

Matter ID/7 1B
Respondents 821 and 822
Cam Valley Wildlife Group and Somer Valley Friends of the Earth

Matter 1B
Appendix 7
ID/7 1B_Appendix_SVF_NPPF

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Contents:

Somer Valley Friends of the Earth submission regarding the NPPF changes.
The parts of the response that were recorded in Schedule 2 are in grey; the unrecorded material is in black.

Representations regarding the National Planning Policy Framework, Somer Valley Friends of the Earth, October 2011

B&NES has identified very few potential changes arising from the new NPPF. The Introduction of the NPPF has the following to say about sustainable development:

10. For the planning system delivering sustainable development means:

- planning for prosperity (an economic role) - use the planning system to build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type, and in the right places, is available to allow growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure
- planning for people (a social role) - use the planning system to promote strong, vibrant and healthy communities, by providing an increased supply of housing to meet the needs of present and future generations; and by creating a good quality built environment, with accessible local services that reflect the community's needs and supports its health and well-being; and
- planning for places (an environmental role) - use the planning system to protect and enhance our natural, built and historic environment, to use natural resources prudently and to mitigate and adapt to climate change, including moving to a low-carbon economy.

11. These three components should be pursued in an integrated way, looking for solutions which deliver multiple goals. There is no necessary contradiction between increased levels of development and protecting and enhancing the environment, as long as development is planned and undertaken responsibly. The planning system must play an active role in guiding development to sustainable solutions.

B&NES suggests a potential amendment to Policy DW1, which replaces promotion of sustainable development in the District with a presumption in favour of sustainable development but has not changed the ways in which this will be promoted.

We consider that the Core Strategy divides up its objectives into component parts and fails to reflect adequately point 11 of the Introduction of the NPPF.

There are no changes proposed to Objective 1 of the B&NES Strategy, which states that it is a cross-cutting objective to pursue a low carbon and sustainable future in a changing climate. We consider that it is important that such an overarching objective should incorporate point 11.

We consider that the policies for the Somer Valley area, set out in SV1, do not adequately reflect the pursuance of the components in point 10 in an integrated way and are not sufficiently well considered to deliver development which is "planned and undertaken responsibly" (point 11).

B&NES has not provided a sufficiently robust evidence base regarding the Somer Valley

area.

Radstock in particular has a historic development pattern that does not lend itself well to generic policies regarding how towns are best developed. Radstock does not have a well-defined centre with an edge to it with, typically, a less populated out of centre bit. The housing is already concentrated in individual settlements and so it is more like a collection of villages in many ways. The schools are, in the main, associated with the settlements, emphasising the fragmented nature of the settlement pattern - they are near the houses. We have a problem - the shops are away from most housing and the schools are near to most housing. The framework wants both near new housing. The Framework has shops and leisure developments in edge of centre and then out of centre sites if suitable sites are not to be had in the centre. Here we again have a problem because the constricted nature of the centre and the difficulties of identifying suitable land that is not of other significant value or already occupied. Clearly, careful consideration must be given to the needs and opportunities in Radstock and evidence gathered - this B&NES has failed to do.

Rather than actively guiding development to sustainable solutions, Policy SV1 simply ignores those elements that appear to be inconvenient, such as the extremely valuable biodiversity resource within the local ecological network, largely provided at the hub of that network in a borderline SSSI site of remarkable quality that B&NES has been allocating for development constantly since its inception and has supported both politically and financially to a significant degree. That remarkable site, one of the best wildlife sites in B&NES and one of the best invertebrate sites in the whole South West region, of high local and educational value and of potential economic value as a tourist/visitor attraction, is to be destroyed utterly by the B&NES Local Plan NR2/Core Strategy RAD 1 strategic mixed use development. The evidence for socio-economic benefits from the proposed development is thin at best, and it can easily be argued that it will do more harm than good to the local economy, will act against promoting a strong, vibrant and healthy local community, will act against protection of our natural and historic environment, will act against mitigation and adaptation to climate change and will also act against moving towards a low carbon economy. Policy SV1's Natural and Built Environment section is particularly poor, and does not even give biodiversity and nature conservation mention. That section talks of "the distinctive character of the area including the landscape" and "green links between the two towns". The casual reader would be forgiven for assuming that there was nothing of note in the area, which would be very far from the truth.

Regarding the environment in the Somer Valley area, we note that the NPPF says: 131. The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- where the green space is in reasonably close proximity to a centre of population or urban area
- where the green area is demonstrably special to a local community and holds a particular local significance because of its beauty, historic importance, recreational value, tranquillity or richness of its wildlife
- where the green area concerned is local in character and is not an extensive tract

of land; and

- if the designation does not overlap with Green Belt.

163. The Government's objective is that planning should help to deliver a healthy natural environment for the benefit of everyone and safe places which promote wellbeing.

164. To achieve this objective, the planning system should aim to conserve and enhance the natural and local environment by:

- protecting valued landscapes
- minimising impacts on biodiversity and providing net gains in biodiversity, where possible; and
- preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of land, air, water or noise pollution or land instability.

165. In preparing plans to meet development requirements, the aim should be to minimise adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value where practical, having regard to other policies in the Framework including the presumption in favour of sustainable development. Plans should be prepared on the basis that objectively assessed development needs should be met, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

166. To this end, local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites

If there is to be a presumption towards sustainable development as set out in the NPPF, it is essential that there is sufficient evidence regarding economic, social and environmental matters for the Somer Valley area available when the Strategy is examined at Inquiry and that all the available evidence regarding the economic, social and environmental aspects are brought together so that a responsible approach to development in the area can be pursued, in line with the NPPF.

Somer Valley Friends of the Earth will endeavour to provide for the Inquiry such evidence as it can that supports the case put forward above if/where B&NES does not.

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