



# **The Frome Gateway Regeneration Framework**

**Consultation Response Report**  
**January 2024**

## CONTENTS

INTRODUCTION	4
RECOMMENDATION 1: CONSIDER AMENDING VISION TO INCLUDE REFERENCES TO INCLUSIVITY AND ACCESSIBILITY	5
RECOMMENDATION 2: EVIDENCE BASE FOR HOUSING NEED IN THE AREA TO BE FURTHER HIGHLIGHTED	5
RECOMMENDATION 3: RECONSIDER INDUSTRIAL QUARTER WITH REGARD TO SIZE, MIX OF USES AND ENHANCING CONNECTION WITH THE REST OF THE REGENERATION AREA	6
RECOMMENDATION 4: FURTHER DETAIL REQUIRED TO SET OUT HOW THE COUNCIL WILL SEEK TO RETAIN BUSINESSES AND JOBS	6
RECOMMENDATION 5: EXPLORE WHETHER THERE IS SCOPE TO RECONSIDER STUDENT BED ALLOCATION	7
RECOMMENDATION 6: STRENGTHEN WORDING AROUND AFFORDABLE HOUSING WITHIN THE FRAMEWORK TO MAKE IT CLEAR BCC EXPECTS DEVELOPERS TO USE GRANT AND OTHER MEANS TO SECURE POLICY COMPLIANT AFFORDABLE HOUSING ALLOCATION	8
RECOMMENDATION 7: EXPLORE WHETHER THERE IS SCOPE TO STRENGTHEN COMMITMENT TO THE LOCAL LETTINGS POLICY	8
RECOMMENDATION 8: NEED FOR LARGER FAMILY HOMES TO BE FURTHER HIGHLIGHTED	9
RECOMMENDATION 9: FURTHER DETAIL REQUIRED TO SET OUT HOW THE COUNCIL WILL SEEK TO RETAIN AND SUPPORT COMMUNITY GROUPS, NOTING ALBASEERA MOSQUE AND TROJAN FREE FIGHTERS IN PARTICULAR	9
RECOMMENDATION 10: MAKE CLEAR THAT DISABILITY GROUPS AND LOCAL RESIDENTS WILL BE INVOLVED IN FUTURE CONSULTATIONS AROUND A NEW MODAL FILTER ON PENNYWELL ROAD TO ENSURE THAT PEOPLE WITH LIMITED MOBILITY ARE NOT RESTRICTED FROM TRAVEL, AND CONSIDER OTHER MODAL FILTER CONCERNS (IMPACT ON RESIDENTS AND BUSINESSES, EMERGENCY SERVICES, TRAFFIC ON STAPLETON ROAD)	10
RECOMMENDATION 11: CONSIDER AMENDS TO INCREASE COMMITMENT TO SEGREGATED PEDESTRIAN AND CYCLIST MOVEMENT TO REDUCE POSSIBLE CONFLICT	11

RECOMMENDATION 12: EXPLORE POSSIBILITY OF MORE DETAILED RESPONSE TO ADDRESS ISSUES ASSOCIATED WITH THE M32/EASTON WAY UNDERPASS	12
RECOMMENDATION 13: CONSIDER AMENDS TO RESPOND TO PARKING CONCERNS	12
RECOMMENDATION 14: REVIEW THE HEIGHT AND MASSING STRATEGY IN LIGHT OF REDUCED SUPPORT FOR TALLER BUILDINGS	13
RECOMMENDATION 15: CONSIDER INCLUDING GREATER REFERENCE TO DESIGN AND BUILD QUALITY OF TALLER BUILDINGS TO ADDRESS QUALITY OF LIFE CONCERNS	13
RECOMMENDATION 16: HIGHLIGHT EFFORTS MADE TO ENHANCE AND PROTECT BIODIVERSITY AND NATURE	14
RECOMMENDATION 17: HIGHLIGHT EFFORTS MADE IN THE FRAMEWORK TO PROMOTE SAFETY	16
RECOMMENDATION 18: PROVIDE FURTHER EVIDENCE OF THE PUBLIC BENEFIT OF THE GREEN SPACE 'BIG MOVE' TO SUPPORT THE RATIONALE	16
RECOMMENDATION 19: CONSIDER AMENDS TO MAKE THE CONCEPT OF THE GREEN SPACE 'BIG MOVE' MORE DISCERNIBLE	17
RECOMMENDATION 20: FURTHER DETAIL REQUIRED TO ADDRESS FLOODING CONCERNS	17
RECOMMENDATION 21: REPHRASE THE TEXT ABOUT NO HOT FOOD TAKEAWAYS TO INSTEAD BE ABOUT PROMOTION OF HEALTHY FOOD CHOICES	17
OTHER CHANGES TO THE FROME GATEWAY FRAMEWORK	18

## **Introduction**

The formal consultation on the draft Frome Gateway Regeneration Framework ran from Monday 23rd October 2023 until Monday 4th December 2023. 327 consultation survey responses were received along with 11 formal representations by letter from a variety of organisations. This data was then analysed, the findings of which are presented in The Frome Gateway Regeneration Framework Formal Consultation Report. The consultation report also provided a number of recommendations arising from the consultation findings. This report sets out Bristol City Council's response to each recommendation. In doing so, further signposting, context and detail is given.

### **Recommendation 1: Consider amending vision to include references to inclusivity and accessibility**

In response to Recommendation 1 the vision now states 'The diversity *and inclusivity* of Frome Gateway's community and mix of activities, and re-connection with the river Frome, are celebrated as the area's greatest strengths and represent the foundations of its unique character and identity ... New buildings, public spaces and infrastructure have been designed with sustainability and a changing climate in mind, creating more attractive and comfortable streets and more space for wildlife to recover and thrive. *Physical accessibility has been integrated into all projects ensuring the area is inclusive for all.*'

Read the amended vision in full on page 4 of the Frome Gateway Regeneration Framework.

Additionally, a new 'Physical Accessibility' page has been created (p46) which brings together physical accessibility considerations and opportunities to inform future detailed design proposals. A set of key outcomes has been included, which were informed by an accessibility audit undertaken during the framework production process.

### **Recommendation 2: Evidence base for housing need in the area to be further highlighted**

Bristol's emerging Local Plan (Draft Policy H1) states that 'there is a clear need for new homes in Bristol: the population is rising; house prices are high; and waiting lists for affordable housing are growing' and 'taking into account the land that can come forward for housing development and the places which are reserved for other necessary land uses, the level of housing development which can be accommodated in Bristol is assessed to be 1,925 homes per year on average up to 2040.'

A housing strategy was undertaken during the development of the Frome Gateway Regeneration Framework and provided an evidence base upon which the approach to housing has been developed as well as what we have heard from the community. The Frome Gateway Housing Strategy notes a report done by Black South West Network (Housing BAME Communities in Bristol, 2020), which 'sets out some of the problems and challenges that people in the study area face in terms of accessing appropriate housing. The report had a special focus on the wards of Ashley, Easton, Southmead, Knowle West and Lawrence Hill which makes it very relevant for the Frome Gateway study area. Overcrowding was cited as the most prevalent problem by 26% of the respondents. A key finding from this report is the unmet demand for larger affordable family homes within the study area.'

The evidence base for housing is summarised on p16 of the framework, and referenced below:

'There is an acute need for affordable housing in the area, despite a steady increase in affordable housing delivery in the city over the past few years. In March 2022, the lower quartile price paid for a home in the Inner East Area of Bristol was £258,879 which is substantially higher than the lower quartile price paid for England and Wales at £175,000. This is also reflected in the demand for social

housing, with new build social housing properties in the Inner East Area receiving 100+ bids when advertised in 2021-22.

There are also high levels of overcrowded homes in Lawrence Hill ward – 17%, compared to 5% overall in Bristol. Due to far lower availability of larger affordable homes (both in terms of existing supply and new development), people requiring larger accommodation are likely to wait for longer than other groups to be re-homed. As such, there is a need for a mix of types, sizes and tenures to satisfy needs. There are also significant needs for adaptable and accessible homes to meet the needs of residents, including wheelchair users. Currently, 12% of households on the housing register have a need for accessible and adaptable housing.’

### **Recommendation 3: Reconsider Industrial Quarter with regard to size, mix of uses and enhancing connection with the rest of the regeneration area**

In response to Recommendation 3 the Industrial Quarter has been reduced in size and now includes only the two most northern plots of the regeneration area (see spatial concept plan on p36 of the framework). For these two most northern plots in the Industrial Quarter, greater emphasis has been placed on consolidation and intensification of industrial space, so that the overall amount of industrial space to be provided remains the same (6,000sqm). This also better aligns with emerging planning policy ambitions to intensify and make more efficient use of industrial employment space in the city.

Reference has also been made to the suitability of co-locating night-time venues here which could have active frontages on the riverside to bring about a greater mix of activity in the evening, responding to concerns that this area could feel unsafe at night-time. By bringing the two sites north of Peel Street Open Space into the Maker Quarter with co-location of residential uses above ground floor maker/workshop space, this change in Character Area boundaries makes the approach to co-location of residential uses in this part of the regeneration area much clearer. It also makes the most of the placemaking potential of the area by enabling residential uses to overlook Peel Street Open Space. These changes can be found on pages 92-103 of the Framework.

### **Recommendation 4: Further detail required to set out how the council will seek to retain businesses and jobs**

The Framework published for public consultation noted that existing businesses should be retained and relocated within the regeneration area wherever appropriate to do so when considered against the wider placemaking and regeneration objectives. For example, while it is considered that most businesses are suitable to be retained within the regeneration area, there may be instances where they are not appropriate to be co-located within a residential neighbourhood due to the nature of their operations. Bristol City Council is very much committed to supporting as many businesses as

possible to remain in the area and be part of change at Frome Gateway, and we have therefore sought to make this clearer in the Framework. Bristol City Council has secured funding to produce a Frome Gateway Business Retention and Relocation Strategy (including community and cultural organisations) to help us better understand how existing businesses and community organisations can be supported to remain and grow in the area or be relocated where necessary. This workstream has been added to the Implementation and Delivery section of the framework (p107). The council has appointed a team to conduct this work which is set to be complete in Spring 2024. The findings from this strategy will inform the next phase of project delivery.

### **Recommendation 5: Explore whether there is scope to reconsider student bed allocation**

Following the consultation, the Frome Gateway project team discussed the findings with planning policy and housing delivery colleagues and discussed the student allocation in Draft Policy DS5. The outcome of this conversation was:

- Bristol's emerging Local Plan (Draft Policy DS5: Frome Gateway) states that 'development will include up to 500 student bedspaces in addition to the new homes in accordance with Policy H7 'Managing the development of purpose-built student accommodation'.
- The inclusion of 500 student bedspaces in the framework was directly taken from this planning policy, which is a strategic allocation of the citywide number of student bedspaces.
- Purpose Built Student Accommodation is an important form of housing to ensure students are able to live in suitable accommodation during their studies. Not providing enough student housing means students would need to use traditional housing which would place a further strain on the city's housing stock. Bristol's Local Plan sets out the appropriate distribution of student housing across the city and Frome Gateway is deemed a suitable location for a student allocation given its designation as an Area of Growth and Regeneration and its proximity to the city centre and transport links.

It was therefore agreed that the student bed space number of 500 in Policy DS5 and in the Frome Gateway Framework would not be changed. Whilst the 500 allocation is unable to be reconsidered, further emphasis has been placed on the 500 allocation being a maximum limit in order to prioritise local housing and other needs:

'This Framework re-confirms the upper cap of 500 bed spaces at Frome Gateway and student bed spaces above this limit will not be supported. Development counting towards the bed space limits for defined areas includes all development completed, started or that has gained planning permission since March 2019.

The justification for this is ensuring the provision of purpose-built student accommodation is balanced with the needs of the wider community. These include a choice of housing including affordable housing, new employment workspace, a range of services and facilities to serve the needs of the whole community and appropriate standards of residential amenity. These needs may not be met where an imbalance in the provision of purpose-built student accommodation occurs.' (p40).

**Recommendation 6: Strengthen wording around affordable housing within the framework to make it clear BCC expects developers to use grant and other means to secure policy compliant affordable housing allocation**

In response to Recommendation 6 a new paragraph on affordable housing has been added which reads 'Affordable Housing is expected in accordance with planning policy requirements and the council's Affordable Housing Practice Note. Developers are expected to meet minimum requirements for affordable housing provision and are invited to work collaboratively with the council to explore ways to further increase the amount and pace of delivery of affordable housing above the minimum provision.' The new paragraph has been added to the housing section of the framework and can be found on p39.

In addition, the wording of the affordable housing component of the Implementation and Delivery section (p105) has been amended and now reads 'housing is a multi-faceted issue and there is significant and locally specific need in the Frome Gateway area. Developers are highly encouraged to engage with the council at an early stage to maximise opportunities for alignment with local needs and deliver the right mix at pace.'

The council will work with a range of partners to deliver new affordable homes including direct delivery of new council homes, housing delivery through council-owned housing companies, and working with Registered Providers to secure funding for affordable housing delivery. To ensure local community benefit from regeneration at Frome Gateway, the council will explore a Local Lettings Policy, as described on page 38.

Developers are expected to meet minimum requirements for affordable housing provision and are invited to work positively and collaboratively with the council to explore ways to further increase the delivery of affordable housing above the minimum provision' (p105).

**Recommendation 7: Explore whether there is scope to strengthen commitment to the Local Lettings Policy**

BCC is very much committed to making the most of opportunities to ensure the local community can take up new housing options and opportunities at Frome Gateway, including through the implementation of a Local Lettings Policy. To date, we have focussed our resource on the creation of the vision and objectives for regeneration at Frome Gateway (as set out in the Framework). We can now turn our attention to delivering against these objectives and have set out the exploration of a Frome Gateway Local Lettings Policy as an early initiative on page 107 of the framework.

In response to Recommendation 7 the following has been included as a recommendation in the Frome Gateway Cabinet report for Cabinet approval: 'To note / authorise the Executive Director of Growth and Regeneration, to implement a local lettings policy in the Frome Gateway Regeneration area.'

This will give the Frome Gateway project team the authorisation to progress this workstream.



### **Recommendation 8: Need for larger family homes to be further highlighted**

As noted in the response to Recommendation 2, the framework states ‘there are also high levels of overcrowded homes in Lawrence Hill ward – 17%, compared to 5% overall in Bristol. Due to far lower availability of larger affordable homes (both in terms of existing supply and new development), people requiring larger accommodation are likely to wait for longer than other groups to be rehomed. As such, there is a need for a mix of types, sizes and tenures to satisfy needs. There are also significant needs for adaptable and accessible homes to meet the needs of residents, including wheelchair users. Currently, 12% of households on the housing register have a need for accessible and adaptable housing.’

The Frome Gateway Housing Strategy additionally states that ‘a report done by Black South West Network, Housing BAME Communities in Bristol (2020), sets out some of the problems and challenges that people in the study area face in terms of accessing appropriate housing. The report had a special focus on the wards of Ashley, Easton, Southmead, Knowle West and Lawrence Hill which makes it very relevant for the Frome Gateway study area. Overcrowding was cited as the most prevalent problem by 26% of the respondents. A key finding from this report is the unmet demand for larger affordable family homes within the study area.’

The ‘housing’ page of the framework has been amended to make the delivery of larger family homes a clearer priority with the following text added: ‘In response to evidenced localised housing need, the delivery of affordable, larger, and well-designed homes which enhance the health and wellbeing of residents is a strategic priority of this Framework.’ (p39)

### **Recommendation 9: Further detail required to set out how the council will seek to retain and support community groups, noting Albaseera Mosque and Trojan Free Fighters in particular**

Bristol City Council has committed in the Framework to working with all community and cultural organisations to support them to remain in the area. The framework states that Bristol City Council ‘strongly supports and encourages the retention of these organisations within the area and commits to working with them and other stakeholders to help them realise their ambitions through regeneration. The provision of indoor and outdoor community and cultural space will be expected as part of new development. Spaces must be designed to meet the needs of the end users, and work towards increasing opportunities for people to be able to come together and participate in public life, with Frome Gateway acting as a new focal point for the community via its spaces and support initiatives. Where necessary, priority focus will be placed on working with landowners and developers from an early stage to support the retention of existing cultural and community organisations, should they wish to remain in the area’ (p41).

To inform the approach to this work, Bristol City Council is producing a Business Retention and Relocation Strategy (noted in the response to Recommendation 4). Community and cultural organisations are included in the scope of this work which will help better understand how they can

be supported to remain in the area, which is the next step in the process. This has been added to page 107 of the Framework which sets out early intervention and initiatives.

With regards to Albaseera Mosque in particular, Bristol City Council has been closely liaising with them throughout the production of the framework. In 2023, council officers met with mosque representatives four times and additionally conducted a youth engagement session with them and held an exhibition of the draft framework at the mosque during the formal consultation. The council understands Albaseera Mosque's desire to increase its capacity and is working closely with them to this end. Bristol City Council is supporting them to explore how the capacity of their current facility can be increased. Bristol's Cabinet approved the sale of a parcel of council land adjacent to the mosque to facilitate this. Council officers are also connecting representative of Albaseera Mosque with private landowners and agents to explore the possibility of acquiring alternative sites within the regeneration area, or taking a lease on new ground floor space that is made available through new development at Frome Gateway.

The council has been meeting Trojan Free Fighters representatives during the production of the framework and their needs and aspirations have been heard and articulated in the framework. Bristol City Council will be working with landowners and developers in the area to explore how Trojan Free Fighters can be incorporated in future development plans. This work will continue as we move into the delivery phase of the Frome Gateway regeneration.

**Recommendation 10: Make clear that disability groups and local residents will be involved in future consultations around a new modal filter on Pennywell Road to ensure that people with limited mobility are not restricted from travel, and consider other modal filter concerns (impact on residents and businesses, emergency services, traffic on Stapleton Road)**

The Framework published for public consultation already set out the need to deliver an additional movement study to understand the impact of the modal filter before any changes are made. In response to Recommendation 10, we have added explicit reference to ensuring that this more detailed movement study to better understand the implications of introducing a modal filter on Pennywell Road will take account of the impact on local residents, businesses and the wider transport network such as Stapleton Road and will be undertaken with engagement with the local community emergency services and disability groups' (p107).

It must also be noted that the exact location of the modal filter will be determined through this more detailed movement study. The location had been assumed to be adjacent to Peel Street Open Space which was a natural break between the Industrial Quarter and the rest of the regeneration area. With the changes to the Character Areas (described in Recommendation 2), the indicative location has been moved further north of Pennywell Road at the bottom of the revised Industrial Quarter.

Vehicular Route Key Outcome 1 has also been amended and now reads 'Modal filter to prevent through-traffic travelling north/south beyond this point significantly reducing the number of vehicle movements, allowing for narrower carriageway and turning Pennywell Road into a community-focused street with generous pavements and urban greening. Further testing of the proposed modal filter (including exact location) is required to better understand the impact of this on neighbouring residents, businesses and the wider road network including Stapleton Road.' (p45).

The framework additionally states that the modal filter 'is anticipated to be a medium term (5-10 years) intervention and engagement with the local community, businesses, disability groups and emergency services will be undertaken before any changes are implemented' (p45).

### **Recommendation 11: Consider amends to increase commitment to segregated pedestrian and cyclist movement to reduce possible conflict**

A number of amendments have been made to the framework in response to Recommendation 11 as set out below.

Pedestrian route key outcome 5 (p43) now reads 'new active travel bridge linking Frome Gateway to St Agnes and St Paul's with segregated pedestrian and cycling space'.

The cycle route key outcomes (p44) have been updated as follows:

- Outcome 1 now reads 'Primary commuter link connecting city centre to Easton and St Agnes. Well considered cycle route that reduce pedestrian and cyclist conflict subject to site constraints - this will be explored fully during detailed design.'
- Outcome 2 now reads 'Subject to site constraints, future re-design of this cycle route must be sensitive to the aspiration to create more opportunities for pedestrians to stop and dwell at the riverside and avoiding conflict with pedestrians and cyclists.'
- Outcome 3 now reads 'The southern end of Pennywell Road is narrower and will be made safer and calmer as a result of the modal filter. Potential for one-way working to reallocate road space to pedestrians and cyclists and reduce conflict.'
- A new outcome has been added which reads 'New active travel bridge linking Frome Gateway to St Agnes and St Paul's with segregated pedestrian and cycling space.'

The strategic route plan of Pennywell Road (p70) now includes:

- 'Cycle routes in the northern end of Pennywell Road should be segregated in order to separate cyclists from heavy vehicles.'

Principle 2 of the Pennywell Road carriageway section plans (p71) now reads: 'Domestic traffic and limited servicing and delivery access. In areas of constrained street widths cyclist and vehicles may share a carriageway (20mph area).' Potential for one-way working to reallocate road space to pedestrians and cyclists and reduce conflict.'

Design principle 9 of the Newfoundland Way section plan (p79) now states 'New active travel bridge to make it easier for pedestrians and cyclists to cross Newfoundland Way and better connect Frome Gateway to St Paul's and St Agnes. This should include segregated space for pedestrians and cyclists' A new bridge provides the opportunity to redefine the arrival experience of people arriving into the city via Newfoundland Way.'

The first paragraph on pedestrian and cycle movement within the Industrial Quarter strategic map (p102) now states 'Improvements to Pennywell Road include footway widening and reduced service vehicular traffic. Pennywell Road is a key cycle route leading to the city centre from Easton and segregated cycle provision should be accommodated to separate cyclists from heavy traffic.'

### **Recommendation 12: Explore possibility of more detailed response to address issues associated with the M32/Easton Way underpass**

Given the strategic nature of the Frome Gateway Regeneration Framework it is unable to provide a detailed design response to resolving issues associated with the Easton Way underpass. The framework has however been amended to further highlight the need for improvements, the details of which will then follow in the Frome Gateway implementation and delivery phase.

In response to Recommendation 12, pedestrian route key outcome 4 (p43) now reads 'Improved connections through traffic infrastructure and public realm improvements including enhanced Junction 3 subway to improve safety and legibility'. Cycle route key outcome 5 (p44) has been amended to 'Junction 3 and Easton Way subway to undergo enhancements to improve usability, public safety and placemaking'.

### **Recommendation 13: Consider amends to respond to parking concerns**

In response to Recommendation 13, the position on parking has been further clarified in the framework: 'This framework does not prescribe parking provision requirements as this will be dealt with through the planning process and policy. However, given the proximity of Frome Gateway to the City Centre and easy access to public transport links, this framework advocates for lower parking requirements than planning policy to create no/low car neighbourhoods' (p45).

Parking provision is something that is dealt with through planning policy. The role of the Framework is bringing many different elements (including planning policy and wider strategic city objectives) into a cohesive and coherent vision for an area, and it is important that the framework aligns with and supports wider strategic citywide objectives to improve public health and wellbeing, reduce car dependency, support sustainable and active travel, and respond to the climate emergency.

As set out in the engagement summary (p27), a Scope of Influence was created at project inception to be upfront and honest about all the different influences that the framework must balance.

‘Movement and connections’, which includes parking, is identified in the Scope of Influence as an aspect ‘which the community will help to shape alongside other factors.’

#### **Recommendation 14: Review the height and massing strategy in light of reduced support for taller buildings**

Because of their long-term and strategic nature, regeneration frameworks are intended to be flexible and set a vision and design and development objectives for an area. They are often criticised or found unhelpful when they are overly prescriptive on specific matters which are largely outside of their control. One such matter is buildings heights, which is principally influenced by individual site opportunities/constraints, site specific assessments, the design process, and the financial viability of development proposals.

Bristol City Council believes well designed and well-located taller buildings have a role in meeting the challenge of the housing crisis and advocates a design-led approach to the determination of suitable building heights on a site-by-site basis which optimises (not maximises) building height and density and enhances urban liveability. To support this approach, the council has produced the Urban Living SPD to provide guidance on this.

To ensure the Frome Gateway Framework remains a flexible and helpful guide which helps developers get the best out of individual development sites for their residents and the city, the Frome Gateway Framework refers developers to this guidance and sets out broad locations which are considered appropriate for taller buildings based on strategic design analysis of the area’s attributes. This has also been informed by Bristol Central Area Plan Policy BCAP39: Newfoundland Way which has been in place since March 2015. This policy covers the southwest corner of the regeneration area (the City Gateway Character Area) and states its suitability to deliver high density development.

Whilst the height strategy, will remain unchanged the concerns regarding building height are noted. Liveability and quality of life concerns have been recognised in particular, as per the response to Recommendation 15.

#### **Recommendation 15: Consider including greater reference to design and build quality of taller buildings to address quality of life concerns**

A number of changes have been made in response to Recommendation 15. Firstly, a ‘liveability and wellbeing’ section has been added to the housing component of the Urban Design Framework part of the framework (p40). Included within this next text is reference to an ‘Urban Family Living Design Guide’ which the council is developing to provide guidance on how new homes will support healthy, family living at higher densities.

Secondly, the 'Height and Massing' section (p47) has been changed to 'Height, Massing and Liveability' and includes the following updated text:

'National and local design guidance including The Urban Living SPD sets out guidance on the successful creation of compact, characterful, and healthy urban areas at higher densities. It is expected that this guidance is used proactively and from an early stage to support a design-led approach to optimising (not maximising) density at Frome Gateway to deliver high quality and well-designed homes which meet local needs and respond to local opportunities and constraints. An optimal density is one that balances the efficient use of land, with aspirations for positive response to context, successful placemaking and liveability.

The proposed scale of buildings has been developed to inform applicants of site-specific constraints and opportunities when undertaking preliminary design studies.

New developments will be expected to demonstrate:

- Detailed contextual analysis to establish a design narrative including approach to height and response to local constraints and opportunities
- Qualitative and quantitative micro-climate analysis to ensure maximum public benefit and minimise negative impact on neighbouring site e.g. overshadowing
- The provision of private outdoor amenity space for all homes
- The integration of play and amenity spaces for children and young people
- An active ground floor with a positive relationship with the street
- The integration of health and wellbeing considerations (see the Frome Gateway Health Impact Assessment for further guidance)
- Analysis of local and strategic views with a sensitivity towards heritage assets'

### **Recommendation 16: Highlight efforts made to enhance and protect biodiversity and nature**

The framework makes considerable effort to enhance and protect biodiversity and nature. Throughout the framework, biodiversity is referenced 24 times and wildlife mentioned on 46 occasions. Areas of particular note are set out below:

- The restoration of the river Frome is a key initiative that is set out in the framework. It will provide myriad benefits to the regeneration, a key one being improvements to biodiversity and connecting local communities to the river. This [project video](#) provides more insight and information.
- The vision states that 'new buildings, public spaces and infrastructure have been designed with sustainability and a changing climate in mind, creating more attractive and comfortable streets and more space for wildlife to recover and thrive' and 'The quality of green spaces has been improved and the river Frome has been restored as a thriving wildlife corridor and opportunities for the community to enjoy the riverside have been integrated' (p4)
- 'Improving parks and wildlife' is a key strategic move (p35)

- In setting out the existing sustainability and public health context, the framework states that ‘the design of our built environment directly influences the health and wellbeing of local people and wildlife. Well-designed homes, workplaces, streets and public spaces that integrate nature enhance the health and wellbeing of both local people and wildlife. Creating space for biodiversity to flourish is essential to delivering placemaking outcomes. There are valuable aspects of the area that future development should further strengthen and enhance, as well as help to protect against harm.’ (p24)
- Community Place Principle 2 (Environmentally sustainable and healthy neighbourhood) includes the following: ‘Increase green space across the site for people to dwell and connect with nature (p30)
- A key outcome of the spatial concept is to ‘encourage retention of south bank ecology while creating a public ‘nature walk’ facilitated by buildings being set back from the river edge’ (p36)
- The part of the framework that covers green and blue infrastructure sets out that ‘A fundamental and effective approach to mitigating the effects of the Climate and Ecological Crises is to dramatically increase the quantity, quality and resilience of our natural habitats. Preservation and enhancement of green and blue infrastructure in our built environment have myriad benefits to the health of our environment and our population. New development will be expected to implement principles that make a positive contribution to placemaking and green/blue infrastructure. Given the significant sustainability and health benefits, enhancements beyond minimum planning policy are highly encouraged. Developers should:
  - Design and plan for a future climate that is far hotter and more changeable than current regulations suggest
  - Early ecological assessments of all development site must be undertaken to establish an ecological baseline
  - Achieve as a minimum the Natural England Urban Green Factor standard
  - Integration of sustainable drainage systems within the landscape to achieve greenfield levels of run-off
  - Implement significant tree planting on-plot to contribute to placemaking, ecological enhancement and to manage urban heat island effect
  - Connect to and extend existing green corridors
  - Contribute to the design and delivery of ecological and placemaking enhancements to the river channel including providing space for wildlife’ (p49)
- Key green and blue infrastructure outcomes include: ‘Retain existing and develop new areas of tree planting along the riverbank to ensure good balance of shaded and unshaded reaches for the rivers’ mixed fish population’ and ‘As a sensitive wildlife corridor with nocturnal species new lighting along the river must balance improvements to access and safety with wider ecological goals’ (p49)
- A key sustainability and climate change outcomes is to ‘deliver enhanced blue and green infrastructure to increase biodiversity and climate resilience’ (p51)

### **Recommendation 17: Highlight efforts made in the framework to promote safety**

The Frome Gateway engagement programme evidenced safety and antisocial behaviour concerns in the area currently. Addressing these concerns is of huge importance and the list below demonstrates efforts made by the framework to promote safety:

- The vision sets out 'activity throughout the daytime and evenings adds to the area's sense of vibrancy and safety' (p4)
- The summary of transport and movement issues currently affecting the area states that 'There are personal security concerns, with inadequate street lighting and passive surveillance, which discourages walking and cycling after dark' (p16)
- The outcomes and learning from public engagement highlights safety as an issue raised (p29)
- Pedestrian routes within the urban design framework section sets out that 'Streets will be made more inviting and accessible through landscaping and urban greening, increasing of pavement widths, a managed reduction in vehicle movements and the provision of active and residential frontages on key routes to bring vibrancy and *safety* to the streetscape' (p43)
- Safety included in a number of the pedestrian routes key outcomes (p43)
- Safety included within key cycle route outcome 5 (p44)
- Promoting safety is a core aspect of the approach to active frontages which states 'All streets in the regeneration area should be vibrant, safe and facilitate connectivity. To achieve this, active frontage must be promoted ... streets that require servicing must also be safe and provide natural surveillance from secondary active uses.' A key active frontage outcome is that they 'should enclose public spaces. Creating safe, friendly and animated spaces for local communities' (p48)
- Within the health and wellbeing section of the framework the following requirement is set for developers: 'Sites adjacent to green spaces must integrate ways to maximise safety and inclusivity' (p60). This section also covers crime reduction and community safety as a specific issue with associated requirements and recommendations (p61)
- The Newfoundland Way strategic routes plan includes the following: 'enhanced lighting along key routes increases footfall and therefore safety. More residents using green spaces will positively impact health outcomes' (p77)
- The use of active frontage in the Industrial Quarter in particular to promote safety is referenced on pages 100 and 101

### **Recommendation 18: Provide further evidence of the public benefit of the green space 'big move' to support the rationale**

In response to Recommendation 18 the list of benefits below has been added to the framework (p50):

- An overall increase of 0.8ha of green space (in addition to the new network of pocket parks) for community enjoyment and wildlife.
- Significant placemaking and quality of life benefits.
- Increased resilience to climate change (flooding and rising temperatures).



- Positive public health and wellbeing outcomes for local residents.
- Enabling development to come forward in areas less constrained by flood risk (from a flood risk perspective, this has strong support from the Environment Agency).

**Recommendation 19: Consider amends to make the concept of the green space ‘big move’ more discernible**

The text explaining the green space ‘big move’ has been amended and now reads ‘Creating an area-wide, once in a generation vision for Frome Gateway has presented an opportunity to consider possible ‘big moves’ in response to some of the areas harder to solve challenges and opportunities such as flood risk, community access to green space and public health inequalities.

The idea of BCC exchanging land parcels with private landowners within the regeneration area has been conceptually explored (as set out in the plan opposite). Doing so would enable BCC to deliver a new publicly accessible park in an area which is at higher risk of flooding (Flood Zone 3).’

Read the amended green space ‘big move’ section in full on p50 of the Frome Gateway Regeneration Framework.

**Recommendation 20: Further detail required to address flooding concerns**

In response to Recommendation 20 two new ‘Flood Risk Management’ pages have been added (p53 and 54). These pages provide further context and rationale for the overall approach to flood risk management set out in the Framework. It also sets out the framework’s response to the ‘sequential test’ insofar as explaining why particular parts of the regeneration area are less suitable to residential development even though they are in areas of less flood risk, for example Riverside Park and Universal House. This page further highlights the green space ‘big move’ concept that has been included in the framework and which follows the sequential approach to flood risk management.

The third new flood risk management (p57) adds further guidance for developers on what site-specific measures they could explore and integrate as part of their flood management response.

**Recommendation 21: Rephrase the text about no hot food takeaways to instead be about promotion of healthy food choices**

In response to Recommendation 21 the text now reads ‘Provide opportunity for different types of food stores, particularly low cost healthy options’.

## **Other changes to the Frome Gateway Framework**

Following the findings of the consultation, several other changes were made throughout the document and as a result of further refinement and review by the project team, including:

- The names of the character areas were changed to better reflect the heritage of the character areas which were previously thought to feel too 'exclusive' and tied to specific uses such as 'Cultural Quarter' and 'Maker Quarter':
  - The City Gateway Quarter was renamed the Elton St Character Area
  - The Cultural Quarter was renamed the Eugene Street Character Area
  - The Maker Quarter was renamed the Peel St Character Area
  - The Industrial Quarter was renamed the Tanneries Character Area
- Following insightful conversations during public consultation events, the project team thought a valuable addition to the framework would be explicit information about the context, constraints and opportunities for physical accessibility in the area. Resultingly, a Physical Accessibility Plan drawing upon the Accessibility Audit undertaken by WECIL during the production of the Framework has been added on page 46 of the Framework.
- There have been some amendments to the Active Frontages and Community Connections Plan (page 48) to better draw out the importance of the relationship between active frontages and key strategic movement routes throughout the area.
- Minor amendments have been made to pages 37-38 to further highlight the importance of skills and training provision (alongside new employment space) and emphasise that employment space requirements are a minimum requirement in order to achieve the 1,000 jobs target, and that BCC expect and support these figures to be exceeded in delivery to go beyond the 1,000 jobs target.
- As a result of representations made during the consultation, a 'wider connections' plan has been added to page 25 of the Framework to show the wider cycling network in context to the regeneration area.
- A number of minor changes have been made throughout the document relating to the river Frome and flood risk management as a result of feedback from the Environment Agency.
- Minor amendments to the descriptions of some regeneration objectives for clarity and to avoid repetition.
- Text changes and edits to improve readability of the document and address errors and typos.