

Issue 1
Appendix 5_TP9Comment

Respondent 822, Somerset Valley Friends of the Earth

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Somerset Valley Friends of the Earth comment in connection with Topic Paper 9

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1.1 This appendix is a more detailed account of the Somerset Valley Friends of the Earth comments in connection with Topic Paper 9 that are summarised in our response to Issue

2.1 We set out our understanding of what B&NES sets out in Topic Paper 9 in Appendix 3_TP9, section A for reference in case this is considered necessary, but do not refer to it in the text below.

2.2 We have drawn certain conclusions about our understanding of the B&NES assumptions and point out matters that we are unable to draw conclusions from or are unclear about in Appendix 3_TP9, section B.

2.3 Despite failing to meet its Local Plan housing targets, B&NES intends to achieve a 44% higher delivery rate for housing in the Strategy period than it did during the Local Plan. This appears to be an over-optimistic assumption, given the constraints to development to which B&NES refers in the Core Strategy and elsewhere and the unquantified under-representation of impacts on wildlife and biodiversity through the assessment of housing land in the SHLAA (see 821\18 para 3, 821\20 paras 2 and 3). Cam Valley Wildlife Group covered the matter of the SHLAA in relation to RAD1 as an example of this failure in its National Planning Policy Framework response, but this does not appear in Schedule 2. This is not the only example that could have been given. For this response, see Appendix supplementary of joint response to ID/7 1B by respondents 821 and 822, pages 3,4,5 & 6.

2.4 We are not convinced by the "Smart Growth" plan. The content of Topic Paper 9 implies a high risk of failure to deliver the number of jobs envisaged. We think that there is considerable doubt regarding the delivery of a much higher rate of housing provision than achieved by B&NES to date to provide for the anticipated growth in jobs.

2.5 We consider that B&NES has overestimated delivery of housing in the B&NES Local Plan due to an inadequate method of identification of deliverable housing land, the high constraints to development that the nature of the district confers and a tendency on the part of the Authority to be over-optimistic about brownfield development. This also applies to the Core Strategy.

2.6 B&NES appears to have taken an aspirations-led approach rather than one characterised by a robust evidence base from the start, which may have acted to hamper formation of a realistic view regarding the likely magnitude of constraints and housing delivery.

2.7 There are considerable constraints to development connected with the wide range of policy considerations in B&NES and these constraints to development were partially responsible for under-delivery of housing in the Local Plan. Government policy, including PPS 3 (CD2/4) and PPS4 (CD2/5), requires that a range of policies and strategies are taken into account, which includes impact on nature conservation and the

built and natural environment. Addressing the impoverished state of the nature conservation resource in B&NES and decline in B&NES and across the UK that is still ongoing is a key part of Government Policy. In order to avoid the area becoming a commuter area for Bristol, it is important that provision of housing is at least in step with jobs and take nature conservation and environment properly into account. We consider that housing provision may have to be reduced to avoid these impacts. Alternatively, the scope for greater jobs provision through a joint Bristol/B&NES urban extension that creates a reduced need to travel may be possible.

2.8 The importance of giving appropriate weight to nature conservation for social and economic reasons, and the importance of retaining the quantity and quality of UK ecosystems has been set out in the White Paper, *The Natural Choice: securing the value of nature* and is backed up by the UK Biodiversity Strategy 2011. The White Paper draws upon evidence provided to the European Commission amongst other evidence (see paragraph 1 of *rationale and ambitions* on page 2 of Appendix 4_article. The White Paper also emphasises key reforms involving local action and voluntary enabling measures designed to conserve and restore the natural environment in order to gain the benefits of ecosystem services, especially economic and other anthropogenic benefits. The number of jobs that can be created needs to be assessed. This also sits within the localism agenda. (See Table 1 of scanned article, *The Defra White Paper on the Natural Environment: laudable ambitions but timid actions*, by Graham Tucker¹ and David Baldock², British Wildlife, Vol 22, August 2011, in Appendix 4_article.

2.9 The uncertainties relating to the economic downturn and likely recovery rate look, at the present time, to be more likely to result in fewer jobs created in the District rather than more; dramatic decreases in jobs across the UK are forecast and there is both pessimism and uncertainty regarding the timing of recovery. It does not look likely that inward migration to the authority will increase, but B&NES has pointed to the possibility that migrants could out-compete local people in the housing market. Failure to provide the jobs B&NES envisages could increase in and out-commuting and would be particularly pertinent to areas with housing of lower market value, such as the Somerset Valley area, exacerbating pre-existing social problems in the area. We are unable to find any justification for the view that increased social impacts from migrants out-competing residents in the housing market will have no economic impact on the District, as B&NES claims.

2.10 On balance, we consider that the planned district-wide scale of provision for jobs and homes related to those jobs is not justified because the provision of jobs appears overly-optimistic and provision of those houses would increase out-commuting from the District whilst further impoverishing the nature conservation resources of the District and increasing pressure on the environment; this would act against Climate Change policies set out in CD2/2.

1 Graham Tucker is the Head of the biodiversity Programme at the Institute for European Environmental Policy (IEEP).

2 David Baldock is the Executive Director of the Institute for European Environmental Policy (IEEP).

2.11 We believe that the contingency of review in the second part of the plan period is not sufficient, including with regard to the implications for Somerset Valley site allocations. We believe that more weight should be given to the social, environmental and economic implications of the spatial proposals for housing and job provision in the Somerset Valley area, and policy for Radstock in particular, for which the evidence provided is sparse. The failure of B&NES to date to provide a cohesive and deliverable strategy for the Somerset Valley area and the towns within it has already led to damaging stagnation and failure to use existing assets for the benefit of the area, including economic and cultural benefits. In Radstock, B&NES has tried to use the 'delivery vehicle' it set up, Norton Radstock Regeneration, not only to deliver a B&NES major project, but also to provide spatial planning for the town, with disastrous results. The proposed housing allocations within the town centre area and outside it in Radstock hinges on delivery of RAD1 and the road infrastructure that enables RAD1. The existing assumptions about delivery risks one of two outcomes, a) development to the detriment of the town, the environment and nature conservation objectives at local, regional and national level, accompanied by significant socio-economic disbenefits and the loss of a better socio-economic alternative, or b) delay and risk of non-delivery while the site's present valuable attributes degrade. Either scenario would continue to blight the area. We do not believe that the matters of important natural and industrial heritage can be left to the forthcoming Placemaking and Green Infrastructure SPDs, and we would expect the opportunity to conserve a cohesive large open trackbed area that displays the landscape-scale feature and industrial features well on RAD 1 to be examined in the process of drawing up the SPD (see 822/PCV/1 and joint response by respondents 821 and 822 to ID/7 1B, paragraphs 2.6.1 to 2.6.3 and paragraphs 2.71 to 2.74). We consider that the Core Strategy plans for Radstock should be informed by such considerations and conflict removed by removal of the assumptions regarding development in Radstock centre, including the argument that an extension of the 2008 outline permission is not feasible, which is argued in detail in the Somerset Valley FoE response to the REN application, the summary of which can be found in Issue 1_Appendix5a_REN. The socio-environmental case put forward by the Planning Inspectorate in its report on the 2006 B&NES Local Plan has not been disproved and it is easy to show that the NRR Regeneration Case does not hold water.

2.12 B&NES makes the argument that allowing build on the Green Belt will allow manipulation by developers. However, the Community Infrastructure Levy (CIL) could be used to level this particular playing field. If the levy is commensurate with the difficulties (cost) of site delivery, it can be expected to negate the disadvantages to the developer of development on sites that are more expensive to develop. It appears to us that there is an argument for an expectation of higher community benefits from development on sites that are easier and cheaper to develop through use of the CIL, which arguably could offset some of the public opposition to Green Belt development and could maximise benefits from sustainable locations in the Green Belt.

2.13 Although brownfield sites have a reputation for higher delivery costs, brownfield sites that are not subject to significant contamination already served by service infrastructure can be less expensive to develop than some greenfield sites. For

brownfield sites that require central government funding through the HCA, developability rests very much with the Agency and it is heavily influenced by the view of the Local Authority and the aspirations of house-builders wishing to boost their reputation for delivery of challenging sites. This would seem to count against the developer manipulation to which B&NES refers in CD6/S10.

2.14 Developers interested in larger brownfield development sites are usually regional or national companies with a relatively wide geographic remit and larger house-builders have substantial amounts of building land in their portfolios. Their argument that they may prefer greenfield sites outside B&NES is countered in part by the acceptability to B&NES of lower levels of affordable housing where costs to the developer are high and its acceptance of contribution to housing targets on using brownfield land as a key benefit. However, this causes pressure to permit development that fails to meet other development control policies as part of the 'weighing' process that takes place when policies conflict; this, in turn, risks failure to achieve targets in other areas. Adequate baseline evaluation for biodiversity and nature conservation is not available and indicators are insufficient. Losses within the plan period are difficult to qualify and quantify and easy to ignore. There is less incentive to avoid these losses in favour of delivering housing to meet targets, which is easier to quantify. The White Paper seeks to highlight the link between nature conservation and socio-economic benefits, which is in line with the recent emphasis in PPS: Planning and Climate Change (CD2/2), the emerging NPPF and the UK 2011 biodiversity Strategy . We consider that the level of development that brownfield land will provide should, therefore, be considered to be lower than B&NES expects and that the likelihood of developers turning to easier sites outside B&NES in preference to some brownfield sites within it should be considered.

2.15 B&NES has made the argument that the environmental costs of developing Green Belt land work against its use for development, but does not apply the same arguments to other areas where the environmental costs are equally high or greater, including brownfield development, and has not properly researched the implications of creating a cohesive ecological network as required in the UK Biodiversity Strategy, 2011, *Biodiversity 2020: A strategy for England's wildlife and ecosystem services* . Brownfield sites can be as valuable to biodiversity as ancient woodland and are essential to the maintenance and enhancement of the ecological capital of the District.

2.16 The Bristol Core Strategy now includes the possibility of an urban extension in the Green Belt at Brislington. (CD3/13, para 60). The argument B&NES makes that Bristol is not keen on greenbelt development appears to be somewhat spurious. The inclusion of joint working with Bristol, where good growth is expected (CD3/13, para 21), seems worthy of examination as an alternative to increasing the role of the Somerset Valley area as a dormitory area for both Bath and Bristol, and as an alternative to the increased jobs/homes disparity proposed.

2.17 B&NES is concerned about the risk that the district may play a dormitory role for Bristol its response (CD6/S10) is to strengthen the economic role of Bath (CD6/S10). There are good inter-city transport links with Bath and a park and ride facility at

Brislington on the Bath side of Bristol; conversely there are very poor links with Bristol from a significant part of the Somerset Valley area. Widening the gap between jobs and housing in the Somerset Valley area is likely to promote commuting to Bristol and the role of the area as a dormitory area; discouraging growth of as well as creation of dormitory areas is included in higher level policies including RPG 10 and the RSS. If there is to be a dormitory role, it would be better to be one that has better access to public transport.

2.18 Should B&NES provide housing to match jobs that are not delivered and the much larger and economically dominant Bristol City does well, as expected, or well relative to B&NES, this could be a recipe for higher out-commuting from Bath, Keynsham and the Somerset Valley area to Bristol, which was already high at the 2001 census and is probably higher still now. It is probable that the alternative of an urban extension at Brislington would be more sustainable than build in the Somerset Valley area in the Core Strategy period, the jobs/homes ratio for which demonstrates exacerbation of the existing problem and town centre pollution in Radstock, which is presently underestimated.