



Frome & District
CHAMBER OF COMMERCE

Somerset

Frome & District Chamber of Commerce

Response to DHCLG consultation

Frome & District Chamber of Commerce represents businesses in the town of Frome. We have approximately 100 member businesses.

Frome is a town of 28,000 people. It is the largest town in Mendip, and the fourth largest town in Somerset. Frome is a thriving town, which has won numerous awards in recent years as a good place to live. It is also a good place to do business. The town has a history of entrepreneurship, the arts and active community involvement.

It has benefited in recent years from a business hub/co-working space set up by a local private investor, and the re-purposing of a redundant factory into a similar facility by another local business. However, a major challenge for businesses in Frome is the lack of suitable workspace for businesses wanting to move to Frome and businesses in Frome to expand. The Local Plan has long recognised the imbalance between the provision for housing and the provision of jobs, despite which that imbalance has become worse. Businesses are having to accept and adapt premises that do not suit their needs, or leave the town.

We have in recent years seen a surge in people wanting to move to Frome from the South East and across the world, bringing their businesses and families with them. That has been turbocharged by the experience of coronavirus, the discovery that it is possible to work from home and that life without commuting is good.

The Chamber has a policy of active involvement with all levels of local authority. We have considered both proposals and held meetings with council leaders and officers on behalf of both proposals. We will respond on both together as the same issues arise with both.

1) Is the councils' proposals likely to improve local government and service delivery across each area? Specifically, is it likely to improve council services, give greater value for money, generate savings, provide stronger strategic and local leadership, and create more sustainable structures?

We do not have confidence that either proposal will do so.

Both proposals claim to save money. Both put forward reports from "experts" supporting their claims to outdo each other in savings. We are not experts, but it does not give us any confidence that those experts can produce such widely differing reports based upon the same proposals.

In both proposals the projected savings are jam tomorrow, and so far off that they cannot confidently be predicted. The recent merger of West Somerset DC and Taunton Deane DC was projected to produce savings which did not materialise and the evidence from other examples is not convincing.

On council services and value for money both levels of local authority have tried "innovative" methods of service delivery which were also intended to save money. In some cases they improved poor service delivery to an adequate level. It has been almost impossible to assess whether they have been value for money, as the councils have been resistant to publishing that information. Southwest One was particularly unsuccessful, and notorious.

For the reasons set out in section 5 we think it is unlikely that either proposal will provide stronger strategic leadership for Frome. We think it is unlikely that either proposal will provide stronger local leadership.

The arguments put forward for the unitary council appear to be that people have lost touch with local government, so making it remote is a strange solution. Reducing the number of councillors increases the risk that they will also be remote from their local community. Sadly, local politics in Somerset remains too tribal and party political; one of the main reasons why independents were voted into control of Frome Town Council. It also means that there are people who will not bother to contact their local councillor because of their party affiliation. Reducing the number of councillors increases the risk of both increased distance, and a poorly performing councillor having a greater effect.

The only way in which either proposal is likely to improve local leadership is if there is a genuine devolution of both power and budgets from whichever unitary authority to a coherent local organisation, which includes both the town of Frome, and the surrounding villages for which it has always provided a focus (broadly the areas of the old Urban and Rural councils).

The One Somerset promise of local community networks is better developed. However, we only have to ask across the border to Wiltshire to find that this idea has not achieved what was promised there.

Our concern is that ultimately this decision will be in the hands of the councillors for whichever proposal is selected. Neither has a good record on devolving power, and the temptation will be to further centralise and control limited budgets and resources. Neither proposal squares the circle of savings by centralisation while devolving power. Our concern is that the first will trump the second, unless specific obligations are imposed by the DHCLG in the governing regulations.

Whether either proposal can create more sustainable structures will depend on whether they can square that circle of cost savings combined with devolution.

They are also based on long term assumptions at a time when long term prediction is even more difficult than usual.

2) Where it is proposed that services will be delivered on a different geographic footprint to currently, or through some form of joint arrangements is this likely to improve those services? Such services may for example be children's services, waste collection and disposal, adult health and social care, planning and transport.

We do not think it will. See our response above.

Children's Services have been run on a unitary basis by Somerset County Council for many years. Those services received extremely poor assessments, although they have been improved in recent years, in some cases where other bodies have taken over doing what the county council stopped doing together. That has not been improved by limitations on the local government spending, poor management and the decisions by County Council leadership. Although the services still need improvement, breaking up and starting again with two authorities led by councillors and officers with no experience of delivering the services seems unlikely to accelerate the necessary improvement.

However, we do applaud at least the 'vision' of the Stronger Somerset team which seeks to tackle the big issues of children and adult services by trying to prevent the issues at an earlier stage.

Adult health and social care also currently delivered by the county council, so we see no reason to expect any change.

We do not expect it to make a difference to waste collection and disposal as that is already operated by South West Waste, a successful initiative run by the councils working in cooperation.

Their ability to do this makes us question why they cannot cooperate better now, without a huge local government reorganisation. In the 1980s and 1990s all levels of local government in Somerset worked well together, and in cooperation with the local Chambers of Commerce, and devolved power locally. In Frome that achieved many of the structural changes which have been the foundation for the town's success. The whole of the road signage system was surveyed by the Chamber of Commerce, and a new signage system designed with Mendip District Council & Somerset County Council, and implemented. That was done over a period of six months in 1995. We still have that signage system 25 years later. It is outdated, it is unhelpful, and in many cases it is positively misleading. The Chamber of Commerce has been trying to get Somerset County Council to improve it for nearly 10 years, with little success. Our attempts to engage Mendip District Council have been equally unsuccessful, even though an improved signage system would improve their income from their car parks.

Many people in Frome already perceive the planning system to be remote, even though it is based in the next town of Shepton Mallet just a matter of miles away. Some of that is a consequence of the way in which Mendip District Council have operated the planning system, which positively discourages public engagement and the sometimes incoherent decisions. Officers are under-resourced.

Having said that, some of the worst planning decisions have been a consequence of advice from Somerset Highways, based in Taunton, who appear to have no local practical knowledge of the town, or how roads are used. Without a genuine devolution of power locally we would expect the quality of decision-making and plan making to decline further. However, if the DHCLG's present proposals to amend NPPF are implemented, they will largely remove any local participation in planning decisions, so this may make little difference.

Somerset Highways also has an extremely poor reputation for road maintenance, and bad planning of road closures. We note that concerns have been raised about it in a recent audit report. There is no proposal by One Somerset to devolve highways responsibility.

3) Is the council's proposal also likely to impact local public services delivered by others, such as police, fire and rescue, and health services.

Neither proposal is likely to have much impact as these are already delivered based on geographical areas which are not coherent either with the existing areas of local government or the proposed new areas. For Frome, health services are largely connected with areas to the north and east outside the proposed authorities, and the risk is that new local authorities are focused to the south and west will not engage fully with these.

4) Do you support the proposal from the councils?

We do not find either proposal persuasive.

Cllr David Fothergill asked us whether, considering the Stronger Somerset proposal; "Would you want to be ruled from Yeovil?" We ask in respect of the One Somerset Proposal "Would we want to be ruled from Taunton?" The answer in both cases is no – under both, it is likely that local democracy would become more remote.

For the reasons explained in section 5 we would only support a proposal including a cast iron guarantee of the devolution of resources and decision-making to a coherent area centred on the town of Frome that is enshrined within legislation.

5) Do the unitary councils proposed by the councils represent a credible geography?

No.

Frome is already an outlier both within Somerset and, to a lesser extent, within Mendip, and would still be in East Somerset.

Frome does not sit easily within a typology of settlements. We are significantly smaller than Taunton, Bridgwater and Yeovil. We are significantly larger than every other town in Somerset.

In the past we have felt that Frome has not fitted into the economic development planning of Somerset County Council, which has in some cases been positively unhelpful. It was particularly discouraging that when the portfolio holder was invited to visit Frome he did not even know the targets for the town in his own Growth Plan.

Our engagement with the economic development officers and portfolio holders in Mendip has generally been more productive. The positive effects have been outweighed by the negative consequences of Mendip as the planning authority failing to defend or replace employment land which has been converted for housing in the town centre. We have welcomed their recent initiative on Saxonvale, though it still provides only a fraction of what is required, and it has been excessively secretive about its financial aims the owner of that site.

Frome operates in a different economic area, a different housing area, a different travel to work area, and uses different transport links to the rest of the present county of Somerset, the current district or the proposed East Somerset.

Frome looks to the north, Bristol & Bath, and East, the towns in West Wiltshire, including their academic institutions. We are becoming a dormitory town for those areas. Almost nobody commutes to anywhere south or west within either of the proposed (or existing) local authorities. Beyond that, we look to London and the rest of the world, using different transport links. The primary transport links are via the M4, and to a lesser extent A303 via Wiltshire, and trains joining or linking to stations in Wiltshire, or Bath.

See the Addendum for evidence.

Taunton is more remote from Frome than we are from administrative centres of all our neighbouring local authorities. One Somerset will continue its existing role as a minor partner in the HoTSW LEP dominated by Devon, which has brought no identifiable benefit to Frome.

The East Somerset proposal by Stronger Somerset reproduces the geographical defects of the incoherent Somerton and Frome parliamentary constituency. That consists of two areas with an almost completely different character, looking in completely different directions, and with negligible links between them. One of our previous MPs said that he thought he was the only person who ever travelled between the two parts of the constituency. It appears to have been sustained by the Electoral Commission because it starts at the other end of Somerset and adds the odd bits left over to Somerton & Frome.

The economic focus of Somerset County Council has been overwhelmingly towards M5 corridor. Eastern Somerset and in particular Frome have been largely forgotten. The Stronger Somerset case for dividing the county at least has some merit in this respect.

But Frome needs any local authority to cooperate more with the authorities for the areas outside Somerset with which we have our links. We do not think there has been enough of that until now, and if the centres of power look in a different direction that is less likely.

A unitary authority in which Frome was combined with B&NES would make much more sense.

6) Do you have any other comments with regard to the proposed reorganisation of local government in each area?

We are not persuaded that the potential gains in the long term will outweigh the almost certain disruption caused by this process in the short and medium term.

We think that it will be a huge challenge for any new unitary authority to design, organise and implement a radical reorganisation of local government within the proposed timescales and while maintaining services and saving substantial sums of money.

We have not seen any evidence that the councils proposing the new authorities have been capable of doing that within their present structures. When they have attempted internal “transformation” we have seen the delivery of services and coherent decision-making policy procedures become worse, though that has also coincided with budgetary cuts.

While this radical re-organisation is being done all the councillors, and council officers will be attempting to deliver services as normal, cope with the recovery from coronavirus, and further cuts to funding, and changes in the workplace which have been accelerated by the experience of coronavirus and coronavirus measures. We therefore anticipate a reduction in the quality of core service delivery during this period.

Addendum

Summary of research evidence that Frome is not part of Somerset or East Somerset as functional regions

This research primarily compares Frome with the proposed East Somerset.

The divergence between Frome and Somerset as a whole is greater.

Demographics - Somerset Intelligence Network (SINE)

SINE shows that the age profile of South Somerset has more people aged 60-65 than any other age group, while both East Mendip & Frome have a smaller than average population aged over 60 and above average in the 25-44 age groups. SINE also shows that South Somerset has an above average retired population, and lower than average proportion of families with dependent children. Mendip, East Mendip and Frome have progressively lower retired populations than average, and higher proportions of families with dependent children.

The household profile of Frome is distinctly different from Mendip and South Somerset, reflecting its urban character and economic base (Mosaic 2005).

Spatial Patterns in Mendip (prepared for MDC Local Plan based on Census 2001)

The Spatial Analysis for MDC to inform strategy to 2016 showed strong links between Frome and Norton-Radstock, BANES and Wiltshire. The numbers travelling to and from Mendip, South Somerset or other parts of Somerset are much smaller.

The Study concluded *“In the rural areas the pattern remains one of dependence on the nearest town for employment and services although the settlements along the northern edge of the district have higher levels of commuting out of the district, some to Norton Radstock, but also to Bath and Bristol.”*

Table 1 - Travel to Work Statistics

From Commuting	Out to	In from
Bath	1,000	138
Norton Radstock	226	305
B&NES (rest)	118	120
Trowbridge & Warminster	663	262
West Wilt (rest)	998	376
South Somerset (exc Yeovil)	135	74
Bristol	173	48

The statistics also show that the proposed new boundaries cut off Frome and other Mendip towns from their functional live/work connections. More people commute to and from two rural wards near Frome than the whole of South Somerset, or the rest of Mendip.

Functional Economic Market Areas and Economic Linkages in the South West,

Final Report, July 2010 SQW Consulting

Research commissioned to investigate FEMAs and other spatial economic linkages to support those developing LEAs and others involved in policy and strategy making at other geographical levels. It included a literature review, consultation with all local authorities and organizations.

3.10 Identified seven functional zones. Of these Frome is in the North East Triangle while the rest of the East Somerset would fall into the A303 Corridor *“the least coherent zone defined by the road link and including the towns of Salisbury and Yeovil.”*

3.11 These zones had been identified based on *“fundamental economic geography’ – having relatively self-contained labour market, and similar economic characteristics.”*

3.14 The SQW research and consultation identified four areas. Frome is similar to the North East Triangle of which SQW said *“They share similar characteristics, access, population, housing and social domains, with the zone extending into parts of neighbouring regions [Wiltshire and South Gloucestershire]”*. The South East Zone included the A303 Corridor and the South East Coastal Zone (i.e., East Dorset). The first looks north and east. The rest of the East Somerset constituency falls into the second, which looks south and east using different transport networks.

Fig 5-12 The SSDC area is identified as an area with a high concentration of people of pensionable age – in contrast to the demographic of Frome.

Table 5-1 Sub-regional description of employment clusters for selected sectors of the economy, mentions Frome as a cluster centre for Manufacturing (>20% of employment) *“(possibly linking functionally to MN-R [Midsomer-Norton-Radstock] in B&NES”* (and vice versa in the assessment of MN-R). The southern part of the constituency is mentioned under

Agriculture and Fishing (>5% of employment), in the “*band stretching from Taunton to Shepton Mallet with strong representation in agriculture*”.

The area around Shepton Mallet and Frome is identified as having high levels of self-employment homeworking, while low levels were identified around Yeovil and Taunton. This may have been the early stages of the high level break-out business which is one of the characteristics of the Frome economy. The high level of growth around Frome was noted, but also that this was not the case around Yeovil.

The description of Wiltshire mentions the cluster of manufacturing jobs around Westbury & Warminster just across the county boundary, and of financial services jobs “*between Westbury [Wilts] and Frome (Somerset)*.” Annex B noted that joint working recommended developing strategies for the functional areas including “*Bath/Chippenham/Trowbridge/Frome*.”

Identifying HMAs and FEMAs in Somerset

(Opinion Research Services for SCC September 2015)

Mendip is largely covered by the Wells commuting zone (56.3% of the population), although almost a third of residents mostly in Frome (32.0%) live in the Trowbridge commuting zone and the Bath and Bristol commuting zones (11.1%).

Recommends that the following areas should be considered as separate functional housing market areas in the context of the NPPF:

- Bridgwater, which includes Burnham-on-Sea;
- Minehead, which includes Dulverton, Porlock and part of the Exmoor National Park;
- Taunton, which includes Wellington;
- Trowbridge, which includes **Frome** and Warminster;
- Wells, which includes Glastonbury, Shepton Mallet and Street; and
- Yeovil, which includes Chard, Ilminster and Wincanton

Figure 34: Main Transport Infrastructure in Somerset shows Frome, with Wells and Shepton Mallet as part of the North East Triangle Economic Area, including the Wiltshire towns, Bath and Bristol, the southern edge of which is defined by a line roughly along the A361. The rest of the propose East Somerset is part of the A303 Corridor extending as far as Taunton and the south coast.

Fig 31 shows Proposed Commuting Zones with ONS 2011 Travel to Work Area boundaries (Source: ONS, August 2015). These zones follow the others, with Frome part of the West Wilts Zone, most of the rest of MDC a separate zone and the rest of the Somerton is part of the Yeovil zone with the border running roughly along the SSDC/MDC boundary.

The report proposed four Functional Economic Areas (FEMAs). Frome is part of the A361 Corridor, not the A303 Corridor, which contains the erst of the proposed East Somerset. (Fig 36)

Although the Yeovil Economic Profile (Ekosgen March 2010) showed that there was a significant level of commuting into Yeovil from Mendip (c.8,500 people/30% of the workforce) almost all that is from other Mendip towns.

**Recommended housing market area boundaries: implications for spatial planning
Geography of housing market areas in England – paper C (DCLG 2010)**

This investigated how two sets of housing market area geographies fit with the existing administrative boundaries of regions and local authority districts. In none of the best fit scenarios considered, including commuting figures, did Frome/MDC fall into the same area as SSDC. In most of them Frome was in the area with West Wilts (and Bath) and MDC treated in most as part of the same housing market area.