

Transport for New Homes observations regarding the Selwood Garden Community – summary of points made in our representations and conclusions by the Planning Inspectorate/ SOS

TfNH concerns and observations	Inspector/SOS conclusions
<p>1. Strategic housing development that has avoided the Local Plan process. Neither in the adopted Local Plan or Plan in preparation. Latter delayed by the establishment of new unitary Somerset authority, local resource shortages and environmental constraints (phosphate pollution). New housing schemes across large parts of Somerset required phosphate mitigation measures before planning permission could proceed. Because many allocated housing sites could not progress, Somerset struggled to demonstrate the required five-year housing land supply. At the same time, national housing targets were increased, making the gap even larger. Consultation on new Local Plan(Regulation 18) expected 2026 and adoption in 2029</p>	<p>SOS/Inspector's conclusion: As the Council could not demonstrate a five-year supply of housing land, paragraph 11(d) of the NPPF was used to grant permission, with no strong reasons to refuse, with no adverse impacts significantly and demonstrably outweighing the benefits, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.</p> <p>Weighing in favour of the proposal were the homes themselves and the highway improvement works to the A36, whilst weighing against were the visual and landscape impacts, and the harm arising from development in open countryside, in conflict with local policies.</p>
<p>2. A matter of scale. As one councillor explained (from the Inspector's report): the development would result in a 23% expansion in the population of Frome. As explained by the Frome Civic Society: <i>'What distinguishes this proposal from any others is its sheer scale. Housing schemes consented or under development in the Frome area typically range from around 70 to 230 units. It would be the second largest development in the county of Somerset'</i>.</p>	
<p>3. Outside the Frome settlement boundary. It is noted that the NPPF treats proposals outside the settlement boundary differently from those within it – see Policy S5 in the (2025) NPPF – raising a much higher bar to get permission.</p>	
<p>4. Car-based in terms of location.</p> <ul style="list-style-type: none"> • Main access off the A361 bypass (also lorry route across Wiltshire and Somerset). • 2-3 parking spaces per home • Limited public transport in the wider Frome area and very minimal bus proposals for the site. • A long way to walk into town – 40 minutes to well over an hour to many services, with hills. 	<p>SOS concludes development in sustainable location as opportunities to use sustainable modes, although the Inspector explains that: 'a residual demand for vehicular traffic' would exist.</p>
<p>5. Approach to 'Vision led' transport and planning in the NPPF.</p> <ul style="list-style-type: none"> • Traffic generation modelled extensively and dominates the Transport Assessment, which assumes a predict and provide approach. The Transport Assessment identified a number of junctions where capacity issues would be caused and needed to mitigate the cumulative effects of development. <i>No iterative approach or optioneering.</i> • From Inspector's report: 'modelling data is provided for a number of junctions and eight route sections, an overall summary identifies that in the AM (08.00 – 09.00) peak hour traffic volumes across the Frome network would increase by 1,699 vehicles (18%). In the PM (16.45 – 17.45) peak hour traffic volumes across the Frome network would increase by 1,444 vehicles (14%)'. • Conclusion includes that two roundabouts on the A36 (T) road towards Bath need extra capacity, and other junctions: • A361 / B3090 roundabout widening to two approach lanes on the Marston Road (B3090) arm; • A361 / B3092 Blatchbridge and A361 / Clink Road roundabouts, placing each roundabout under partial or full signal control, and associated works • B3090 / A362 Gore Hedge gyratory and Bath Street roundabout placing each junction under full or partial signal control, and associated works. 	<p>The Inspector's report explains that the applicant says that...<i>the application is a vision led scheme in terms of accessibility measures and, in the terms of the Framework, it does not give rise to either unacceptable safety or severe residual impacts.</i></p> <ul style="list-style-type: none"> • The applicant's claims on Vision Led are accepted. • The Inspector concludes that an important part of the transport benefits is the extra capacity at two junctions on the A36 (T), funded by the developer, and accepts the Transport Assessment which concentrates on traffic modelling.

Transport Assessments, travel plan and targets and a bypass as a distributor road	Inspector/SOS conclusions
<p>6. Transport Assessment lacking in practical credibility. The Transport Assessment with many hundreds of pages of traffic modelling results and TRICS worksheets, was thought by many concerned about the scheme as far too abstract, impenetrable, and failing to grasp the reality of what was proposed. Comments included:</p> <ul style="list-style-type: none"> • The lack of involvement of an experienced large transport consultancy with expertise in planning urban extensions, essential given the scale of the site and the difficult location. Nearly all the Transport Assessment for SGC was done by a single local consultant. • The build-out date of 2029 in the modelling was out of date in 2025 – explained by the fact that the transport consultant had been working on the TA for many years. • We and others questioned the methodology used in determining the modal split in the context of residential parking provision, distance from the centre of Frome and public transport limitations, and the excessive reliance on the 2011 travel census data for Frome (the historic town) which used as the argued modal split for SGC. • There appeared to be no external scrutiny or analysis of the Transport Assessment in terms of density and layout, public transport, active travel etc; no bus industry advice nor advice from Active Travel England. 	<p>The Inspector accepted the TA Assessment provide by the developer’s Transport Consultant in its entirety.</p>
<p>7. Travel Plan We thought the Travel Plan would have very limited impact in the context of a development oriented around driving. For example, the proposed cycling improvements were insufficient to enable safe cycling not only from the estate but in and around Frome itself. They did not involve segregated cycleways and carefully managed crossings of main roads and junctions with cycle segregation, but advisory cycle lanes, wayfinding improvements and legibility of walking and cycling routes</p>	<p>From the Inspector’s report:</p> <p>The Travel Plan, which would to be secured by the Section 106 Agreement, includes specific targets for self-containment of travel by residents within SGC with a Mode Shift Target for self-containment of travel of 22% in the AM peak hour and 15% in the PM peak hour.</p>
<p>8. Bypass as distributor road. There was widespread concern that the A361 bypass – a busy lorry route- was to become the distributor road for the development.</p> <ul style="list-style-type: none"> • With SGC essentially isolated from the town with no direct access for cars, residents will be reliant on the car for most journeys including going to the supermarket, the secondary school (a school bus will have difficulty getting in), the town centre, facilities the other side of town etc. These journeys will involve the bypass in most cases. • Equally the bypass will be used for commuting to Bath, West Wiltshire, and beyond. • Approx. 4,000 residential car parking spaces provided with easy access to the A361, A36 and beyond. • Many local respondents suggested climbing lane for the high volume of quarry lorries as the traffic increased on the bypass. No input from freight industry as far as we are aware. 	<p>The Inspector did not identify any issues with respect to this.</p> <p>He accepted instead the narrative put forward by the developer that residents will choose to walk the 40 minutes to an hour up the hill and into town, because driving would entail a longer distance and less direct route.</p> <p>No analysis in terms of the very large time difference between driving and walking, weather, darkness, carrying shopping etc. made.</p>
<p>9. Surprising sustainable transport targets.</p> <ul style="list-style-type: none"> • The development site is not integrated with the rest of the town in terms of extended suburban roads leading to it, not integrated with new housing already in construction around the edge, but orientated around a bypass. • 3 - 4 km to many common destinations within Frome and even the fringe of town retail on the south side of town is approx. 1 km from many parts of the SGC development. Busy roads and junctions, narrow pavements, and steep hills. • To get round these disadvantages of the site, the Transport Assessment assumes a great emphasis on home-working (including drone delivery) and car-sharing, and despite long distances, walking. • We had safety concerns re walking and cycling, especially for women and children: ‘Active travel routes’ involved sections that were not overlooked but along cut-throughs and green infrastructure rather than along streets overlooked by houses. Not good in the dark. Would people really walk given this? 	<p>Content with the developer’s Transport Assessment and its emphasis on sustainable modes. He concludes that the initial mode shift targets for the proposed development would be secured through the Travel Plans and the Section 106 Agreement and are proposed as</p> <ul style="list-style-type: none"> • Home working – at least 20% • Self-containment of travel – 22% in the AM peak hour; 15% in the PM peak to be contained within the scheme. • Walking: 20% • Cycling: 10% • Bus use: 5% • Rail use: 2.5% • Single Car Occupancy: 45% • Car Sharing: 10%

Public transport, density, employment; self-containment, unbuilt brownfield sites, cross boundary	Inspector/SOS conclusions
<p>10. Traffic management by bus gates. The development is essentially cut off from the town by existing fringe of town development and housing estates in construction (these in the Local Plan). Small lanes lead to the SGC development but these are narrow and cannot take much traffic.</p> <ul style="list-style-type: none"> We thought the use of 'bus gates' to block direct vehicular access to Frome via country lanes and force it to use the bypass, belied the wrong place to build a large housing estate in the first place. The bus gates would allow only the town minibus service through, but residents were concerned that these might still get stuck with parked cars, and a narrow carriageway. It seems to us impossible that a full-sized school bus or coach could service the homes at SGC. 	<p>Accepts applicant's case that the strategy of blocking direct car access into Frome using a 'bus gate' will mean people will walk the many km there and back.</p>
<p>11. Public transport in the Frome area</p> <ul style="list-style-type: none"> This is very limited especially to towns and cities with more and better paid jobs, with infrequent bus services generally stopping after 5.30 or in the case of the bus to Bath, becoming infrequent. Bus services to Westbury station, nearby Somerset towns (eg Glastonbury, Shepton, Wells) very sparse, indirect or not provided at all. The lack of public transport options affects access to further education (not available in Frome). Very Infrequent rail services from Frome station including at peak times. Eg Frome to Bath Spa 08:50 am and then 10.26 am. 	<p>Not discussed</p>
<p>12. Public transport offer to the Selwood Garden Community.</p> <ul style="list-style-type: none"> The proposal is for the town minibus to be extended to loop around the development. We thought this insufficient (even at daytime proposed 20 minute frequency) for future 4,000 – 5,000 residents and questioned if people would use it with two cars in the drive. Most other buses would involve walking into town. The circuitous route was to be extended to include the station and the health centre, both a long way from the SGC site. The bus service is currently used mostly by older people who find the hills and distances difficult; it is unclear whether the minibus would appeal to all sections of the population in a new large urban extension. Constrained nature of bus access to the site means larger buses (eg a school bus) would have difficulties getting into the estate at all. 	<p>'The Secretary of State agrees that improvements to sustainable transport and active travel assets in Frome, in particular greater frequency of the bus service and geographical coverage and improvements to key active travel corridors, carry moderate weight in favour of the proposal.'</p>
<p>13. Cross boundary effects and sub-regional perspective needs consideration in terms of several thousand new homes close by in Wiltshire and need to upgrade public transport links. West Wiltshire MP and Chapmanslade parish – in Wiltshire - council object. Bath specifically wants to limit car commuter traffic but this development funded capacity on the A36 commuter road towards the city.</p>	<p>Not discussed.</p>
<p>14. Brownfield sites still unbuilt. The large brownfield site at Saxonvale in the middle of town, remains empty and unbuilt, as have other large brownfield sites in east Somerset. More greenfield out of town development depletes the town centre, rather than adding vitality. CPRE Somerset estimates that there are 199 sites on brownfield registers across Somerset, with a combined area of 258 hectares, or 637 acres - enough brownfield land to build up to 6,220 homes.</p>	<p>Arguments relating to the five-year housing land supply mean easily deliverable sites are the priority.</p>
<p>15. The employment proposed was not integrated with the housing but separate from it off the bypass and hard to walk to in the dark (across . This model was not genuine 'mixed use' – see Poundbury for counter example.</p>	<p>Lack of integration no especial interest to the Inspector. Weighing in favour of the proposal are the jobs arising from the employment land as well as construction employment, which each carry significant weight.</p>
<p>16. Self-containment. Concern that the development would not be highly self-contained as claimed. Local amenities were limited eg the retail offer would likely be single convenience store with small community space under some flats and a possible café/takeaway. Density of the development too low to support shops and cafes as walkable place; lack of corner shops/ urban park/pub etc. The employment (B8 warehousing and logistics, B2 general industry and class E) area was separate and not easy to walk to in the dark.</p>	<p>Our points were not apparently of importance.</p>