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Frodsham Town Council

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15th July 2024

Andrew Mead
Intelligent Plans and Examinations (IPE) Ltd
3 Princes Street
Bath BA1 1HL

Dear Mr Mead

Frodsham Town Council NP Steering Group - Response to Examiner's Initial Questions

Frodsham Neighbourhood Development Plan

Further to your letter dated 4 July 2024, please find below a response from Frodsham Neighbourhood Plan Group (FTC).

1. Date of submission to CWaCC.

a. Question to FTC. Please could the date of the submission of the FNP to CWaCC be confirmed?

The date of submission of the Frodsham Neighbourhood Plan and associated documents was 28th March 2024.

2.a Habitats Regulations Assessment (2023)

Question to FTC. I refer to paragraphs 7.12, 8.4 and 8.5 of the Habitats Regulations Assessment and the comments by CWaCC in the Regulation 16 consultation response. Please explain how the changes recommended by the Appropriate Assessment have been incorporated into the FNP?

FTC added the following bullet points to policy EDVE2 to address the potential recreational pressures on the Mersey Estuary and seeks to mitigate them in line with the recommendations in the Habitat Regulations Assessment (HRA):

- *Will not result in adverse impacts on the ecological value and function of Frodsham Marshes*
- *Demonstrate that potential effects on biodiversity, noise and environmental impacts have been explored and avoidance and mitigation measures employed.*

FTC would also suggest an additional paragraph under policy H1 of the plan to encourage developers to provide the packs referred to in Paragraph 7.12 of the HRA.

"In the interest of biodiversity and protection of the habitats on Frodsham Marshes, developers will be encouraged to provide a Homeowners Pack to include information about the sensitive environment on the Marshes and alternative areas of greenspace which can be used for recreation".

3b. Question to FTC. Although the background papers reveal the identified sites for residential development in greater detail than on Fig 3.2, I consider that the Plan should incorporate larger scale maps, perhaps as Insets, showing their exact delineation. Does the Council have any comments?

FTC agree that larger maps should be included. FTC consider the AECOM Masterplan to be a key document that should be taken into account when any of the sites come forward for development. The indicative layout and constraints identified in the AECOM Masterplan should help frame the thinking on any proposal and assist with planning decisions.

4. Housing Allocations

a. Question to FTC. The Plan states that the housing requirement for Frodsham under the adopted Local Plan (Part One) is for at least 250 dwellings to be delivered between 2010 and 2030. The Plan also states (page 14) that the CWaCC Monitoring Report 2021/2022 indicates 191 dwellings have been completed and a further 27 dwellings have extant planning permission. The resulting “shortfall” is 32 dwellings. Is this the current position?

The latest published Annual Monitoring Report (AMR) 2023 covers the period 1 April 2022 to 31 March 2023. The table below is an extract from the 2023 AMR which shows that the current position is: 194 net completions (2010-2022), a remaining net requirement of 56 dwellings (2022-2030) and 10 commitments (extant planning permissions), leaving a shortfall of 46 dwellings. See following link for the Council’s AMR reports: <https://consult.cheshirewestandchester.gov.uk/kse/folder/75217>

Housing completions and planning permissions-key service centres

Table A.2 Housing completions and planning commitments in the key service centres

Spatial area	Net housing requirement	Net completions (2010-2022)	Remaining net requirement (2022-2030)	Commitments (extant planning permission)
Cuddington and Sandiway	200	203	-	1
Farndon	200	246	-	7
Frodsham	250	194	56	10
Helsby	300	325	-	366
Kelsall	200	236	-	3

b. Question to FTC. In noting the Regulations 14 and 16 comments by CWaCC about the suggested housing densities in the Plan allocations, if the densities were to be reduced to those in the Housing and Economic Land Availability Assessment (25 – 30 dwellings per hectare), would the housing requirement of 250 dwellings still be met?

The following Table shows the number of units that would be provided if the Housing and Economic Land Availability Assessment 2017 (HELAA) densities applied to all the sites. The total, when the 194 completions and the 10 extant sites with planning permission are added to the HELAA housing densities would be 250 – 259. The net housing requirement of 250 would be met, just. However, no “buffer” would have been built into the plan.

FTC considers the development of a Flatted and Apartment scheme (on the Land at Frodsham Health Centre – S/01) as a key component in the Housing Strategy. This will provide downsizing opportunities with first homes for young families and affordable housing, in line with the Housing Needs Assessment. AECOM studied the sites and their assessment, set out in the Masterplan, is that a density of 50-75 u/ha for Site S/01 is appropriate.

The FNP Plan together with the 2023 Annual Monitoring Report as the new base, would add 294-299 dwellings, if all the sites were built out within the Local Plan period.

Site FRO/0010 - 64 Main Street, Frodsham			
Site area	Allocation proposed density and units	25 u/h	30 u/ha
0.1ha	1 unit proposed @ a density of 10 u/ha	2.2 (2 units)	3 units
Site FRO/0038 Land off Greenfield Lane, Frodsham			
0.37ha	10 units at a density of 27 u/ha	9 units	11 units
Site FRO/0039 Land to the rear of St Hilda's Drive, Frodsham			
0.11ha	The site would support 5 units at a density of 45 u/ha	2.75 (3 units)	3 units
Site S/01 Land at Frodsham Health Centre, Princeway Frodsham			
0.84ha	The site would support 60-65 Units at a density of 50-75 u/ha for a flatted and apartment scheme	21 units	25 units
Site S/07 Brook Works Main Street Frodsham			
0.32ha	The site would support up to 12 residential units as well as Business use at a density of 38 u/ha	8 units	9.6 (10 units)
Site S/10 Land at Penkman's Lane			
0.1ha	The site could support up to two dwellings at a density of 20 u/ha	2.5 (3 units)	3 units
	Total number of dwellings: 90-95 units	46 units	55 units

5. Affordable Housing

a. Question to FTC. Has the Council any comments on the point raised by CWaCC about whether the Local Connection test should be for first occupation only?

FTC considered CWaCC's point. FTC's intention is that the affordable housing should be provided in perpetuity and we suggest an amendment to the second bullet point of Policy H4 to add clarity.

- Affordable Housing, both rented and purchased, should be provided in Perpetuity and for those with a Local Connection to Frodsham.

6a Heritage Assets

FTC agree with the Examiner's suggestion that in order to meet the Basic Conditions, the policy should be amended to remove non-designated heritage assets from the second bullet point and introduce a further bullet point to consider non-designated heritage assets separately.

7. Local Green Space

a. Question to FTC. I assume that Fig 5.2 is an error and that it should be corrected to Fig 5.1 (unless Fig 5.1 has been omitted from the Plan). If so, the remaining enumeration of the Figures in Section 5 would require correction.

FTC consider that the figures in section 5 are set out appropriately.

9. Policy CA4

a. **Question to FTC. Policy CA4 refers to a list of schemes in Section 6.8.1 which should be addressed through the Community Infrastructure Levy (CIL). The Regulation 16 comments by CWaCC state that the list does not have approval from a highways point of view and has not been checked for viability or deliverability. Therefore, without questioning the inclusion of the list in the Plan or any individual project, it seems to me that the policy should be qualified as being aspirational and subject to later scrutiny when the opportunity arises for the implementation of any specific scheme. Has the Town Council any comments?**

FTC agree with the Examiner's comments, and we suggest the following amendment to paragraph 6.8.1

6.8.1: Site Specific Schemes

Introduction

Through community feedback a number of key pedestrian routes were identified that lack effective or safe connectivity due to poor layout or missing infrastructure. The list of potential schemes that could be implemented with appropriate CIL funds and / or S106 agreements with developers is summarized below.

The list is not exhaustive and although viability should be ensured when the applicable funding agreements are in place, implementation will be subject to assessment for compliance by the Highway Authority.

Prioritisation for implementation will need agreement between FTC and the Highway Authority.

If you require any further information do get back to me.

Your sincerely



Jo O'Donoghue (FSLCC)
Town Clerk