefits. These sites include the following:

- FR3a Wainhomes (Seven Valley) Ltd (Refused but appeal ongoing) – 70 dwellings (ref: 2020/0451/FUL)
- FR3a David Wilson Homes (Southern plot) (Committee resolution to grant) – up to 131 dwellings (ref: 2020/0341/OTS)
- FR3a David Wilson Homes (eastern plot) (Committee resolution to grant) – up to 124 dwellings (ref: 2019/3076/FUL)
- FR2 (Approved) – mixed use, comprising 235 dwellings, employment floorspace (B1-Class uses up to 4,050sq.m, a Class A3/A5 drive thru of up to 170sq.m, a food retail building of 1,800sq.m and a non-food retail units (1,400sq.m) (ref: 2019/1671/OTS and 2021/1659/REM)
- FR8 Site B (Approved) – industrial/business park [Class B1(c) 2,300sq.m] (ref: 2019/0885/FUL)
- FR8 Site A (Approved) – public house, 601sq.m (ref: 2019/0884/FUL)

13.5.56 Collectively these schemes will include:

- Up to 560 new homes
- Employment floorspace:
  - B1-Class Uses: 6,350sq.m (NB: now classed as Class E Uses)
  - Food and drink (Class A3/A4/A5): 771sq.m (NB: now classed as Class E/sui generis depending on the extent of drinking/takeaway)
  - Class A1 food/non-food retail: 3,200sq.m (NB: now classed as Class E)

13.5.57 Based on a review of these current or determined applications, against current household data (of 2.3 residents per household), we can estimate that these developments could generate up to 1,288 new residents.

- 13.5.58 Based on average employment densities, using the HCA Employment Densities Guide<sup>iii</sup>, the employment and commercial floorspace provided within these developments will produce around an additional 259 FTE in traditional employment (i.e. former Class B1 (now Class E) and Class B2 uses), 42 FTE in food/drink uses, 106 FTE in the proposed food retail building and 74 FTE in other retail uses. This gives an overall employment of around 481 FTE jobs.
- 13.5.59 Some of these schemes will make s106 contributions towards relevant infrastructure requirements/improvements. It is therefore assumed that individual schemes will adequately mitigate against any negative effects arising from the individual proposed developments.

## **13.6 POTENTIAL EFFECTS**

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### **During Construction**

#### *Population*

- 13.6.1 Due to the existing residential context of the site, during construction works potential impacts on the current population will arise from:
- Noise and disturbance from construction traffic;
  - Dust from the construction of homes; and
  - Vibration impacts on residential properties along the main roads.
- 13.6.2 The construction works will potentially increase the level of noise and disturbance through increased traffic and an increase in density of the population in south Frome. These issues have been assessed in detail as part of the respective ES chapters of these subjects (transport and noise) and we will not reiterate their findings on these matters.
- 13.6.3 The separate chapters on Transport (Chapter 5), Landscape and Visual Impact (Chapter 6), Air Quality (Chapter 10) and Acoustics (Chapter 11) consider the effects of construction traffic, on the road network and the associated effects this would have on population in respect to traffic, air quality and noise and visual impact. Again, we do not repeat the findings of this chapter here.
- 13.6.4 In respect to these matters arising from construction work, such effects will be temporary and short-lived in terms of the impact on existing residential properties affected. The phasing of the proposed development will mean that certain parts of the site are constructed and occupied before later phases commence. Without mitigation, these

effects have the potential to have a **short-term moderate adverse** impact on surrounding residential receptors.

*Economy*

13.6.5 The Housing and Communities Agency (HCA)<sup>iv</sup> estimates that the direct jobs created per £1m output per year (based on 2011 prices) is as follows:

Productivity	New housing	Infra-structure <sup>16</sup>	Public non housing <sup>17</sup>	Private Industrial <sup>18</sup>	Private Commercial <sup>19</sup>	Housing Repair & Maint.	Non Hsg Repair & Maint.
Direct Jobs	19.9	13.9	10.7	10.0	16.6	30.8	29.7
<b>Note: Construction Skills labour coefficients updated.</b>							

Figure 13.7: Labour coefficients (workers per £1m output per year at 2011 prices) (Source HCA 2015)

13.6.6 It is anticipated that the build cost will be around £342 million, and the development will be constructed over a time period of approximately 14 years. Therefore, we have assumed an average spend of £24.42 million per year, although this is likely to fluctuate as infrastructure is delivered in earlier phases of the development. Based on the HCA Labour Coefficients outlined in Figure 13.7 above, we assume an average of 17 jobs per £1m spent given that the majority of site capacity will relate to the provision of new housing. Based on this assumption, it is estimated that the proposed development will create around an additional 411 FTE jobs.

13.6.7 A number of recent studies have sought to quantify the number of direct jobs created by house-building activity across the UK. The House Builder’s Federation estimated in 2005 that for each dwelling built, 1.2 full time jobs were created. However, as well as direct jobs (i.e. those employed on-site), jobs are also created indirectly, through for example, the construction industry’s large supply chain. In addition to this, there is induced employment (i.e. jobs supported by the spending of wages/disposable income of construction and supply chain workers, in the local area in shops, cafes, pubs etc.). More recent research undertaken by Lichfields<sup>v</sup> now indicates that the scale of employment supported by house-building is more likely to be equivalent to between 2.4 and 3.1 jobs created per dwelling. Based on this research therefore, it is anticipated that the development has the potential to generate up to 4,080 and 5,270 jobs as a result of the housing element of the proposals alone.

13.6.8 The development will be phased over a number of years, and therefore, the actual job generation will also be phased across the whole build period, so the reality is that the phasing is likely to sustain jobs for the same people for longer (rather than creating new jobs for each phase). Over 14 years, housing delivery would average 121 dwellings per

year, hence the Lichfields' analysis suggests between 290-375 jobs would be created/sustained every year over the 14-year build programme. This is comparable to the number of jobs estimated using the HCA data and taking into account that additional jobs, over and above the Lichfield derived calculations, will be provided in the construction of infrastructure and the employment land.

- 13.6.9 As Lichfields' research notes, house-building also generates tax revenues by house builders and their supply chains. At a national level, this includes Stamp Duty Land Tax, which is usually charged on all purchases of property and land (although there is a current "stamp duty holiday" as a result of the Covid-19 pandemic on some purchases, this is currently scheduled to end at the end of June 2021 and then tapered until the end of September 2021). Likewise, corporation tax is levied on housebuilders' profits and tax is paid through National Insurance and PAYE contributions. At a local level, revenue streams include Council Tax and Business Rates, and the New Homes Bonus scheme.
- 13.6.10 It is considered that these combined economic effects will have a **temporary/short-term moderate beneficial** impact on the local economy of the study area for the duration of the construction period (circa 14 years).

#### *Energy and Carbon Emissions*

- 13.6.11 The construction process gives rise to CO<sub>2</sub> emissions from the production of materials used in construction and the transport related emissions associated with delivering material to the site.
- 13.6.12 Therefore, the development has the potential to result in a **moderate adverse impact** in respect to increased carbon emissions linked to construction.

#### **During Operation**

##### *Population*

- 13.6.13 To project the residential population from the proposed development, based on the 2011 Census, we have established that the average household size in Mendip is 2.3 persons. Based on the maximum potential number of dwellings proposed for the site (1,700), we have ascertained that the development would generate a population of approximately 3,910 people (which assumes that there is no redistribution from currently overcrowded or other properties within Frome). This represents an increase of 3% above existing population levels in Mendip as a whole, and by 13% within Frome. This is not considered

to be a substantive increase given that Frome is the largest settlement within the district and the percentage increase referred to above assumes that all the residents of SGC will be incomers to the area, when in fact many will be existing residents relocating from currently unsuitable accommodation, people separating and younger people moving out of family homes for example.

- 13.6.14 Once the development is completed, the main effects on population will arise from increased traffic in the area which is dealt with under Chapter 5 of this statement as well as potential impacts on community services used by existing residents, which we will go on to describe later.
- 13.6.15 Economic effects on the population will also occur. This includes a slight positive impact arising from the increased inward investment in the area; provision of new housing and associated infrastructure; and new employment land in close proximity to wards that the baseline suggests are more deprived than other parts of the Town and wider MDC area.
- 13.6.16 In terms of the proposals impact on the population of Frome, given the scale of population change that would result from the development over a fairly long period in excess of 10 years, the effects are considered to be **negligible**.

#### *Open Market Housing*

- 13.6.17 As outlined in Chapter 1 (Introduction), the current LPP1 housing targets are now out of date. Mendip itself acknowledges that even with the sites allocated through the emerging LPP2, additional housing growth is required to meet increased housing requirements that are borne out of the application of the Standard Method.
- 13.6.18 In relation to accommodating existing and new residents to the area in suitable housing, the proposal of up to 1,700 dwellings will make a significant contribution towards meeting the local and strategic housing need for Mendip in a sustainable location. As well as meeting housing need, adding to the supply of housing may reduce house price inflation in the area which has been significant in recent years.
- 13.6.19 Open market homes are also acutely needed, with the 420 dwellings per annum housing requirement that the LPP1 planned for, now being accepted as out of date and the standard method setting a requirement of 595 for the district. Furthermore, the council cannot demonstrate a five-year housing land supply, therefore new housing sites are needed to address this shortfall now.

- 13.6.20 The development would provide new housing land that will deliver a range of house types, sizes and tenures, which will contribute to increasing the choice and mix of housing available and competition in the market.
- 13.6.21 Given the lack of a five-year housing land supply estimated at 4.11 years which is a significant shortfall, the provision of new housing land to address this shortfall is supported by national planning policy. It is considered that the impact on the local housing market in this regard will represent a positive impact of **permanent major beneficial** significance.

*Affordable Housing*

- 13.6.22 We have established the baseline of affordable housing need that identifies that affordable housing need has not been met over an extended period, and the levels of affordable housing that the LPP1 planned for were significantly below the actual established annual need.
- 13.6.23 The only credible way to address this deficiency is to deliver housing on sites that are viable when the delivery of policy compliant affordable housing is taken into account. The Development Proposals have been assessed by Savills in terms of its ability to deliver both the infrastructure required to service the site as well as 30% affordable housing. This has confirmed that the scheme is viable and therefore the assessment of this issue is undertaken with confidence that at the end of the 14-year build period, up to 510 affordable dwellings will be delivered on site in a range of types and tenures to suit local needs.
- 13.6.24 Currently the affordable housing mix for the development has been based on the SHMA evidence and this has been agreed with MDC's housing officers. If, during the determination of the application or as part of later Reserved Matters applications, the affordable housing requirements change, the Section 106 agreement will provide the flexibility for tenures and unit types to be provided in response.
- 13.6.25 The 510 affordable units provide a substantial boost to affordable housing supply in the area which will assist in meeting the identified acute need for affordable housing over the 14-year period the development will cover. Furthermore, it will immediately contribute towards accommodating some of the 1,921 households who are already on the housing register in MDC, of which 593 need housing in Frome.
- 13.6.26 Therefore, the delivery of 510 affordable homes as part of the development represents a positive impact of **permanent major beneficial** significance.



*Retail Impact*

- 13.6.27 In terms of impact on the existing Frome Town Centre, we note that the NPPF confirms that where there is no locally set threshold (as is the case), the default threshold for undertaking a retail impact assessment is 2,500sqm (and paragraph 89 of the NPPF makes it clear that the impact test only applies to retail and leisure uses).
- 13.6.28 The proposed food store element of SGC is 250sqm and represents the only 'pure' retail element of the scheme (Use Class E(a)), and even if non-retail food/drink elements of the scheme (restaurants/cafés and takeaways) are included, the total is 750sqm, which therefore falls beneath the threshold for when a Retail Impact Assessment is required. While Hotels are defined as main town centre uses, they fall within the definition of 'tourism development' (as set out in NPPF Annex 2) and therefore the NPPF does not require an assessment of impact for such development.
- 13.6.29 The scale of uses proposed within the Community Hub, is an entirely appropriate scale for a new community, comprising 1,700 dwellings (giving rise to a population increase of c. 3,910 people as based on 2011 census average household size levels) as well as over 28,243sq.m of commercial floorspace, all of which will generate local demand for services. The scale and type of uses proposed are aimed at meeting the day-to-day local needs of the new community and will not compete with the existing town centre offer.
- 13.6.30 As identified above, Mendip Council's Economic Development Strategy 2017-2020 acknowledges that Frome is a vibrant and historic market town, which has a strong artisan and independent retail sector. The 2010 Mendip Town Centre Study includes a Town Centre Health Check of Frome, which notes an increase in the number of occupied units and a reduction in vacant units since the previous Health Check (in 2005), noting that there were fewer vacancies (at the time, which was soon after the 2008 recession) within the town than during the pre-recession period of economic growth. The assessment notes that Frome *"compares favourably to those in Mendip and fares well with other similar sized towns in the South West"*. Likewise, the emerging LPP2 recognises Frome as *"...a vibrant town offering a good range of services and shopping, including a strong independent retailing sector"*(para 10.1.1).
- 13.6.31 While we have not undertaken a full health check of Frome Town Centre, it is clear that the town continues to be a thriving and healthy town centre with low vacancy rates. While there may be some change following the Covid-19 pandemic, this is not likely to be significant. It is therefore not considered that the proposed development would adversely

affect the vitality or viability of Frome Town centre. On the contrary, the increased employment opportunities and influx of new residents will help support Frome's self-sufficiency and reduce out-commuting, and it is expected that new residents and workers will help support existing shops and services.

- 13.6.32 It is therefore considered that the proposed development will have a **negligible-minor beneficial effect** on Frome Town Centre.

#### *Economy*

- 13.6.33 In addition to providing the much-needed housing, the proposed development will bring with it a range of measures which will benefit the community – either through delivery on site and/or through financial contributions through a s106 Agreement.

- 13.6.34 MHCLG<sup>vi</sup>, for example, estimates that developer contributions in 2016/17 amounted to £6 billion (which includes contributions through CIL payments as well as s106 contributions). While there are currently no CIL charges on development in Mendip, it is expected that financial contributions would be made towards other facilities such as the creation, adoption and maintenance of open space, primary and secondary education provision, community facilities (such as libraries), health care etc., which will benefit new residents as well as the wider existing community of Frome.

- 13.6.35 In addition to this, housing development brings new residents to the area, who will spend money on goods and services in the local area. This includes "moving in" costs and "one-off" costs furnishing a property, as well as further spending through their occupation of the property. This all goes towards supporting shops and services in the local area and helps support the associated jobs.

- 13.6.36 Across the site, employment is proposed within two dedicated employment areas, but other employment uses are also proposed to be integrated into the community hub and within the residential elements. Table 13.2 below provides a summary of the estimated commercial uses and the associated typical employment densities (i.e. jobs created), based on the indicative figures outlined in the HCA employment density guide (3<sup>rd</sup> Edition – November 2015) and our own assumptions. We have used conservative estimates where applicable.

- 13.6.37 For land falling within general employment (i.e. E, B2 and B8 uses) there is a wide range of employment density (from 8 per sq.m for certain types of offices, between 15-50 per sq.m for light industrial/R&D/Studio and 'Maker' Space, 36 per sq.m for industrial and manufacturing and between 70 and 77 per sq.m for storage and distribution). Based on

the type of end-user anticipated (given the type of units proposed and their location), we have used an average figure of 40 FTE per sq.m.

- 13.6.38 For Care Homes, Dentists, Takeaways and the primary school there are no defined employment densities provided by the HCA analysis, therefore we have made some assumptions based on the statistical data available, and our own experience.
- 13.6.39 According to a survey undertaken in 2016 (Laing and Buisson survey), the overall population in care homes in the UK is 418,000, and 435,000 people are employed in them. Therefore, a jobs-to-beds ratio of 1.04 is assumed in respect to this element of the scheme.
- 13.6.40 In respect to the takeaway elements of the scheme the HCA report refers to cafés restaurants having an employment density of 15-20sq.m per employee. For takeaways the lowest point (1 job per 15sq.m) is taken based on the fact they generally serve food more quickly and from much smaller premises.
- 13.6.41 In respect to the proposed dentists, we have made an assumption on the overall job creation based on our experience of similar sized facilities.
- 13.6.42 In respect to primary schools, nationally the average is 1 teacher per 16 pupils, however that does not account for teaching assistants, administrative/management and catering staff. The national average is 0.58 teaching assistants per teacher (based on 2019 School Workforce Census), but primary schools tend to have more TAs than secondary. Therefore, we have applied 1 employee per 10 pupils to reflect the higher proportion of TAs and also other support staff.
- 13.6.43 Table 13.1 summarises the potential job creation of the SGC development, applying these assumptions.

*Table 13.2: Summary of Projected Job Creation*

Land Use	Max. Floorspace proposed (GEA)	Area per FTE (sq.m)	FTE jobs
Convenience Store	Up to 250 sqm	20	12.5
Restaurants and Cafes (Use Class E)	Up to 250 sqm	20	12.5
Hot Food Takeaways (Sui Generis)	Up to 250 sqm	15	16.5
Employment (Classes, E, B2 and B8)	Up to 28,243 Sqm	50	565
Dentists (Use Class E)	Up to 350 sqm	N/A	10
Community Meeting Space (Use Class F1)	Up to 250 sqm	N/A	2

Residential Care Homes	Up to 105 beds	1.04 jobs per bed	109
Primary School (Class D1)	For up to 420 pupils	1 employee per 10 children	42
<b>Total</b>			<b>769.5</b>

- 13.6.44 While it is recognised that some of these jobs created will already be present in and around Frome, and as a result some of the existing businesses will relocate their premises or upgrade to larger/more modern premises, this will have a positive knock-on effect as it will free up existing premises elsewhere for alternative uses/businesses. Frome Town Council and the Chamber of Commerce have repeatedly identified a shortage of office and commercial space in Frome. The new employment land will provide opportunities for existing businesses to upgrade and/or expand their existing premises, possibly retaining businesses which would otherwise have to relocate.
- 13.6.45 Based on the 2011 census, the number of people in employment in Frome is 12,811 people (i.e. 68% of the population), so the development has the potential to create an additional 1,256 jobs on site (i.e. a 10% increase on existing employment levels).
- 13.6.46 In addition to the jobs actually created, there will be indirect jobs created, through the supply chain and the spending power of those employed on site, and within the wider supply chain. The HCA's Additionality Guide, estimates a supply linkage multiplier effect of between 1.21 for retailing and 1.29 for offices (with recreation being 1.56), which would provide a further boost to creating and supporting jobs both directly and indirectly.
- 13.6.47 The Local Plan recognises that Frome is a net exporter of labour, so creating new employment areas and opportunities will have a positive role in strengthening Frome's role as an economic centre, helping to reduce out-commuting.
- 13.6.48 According to the 2011 Census, 54% of Mendip's population (and 74% of Frome's population) was economically active. Based on that figure, it is anticipated therefore that the development has the potential to add between 2,111 and 2,893 extra people to the labour market. While inevitably some of these will already be employed locally and some will commute out of the area, it will nonetheless provide a substantial uplift, bringing a range of skills and experience available in the local area.
- 13.6.49 The impact Covid-19 has had on working patterns is not yet fully clear, but it is inevitable that working from home and more localised, hub-based employment will become more popular. This is likely to further reduce the levels of out-commuting and help retain employment and spending power within Frome and the local area.

13.6.50 The range of employment sectors and job types will create a mix of jobs aimed at different skill sets, educational backgrounds, and work patterns.

13.6.51 The economic impact of the proposed development will be long term, **permanent and major beneficial effect.**

*Agricultural Land*

13.6.52 As the site comprises predominantly poorer quality agricultural land (Grade 4), with some areas of moderate quality agricultural land (Grade 3b), none of the site area is classed as the “best and most versatile agricultural land”. The NPPF requires that planning authorities should ‘take into account the economic and other benefits of the best and most versatile agricultural land’ and ‘where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use area of poorer quality land in preference to that of a higher quality’ (para 122).

13.6.53 Given the quality of the agricultural land and the NPPF policy on this matter, it is considered that its loss to development would have a **permanent negligible adverse effect.**

*Education*

13.6.54 According to SCC projections, there is capacity within local schools at all levels taking into account some (but not all) projected development in the SOP area (excluding the proposed development).

13.6.55 The provision of 1,700 new homes will include many families. Based on the average household size (of 2.3 people), the development would have a population of around 3,910 people. Assuming the age structure reflects the general population of the existing built-up area of Frome, based on the 2011 Census data for Frome, child yield predictions from the proposed development are as follows:

Age Range	2011 Census (% of total population)	Anticipated child yield from development (approx.)
Age 0-4	6%	235
Age 5-9	5.9%	230
Age 10-14	6.1%	239
Age 15-17	4%	156
<b>Total:</b>	<b>22%</b>	<b>860</b>

- 13.6.56 As such, based on current school capacity, taking into account the proposed development, there would be a shortfall in school places. Notwithstanding the current position, we consider the receptor to have a moderate sensitivity to the projected population increase.
- 13.6.57 It is understood from one of the School Governors who wrote in following the public consultation event, that there is capacity within the closest existing primary school, Christ Church School and Nursery on Feltham Lane. The School Governor advises that the school “...is not oversubscribed AND has the capacity to grow/expand)...WITH space ready to take on any new families now, and while the new school is being built” and this has been verified with SCC. The school has capacity and would therefore be able to accommodate new pupils in the short term.
- 13.6.58 Therefore, in the short term the impacts on school places will be **negligible beneficial** as it will boost the rolls of the adjacent Christ Church School making it more financially sustainable. However, as housebuilding continues, there is likely to be a deficit in school places that will result in the town which will result in a in a **moderate adverse effect** because of a resulting need to travel further to secure school places and also from the resulting pressure on existing schools resulting from pupil numbers increasing beyond existing capacity.

#### *Open Space*

- 13.6.59 Without mitigation, as the south of Frome is currently already under provided in terms of sports provision and open space, the proposed development has the potential to have a **permanent moderate-major adverse** impact on existing open space and sports provision within and around Frome.

#### *Community Facilities*

- 13.6.60 Frome is relatively well served by a range of community facilities, and additional residents will help support these, as well as providing funding through membership, potential new volunteers etc. This will sustain these facilities in the longer term will result in a **permanent minor beneficial impact**.

#### *Health Care*

- 13.6.61 Currently the medical facilities in Frome provide GP's relative to population below the maximum level considered acceptable by NHS England (1 GP per 1,800 population).

- 13.6.62 The Somerset Clinical Commissioning Group has confirmed that there is physical capacity to expand the Frome Medical Centre to accommodate the population increase associated with the Development. However, without direct developer contributions, there may not be funding to deliver this expansion.
- 13.6.63 While some dental practices in the town do have capacity to take on new NHS patients, it is unlikely they would have capacity to accommodate all of the potential new residents of the SGC.
- 13.6.64 Without mitigation (i.e. a financial contribution towards funding additional health care facilities or land to accommodate new facilities, as required), there is the potential for a **longer term moderate negative** impact on health care facilities arising from increased delay for appointments or by forcing people to travel further afield for care.

#### *Energy and Carbon Emissions*

- 13.6.65 While building regulations will ensure that new dwellings and commercial buildings are constructed to a standard that minimises their energy demand, planning policies in MDC do not require new housing to generate specific thresholds of renewable energy to meet a proportion of their needs (although this is encouraged).
- 13.6.66 As energy would be provided to the housing via the national grid, and a large proportion of that energy would be provided via non-sustainable means, there would be an increase in CO2 emissions that would arise from this.
- 13.6.67 Therefore, the development has the potential to result in a **moderate adverse impact** in respect to increase carbon emissions linked to these factors.

#### **Committed Development/ Cumulative Impact**

- 13.6.68 Regard has been had to the cumulative impact of the LPP1 and LPP2 sites.
- 13.6.69 When taking into account the impact of development associated with the allocated LPP1 and emerging LPP2 sites, the cumulative impact of development has the potential to place significant additional adverse pressure on existing infrastructure and services (such as roads and services) resulting in a potential **moderate-major adverse impact**.
- 13.6.70 However, consideration must also be given to the new jobs created by the combined total of additional nearby development in Frome (which totals 481 FTE jobs) and those created through the development itself (around 769.5 FT new jobs). In addition to this, there is

also the direct and indirect jobs which will be sustained over the construction phase, which in total is likely to be around 10-15 years. This will result in a **temporary moderate beneficial impact**.

13.6.71 Likewise, the cumulative provision of around 2,260 new homes, including a proportion of affordable housing, will go towards meeting the current (and future) shortfall in housing supply. The cumulative impact will be the creation of a range and mix of housing types and sizes, which will contribute to the creation of mixed and balanced communities. This will result in a **permanent moderate beneficial impact**.

13.6.72 The cumulative impact of the proposed developments will help create inclusive and mixed-use sustainable development contributing to a balanced community, which provide new facilities and infrastructure that will serve and support the existing and new communities, thereby having a **permanent minor beneficial impact**.

## **13.7 MITIGATION MEASURES & MONITORING**

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### **Introduction**

13.7.1 The following mitigation measures are proposed as part of the development and it is proposed that in most cases the delivery of these measures will be secured by planning condition and/or through a s106 agreement, as part of any planning permission.

13.7.2 In relation to the mitigation measures proposed, these relate to the issues to which negative effects have been attributed, because beneficial impacts do not require mitigation.

### **During Construction**

13.7.3 As identified above, the construction phase of the development will create employment opportunities both directly and indirectly. In order to maximise the benefits within the local area, there are a number of measures which could be incorporated, including:

- a. Encouraging the use of local businesses for providing services and products/material, where possible.
- b. Establishing links with local businesses to offer apprenticeships and training opportunities.



- 13.7.4 Inevitably, there will be some adverse impacts associated with the development which have the potential to adversely impact upon the local population, namely in terms of noise and disturbance.
- 13.7.5 A Construction Environmental Management Plan (CEMP) would be secured by condition. CEMPs are regularly used in respect to development sites across the UK and this will adopt best practice construction guidelines and incorporate mitigation measures such as dust and noise suppression, construction vehicle routing to avoid existing residential areas and access the site via a new Junction off Marston Road or the new junction from then A361, timing of works and working hours, phasing, waste management and minimisation and also seek to reduce impacts on ecology and arboriculture. This will help mitigate the impact upon the current local population of Frome and the surrounding villages with regards to noise/disturbance and traffic impact (as explained in Chapters 5, 10 and 11).
- 13.7.6 Likewise, the phasing plan will ensure that the provision of facilities and benefits (identified below) are delivered in a timely manner to meet the needs of the population as and when they are required.
- 13.7.7 To ensure that the proposed construction phase benefits the local area a number of measures can be put into place, such as establishing links with local businesses to provide staff and services, and local employment schemes. This will be discussed with MDC and could be secured through a s106 agreement.

### **During Operation**

- 13.7.8 As outlined, without mitigation, the proposed development has the potential to create a burden on existing infrastructure and facilities such as schools, health services, open space/sports facilities etc.
- 13.7.9 The proposed development has been comprehensively masterplanned, and the scale of development proposed will enable the delivery of the required infrastructure (i.e. active travel routes and highways works), housing and other benefits/enhancements to be (mainly) delivered on-site. These are outlined within the description of the proposed development in Chapter 3 of the ES (and the Planning Statement which accompanies the planning application, but a summary is set out in Table 13.3 below:

*Table 13.3: Summary of the Proposed Development*

Delivered (on site)	Description/Summary
New homes	Up to 1,700

Affordable homes	Up to 510 affordable homes
Primary school	Anticipated to be a two-form entry primary school that will serve the proposed new development, other nearby development (such as the allocated LPP2 sites), as well as existing communities.
Green Space (incorporating Public Open Space)	<p>Green space will amount to a minimum of 36.5 hectares of the total development area (minimum 38.5%). Publicly accessible open space is distributed across the development, and will incorporate:</p> <ul style="list-style-type: none"> <li>• A range of grass pitches for school and community use, comprising public playing fields and a school playing field (around 2.2 hectares in total)</li> <li>• A multi-use Games area (MUGA)</li> <li>• Country Park and meadow parkland alongside the River Frome</li> <li>• 2 x Neighbourhood Equipped Areas of Play (NEAP)</li> <li>• 3 x Local Equipped Area of Play (LEAP)</li> <li>• 66 x Local Area of Play (LAP)</li> <li>• A 3km circular fitness trail, incorporated with activity trails and exercise equipment</li> <li>• Central Park, an informal cascading wetland park, linear parks, pockets parks etc.</li> <li>• Community orchard</li> <li>• Allotments</li> <li>• Foraging woodland</li> <li>• Riverside walks</li> </ul>
Community Hub	<p>While Frome Town Centre offers a thriving and vibrant centre, the community hub is proposed to complement (but not compete with) the existing offer. It is intended to offer a range of facilities and services that will meet the local day-to-day needs within walking distance of the proposed new residents. The hub will incorporate:</p> <ul style="list-style-type: none"> <li>• The primary school;</li> <li>• Community uses;</li> <li>• A convenience store;</li> <li>• Restaurants and Cafés;</li> <li>• Hot food takeaways;</li> <li>• Offices; and</li> <li>• Active travel hub</li> </ul>
Connections	<p>Network of quiet ways and active travel routes, connecting the green spaces, local centre/community hub, jobs with houses.</p> <p>Improvements are also proposed to the existing highways network and public transport routes, including an equestrian/cycle/pedestrian crossing over the bypass.</p>

Other facilities/ commercial uses	<ul style="list-style-type: none"> <li>• Dental Surgery</li> <li>• Care Homes</li> <li>• Employment land</li> </ul>
Energy & Carbon	<p>Aim is to achieve an ultra-low carbon emissions in terms of the development's energy use during operation, which is substantially better than the current regulatory and local planning policy aims.</p> <p>This will be achieved by ambitious CO2 reduction targets (see Design Principles Framework for details) and on-plot renewable energy generation.</p>

13.7.10 In addition to this, the development will provide S106 contributions towards the delivery of enhanced capacity in respect of a number of facilities. This will be discussed in detail with Mendip District Council, but will include contributions towards education (i.e. early years, primary and secondary school), NHS services, bus service improvements, sustainable transport infrastructure and highways works to ensure that there is sufficient highways, social and health infrastructure in place to meet the needs of the additional population.

## 13.8 RESIDUAL EFFECTS

### Introduction

13.8.1 This section considers the residual impacts, taking into account the proposed mitigation measures outlined above.

### During Construction

13.8.2 The CEMP will ensure that the adverse impacts associated with the construction activity, including noise/disturbance, dust/vibration and vehicle routing are limited and controlled as far as possible, thus minimising the social and environmental effects associated, **short term, temporary, minor adverse effects.**

13.8.3 Likewise, the phasing of the development will ensure that construction activity (and associated noise/disturbance/traffic etc) is appropriately phased across the lifetime of the development, so not concentrated at any one time. This would result in a **short term, temporary minor adverse social and environmental effects.**

13.8.4 Jobs created through construction, directly on site, as well as through indirect and induced jobs will result in a **temporary, but medium-term, moderate beneficial impact.**

- 13.8.5 Overall, the residual socio-economic effects arising from the construction phases of development are considered to be of **short term, temporary, minor/negligible significance**.

### **During Operation**

#### *Population*

- 13.8.6 Potential impacts were identified as negligible prior to consideration of mitigation, and following mitigation, this remains as **negligible**.

#### *Open Market Housing*

- 13.8.7 As outlined earlier, there is an acute need for housing within Mendip. The delivery of 1,700 new homes, which will provide a range of house types, sizes and tenures, will make a substantial contribution towards helping the Council meet its deficit in its housing land supply, and will increase the choice and mix of housing available. The development will have a positive impact of **permanent major beneficial** significance.

#### *Affordable Housing*

- 13.8.8 The development will deliver up to 510 affordable units, which will provide a substantial boost to affordable housing supply in the area, thereby assisting in meeting the identified acute need for affordable housing over the 14-year period the development will cover. It will also contribute towards accommodating some of the 1,921 households who are already on the housing register in MDC, of which 593 need housing in Frome.

- 13.8.9 Therefore, the delivery of 510 affordable homes as part of the development represents a positive impact of **permanent major beneficial** significance.

#### *Retail Impact*

- 13.8.10 The type and scale of uses proposed within the Community Hub is an entirely appropriate scale for a new community of the size proposed. The uses proposed are aimed at meeting the day-to-day local needs of the new community and will complement, rather than compete, with the existing town centre offer. Frome Town Centre is clearly a thriving and healthy town, which has a low vacancy rate, and it is noted that the scale of retail and leisure "main town uses" proposed fall below the threshold where a Retail Impact Assessment would be required.

- 13.8.11 The increased employment opportunities and influx of new residents is likely to help support Frome's self-sufficiency and reduce out-commuting, and it is expected that new residents and workers will help support existing shops and services. It is therefore considered that the proposed development will have a **permanent negligible-minor beneficial impact** on Frome Town Centre.

*Economy*

- 13.8.12 The residual effects assessed within the potential effects section of this ES Chapter remain the same after mitigation, with the benefits associated with the number of jobs created (in excess of 769.5 FTE) and the knock-on jobs created and supported through the wider supply chain, as well as the effect this will have on strengthening Frome's role as an economic centre and helping to reduce out-commuting.
- 13.8.13 In addition, the development will have other benefits associated with financial contributions towards education, community facilities (such as libraries), health care, and other active travel and highways infrastructure which would benefit existing residents of Frome and the surrounding areas, as well as the new development.
- 13.8.14 For these reasons, the economic impact of the proposed development will have a long term, **permanent and major beneficial effect**.

*Agricultural Land*

- 13.8.15 Given the poor to moderate quality of existing agricultural land (i.e. Grade 4 to 3b), the proposed development will not result in the loss of the "best and most versatile agricultural land". As such there will be a **permanent negligible adverse effect**.

*Education*

- 13.8.16 The short-term effects of boosting the roll of the adjacent Christ Church School, making it financially more sustainable will have a negligible benefit. Once the new primary school proposed as part of the development is operational, it will have a long term, **negligible-minor beneficial impact**, as the new school catchment would be likely to serve some existing areas of Frome.
- 13.8.17 A new primary school is proposed as part of the development proposals, which would meet the demand of the proposed development (and other allocated LPP1 and LPP2 sites), and also provide capacity for existing residents. It is expected that the phasing of

this would be secured through the s106 agreement to ensure that the primary school is delivered to match the needs of the population. Once the new primary school proposed as part of the development is operational, it will have a **long term, negligible-minor beneficial impact**.

#### *Open Space*

- 13.8.18 The current site comprises agricultural land which is generally not publicly accessible (apart from rights of way). The development proposals include the provision of approximately 36.5 hectares (approximately 38.5% of the total development area) of green infrastructure. Within this, a range of formal and informal green infrastructure and open space provision is proposed, located close to where people will live and work and is well-connected by a network of linear parks and active travel routes.
- 13.8.19 The delivery of this strategic open space which will incorporate features such as a fitness trail, numerous equipped and non-equipped children's play areas etc. The provision will encourage high levels of physical activity for everyone, including both the young and old, providing opportunities for healthy lifestyles and assisting in reducing levels of childhood obesity.
- 13.8.20 While there is a slight shortfall in the level of playing pitches proposed (when assessed against the Six Acre Standard<sup>vii</sup>), it is anticipated that a financial contribution would be made to fund facilities off-site (in accordance with LPP1 policy DP16). All other provision meets, or significantly exceeds, the relevant benchmarks and will provide substantial amenity value to existing residents, as well as serving the proposed new development.
- 13.8.21 The development will be constructed in a phased way, and therefore there will be a gradual increase in population. This will allow the proposed public open space to be provided in a phased manner, to match the delivery and meet the needs of the population alongside the development of the site.
- 13.8.22 The proposed development will have a **permanent minor beneficial effect** in terms of open space and recreational facilities provision.

#### *Community facilities*

- 13.8.23 The development will bring a new community who will help support existing community facilities (through membership and new volunteers, for example), but the development will also provide new community floorspace within the proposed Community Hub. The

open space proposed will also provide additional opportunities for social integration and community engagement (i.e. community orchards). This will further enhance the identified **permanent minor beneficial impacts** of the proposed development.

#### *Health Care*

- 13.8.24 With financial contributions towards funding additional health care facilities and provision of new dentists' facility, if required, the proposed development would have a **negligible effect** on health care provision.

#### *Energy and Carbon Emissions*

- 13.8.25 It is anticipated that the proposals would achieve neutral/positive carbon effects in terms of the energy usage of the development. It is proposed to adopt a requirement that new development significantly exceed the CO2 reduction standards set out in Building Regulations and at least 20% of the developments energy requirements will be provided via on-site renewable energy generation. These measures, which will be secured via conditions, will mean the SGC development delivers energy efficient buildings which are substantially better than the current regulatory and local planning policy requirements. The proposed development will have a **negligible effect** on energy and carbon emissions.

#### **Committed Development/ Cumulative Impact**

- 13.8.26 Regard has been had to the cumulative impact of the LPP1 and LPP2 sites. The effects are summarised below:
- After the mitigation outlined above, and that which forms part of the individual development proposals, the cumulative impact of development has the potential to place some additional adverse pressure on existing infrastructure and services (such as roads and services). However, the provision of infrastructure proposed, combined with the likely financial contributions, will offset this to a significant degree, reducing the impact to a **potential minor adverse effect**.
  - The cumulative impact of job creation (both direct and indirect) which will be sustainable over the construction period, which is likely to be around 10-15 years in total, will result in a **moderate beneficial impact**.
  - The cumulative provision of around 2,260 new homes, including a proportion of affordable housing, will go towards meeting the current (and future) shortfall in housing supply. The cumulative impact will be the creation of a range and mix of

housing types and sizes, which will contribute to the creation of mixed and balanced communities. This will result in a **permanent moderate beneficial impact**.

## Conclusions

13.8.27 The table below (Table 13.4) provides a summary of the residual socio-economic impacts (after mitigation):

Table 13.4: Summary of Effects

Issue	Duration	Effect
Noise/disturbance during construction	Temporary	Minor adverse
Employment during construction	Longterm-temporary	Moderate beneficial
Resident expenditure	Permanent	Moderate beneficial
Council Tax/Rates/s106 monies	Permanent	Moderate beneficial
Education	Permanent	Negligible-Minor beneficial
Retail/Town Centre Impact	Permanent	Negligible-minor beneficial
Impact on services (i.e. health)	Permanent	Negligible
Open space/sports/play/recreation	Permanent	Minor beneficial
Open Market Housing delivery	Permanent	Major beneficial
Affordable Housing delivery	Permanent	Major beneficial
Employment/economy	Permanent	Major beneficial
Community facilities	Permanent	Minor beneficial
Linkages/access	Permanent	Minor beneficial
Energy and carbon emissions	Permanent	Minor beneficial
Agricultural land	Permanent	Negligible

## Compliance with policy and legislation

13.8.28 In relation to the technical aspects referred to in this ES (i.e. Ecology and Nature Conservation, Landscape and Visual Impact, Transport, Heritage, Hydrology and Flood Risk, Air Quality and Noise), the way in which the proposals comply with policy are clearly set out in these respective chapters.



- 13.8.29 In relation to the specific socio-economic effects discussed in this chapter, the delivery of much needed open market and affordable housing, employment land, community hub along with supporting open space, clearly meets the adopted LPP1 and emerging LPP2 policies identified and also the specific policies of the NPPF.

## **13.9 SUMMARY AND CONCLUSIONS**

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- 13.9.1 The proposed development will provide up to 1,700 new homes, 510 of which will be affordable. This will contribute to meeting housing need, and will provide a mix of house types, dwellings sizes and tenures, helping to create mixed and balanced communities.
- 13.9.2 The provision of employment area, a community hub and other commercial uses, including, retail units, offices, and care home, will provide long term and permanent employment opportunities for local people. The construction phase of the development will provide a large number of direct and indirect jobs. Other substantial social benefits include the provision of a new primary school, community hub, playing fields, a network of public open space, parks, play areas, allotments, woodland and community orchards.
- 13.9.3 The proposed development will provide substantial investment and provide significant socio-economic benefits to the local area, and wider area of Frome.

## **13.10 APPENDICES**

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Appendix 13.A	Pioneer Report
Appendix 13.B	Agricultural Land Classification Assessment
Appendix 13.C	Somerset Clinical Commissioning Group Email

## **13.11 ABBREVIATIONS & REFERENCES**

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### **Abbreviations & Definitions**

MDC	Mendip District Council
SAP	Standard Assessment Procedure
SOP	School Organisation Place

### **References**

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<sup>i</sup> Source: [dclgapps.communities.gov.uk/imd/iod\\_index.html#](https://dclgapps.communities.gov.uk/imd/iod_index.html#)

<sup>ii</sup> (accessed October 2020)

<sup>iii</sup> Homes & Communities Agency (HCA), Employment Densities Guide 2<sup>nd</sup> Edition, 2010

<sup>iv</sup> Homes & Communities Agency, Calculating Cost Per Job | Best Practice Note 3<sup>rd</sup> Edition (2015)

<sup>v</sup> Lichfields, The Economic Footprint of House Building in England and Wales (July 2018)

<sup>vi</sup> MHCLG, Supporting housing delivery through developer contributions, March 2018.

<sup>vii</sup> Guidance for Outdoor Sport and Plan, Beyond the Six Acre Standard, England, November 2020 (Fields in Trust)