

Bath and North East Somerset Council Draft Core Strategy Representations by Plan Reference: Chapter 4 - Somer Valley

Plan Reference: Diagram 14: Somer Valley Location

Reference: 246\18

Respondent: Combe Hay Parish Council

Representation It is not correct to show the built-up extent of the City Of Bath as including the area along the A367
(soundness): beyond the boundary of the City.

Change sought to make sound: Delete the extensions showing the built-up City of Bath along the A367.

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Somer Valley: The Vision

Reference: 93\9 S

Respondent: Highways Agency

Representation The Agency notes the growth proposals and supports the Council's aspiration to increase self-
(soundness): containment in the larger settlements and improve sustainable forms of transport. The Agency is concerned about how any improvements to the SRN would be delivered when there is no reference to the SRN within the IDP. Such concerns will be removed if the Council makes changes as per the Agency's representations to 6G and Policy CP13

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 169\2

Respondent: Norton Radstock Town Council

Representation 4.17 does not consider the difficulties of commuting due to large freight traffic using the A37, A367 and
(soundness): A39 and does not consider all the alternatives such as re-opening of rail links.

Change sought to make sound: Consideration should be given to an integrated transport system.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 197\1

Respondent: Railfuture Severnside

Representation Radstock needs an operating railway, linked to the National Rail System, in order to realise its potential
(soundness): for tourism. Paras 4.03 and 4.09 appear to suggest that cycleways alone can reduce the impact of motorised traffic on the environment. Even if people cycle within the area, few will cycle all the way from other regions of the UK.

A reinstated railway from Radstock to Frome would not only enable tourists to reach the Somer Valley without using cars but could in all probability be the centrepiece of the attraction. It is worth noting that the Dean Forest, Severn Valley and Swanage Railways all serve former missing areas; all three lines have interchange with or physical linkage with the main rail network. The tourist assets named in para. 4.22 (page 86) are close to the Radstock Station site; arguably it would be a working railway that

would bring visitors' attention to the other main features of the town's industrial heritage.

The potential for Heritage railways to serve communities in former mining and quarrying areas has been demonstrated by the Weardale Railway in Co.Durham, which has since May 2010 provided an all year, daily passenger service between Stanhope and Bishop Auckland. From May 2011 the Ecclesbourne Valley Railway (Wirksworth-Duffield) in Derbyshire is scheduled to run regular services connecting with the national rail system.

Change sought to make sound: Para. 4.03 and 4.09 need to be amended to include the possibility of restoring the Radstock-Frome railway as a means of access to Radstock's heritage and as a tourist attraction in its own right. (This would meet the spirit of strategic objective 7, which includes delivery of "well connected places accessible by sustainable means of transport.")

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 4.13

Reference: 254\3

Respondent: Galliford Try plc.

Representation (soundness): Paragraph 4.13

6.3 We support the aim of making the area more self-reliant. However, it should also recognise the reality of the economic relationships with Bath & Bristol and aim to make these more sustainable. In part this will require a residential and business premises stock that enables flexible patterns of working e.g. dwellings that enable home working (through the provision of live-work units) and flexible business space so that commuters to Bath/Bristol can work more flexibly, and reduce the frequency of out commuting.

6.4 In order to bring about the delivery of new business space a step change in the quality and image of the Somer Valley area will be required. The Vision and Spatial Strategy needs be more explicit in this respect, and acknowledge that the enhancement of existing residential neighbourhoods could in part help to achieve the vision.

Change sought to make sound: Revise the housing target for the district to reflect more realistic growth and inward migration assumptions, and adopt a less prescriptive approach to new residential led proposals in the Somer Valley Area.

Representation (legal compliance): 1: Not Justified: In terms of the evidence base relating to the housing requirement for the district, or in relation to the definition of the Midsomer Norton Town Boundary.
2: Not Effective in terms of strategy: delivery of housing and employment under Policies SV1 and SV2.
3. Not Consistent with National Policy? PPS3, PPS4 and PPS12 (deliverability and flexibility).

Change sought to make legally compliant:

Plan Reference: Paragraph 4.14

Reference: 169\5

Respondent: Norton Radstock Town Council

Representation (soundness): There is no explanation why only 50% of the potential jobs will likely come forward and therefore no defined way in which these jobs may be more deliverable. Given the imbalance in the jobs to housing ratio it is essential job creation is supported.

Change sought to make sound: A greater understanding and explanation of the area's deliverable job capacity and ways in which the growth of this can be supported by this plan.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 182\6

Respondent: Meadow View Residents Action Group

Representation E) There is no consideration of the best driver for economic regeneration in the Somer Valley, providing
(soundness): means to facilitate self-employment, helping those who work in their homes on the internet, creating advice and financing hubs, appropriately sized industrial units (those in Radstock are too small for our succesful businesses) etc. (para.4.14 is inadequate)
F) The glaring omission of an Economic Plan for Radstock which local community groups could have provided if BANES will not re-activate the masterplanning process property.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 4.15

Reference: 254\4

Respondent: Galliford Try plc.

Representation Paragraph 4.15
(soundness):

6.5 To expect all housing development to provide economic, employment and community benefits seems unduly prescriptive and excessive. This also assumes that housing development with generate surplus residual values to provide such benefits. This is in fact unlikely to be the case in the Somer Valley area, and also in the context of the already very full list of planning obligation requirements set out in the adopted SPD. If the housing target reflects a need then the policy should enable delivery in appropriate locations to meet this need without absolutely requiring each housing scheme to fund economic development and community provision.

Change sought to make sound: Revise the housing target for the district to reflect more realistic growth and inward migration assumptions, and adopt a less prescriptive approach to new residential led proposals in the Somer Valley Area.

Representation (legal compliance): 1: Not Justified: In terms of the evidence base relating to the housing requirement for the district, or in relation to the definition of the Midsomer Norton Town Boundary.

2: Not Effective in terms of strategy: delivery of housing and employment under Policies SV1 and SV2.

3. Not Consistent with National Policy? PPS3, PPS4 and PPS12 (deliverability and flexibility).

Change sought to make legally compliant:

Plan Reference: Policy SV1: Somer Valley Spatial Strategy

Reference: 106\4

Respondent: Pro Planning

Representation Core Strategy Policy SV1 Part 3 is considered to be inconsistent with national policy as contained within
(soundness): PPS4: Planning for Sustainable Economic Growth. Paragraph 4 of PPS4 defines "Economic Development" as development within the "B Use Classes, public and community uses and main town centre uses." This is expanded in paragraph 7 to include retail development, leisure and entertainment facilities, offices and art, culture and tourism. Policy SV1, Part 3 on economic development in the Somer Valley neither makes reference to PPS4, nor reflects this definition of economic development. Part 3a refers solely to jobs, but 3b and 3c refer only to "business use" with the implication that business is referring to Class B employment uses. This apparent inconsistency between PPS4 and Policy SV1 is neither explained nor justified in the Core Strategy text. Moreover in the case of some of the business parks

listed and Bath Business Park in particular, some of the developments already fall outside Class B employment uses, developments which have brought clear benefits to the local economy. Given that these benefits and absence of harm are now recognised in national policy in PPS4, the Core Strategy has in effect built in obsolescence by failing to incorporate this Government policy which was published in 2009.

Funding Support and Location of Business Parks

In relation to effectiveness, although there are regeneration provisions for the town centres of Midsomer Norton and Radstock, not all the designated employment sites lie in or adjacent to these town centres. Again Bath Business Park at Peasedown St John is an example. In addition, as with many other employment designated sites in the Somer Valley, Bath Business Park has struggled to attract Class B developments and occupiers in the ten years during which it has had planning permission. That remains the case, even where speculative developments have been carried out, but have not been fully let. If funds are to be made available to regenerate and support economic developments within Midsomer Norton and Radstock, the Core Strategy should make equal provision for support for all of the designated employment sites.

The Core Strategy's ignoring of the current economic recession, its impact on those parts of the area which were already struggling economically such as Somer Valley and the need for extraordinary measures, all contribute to its ineffectiveness. It is acknowledged that the Core Strategy is to look to the future and is to be enduring, whereas the recession is, hopefully, a current phase which will pass. Nevertheless its depth and impact have been so severe that to ignore it completely must be deemed to undermine the Strategy's effectiveness. Again citing the example of Bath Business Park, any interest that there has been in either the remaining development land or the vacant speculative units, has been shelved for 12 months or more. Conversely there is ongoing dialogue with different types of non-Class B occupiers for the development land.

Consistency with PPS4

Policy EC2 of PPS4 is the plan making policy for sustainable economic growth. EC 2.1.h. states: "Existing site allocations should not be carried forward from one version of the development plan to the next without evidence of the need and reasonable prospect of their take-up during the plan period."

It continues that if there is no reasonable prospect it should not be retained and either wider economic uses or alternative uses should be considered. It does not appear that this government advice has been followed in relation to those employment sites which have not been brought forward during either the BANES Local Plan or indeed the previous Wansdyke Local Plan periods.

Change sought to Amend Policy SV1 Part 3a as follows:

make sound: "Enable the delivery of around 1000 net additional jobs (as defined as economic development in PPS4 paras 4 and 7) between 2006 and 2026."

Amend Policy SV1 Part 3b to read:

"Encourage the retention and expansion of local companies and the growth of new employment opportunities by making provision for...."

Replace Policy SV1 Part 3c as follows:

"Review existing employment sites through the Placemaking Plan. Where allocations have not been brought forward, or vacant sites redeveloped, allow economic development uses as defined by PPS4, or support alternative uses."

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 106\5

Respondent: Pro Planning

Representation Economic Development

(soundness): 1. There is considered to be an inconsistency under the heading of Economic Development Parts 3b and 3c. Part 3b allows for a planned reduction in industrial\warehouse floor space from about 110,000

square metres in 2006 to about 100,000 square metres in 2026. It is difficult to see how this can be achieved whilst complying with the requirement in Part 3c that all land in existing business use is to be protected and alternative uses only allowed where there is employment benefit, or which contribute to improvements to the town centre or does not lead to an unacceptable loss of employment land. For sites which are not in town centres how can a reduction in industrial floor space be achieved if employment land is to be so protected?

2. Similarly there is considered to be an inconsistency between Part 2a of Policy SV1 and Part 3c for similar reasons. Part 2a encourages the redevelopment of vacant and underused industrial land and factories, whereas Part 3c protects land in existing business use which includes vacant and underused premises.

Housing Development Boundaries

3. There is no reference to or provision for reviewing the Housing Development Boundary for either Radstock or Midsomer Norton through the Core Strategy and subsequent Placemaking Plan. This is in stark contrast to the provision in para 5.21 for rural villages which allows:

“The Housing Development Boundaries shown in the Proposals Map (saved from the existing Local Plan) will also be reviewed as part of the Placemaking Plan.”

If such a review is justified for villages where limited growth and development is to take place, it is imperative that it should also be allowed at major settlements such as Radstock and Midsomer Norton where growth and regeneration are critical issues. Furthermore, it is not thought that any review of the Housing Development Boundary was carried out for the Core Strategy preparation and it must therefore be both timely and ongoing. This is particularly the case in the Coomb End area of Radstock which links Radstock with Clandown. It is an area of mixed use employment premises and housing, subject to severe traffic constraints. Its regeneration is important to both settlements and, at present, the Core Strategy makes no provision for this as part of the Placemaking Plan process. There are currently vacant brownfield sites lying outside the Housing Development Boundary which, under Policy SV1 should not be redeveloped for industrial employment use, cannot be delivered for office use because of the location outside the HDB and traffic and access constraints and, notwithstanding their proximity to both the centres of Radstock and Clandown, are precluded from housing development by the current structure of the policies for Radstock.

A further justification for making provision to review the Housing Development Boundary arises because at present the Conservation Area for Radstock extends outside the Housing Development Boundary and yet embraces derelict and redundant industrial sites. It is difficult to achieve enhancement of these employment sites within the Conservation Area against this currently constrained policy context.

Housing Growth

4. Part 4b of Policy SV1 in effect precludes any new housing above the existing commitment of 2,200 dwellings. It is understood that these commitments are carried forward from the BANES Local Plan, approved in 2007 and with an end date of 2011. Where however, Local Plan policies have not been implemented during the Local Plan period, they should not simply be carried forward into the Core Strategy without careful scrutiny and justification. There are therefore a number of concerns regarding the Core Strategy for Radstock if it is to be dependent solely on existing allocations which to date have not been brought forward, and with virtually no opportunity to consider alternative sites for the duration of the Core Strategy period to 2026. For a town urgently in need of regeneration, such constraints on new house building will be counterproductive.

The argument for constraining housing growth in Radstock is to seek to reduce out-commuting to Bath and other employment centres. The Core Strategy recognises the differential house prices between Bath and Radstock and, whilst purchasing ability will improve if and when higher order jobs are introduced in the Somer Valley, this measure alone is unlikely wholly to address that price differential. It is considered that the Core Strategy needs to take a more realistic approach by accepting that significant out-commuting will continue from Radstock, and put in place measures to ensure that commuting can be carried out by as sustainable means of transport as possible i.e. primarily by bus. This reflects the approach taken in Keynsham where significant investment is to be made into the

commuter rail network linking Keynsham with both Bath and Bristol, partly in recognition of the continuing high levels of out-commuting from Keynsham. It is acknowledged that funds are identified to improve bus links between Bath and Radstock, but the strategy in relation to out-commuting is not.

Change sought to Amend Policy SV1: Somer Valley Spatial Strategy as follows:

make sound: • Delete Part 3c or replace by:

“Review existing employment sites through the Placemaking Plan. Where allocations have not been brought forward, or vacant sites redeveloped, allow economic development uses as defined by PPS4, or support alternative uses.”

• Include a new proviso 4c:

“Re-visit both the Town Centre and Housing Development Boundary for Midsomer Norton and Radstock as part of the Placemaking Plan process.”

• Amend 4b to read:

“Review the viability of the existing 2,200 committed dwellings within the Housing Development Boundary and, where either not currently viable, or where they have not been brought forward within 5 years of identification, delete from the committed list and seek alternative housing sites within or adjacent to the urban area as appropriate.”

• Introduce a new proviso 3X:

“Where industrial sites lie in or adjacent to the urban area and its loss would contribute towards the planned reduction of industrial sites, give support for re-use including for housing development.”

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 147\20

Respondent: Bath Green Party

Representation The options do not comment on the sustainability of the area, which needs to be the first element to
(soundness): consider. There is a lack of ambition to provide jobs to more closely match the population. The opportunity to bring rail back in use should be considered as part of the transport plan.

Change sought to
make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 155\1 S

Respondent: Mr Nicholas Press

Representation support strategy
(soundness):

Change sought to none
make sound:

Representation (legal compliance):

Change sought to make legally compliant: none

Reference: 169\1

Respondent: Norton Radstock Town Council

Representation There is an ineffective jobs – housing balance: 0.37:1 instead of the effective balance of 0.75 – 1.50 jobs
(soundness): per household (cervero, 1996a) which will lead to more commuting.

Change sought to Reduction in housing or increase in employment opportunities to have a more beneficial jobs : housing
make sound: ratio. Reduce the number of new homes for the Somer Valley.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 169\3

Respondent: Norton Radstock Town Council

Representation The Core Strategy currently states an increase in office space and reduction in industrial/warehouse
(soundness): floorspace, but does not show any overall growth in expanding the overall provision for economic development in the Somer Valley and in particular the town centres of Midsomer Norton and Radstock.

Change sought to A more thorough look at the Economic Development potential for the area and commitment to
make sound: encourage growth in employment floorspace, greater than currently shown.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 169\4

Respondent: Norton Radstock Town Council

Representation The document does not mention biodiversity and the important areas of local ecology. The document
(soundness): does not allow for a renewable energy area.

Change sought to Thorough research and consideration of the ecology of the area and the biodiversity and renewable
make sound: energy opportunities.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 182\3

Respondent: Meadow View Residents Action Group

Representation C) The Challenges outlined in Section 1b (pp 9-10) are not addressed by the policies for the Somer
(soundness): valley.

D) The question of how jobs will be created is not sufficiently addressed. Infrastructure improvements will clearly help, but more than that is necessary.

Change sought to P82 Should include Combend/Clandown Potential.
make sound:

Representation (legal compliance): Finally, although the Regional Spatial Strategy, which originally informed this document, is extinct, the Directive from the Secretary of State for Communities, that job creation should match the number of new houses built (or vice versa) is still in force, we believe, and indeed is found in all the figures except for the Somer Valley, where the disproportionate houses to be built compared with the number of job will lead to increased 'out-commuting' or 'retirement villages', neither of which serve the aim of sustainable well-balanced communities.

Change sought to make legally compliant:

Reference: 218\1

Respondent: Keith Tyrrell

Representation As it stands it seems to ignore the needs of Writhlington. Changes need to be put into place to give
(soundness): scope for growth of a sustainable community. The local plan needs to take in all the existing houses without exception and also give room for growth to allow our village to prosper.

Change sought to
make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 219\1

Respondent: Edward Ware Homes Ltd

Representation We object to the content of the Core Strategy in terms of its intentions for Peasedown St John. The
(soundness): Core Strategy is seeking only limited development within the settlement due to previous significant housing delivery.

The Council fails to recognize the importance of Peasedown St John and its role within the District and indeed the Region. It is a sustainable settlement with a very good range of services and facilities. The settlement is capable of absorbing more housing growth than the Council anticipates in order to sustain existing social and economic provision and also to encourage a stronger economic position.

Land at Greenlands Road is considered to be suitable, available and achievable and can be delivered for residential development in the short and medium term. The site has the potential to yield approximately 235 new dwellings and the possibility of local facilities such as a Parish meeting room. The site has been presented as an opportunity to the Council through its Development Plan Team. Officers are therefore aware of the sites potential.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 220\1 S

Respondent: Radstock Cooperative Society

Representation Radstock Cooperative Society (RSC) broadly supports Policy SV1 (Somerset Valley Spatial Strategy) and
(soundness): Policy SV3 (Radstock Town Centre Strategic Policy), in particular the classification of Radstock as a market town and a key focus for development. RSC welcomes the scope for delivering increased levels of sustainable development across the Somerset Valley as a means of facilitating regeneration, supporting the local community and local business.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 220\4

Respondent: Radstock Cooperative Society

Representation The Society acknowledges that the level of housing growth directed towards the Somerset Valley contains
(soundness): a very high level of existing housing commitments. In light of this, the market towns of Midsomer Norton and Radstock will be afforded a new housing allowance of 200 dwellings each over the plan period, and new housing in the local centres of Peasedown St John and Paulton will be very limited.

RSC is concerned that this level of new housing growth provides very little flexibility to bring forward new development and may, in fact, hinder the facilitation of new development in these areas through the private sector. While RSC believes that the level of development will go some way towards increasing the self containment of Radstock town centre, it is enough to make the concerted effort necessary to regenerate the area, in a strategic sense, in the longer term.

RSC consider the emphasis should be placed on facilitating the regeneration, investment and growth of these areas through the Core Strategy. RSC supports the promotion of more housing allocations in the market towns and local centres of the Somerset Valley and believes the Council should adopt a flexible attitude to applications which have no significant adverse impact on their surroundings.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 222\8

Respondent: Duchy of Cornwall

Representation For the reasons set out in our response to Policy DW1, we object to the distribution strategy as it
(soundness): relates to the planned levels of housing provision to be met in the southern part of the District.

Policy SV1 relies upon the delivery of 2,700 new homes of which 506 have been completed in the period 2006 to 2010. There is also a large supply of existing allocations with planning permission. Sites identified within the SHLAA amount to in excess of 500 dwellings.

By decanting part of the strategic housing requirement to be met in the form of an urban extension to Bath, the CS is encouraging a more dispersed pattern of growth that is unlikely to provide for a sustainable pattern of development. Such an approach is only likely to serve to increase commuting distances and encourage people to commute longer distances to Bath to access employment opportunities together with the retail and leisure attractions afforded by the SSCT.

Change sought to make sound: The housing requirement to be met within the Somer Valley should be revised in order to facilitate a greater number of dwellings at Bath in the form of an urban extension to the south west of the urban area.

The omission of a requirement to plan for a sustainable urban extension to the south west of Bath is a major failing of the draft Core Strategy which will fail to address the significant imbalance between employment opportunity and housing choice, particularly at the Bath SSCT.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 226\1

Respondent: Radstock Action Group

Representation The omission of renewing rail transport, particularly the link between Radstock and Frome, ignores the
(soundness): Core Strategy aspirations to foster sustainable economic development, create successful and sustainable communities. References to more cycling and walking entirely ignore the terrain and the time constraints of such activities in the overall economic regeneration of the town, which will involve inward and outward travel to work places in the town and elsewhere.

Change sought to make sound: Insert in Section SV1:6 a commitment to exploring the reinstatement of the rail link between Radstock and Frome.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 230\1 S

Respondent: Mrs Anne Hutton

Representation The Core Strategy is sound because it does not allocate any new greenfield sites at Radstock. Radstock
(soundness): cannot cope with any new housing areas because sufficient brownfield sites have been allocated and there is insufficient transport and community facility capacity to cope with anymore housing. Also, greenfield housing will harm the landscape character around the town.

Change sought to make sound: none

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 234\1

Respondent: Taylor Wimpey UK Ltd

Representation Paragraph 4.06 of the Draft Core Strategy identifies that since the 19th Century, Midsomer Norton has
(soundness): continued to be a key centre for services, employment, shopping and leisure facilities which support the wider communities in the Somer Valley. The previous contextual paragraphs also comment that

despite some closures and relocations manufacturing industries (including printing, binding and packaging) continue to provide important local employment opportunities, with the area presenting positive opportunities to increase economic competitiveness, particularly with small and medium scale local business and skilled entrepreneurs. However, Paragraph 4.08 goes on to state that recent housing development has led to an imbalance between jobs and homes, and that in order to thrive it is identified that the Somer Valley needs to create a more sustainable balance by enhancing economic activities and wealth creation.

Taylor Wimpey agrees that the Somer Valley settlements, when taken as a whole and in particular Midsomer Norton, are key centres for facilities and services within the District (including employment). It is not disputed that levels of housing growth may not have been matched by employment growth in recent years; however, Taylor Wimpey do not consider that this fact, nor the relative accessibility of the Somer Valley (compared to other parts of the District) should preclude the provision of further additional housing development (beyond that already committed) at these inherently suitable/sustainable locations. The Core Strategy should more fully embrace the potential of such development (to meet community needs for housing and contribute to economic growth and regeneration) as this will enable the District to achieve its total development requirements (as discussed elsewhere and in other representations submitted on behalf of Taylor Wimpey) and help to provide a range of housing opportunities to help deliver the economic and other regeneration objectives for the Somer Valley.

Although the current Core Strategy seeks to only recognise 'direct' economic and community benefits of new housing provision (Paragraph 4.11) the many indirect benefits and the contribution housing (including affordable housing) makes to the vitality of the settlement should be clearly recognised. Such development will be an important part of the overall 'package' for this area to help retain and attract employers and other economic activity, help to maintain and enhance the various centres in the area (including Midsomer Norton Town Centre) and at the same time make a significant contribution to meeting the overall housing requirements of the District (where there are constraints relating to, amongst other things, the Green Belt and AONB's in other areas) including addressing housing affordability. The constraints to development which exist in the other parts of the District, such as a relative lack of previously developed land within Bath, mean that the full potential for development at Norton Radstock (and across the Somer Valley) should be realised to meet local and District wide objectives/requirements for economic growth and affordable housing.

Housing Supply and Spatial Strategy

Other representations submitted on behalf of Taylor Wimpey deal in greater detail with the issues relating to economic growth, job creation and the provision of new housing. In summary a run of the 'Chelmer' model by Taylor Wimpey suggests that on a long term migration trend household growth will require the provision of c 15,500 new dwellings during the plan period, taking into account other evidence this is increased to a total requirement of 21,800 new dwellings.

In terms of the 'spatial strategy' the position is clear that, based on the above, the Council needs to find further significant sources of new housing supply, some of which will be at Bath, Keynsham and the edge of Bristol, but some of which will come from the settlements within the Somer Valley.

Exploring this in slightly more detail it is worth reflecting on the consideration which was given to the issue of housing distribution during the Bath and North East Somerset Local Plan Inquiry. Whilst the Local Plan Inspector noted the Council's concern, at that time (2006) to address the balance between residential development and employment within Norton Radstock, in the absence of an adequate supply of housing land overall within the plan, it was found that Norton Radstock had the potential to make significant contribution to future housing supply (IR Para 2.4). These conclusions followed on from earlier comments on the settlement hierarchy, where the Inspector found Norton-Radstock to be a suitable location for further residential development. The Local Plan Inspector found that constraints associated with the Green Belt/AONB/World Heritage Site at Bath and the Green Belt at Keynsham meant that development at Norton Radstock is well placed to make a significant contribution to the housing needs of the District; these issues are still relevant and it remains that Norton Radstock (the Somer Valley) is well placed to make a significant contribution to the increased supply of housing (21,800 dwellings during 2006 -2026) which is required within Bath and North East Somerset. Whilst Taylor Wimpey fully recognise and support the potential for strategic growth at Keynsham, and in the

other areas surrounding the urban edge of Bristol, they are also keen that all other opportunities for sustainable growth (including specifically the provision of sufficient housing) are embraced and facilitated by the Core Strategy.

The Council's evidence (BANES Local Economic Assessment, May 2010 and Smart Economic Growth – Cabinet Report, November 2010) recognises that housing affordability has been exacerbated by a lack of house building (particularly affordable dwellings) and that this could constrain future population, and therefore economic, growth. Other detailed representations submitted on behalf of Taylor Wimpey deal with the issue of the overall housing requirement for the District, economic growth and jobs, and so this matter is not covered in detail here. For the purposes of these comments specifically on the Somer Valley it is sufficient to state that Taylor Wimpey consider that more housing than is planned for in the Core Strategy is required by the District, and that Norton Radstock is well placed to make a significant contribution to meeting this needs, give that it is a suitable/sustainable location for development/growth and a range of suitable and deliverable sites for new housing exist (on both brownfield and greenfield land). As a minimum there should be additional provision made for at least 500 more dwellings than is currently envisaged, which would be suitable and achievable (in the context of the Council's overall strategy and the specific local circumstances of the Somer Valley).

Following on from the above, the Council's SHLAA (December 2010) identifies a total supply of 2,664 dwellings available within the Somer Valley – however of this total some 542 units are on newly identified sites (those outside of the planning process) within the existing built framework of the urban area. An assessment of this 'urban capacity' at Midsomer Norton reveals that whilst some sites might realistically be deliverable others may take longer to come forward (if at all), as they rely on the relocation of existing employment uses, the provision of flats and/or the relocation of existing retail floorspace. This highlights that even to achieve the modest level of new housing growth being planned for by the Draft Core Strategy additional sites are likely to be required - this additional capacity (and that required by the necessary increase in the total housing quantum) is likely, especially in the earlier periods of the plan, to be met by further greenfield sites and the Core Strategy should make provision for this.

Transportation

At Paragraph 4.09 one of the challenges identified for the Somer Valley area is high levels of out commuting, due to lack of local employment opportunities; however, at Paragraph 5.2 of her report the previous Local Plan Inspector concluded that notwithstanding the high level of car borne commuting from settlements such as Norton-Radstock, it is essential that sufficient housing land is identified [overall] to meet the District's requirements. Furthermore it was highlighted by the Inspector that the addition of new housing to the 'other urban areas and larger settlements' within the District (such as those which make up the 'Somer Valley') would add to the potential to maintain and improve existing services, in particular public transport provision, thus adding to the sustainability of those settlements. The same considerations continue to apply as the Council moves forward with its Core Strategy DPD; to support the communities of the District and the overall health of the local and sub-regional economy it is essential that sufficient new housing opportunities are identified (and currently the Core Strategy does not make provision for sufficient housing), and it is necessary to distribute this housing in the most sustainable way (also accounting for other aims and objectives such as environmental protection and regeneration initiatives), this requires further housing development within the Somer Valley where community regeneration initiatives will be supported and there will be impetus for local economic growth together with maintained and improved local facilities and services (including the provision of enhanced public transport services to link the Somer Valley settlements to the larger urban areas to the north). Currently the Core Strategy fails to recognise the benefits of additional development in the Somer Valley (including housing above the level already committed) and in particular transport issues are overstated as a constraint to further development at Norton Radstock. The Council's evidence base (Bath and North East Somerset Local Economic Assessment – May 2010) confirms the relatively high levels of out commuting which exists within the Somer Valley, although this situation needs to be considered 'in the round' as this document does show that over two thirds of Norton Radstock's resident working population, either work within the town(s) or within Bath, where there is good potential for journeys to be made by public transport. The strong links between the Somer Valley and Bath (compared to the links between Keynsham and the greater Bristol urban area) need to be recognised by the Core Strategy where there is strong potential for enhanced public

transport links between the two settlements (principally using the bus network, as well as using other more bespoke transport solutions).

Previously Developed Land

The strategy for the Somer Valley (Policy SV1) seeks to prioritise brownfield sites, however the need for a balanced approach to the reuse of brownfield land for housing was also previously considered within the Local Plan Inspectors Report. The Inspector set out her conclusions on this matter at Paragraph 5.55 stating that it remains appropriate for the plan to include an element of employment development on brownfield sites, to encourage sustainable mixed use schemes, as the location of housing and employment uses in close proximity can encourage more sustainable forms of transport and brownfield sites offer a more sustainable location for employment development since they are likely to be more accessible by a range of transport modes. This reflects the general conclusions reached by the South West RSS Panel Inspectors, i.e. that brownfield supply can never be regarded as 'exhausted' and that, in general terms, the brown and greenfield components of housing land supply can be regarded as complementary rather than competitive, and also reinforces the need for all housing land supply sources within the Somer Valley to be considered as complementary, so as to ensure that District requirements and local objectives can be met. To ensure that the Somer Valley, and especially Norton Radstock can flourish it will be necessary to maximise the use of brownfield land for both employment and housing – although this resource alone will not be sufficient to ensure District wide and local objectives can be met.

Regeneration and Economic Development

The maintenance and enhancement of the Town Centres at Midsomer Norton and Radstock, and other regeneration activity across the Somer Valley are promoted by the Core Strategy; Taylor Wimpey supports this approach, however is concerned that (as set out already above) the level of development being proposed, specifically the level of new housing to be allowed in this area, does not provide sufficient support to this element of the Councils Strategy. As well as the well documented 'Direct' economic benefits of housing growth (e.g. HBF – Building a Recovery, December 2010) there are many indirect economic impacts generated by new housing, these impacts are diverse but can be linked to construction activity itself, linked to the overall attractiveness of an area (to both employers and employees) and through supporting local facilities and services (which are necessary to ensure viable centres and communities). In particular increased population within the Somer Valley will support the regeneration activities of the plan, attracting (and supporting) higher order services within the town, reducing the need for people to travel but also making more viable the provision of public transport services to provide sustainable links to the major urban areas in this part of the sub-region. New development will contribute to infrastructure and help to encourage the delivery of the 1,000 (net) additional jobs currently being sought by Policy SV1, and the higher levels of economic growth (job creation) that should be aimed for.

Change sought to make sound: The Core Strategy should reflect the need for further housing development within the Somer Valley (beyond that already committed), to meet the overall housing requirements of the District (21,800 total dwellings), including the need for affordable housing. Such development would also provide further critical mass, to support regeneration activities and the provision of facilities/public services (including transport) within the Somer Valley. It is likely that at least 500 further dwellings will need to be identified within the Somer Valley, with potentially more depending on the overall distribution of necessary housing within the District and to take account of likely actual delivery from brownfield land supply.

The Core Strategy should positively plan for further Greenfield development within the Somer Valley, which will be necessary to achieve the overall level of housing required for the District, and will help deliver the aims and objectives of the community strategy (including regeneration and local facilities/services). There are greenfield locations within the Somer Valley, including land controlled by Taylor Wimpey at Monger Lane, Midsomer Norton, which are suitable and deliverable and these opportunities should be embraced.

Specifically Part 4 of policy SV1 should be amended to make provision for additional residential

development within the Somer Valley (beyond that which is already committed), including the use of suitably located Greenfield sites, which can contribute to meeting the housing needs of the District (including the acute need for more affordable housing), and economic growth and regeneration objectives (as set out previously above).

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 247\1

Respondent: Keith and Anita Tyrrell

Representation When the building line is redefined we feel that it ought to encircle all the existing houses in
(soundness): Writhlington including the Junior School not as it is at the moment when some are within and some are outside the boundary.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 247\1 S

Respondent: Anita and Keith Tyrrell

Representation When the building line is redefined we feel that it ought to encircle all the existing houses in
(soundness): Writhlington including the Junior School not as it is at the moment when some are within and some are outside the boundary.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 248\10

Respondent: Crest Strategic Projects and Key Properties Ltd

Representation 1) In the first instance, if the Council persists with the notion that 11,000 homes is the right figure for
(soundness): the Core Strategy to pursue, then dispersal of development to locations such as the Somer Valley should not be an alternative to a strategy for the major focus of development to be at the SSCTs. If the proposals for the Somer Valley, Keynsham and the rural areas progress, then the only way in which it can be achieved 'soundly' is if the Council adopts a higher strategic requirement in line with the RS Modifications. It cannot be at the expense of identified requirement at the SSCTs.

2) The Council has long since promoted a strategy for renewal and regeneration at Norton Radstock. The Council made clear in its representations through the RSS process that it saw the Norton Radstock area as important area for regeneration that should be subject to more development than the draft RSS allowed for. In the context of the draft RSS, Norton Radstock falls under the definition of rural areas for which 2,000 homes are identified. Given the extent of existing "commitments", there would not be the opportunity for significant additional growth at Norton Radstock beyond that which is already planned for.

3) Given the extent to which the prospects for development were promoted through the draft RSS, the Panel makes specific mention to Norton Radstock in the Panel Report. Paragraph 4.1.37 states that, "Mention was made at the EiP ending the evidence submitted to the opportunities at Norton Radstock in relation to the needs of Bath. In our view the formal dispersal of provision from Bath would run counter to the principles set out in policies SD1-4 and the regeneration of the small towns hinterland of the city region should be based on local growth".

4) Although the Panel and subsequent RSS Modifications increase the requirement in the rural areas, it was only by 300 to give a total of 2,300 homes. Draft RSS policies SD1-4 go the heart of the principles of sustainable development insofar as they relate to the ecological footprint, climate change, the environment and natural resources, and sustainable communities. Although the SD policies have

subsequently been reworked in the Proposed Modifications, the policy emphasis is still very much there and is rehearsed in Policy CSS – The Core Spatial Strategy. That policy sets out that: “To accommodate the managed growth in the most sustainable way most new development will be provided for a strategically significant cities and towns (SSCTs). Provision for more limited development will be made at market and coastal towns and in small towns and villages where this will increase self containment and promote stronger communities”.

5) The fact that at no stage during the process has the RSS identified scope for significant development at Norton Radstock suggests that it is clear how the strategic part of the development plan envisages the towns progressing in the next 20 years; that is to increase the level of self containment in a sustainable way.

6) In that context, it is difficult to argue with the principle of economic regeneration in Norton Radstock. It is economic regeneration that should be at the heart of the strategy. The strategy does not need significant additional housing for it to work; indeed significant additional housing will simply eradicate any benefits derived from the objective of generating additional jobs in this location.

7) With a population of 21,600 people, Norton Radstock has 15,465 people at working age. At 2005, there were 8,425 jobs available in Norton Radstock; given the closures of major industry in the local area, it is assumed that the jobs figure may have fallen in recent years. Since the number of jobs available is less than half of the number of economically active people in Norton Radstock, it is no surprise there is a significant out-commuting problem. The Council’s solution to this seems to be to make some sweeping statements regarding the economic potential of the area and to identify significant additional housing growth. This is an entirely unsustainable strategy.

8) It is for this precise reason why the RSS does not allow for significant additional growth beyond that already committed at Norton Radstock. Clearly the emphasis has to be on economic regeneration and there is no value in offsetting any benefits accrued through that process by increasing the number of households in the area. That is not a strategy that will lead to greater levels of self containment. Set out below is a comparison between the Spatial Options presented in December 2009 and what is now contained in the publication version CS:

- Option 1 seeks to make provision for 1,000 new dwellings and 1,050 new jobs.
- Option 2 seeks to make provision for 1,700 new dwellings and 1,890 jobs.
- Publication CS seeks to make provision for 2,700 new dwellings and 1,000 jobs.

9) The average household size in BANES is 2.31 (2001 Census). Under the terms of Option 1, this could lead to an additional population of circa 2,300 people. If it is right that approximately 71% of population is at working age, this will lead to an increase in the economically active population of approximately 1,600 people. Under the terms of Option 1, only 1,050 new jobs are proposed. However which way the figures could be massaged, it is clear that under the terms of Option 1 there was no potential for increasing the level of containment in the town.

10) Under the terms of Option 2, 1,700 additional homes could result in an increased population of circa 3,900 people, resulting in circa 2,800 people who are economically active. Only 1,890 jobs are proposed under this strategy (Economic Development and Employment Distribution Information Paper, November 2009).

11) Both strategies presented in the Spatial Options Paper completely fail the test of seeking to provide the greater self containment at Norton Radstock. Whilst it is acknowledged that the Somer Valley strategy now covers a wider area (including Paulton), the position is only compounded now that double the number of homes are now proposed alongside fewer jobs than previously proposed in either of the spatial options.

12) The CS makes no mention of any phased approach to development. Given the above evidence, it could be assumed that at the very least, the strategy should be making clear that housing should only be brought forward alongside an equivalent level of economic regeneration/jobs. The strategy does not say this. There is a danger therefore that housing growth will continue in Norton Radstock, without any complimentary economic regeneration for which no strategy exists.

13) For these very reasons, Norton Radstock does not fulfil the requirements of RSS Modifications classification for a Policy B town. It is important to stress the need to adhere to RSS Modifications definitions since these have been subject to detailed scrutiny and there are subtle changes that the authority should be alerted to. Development Policy C does not rule out economic growth at such locations. It makes clear that the emphasis is on greater self containment and stronger local communities. Provision should be made for economic activity appropriate to the scale of the

settlement and extend the range of services to better meet the needs of the settlement and its surrounding area.

14) It does not therefore prevent BANES from seeking to implement its strategy, but it does not allow for significant extra housing growth in order to achieve it. It is somewhat of a naïve strategy to suggest that significant housing growth will automatically help and stimulate economic regeneration. There is no evidence of this.

15) The Council's "emerging" economic strategy for Norton Radstock would seemingly be to build on the heritage of the location by "tapping into new low carbon opportunities". There is no clear basis on which Norton Radstock is any better placed to tap into new low carbon opportunities than anywhere else in the South West region. Indeed, given the high technology nature of the emerging sector, it is more likely that the SSCTs will have the knowledge base and understanding to respond to the challenges ahead. Whilst Norton Radstock may function as a manufacturing base for such uses, any potential is some way off in the future and there is no certainty that it can be realised. A strategy for Norton Radstock cannot be built around this premise.

16) The Council sets out that the current commitment to new housing is around 900 homes in Norton Radstock (not the wider Somer Valley). That is a significant quantum of new homes for the local area over the next 20 years. It is possible that not all of those homes will come forward for development. Certainly, at least 240 of those commitments are on Local Plan allocations that are not yet subject to planning permission. There is every opportunity to review those Local Plan allocations and seek to re-allocate them elsewhere within the central strategic area.

17) The Council is relying on development to fund and secure all the other enhancements to Norton Radstock that it would like to see implemented. There is no certainty of any of the other funding mechanisms coming to fruition. If the focus is on brownfield regeneration, then the Council cannot assume that there will be a bottomless pit of money from the developers to make the proposed contributions to the public realm. It will simply not happen. The deliverability section of the Chapter notes that employment delivery is dependent on significant public support and intervention. The Council should be focussing on these issues rather than assuming that it will come forward off the back of significant additional housing growth.

18) It is interesting to note that the Economic Development and Employment Distribution Paper provides a factual assessment of land available. It provides no analysis of potential need and demand and whether the proposed number of jobs can be realised. The Paper only makes passing reference to such issues and it is noted that paragraph 1.64 states that under the terms of Option 2 "the office market in the south of the district would have to grow at a faster rate for this amount of space to be needed". It does not identify how this might be achieved.

19) No further housing growth should be promoted in the Somer Valley given the inherent issues of out-commuting that will persist. RPS queries the extent of genuine commitments. It is considered that the commitments figure is heavily skewed because it assumes greater capacities at the Local Plan allocations than that which is actually allocated. There is a significant difference between the figure of 780 advocated in the AMR compared to 396 in the Local Plan. The Paulton Printing Factory is identified as having capacity for over 630 homes in the AMR, yet is only allocated in the Local Plan for 250. RPS would expect to see these assumptions tested at examination.

- Change sought to make sound:** 1) RPS does not consider the levels of residential growth apportioned to the Somer Valley to be justified or effective. Housing growth should be tied to economic growth and should not be providing more homes than jobs; the approach fails all sustainable principle tests.
2) The majority of growth in the Somer Valley would be better distributed to the SSCTs where jobs already exist and are more likely to be created, whilst a strategy for economic regeneration should be the focus in the Somer Valley.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 254\1

Respondent: Galliford Try plc.

Representation 1.0 Introduction

(soundness): 1.1 GL Hearn act on behalf of Galliford Try plc, who are one of the UK's leading construction and house-

building groups. Galliford Try purchased the vacant former Alcan factory site in January 2010 with the express intention of progressing a residential led redevelopment of the site through their subsidiary company, Linden Homes Western Ltd.

1.2 In January 2010 GL Hearn submitted representations in response to the Spatial Options October 2009. However, in parallel with LDF process, Linden Homes have undertaken a comprehensive process of engagement with the local community, the Council and other stakeholders in respect of the redevelopment of the Alcan site.

1.3 This report briefly summarises the progression of a detailed technical evidence, the scope of the community consultation process, and the resultant submission of redevelopment options, which are at the time of writing are under consideration by the Council's Major Development Team. We have then set out our representations on the December 2010 Publication Version of the BANES Draft Core Strategy to ensure that an appropriate planning policy framework is put in place to enable the future redevelopment of the Alcan site and surrounding area.

2.0 Context

2.1 The former Alcan site has a site area of about 4.6ha and is situated within the Midsomer Norton urban area. It lies approximately 200m east of the town centre boundary. The previous employment use on the site ceased in 2006. During 2010 the majority of the former industrial buildings on the site have now been demolished in response to health and safety liabilities. The only remaining active use on the site is the Social Club.

2.2 In terms of surrounding land uses, residential estates lie to the south, west and northeast of the site, with the Sun Chemicals factory immediately adjoining to the north. Further east from the site are the industrial areas of St Peter's Park and Westfield Industrial Estate to the north and east, on the other side of the main Wells Road. To the west, beyond a row of houses, lies a disused railway line.

2.3 From the end of Nightingale Way, adjacent to the site access, a footway runs between the site and the Sun Chemicals site, providing a pedestrian route to residential properties to the north east. The site is within easy walking distance of Norton Hill School, which is a highly successful state secondary school. Vehicular access to the site is from the western corner via Nightingale Way, which is a residential road.

2.4 The site is reasonably level and is not constrained by any significant vegetation or watercourse. The existing boundary treatment comprises: various security walls; fences, and sparse vegetation.

Planning Policy Context PPS1 - Delivering Sustainable Development (2005)

2.5 PPS1 sets out the Government's aspirations for achieving sustainable development through the planning system. At Paragraph 1 of the "Delivering Sustainable Development" section, the Government sets out a number of criteria that local planning authorities should adhere to when preparing development plans. Criterion (viii) states that LPA's should: "Promote the more efficient use of land through higher density, mixed use development and the use of suitably located previously developed land and buildings. Planning should seek actively to bring vacant and underused previously developed land and buildings back into beneficial use to achieve the targets the Government has set for development on previously developed land." PPS3 – Housing (2006)

2.6 Paragraph 36 of PPS3 states that: "In support of its objective of creating mixed and sustainable communities, the Government's policy is to ensure that housing is developed in suitable locations which offer a range of community facilities and with good access to jobs, key services and infrastructure. This should be achieved by making effective use of land, existing infrastructure and available public and private investment, and include consideration of the opportunity for housing provision on surplus public sector land (including land owned by Central Government and its bodies or Local Authorities) to create mixed use developments. The priority for development should be previously developed land, in particular vacant and derelict sites and buildings."

2.7 With this in mind, when developing previously developed land strategies, paragraph 44 advises local planning authorities to consider a number of options, including: "Considering whether sites that are currently allocated for industrial or commercial use could be more appropriately re-allocated for housing development." PPS4 – Planning for Sustainable Economic Growth (2009)

2.8 PPS 4 requires LPAs to plan positively and proactively to encourage economic development, in line with the principles of sustainable development. The PPS states LPAs should plan for, and facilitate a supply of land which will be able to cater for the differing needs of businesses and the expected employment needs of the whole community, but which is flexible enough to be responsive to a

changing economy or new business requirements.

2.9 For existing site allocations, Policy EC2.h requires LPAs to: “ensure that site allocations for economic development, particularly if they are for single or restricted uses, are not carried forward from one version of the development plan to the next without evidence of the need and reasonable prospect of their take up during the plan period. If there is no reasonable prospect of a site being used for the allocated economic use, the allocation should not be retained, and wider economic uses or alternative uses should be considered”

Local Plan

2.10 The adopted Local Plan defines the site as a Core Business Area, which seeks to protect such sites from alternative development, including residential. However, this designation was attached at a time when the Alcan site was fully operational. Alcan ceased operations on the site in 2006 and the site has remained vacant ever since, and has been subject to a formal marketing process undertaken by GVA Grimley. No other site specific Local Plan policies are applicable, but any proposals would be subject to the usual criteria-based development control policies.

Planning History

2.11 It is considered that the established lawful use of the site falls into Use Class B2 (General Industrial) with the various office accommodation being ancillary to the principal use. The social club, which serves the wider community, is considered to constitute a separate planning unit falling into Class D1 (Community Use).

2.12 The site itself has a number of permissions associated with it, for various works including additional extensions, ductwork and signage.

BANES SHLAA

2.13 The Alcan site has been assessed under the BANES SHLAA process (BANES Ref: Alcan MSN 10). The SHLAA report acknowledges the site’s availability and potential to be delivered through residential led redevelopment.

The case for redevelopment

2.14 The full case for the redevelopment of the site is set out in the January 2011 submission to the Council’s Major Development Team. However, the key points can be summarised as follows: Site marketing has confirmed no interest in redeveloping or re-using the existing site for employment use. Commercial agents’ advice has confirmed that speculative large scale employment development would not be viable in this location under current or foreseeable market conditions, principally due the situation of the site in a predominately residential area with no direct access to the A362. Community consultation undertaken during 2010 has confirmed clear support for a residential led redevelopment solution for the site with s.106 provision towards enabling the provision of community facilities, and off site employment. Technical studies have confirmed that the site is physically developable, and can be supported by existing infrastructure.

Planning permission for a residential led redevelopment of the Alcan site could act as a catalyst in bring forward other adjacent potential redevelopment sites, which in turn will assist in the wider regeneration of the neighbourhood.

3.0 Evidence Base

3.1 During 2010 Linden Homes assembled a full project team and undertook a series of baseline studies including: Topographical survey Ground investigation – no significant contamination Archaeological assessment – low potential Drainage and utilities – existing infrastructure has capacity to service the site Flood Risk – the site is situated in FRZ 1 on the Environment Agency’s Flood Risk Map. Any redevelopment proposals will significantly reduce the extent of hard surfacing, which will result in a reduced surface water runoff. Ecology – limited bat presence confirmed in industrial ducting and will be addressed through a licensing process through Natural England Noise assessment – the majority of the site falls within PPG 24 NEC A, with only part of the site adjacent to Sun Chemicals falling within NEC B. Landscape and visual assessment – potential for enhancement through redevelopment Area character assessment – potential to development a distinctive neighbourhood referenced to the local vernacular Existing community facilities survey – MSN is well provided for in community facilities, but there is

some local support for the retention of the existing facility Market advice – a residential led is the only viable option for redevelopment Transport and access feasibility – taking account of the site’s established fall back position the existing access from Nightingale Way is an appropriate principal point of vehicular access. Options are available for improving permeability including a cycle/pedestrian link to the town centre Adjoining landowners discussions – all neighbouring landowners have been contacted, and discussions are ongoing.

3.2 The full evidence base, as summarised above, has been included in the January 2011 Major Development Team submission.

4.0 Consultation Process and Project Programme Consultation

4.1 A summary of the consultation undertaken to date is included in the document supplied by Creatrix, who are the project team’s public relations advisors. This document is included in the January 2011 Major Development Team submission.

4.2 A fully inclusive process of engagement with the local community has been undertaken and is ongoing in accordance with the Council’s Statement of Community Involvement. Two formal events were held in April 2010 and November 2010. The outcome of both the formal and informal engagement, as described in the Creatrix report, has informed the pre-application option proposals. The main points raised by the local community include the following:

Majority support for a residential led redevelopment of the site Little support, or ambivalence, towards the possible creation of new business space. Concern expressed about the integration of social rented housing into a predominately privately owned neighbourhood Vehicular access, particular at during the peak school opening and closing times. Strong support for the retention of the Social Club Gateway Group

4.3 Although only limited feedback was received in respect of one of the three Gateway Group presentations, the advice received has been taken into consideration in the formulation of the pre-application proposals and associated mitigation strategies.

Major Development Team

4.4 A comprehensive pre-application submission was considered at the 25 January 2011 meeting of the Council’s Major Development Team. A formal response is expected by mid February 2011.

Project Programme

4.5 Following the conclusion of the pre-application process it is anticipated that a full planning application will be submitted during March 2011. The development of the Alcan site is likely to be phased over a two year period. Subject to the grant of planning permission the development is planned to commence towards the latter part of 2011.

5.0 Description of Pre-application Proposals

5.1 The January 2011 Major Development Team pre-application proposals comprise two option layouts, and a compressive masterplan showing the proposals in context with adjacent potential development sites. These are described below for information:

Option A

5.2 Option 1 comprises a total of 174 proposed dwellings and the existing Social Club retained with a redundant element demolished the remainder refurbished:

Open market mix: 8 # 4-bed live-work; 30 # 4-bed; 39 # 3-bed; 22 # 2-bed; 2 # 2-bed FOG; and 10 # 2-bed flats; Affordable mix (assuming 35% onsite provision): 4 # 4-bed; 17 # 3-bed; 32 # 2-bed flats; and 10 # 1-bed flats Social Club circa 900m² GEA to be repaired and refurbished – a preliminary estimate for the works is £200-280k and the development would only be able to afford a proportion of this (e.g. roof and external refurbishment) unless reduced developer contributions to other items can be agreed..

Option B

5.3 Option B is as Option A but the Social Club is replaced with 9 new houses, which provides a total of 184 dwellings. The 9 additional dwellings comprise: 7 # 3-bed; and 2 # 4-bed.

Masterplan

5.4 The indicative future masterplan shows the Option A and B layouts on the Alcan site in context with

the adjacent potential development sites. The masterplan has been developed to demonstrate that the Option A and B proposals can be implemented without prejudicing the ability of adjacent potential development sites to come forward as part of an overall vision that will create a distinctive new residential neighbourhood. The masterplan makes explicit provision for the retention of the main part of the adjacent Sun Chemicals site as an R&D facility for that business for the foreseeable future.

5.5 Other elements of the masterplan include:

A DDA compliant pedestrian/cycle linkage from Alcan via Sun Chemicals land, the former railway land, greenway cycle link, and across to the town centre. New build residential and speculative employment development on the Sun Chemicals land. Conversion and refurbishment of an existing vacant office building on the Sun Chemicals land. The Hann land shown as public open space linking the Alcan site to the primary school. The Flower and Hayes site can be developed out as approved in the now expired 2003 planning permission. However, Linden Homes remain willing to incorporate this land into the development should an agreement be secured with Flower and Hayes in due course. Potential new bus link subject to wider transport strategy/ funding. Potential "greening" of adjacent residential areas.

Policy SV1: 3c

6.6 This policy, which only allows loss of employment land where there is employment benefit of a contribution to the town park, needs to be more flexible and allow for loss of sites that are simply no longer suitable for continuing employment use.

6.7 The anticipated reduction in industrial land should not be contingent upon those sites making a contribution to employment or the town park as it cannot be assumed that there will be surplus residual values in addition to meeting the standard SPD contributions.

Policy SV1: 4b

6.8 The same viability point set out in 6.6 above is also applicable to this policy. Strict application of this policy could render some potential housing sites unviable, or require relaxation of other applicable standard SDP tariffs.

Change sought to Revise the housing target for the district to reflect more realistic growth and inward migration
make sound: assumptions, and adopt a less prescriptive approach to new residential led proposals in the Somer Valley Area.

Representation (legal compliance): 1: Not Justified: In terms of the evidence base relating to the housing requirement for the district, or in relation to the definition of the Midsomer Norton Town Boundary.
2: Not Effective in terms of strategy: delivery of housing and employment under Policies SV1 and SV2.
3. Not Consistent with National Policy? PPS3, PPS4 and PPS12 (deliverability and flexibility).

Change sought to make legally compliant:

Reference: 255\2

Respondent: Taylor Wimpey Developments

Representation In the context of our objection, the Council should be seeking locations for 7,300 additional homes
(soundness): within BANES. This is the difference between our proposed housing provision, excluding the urban extension at Whitchurch, and the Council's proposed housing provision (18,300-11,000). Much of this would be expected to be directed towards Bath, but as the next largest urban areas Keynsham and Norton Radstock should also take a share. At Norton Radstock, existing commitments already total 2,200 and we submit that an increase in the proposed provision from 2,700 to 3,200 is easily achievable in market terms.

Our clients control land at Monger lane on the north west side of Midsomer Norton. This can deliver about 100 dwellings depending on density. It is close to other areas of new development and to the A362. It is less than 1 kilometre from the Tesco store and about 1.5 kilometres from Midsomer Norton town centre. It is not subject to any restrictive designations and we consider it a suitable location for development.

Change sought to 1. Increase the level of housing provision in the Somer Valley to 3,200 houses
make sound: 2. Indicate the north west of Midsomer Norton as a general location for new housing

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 292\9

Respondent: Bath Avon River Corridor Group

Representation A lack of recognition of the factors that can create a synergic relationship between these towns and
(soundness): others in the district to the overall benefit of the whole and the infrastructure and land use support they will need.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 300\12

Respondent: Somer Housing

Representation Economic Development

(soundness): 4.1 With regard to the area based policies, we only have one recommendation which applies to all the Economic Development Policies in each area. This is that the Council inserts the policy wording as below which means that it will consider releasing lower quality employment land for affordable housing development. The quality of land should be measured against a set of criteria before it is released, but the Council should set a priority of releasing it for a significant proportion of affordable housing within the policy. Given the lack of supply of affordable housing likely to come forward over the plan period and the difficulties housing associations face competing for sites with general market housing developers without public subsidy, this could be an important source of affordable housing. ' The Council will consider releasing lower Quality employment land for schemes which deliver a significant community benefit, such as the delivery of affordable housing.'

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 311\3

Respondent: Parish Council's Airport Association

Representation 3. Airport expansion and the economic development of Bath & N. E. Somerset.

(soundness): The Draft Core Strategy is much concerned with questions of economic development, especially the building of new houses, and the provision of new jobs. It recognised that at present there is a shortage of jobs, especially in the southern part of the district (the so-called "Somer Valley") (p. 19, para. 1.29) meaning that long commuter journeys by private car occur, contrary to the Council's policies for reduction of greenhouse gas emissions (p. 129 sect. 6.93) As the Draft Core Strategy aspires to see around 11,000 new dwellings built, but only 8,700 new jobs provided (p. 19 sect. 1.26; p. 20 sect. 2), there is clearly potential for the problem of shortage of jobs to be aggravated. This applies particularly in the Somer Valley area where 2,700 new dwellings are to be built, but only 1000 new jobs provided (p. 81-2).

The development of tourism is seen as a potent means of providing new jobs, both in Bath itself and in the southern parts of the district (p. 15, 16, p. 78 Strategic issues sect. 4.08, pp. 100, 109, 114).

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 319\2

Respondent: Raymond Baron Hervey

Representation (soundness): Policy DW1 and SV1(3) as currently proposed are inconsistent with the 'flexibility' that is consistently emphasised by PPS12 as a requirement of Core Strategies. It states for instance: 'A strategy is unlikely to be effective if it cannot deal with changing circumstances.' (PPS12, paragraph 4.46).

PPS12 stresses that because Core Strategies are long-term documents, many issues can change over that time and therefore plans 'should be able to show how they handle contingencies', through showing 'what alternative strategies have been prepared to handle this uncertainty and what would trigger their use' (op. cit). Whereas the Economic Strategy adopts a fairly flexible approach, it is not apparent that this has been translated into policies DW1 and SV1(3) given their failure to provide for a sufficient quantity of employment land and jobs. Similarly PPS4, Policy EC2, criterion b states that Development Plans should: '[support] existing business sectors, taking account of whether they are expanding or contracting and, where possible, identifies and plans for new or emerging sectors likely to locate in their area, such as those producing low carbon goods or services. However, policies should be flexible enough to accommodate sectors not anticipated in the plan and allow a quick response to changes in economic circumstances' The under-provision of employment land in the proposed Core Strategy, beyond being inherently problematic as identified above, fails to provide the flexibility demanded by PPS4 above.

Areas of support Notwithstanding the above objections to the proposed levels of employment growth, we are supportive of the identification of the Westfield Industrial Estate as a location for further floorspace. We would suggest that amongst the existing major employment sites in the Somer Valley, Westfield would be the most suitable to accommodate significant further floorspace. The Business Growth and Employment Land Study (Roger Tym / Cluttons, 2009, produced for BANES) highlights a number of advantages of Westfield, including in locational terms, and reports high satisfaction levels amongst occupiers.

However, it also reports that there are few vacant units. We would therefore suggest that further development at Westfield would require a significant eastward expansion of the existing area onto the relatively unconstrained adjacent land. In particular, the level area of land beyond 1st Avenue and 3rd Avenue could form a logical and unobtrusive, but nonetheless sizeable, strategic employment allocation of approximately 6 hectares.

Change sought to make sound: Amend policies DW1 and SV1(3) to reflect the quantity of employment land and jobs that is identified by the BANES Economic Strategy as a requirement of the plan area to 2026.

Representation (legal compliance): The Economic Strategy for Bath and North East Somerset document (published 2010) is one of the most recent elements of Bath and North East Somerset's (BANES') evidence base on which the Core Strategy is purportedly based, and takes into account economic changes in the area since the recent recession. However, some of its key recommendations have not been reflected in the proposed Core Strategy. The table below provides a summary of the differences between the two:

(see table in supporting material)

In brief, the Core Strategy proposes 50,500 sq.m less new employment space than is recommended by the Economic Strategy for the Somer Valley, and only 40% of the jobs provision. At a BANES-wide level only 58% of the total provision for jobs is made. Further, whereas the Economic Strategy recommends significant new industrial space, the Core Strategy envisages an overall decline. It is thus clear that the Core Strategy deviates significantly from BANES' own, current, economic objectives that have been developed in partnership with the 'Sustainable Growth Alliance (SGA)' - the economic working group of the Local Strategic Partnership for Bath and North East Somerset. This body includes a range of organisations including the Government Office for the South West, the universities in Bath, and the Federation of Small Businesses. We would draw attention to the important connection between the Economic Strategy and the Sustainable Community Strategy ('SCS') for BANES - namely that the former is explicitly identified by the latter as a means of delivering its vision.

Hence, the failure of the Core Strategy to make provision for adequate employment land places it in conflict with the SCS, which is inconsistent with the approach required by PPS12 (paras 4.34-4.35). Policies DW1 and SV1(3) as they stand are thus unsound and not legally compliant.

Change sought to make legally compliant: · Amend policies DW1 and SV1(3) to reflect the quantity of employment land and jobs that is identified by the BANES Economic Strategy as a requirement of the plan area to 2026.

Reference: 320\1

Respondent: Andrew Jolliffe

Representation It is recognised that the current Examination is concerned with the Core Strategy and not site-specific
(soundness): considerations. However for the avoidance of doubt, this submission is made on behalf of the Kilmersdon Estate, which has extensive land holdings around the southern fringes of Midsomer Norton, Radstock and Writhlington, areas of which would be suitable for residential development.

Summary of case There is a case for brownfield redevelopment in Norton Radstock under the broad banner of regeneration. However, this does not justify the approach set out under SV1(4)(b), which effectively imposes a 15-year blanket restraint against any new greenfield housing land allocations around the periphery of the town. By adopting this approach, Bath and North East Somerset Council (BANES):

(a) Fails to build the flexibility into its Core Strategy that is required by PPS12, placing an excessive reliance upon the development of brownfield sites whose achievability is uncertain and whose suitability has not been tested;

(b) Pre-empts and prejudices the Site Allocations DPD, and thus fails to provide the opportunity for reasonable alternatives to be fully scrutinised through the site allocation process.

These two key points are now expanded upon.

A. Flexibility and uncertainty

Policy SV1 as currently proposed is inconsistent with the 'flexibility' that consistently emphasised by PPS12 as a requirement of Core Strategies. It states for instance:

'A strategy is unlikely to be effective if it cannot deal with changing circumstances.' (PPS12, paragraph 4.46).

PPS12 stresses that because Core Strategies are long-term documents, many issues can change over that time and therefore plans 'should be able to show how they handle contingencies', through showing 'what alternative strategies have been prepared to handle this uncertainty and what would trigger their use' (op. cit). The current proposal to accommodate all new development within the existing Housing Development Boundary (HDB) is self-evidently an inflexible approach, and does not appear to be accompanied by consideration of contingencies.

Two important, unfounded, assumptions underlie BANES' approach: firstly, that the full complement of 2,700 dwellings can be accommodated within the existing boundary; and secondly that all such development would, in all instances, be more suitable than greenfield alternatives. In terms of the first assumption, although BANES has identified through its Strategic Housing Land Availability Assessment ('SHLAA', December 2010) that there may be sufficient supply within the existing HDB to meet identified Core Strategy targets, this is essentially a mathematical conclusion and it has not been demonstrated that all these sites are deliverable. In terms of the second assumption, BANES has fallen into a circular argument in terms of the supply of potential sites and Core Strategy policy. On the one hand, the Core Strategy is purportedly based upon and guided by evidence such as the SHLAA.

However, the SHLAA itself discards sites as 'not suitable' purely on the basis of draft Core Strategy policy SV1(4a) – one example being site RAD24 (Knobsbury Lane and Frome Road, Writhlington).

Thus, nowhere is it actually shown that all greenfield sites are inherently unsuitable, and the policy is consequently not justified. In summary, the Core Strategy's objectives for the Somer Valley (particularly in terms meeting housing demand) are at significant risk given the inflexible approach that policy SV1 adopts. The approach BANES proposes in this regard is thus unsound since it is inconsistent with PPS12.

b. Pre-emption of Site Allocations DPD Policy SV1(4) goes beyond the remit of Core Strategies defined by PPS12. The foremost role of a Core Strategy is to provide: 'an overall vision which sets out how the area and the places within it should develop' (PPS12, para 4.1, criterion 1).

Within the context of BANES it is thus legitimate for the Core Strategy to, for instance, set out the broad hierarchy of settlements within the authority area and to identify broadly the quantity of growth that each of these should accommodate. However in determining that no greenfield sites are required in the Somer Valley, policy SV1(4) strays beyond strategic, spatial issues and by default into a comparative assessment of alternative sites within and around the town. Moreover, in defining the total quantity of new development required in the Somer Valley, but without offering the scope for the existing Housing Development Boundaries to be reviewed, policy SV1(4) is tantamount to allocating those SHLAA sites considered by officers to be suitable on the basis of their preliminary review. This is inconsistent with the requirement under legislation and national policy for there to be full consideration and consultation on development options.

Beyond these in-principle objections, we would draw the Inspector's attention to the following more practical points that underscore the need for a full review of development options:

- Evidence regarding HDBs. We understand that the existing HDBs in BANES were defined at around the late 1990s, and they remain largely unchanged since the Local Plan Deposit Draft 2002. To our knowledge there is no available evidence to support the location of these boundaries, and to our knowledge none has been presented to this Examination. Nonetheless, the SHLAA effectively categorises all sites outside of the HDBs as inherently unsustainable, with (for example) officers commenting as follows on site RAD24:

'These sites lie outside of the Radstock development boundary, and an in-principle objection will be raised on sustainability grounds ...'

It should be noted that HDBs often take tortuous routes, often excluding some central areas and excluding more peripheral areas, and this alone suggests that the above blanket approach to defining sustainability is unjustified. In summary, we believe that the reliance on these boundaries for the period to 2026 is unsound, because it is not evidence-based as required by PPS12. Instead a full review should be carried out in the context of a Site Allocations DPD, provision for which should be made in a revised wording to policy SV1.

Suitability of alternatives. Whereas the SHLAA purports to identify sufficient sites to cater for identified growth requirements in the Somer Valley, the preliminary assessments of candidate sites by no means conclusively demonstrate that these sites are deliverable. For instance, site MSN10 (Alcan) has been identified by the SHLAA as having the potential to deliver 150 units, but the planning officers' assessment sheet makes clear that there has been no detailed consideration of factors such as utilities, whether or not retention of employment space in this area would be beneficial, whether the local road network is suitable, and site-based issues such as contamination. Similarly, Site MSN6 (The Hollies / Sainsbury's) has been identified by the SHLAA as being suitable for further 80 dwellings but it is clear from officers' commentary that the achievability of the site will depend upon a number of extraneous factors, not least the need for it to be 'unlocked' alongside a further site (MSN.4a – South Road Car Park). These examples suggest that there is not currently enough evidence to show that these (and potentially other sites) are deliverable. Consequently it would be inappropriate for the Core Strategy to proceed relying upon these sites.

- Potential benefits of larger greenfield allocations. Although the countryside surrounding the Somer Valley settlements is constrained, it has by no means been shown that there are no suitable candidate sites, and this is a process that PPS12 envisages should be handled not by Core Strategies but by subsequent Development Plan Documents (where sites are not of a 'strategic' scale, i.e. 'central to the achievement of the strategy' – paragraph 4.6). Our client's land directly opposite Writhlington School (Site RAD.24) would for instance offer a medium-scale development opportunity close to a range of community facilities and public transport links, without significantly extending the overall envelope of Norton Radstock and without causing harm to the town's Conservation Area or any ecological designations. Development on this site could more readily be delivered than brownfield alternatives (there being no dependency on it being vacant), and community facilities and other infrastructure could be more effectively planned from the outset than on many of the smaller-scale infill alternatives included within the SHLAA. We recognise it is not the function of the Core Strategy to judge the merits

of this or any other site, however we would suggest that full consideration has yet to be given to possible site allocations in the Somer Valley, and that this should occur in full at the Site Allocations DPD stage rather than be predetermined through a needlessly prescriptive Core Strategy policy.

Change sought to make sound: Delete from Policy SV1(4)(b) the reference to Housing Development Boundaries, thus enabling the Site Allocations DPD to consider suitable greenfield sites around the towns of Somer Valley. A possible new wording of Policy SV1(4)(b) would be as follows:

Ensure that any new housing above the existing commitments of 2,200 dwellings contributes to sustainable development within the Housing Development Boundary and has either employment benefit or contributes to the implementation of the Town Park.

Provision should be made elsewhere in the Core Strategy for a review of Housing Development Boundaries and the comparative assessment of greenfield and brownfield sites in the context of a site allocations DPD.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 399\1

Respondent: Midsomer Norton & Radstock Chamber of Commerce

Representation (soundness): Whilst overall we fully support the Core Strategy our concern is that given the wording of the target to create 1000 new jobs, that this objective will be seen as inspirational rather than as a hard target which must be achieved.

Change sought to make sound: The Midsomer Norton Forum sees it as essential that the 1000 jobs is the minimum target and that we put in place measures to try and exceed this so that any that short all will mean we still hit the target.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 400\1

Respondent: Redfield Residents Association

Representation (soundness): Whilst overall we fully support the Core Strategy we have two concerns in the detail:

i) Our fear is that given the wording of the target to create 1000 new jobs, that this objective will be seen as inspirational rather than as a hard target which must be achieved.

ii) We see it as essential to put in place an Article 4 Direction relating to the Midsomer Norton and Welton conservation area. Without this MSN and Welton will risk losing their distinctive character//heritage and this is not just important historically but an economic differentiator and asset in terms of attracting footfall to the town.

Change sought to make sound: The Midsomer Norton Forum sees it as essential that the 1000 jobs is the minimum target and that we put in place measures to try and exceed this so that any that short all will mean we still hit the target.
Put in place an Article 4 Direction relating to the Midsomer Norton and Welton conservation area.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 819\4

Respondent: Paulton Parish Council

Representation (soundness): 1 The Somer Valley is to provide 2,700 new homes of the 11,000 contained within the strategy document. This equates to about 24% of the total, do you not consider this figure to be too high?

2 The Polestar site in Paulton is scheduled to provide 421 new dwellings, is this number part of, or additional to the 2,700 new homes to be constructed in the Somer Valley?

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 821\2

Respondent: Cam Valley Wildlife Group

Representation We are concerned that the lack of detailed assessment for Chapter 4 has effectively ruled out proper
(soundness): consideration of the importance of a link between SACs via Radstock and has also ruled out the proper consideration of the impact upon SACs. Research into the matters that would have emerged upon a detailed assessment of Chapter 4 may have resulted in consideration of that Chapter under the Habitat Regulations Assessment. We are not presuming that consideration of Chapter 4 would have resulted in an assessment of a potential or actual impact on the SACs, but information that we have gathered and independent study in 2009 and 2010 suggests that this is a possibility that should have been investigated.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 821\7

Respondent: Cam Valley Wildlife Group

Representation The sustainability appraisal recommends that for Bath, areas of particular importance for habitats,
(soundness): protected species and biodiversity should be referenced, but there is no similar recommendation for the Radstock and Midsomer Norton area, in which there is an emerging picture of an extremely important biodiversity resource and potential for significant biodiversity conservation and enhancement.

Excerpts from the sustainability appraisal, paragraph 5.5:

The Somer Valley area has not been known for its wildlife so far, being viewed as relatively poor in wildlife resources. However, the stunning biodiversity of the Somer Valley area is as significant to it as Chew Valley Lake is to the rural areas and Combe Down bats to Bath. It is important to be positive about this in the Portrait, Strategic Objectives, Key Issues and Place-making Principles and to use it within the strategy as an asset of economic and social benefit.

Radstock Railway Land (RAD1) supports one of the best invertebrate sites in the South West and the best dry grassland site in B&NES on a site which extends to within the urban policy area set out in the Strategy. It is at the hub of an ecological network that supports metapopulations of threatened and vulnerable insect, acting as a supporting and feeder site for many smaller sites and even populations of rare insects on sites further away, such as at Tucking Mill and Combe Hay, linked to it through an existing ecological network peppered with former industrial features and linked by former railway lines and natural features. It supports a wealth of other animal and plant life, including UK Biodiversity Action Plan species (see below). This important hub may be lost to development, on the basis that placement of an urban block structure may act as a catalyst for regeneration, a key element of the existing spatial strategic vision for Radstock, for which the case for regeneration and economic benefit is thin at best. However, whether or not it is lost, it is important to try to conserve the remnants of important populations and to make every effort to enhance the local network in the hope that some of the rare and endangered species, as well as the more common, can be saved in the Radstock, Westfield and Midsomer Norton area and that at least some of the value of the network that will be lost can be restored. The Core Strategy has an important role to play in promoting this.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 821\21

Respondent: Cam Valley Wildlife Group

Representation (soundness): We note that the sustainability appraisal states that Option 1 for the Radstock and Midsomer Norton area is the more environmentally sustainable option and that Option 2 is has higher economic benefit. We assume that this economic benefit is in a district context, as it is an appraisal of the sustainability of the Strategy in a District context. As there are fundamental differences in the presentation of housing numbers allocated to the various locations in the Launch document and the Draft Core Strategy, it is not that easy to apply the Options format, but it does look as if the Council has gone for Option 2 or perhaps a higher development level than Option 2 for the Somer Valley area. It appears that the Council has favoured economy over environment. As this evaluation has not been broken down into wildlife/biodiversity and other environmental impacts, it is difficult to say how much of the more negative impact of the development allocation applies to wildlife and biodiversity either in terms of direct impacts or indirect impacts. Indirect impacts include the effects of air pollution, road-kill (including insects) and increased pressure on recreational areas. More information is needed if the impact of the chosen locational strategy on the wildlife and biodiversity resource in the district can be ascertained. We suggest that the lower development level option for the Somer Valley area will have a less detrimental impact on biodiversity, given that translocations rarely work and ecological mitigation almost invariably fails to deliver a resource equal to that lost and usually results in a net loss.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 822\3

Respondent: Somer Valley Friends of the Earth

Representation (soundness): We note that the Equality impact assessment for the Core Strategy makes a number of recommendations for improvements, but makes none with reference to Radstock. The only reference to Radstock in the assessment is that "the regeneration of the town centre includes improving the way it looks and the way it feels to be there (an improved public realm). This is an excellent opportunity for better and useful places for all".

This "excellent opportunity" has not been recognised as such by the people of Radstock itself and rejected wholeheartedly by local traders and our elected representatives, the Town Council. The most commonly encountered local perception in Radstock is that the development has been foisted upon Radstock in the face of local opposition, leading to a sense of powerlessness. There have been many years of increased housing without the jobs and facilities, controlled by B&NES planning decisions, in an environment where B&NES already freely accepted the argument that there had been an imbalanced development model for many years before that, with far too many houses for the infrastructure, jobs and services provided. This and the long-standing pursuit of one unsuitable development proposal after another for the Railway Land site, enabled through support from B&NES, has many left people in the town feeling angry and put upon, although there is still an optimistic core of people that are hopeful of a change in direction. There is a widespread distrust of B&NES in Radstock.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 822\4

Respondent: Somer Valley Friends of the Earth

Representation (soundness): The Health Impact Assessment of the Sustainable Communities Strategy looks at the wider determinants of health and points out that areas with a greater sense of trust and mutual support have better mental and physical health than socially fragmented areas with little trust. Radstock has become a socially fragmented area with little trust in B&NES. Radstock people on the whole do not trust the sentiment found in the Equality Strategy - they view the regeneration proposals as a loss of opportunity

and local uniqueness; as an agent for change, not for the better, but for the worse.

We find it very interesting to note the links made in the Health Impact Assessment of the Sustainable Communities Strategy between deprivation and social factors and the issues to be addressed, including:

- environmental factors such as noise and air pollution
- opportunities for education and training
- a focus on thinking 'local'
- growth in sufficient infrastructure
- improving opportunities for deprived communities
- helping communities to influence and control issues that affect them and their area
- working in new ways to achieve better collaboration and innovation
- promoting well-being
- investing in cultural facilities in line with local interests
- encouraging physical activity
- provision of affordable appropriate transport
- promoting the community sector, a volunteer network and social enterprise

Alternatives to the present proposals for the Railway Land, for which it has still not been demonstrated that the Section 106 conditions can be met, can help address the issues flagged up in the Health impact assessment. As the existing proposals appear to be a key element of the strategy identified so far for Radstock, we firmly believe that alternatives should be assessed, which was not the case when the application for development was put in and given outline permission; the comparison was the 'do nothing' scenario.

We would welcome the opportunity to discuss how the recommendations in the Health Impact Analysis document ties in well with the re-allocation of RAD1 (a strategic site) for use as an industrial and natural history resource of high community value including high educational value and tourist potential (nature reserve, interpretation resources, educational shelter, space reserved for railway). We believe the Council has overlooked the true value of this strategic site to the community. The outline permission will soon run out and monies promised by the HCA are less than required, so we view this as an opportunity for a possible re-think on a strategic site.

We believe that the delivery of this site acts against national policy, as did the Planning Inspector who reported on the B&NES Local Plan public Inquiry, and that health and equality matters also act against its delivery. We believe that the Core Strategy implications are sufficiently significant for the re-examination of the proposal for RAD1 with reference to properly addressing the matter of health and equality in Radstock.

We do not believe the Core Strategy is sound because it has not properly assessed impacts and opportunities for Radstock in this regard.

This document includes material that was prepared for the use of Radstock Action Group by Deborah Porter. We apologise for any duplication, therefore

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 822\5

Respondent: Somer Valley Friends of the Earth

Representation The Somer Valley strategy mentions the high quality natural environment in and around the town, but **(soundness):** only seeks to "protect and enhance the distinctive character of the area, including the landscape and built and historic environment". In the past 15 years, areas of high biodiversity value and habitats that

can support the conservation and enhancement of biodiversity have been identified within and outside the urban areas. Although this resource could conceivably come into the category of "historic environment", it is not what springs to mind and may not be interpreted so by councillors and planners alike throughout the plan period. The identification of a Somer Valley ecological network which will encourage movement of species through the landscape and encourage the maintenance and enhancement of stable 'metapopulations' of rare species within an ecological network is a good first step. The wildlife and biodiversity of the Somer Valley area has been largely overlooked or undervalued, but has the potential to contribute very significantly to the biodiversity of the District and needs to be promoted. The area supports a range of important habitat types and the excellent biodiversity resource is supported by both acid and alkaline grasslands and by UK BAP Priority habitat, open mosaic habitat on post-industrial land.

The promotion of the conservation and enhancement of biodiversity can add interest and value to an area. It would sit very well with the energy conservation measures that the Council wants to encourage in this area, as part of an overall strategy aimed at conserving and enhancing natural resources.

The Government accepts that access to wildlife resources are beneficial to mental health and well-being. Easy and free access to quality natural environment is socially inclusive and areas of high biodiversity value are good educational tools that also offer opportunities for community involvement in promotion and management of the resource for the benefit of residents and the local economy. We believe that biodiversity conservation and enhancement should be promoted in the Somer Valley area. We believe that this complies with national policy and that not to do so is non-compliant and will result in the loss of significant biodiversity value in the District, important community resources, and the loss of a major opportunity to enhance the biodiversity of the District that cannot be equalled by enhancements in the B&NES Nature areas because of the nature of the habitats that are prioritised in those areas.

The bulk of this document was originally drawn up for use by Radstock Action Group and we apologise for any repetition, therefore.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 822\6

Respondent: Somer Valley Friends of the Earth

Representation There is a need to address both the causes and effects of climate change, which not only has impacts

(soundness): on the ability of future generations to meet their needs and their need for a decent environment, but also has local impacts that influence the health and well-being of the people of Radstock and their immediate environment.

Causes of climate change in Radstock are mainly in connection with out-commuting due to imbalance between homes and jobs, which is a long-standing and increasing disparity. The need to address CO2 emissions with reference to energy in the home is also significant, as it is everywhere in the District.

Plans to locate more development in central Radstock will exacerbate the problem of increased CO2 emissions unless it is designed in a way that severely limits the use of the private car by new residents in the central area. The Council flags up the area as already having congestion problems, an imbalance between jobs and housing and excessive out-commuting. It has not presented noise studies to show the present noise levels or the projected noise levels expected at the development level proposed for the Somer Valley area (Town Centre and areas elsewhere that will impact the Town centre). The sustainability appraisal says that the higher development level, which is the one that appears to be proposed, is the more environmentally damaging option, but without the baseline data, it is not possible to estimate the likely level of harm. This will be a problem in parts of the central area if the RAD1 development goes ahead as proposed, but we believe it will be worse than the developers'

assessments projected as we believe that there is evidence, including in the application documents for the proposed development, that shows that indicates that the traffic level was underestimated; this development will also have a significant impact on CO2 levels and air pollution, which could easily exceed acceptable levels. The Council has provided no up-to-date air pollution data either, and the data for the RAD1 outline application is not up-to-date and is unreliable. What is clear to us is that the council is pursuing a housing growth model for the Somer Valley area that is more environmentally damaging but benefits the economy of B&NES as a whole and that acts against national policy to reduce travel, especially journeys to work by private car.

The major contribution by far to CO2 emissions is through travel to work, and we feel that the nature of the jobs market, the limited capacity for job creation in Radstock centre itself, and the impact upon noise levels, air pollution, traffic congestion and resulting town centre ambiance must be very carefully considered when making decisions about the amount and type of development that it is desirable to locate in the central area. The major populations will still be located in the settlements of the town (mostly on the hills) after any town centre residential development is completed, yet the emphasis regarding both job creation and provision of services appears to be upon the central area. This central area is very congested due to the geography of the area and the criss-crossing of several major roads, roads to the settlements and the river. Although the principle of placing housing near to jobs and services is well known, the demand for jobs created by the additional development in Radstock and the wider area will outstrip the number of jobs that the Council hopes to provide and will exacerbate the already unacceptably high level of out-commuting in the town. Therefore, we question the thinking behind this approach in this particular town. We note that the Regional Strategies (RPG 10 and the RSS) were both against development in areas like this close to major urban areas such as Bristol and Bath precisely because of the satellite effect and the resultant impact on the environment from out-commuting, looking at the principle from a wider perspective.

The need to provide homes for younger people is significant in Radstock, and the needs of older people are clear. It is these sectors of the community that have the greatest need for easy access to public transport and to leisure/recreational facilities; younger people desperately need housing provided by social landlords in order that it is affordable for them ; families and younger people wanting to share a house can benefit from older people moving out of larger properties and into purpose-built properties that better suit their needs and that are also closer to the services and facilities they need. The central area of Radstock is close to Town Centre facilities, including tea rooms and the churches, but it is unclear how much attention has been paid to the capacity of Radstock centre to accommodate the 2-bedroom bungalows and flats that older people prefer if they are moving out of their homes. We see the impact on climate change from central residential development in Radstock as a key issue and it would be helpful if information related to the capacity of Radstock centre to accommodate a larger proportion of his sort of development (as opposed to development that will increase out-commuting to work) is needed.

The financial viability of the type of low-car development described above in the central areas is a key issue and the likelihood of completions of this type of development, with and without grants and partnership working, is a major factor when considering the capacity of central Radstock to accommodate residential development within a sustainable framework.

We do not believe that the housing growth figures for Radstock and the Somer Valley area demonstrate sound strategic policy in line with national policy.

**Change sought to
make sound:**

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 822\10

Respondent: Somer Valley Friends of the Earth

Representation (soundness): The baseline data in the Sustainability Appraisal states:

- The high level of self-containment in Bath and easy access to a mainline railway station does not prevent heavy traffic congestion during the day, perceived to have a negative impact on businesses in the City.
- High levels of out-commuting from Midsomer Norton and Radstock means that the link road south from Bath to Keynsham, Midsomer Norton and Radstock copes with high levels of commuter traffic.
- Norton Radstock is connected to Bath by the A367, a popular tourist route to the West Country, and to Bristol via the A362 and A37, the latter also extending south to the A303.
- Problems with congestion are experienced in Bath, Keynsham and Radstock.
- Any proposals for the further development of the area will need to address this by bringing relief from current congestion, and promoting more sustainable forms of transport.

Part of the congestion in Bath is due to out-commuting from the Radstock area; the cost of commuting by bus is high. It is difficult to see how the extant public transport provision could be improved significantly, given that it is in the hands of a commercial operator and given the relatively moderate increases in population forecast for this area. The cycle link from Radstock to Bath is a long and tortuous one that skirts around and then back in to Bath, so is of little help. Increased housing in Radstock and the surrounding area will lead to increased commuting and increased congestion in both Bath and Radstock, which both have problems with it presently. Wage statistics for Bath and the Radstock area suggest that people presently working in Bath can out-compete local people in the Radstock property market; even taking into the account the costs of public transport to work rather than the (much cheaper) car, it makes financial sense for Bath workers to move to Radstock - these new residents would be likely to have ties with Bath which would result in a higher level of travel than that undertaken by existing Radstock residents (this has been shown to be the case in studies of new developments).

Rail link option

A station in Radstock linked via the mainline directly to Bath may be possible within the plan period and could help alleviate city congestion in Bath and out-commuting from Radstock. The redevelopment of RAD1 in accordance with the outline consent will not only significantly increase out-commuting, but will also render a railway link non-viable, with the only remaining space for a rail bed being over high quality ecological mitigation land to be managed in perpetuity for biodiversity and wildlife as a condition of consent. The cost of providing a station/halt beyond the site would be prohibitive, the location too far away from the centre to promote sufficient take-up, and the opportunity for station parking would be almost non-existent without substantial and expensive highways and other works. However, the conditions of consent for RAD1 have not been satisfied; there is hope that the development will not come to pass, allowing a change of direction and reinstatement of a sustainable transport rail link in the not-too-distant future, the remaining area being mainly turned over to an industrial and natural history reserve for the educational, recreational, cultural, and economic benefit of the people of Radstock and beyond. The appraisal states that the A 367 through Radstock is a popular tourist route to the West Country. An attraction such as this to complement the award-winning Museum would allow Radstock to capitalise on this untapped source of revenue by boosting its attractiveness to visitors. There are many local historic and other features that could be brought into a local visitor trail and a small but thriving visitor-based economic sector could be developed in the area which would include visitor accommodation as part of the identified necessity to diversify the

economic base.

Local park and ride

The building of a local park and ride on the Farrington side of Midsomer Norton has the potential to reduce congestion on the route to Bristol; it has the potential to provide increased frequency of bus journeys from the Midsomer Norton area to Bristol and so encourage bus use. Bus use could be further encouraged through a local (subsidised, community-run or B&NES-run) shuttle bus connecting the various settlements to each other and to the local park and ride, which has the potential to cut down the journey time from Radstock to Bristol by bus considerably, making bus travel a more popular option. To prevent aggressive business practice threatening the viability of such a scheme, a combined park-and-ride/shuttle ticket could be purchased on the shuttle.

We believe that the Core Strategy fails to take into account properly the positive impact that a railway in Radstock and local park and ride would have on not only the Somer Valley area but also on other areas such as Bath and fails to properly implement national policy

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Policy SV2: Midsomer Norton Town Centre Strategic Policy

Reference: 254\5

Respondent: Galliford Try plc.

Representation (soundness): Policy SV2

6.9 It is noted that the Town Boundary includes part of the Alcan site. We suggest that the boundary is redrawn to terminate along the former railway line to avoid any conflict with the suggested 200 dwellings anticipated for the town centre.

6.10 We suggest that the policy should indicate the scale of office development/jobs envisaged in the town centre over the plan period.

Change sought to make sound: Revise the housing target for the district to reflect more realistic growth and inward migration assumptions, and adopt a less prescriptive approach to new residential led proposals in the Somer Valley Area.

Representation (legal compliance): 1: Not Justified: In terms of the evidence base relating to the housing requirement for the district, or in relation to the definition of the Midsomer Norton Town Boundary.

2: Not Effective in terms of strategy: delivery of housing and employment under Policies SV1 and SV2.

3. Not Consistent with National Policy? PPS3, PPS4 and PPS12 (deliverability and flexibility).

Change sought to make legally compliant:

Reference: 292\10

Respondent: Bath Avon River Corridor Group

Representation (soundness): A lack of recognition of the factors that can create a synergic relationship between these towns and others in the district to the overall benefit of the whole and the infrastructure and land use support they will need.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 398\0

Respondent: Midsomer Norton Forum

Representation Whilst overall we fully support the Core Strategy we have two concerns in the detail:

- (soundness):** i) Our fear is that given the wording of the target to create 1000 new jobs, that this objective will be seen as inspirational rather than as a hard target which must be achieved.
ii) We see it as essential to put in place an Article 4 Direction relating to the Midsomer Norton and Welton conservation area. Without this MSN and Welton will risk losing their distinctive character//heritage and this is not just important historically but an economic differentiator and asset in terms of attracting footfall to the town.

Change sought to The Midsomer Norton Forum sees it as essential that the 1000 jobs is the minimum target and that we
make sound: put in place measures to try and exceed this so that any that short all will mean we still hit the target.
Put in place an Article 4 Direction relating to the Midsomer Norton and Welton conservation area.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 401\1

Respondent: Midsomer Norton Society

Representation Whilst overall we fully support the Core Strategy see it as essential to put in place an Article 4 Direction

- (soundness):** relating to the Midsomer Norton and Welton conservation area. Without this MSN and Welton will risk losing their distinctive character//heritage and this is not just important historically but an economic differentiator and asset in terms of attracting footfall to the town.

Change sought to Put in place an Article 4 Direction relating to the Midsomer Norton and Welton conservation area.
make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Diagram 17: Radstock Town Centre

Reference: 305\1

Respondent: JPC Strategic Planning and Leisure Ltd

Representation We support the existing proposals for housing development in the Somer Valley area, however, believe

- (soundness):** the existing policy area for Radstock is too narrow to deliver the stated objectives. The 'potential areas for change' outlined, also limit the options for development. The current policy area excludes land on the fringe of the proposed policy area which has already been demonstrated to offer sustainable options for housing development through the SHLAA.

Change sought to The policy area for Radstock should be extended so that further opportunities for housing and
make sound: development can be sought outside of the immediate vicinity of the town centre.

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 4.22

Reference: 182\7

Respondent: Meadow View Residents Action Group

Representation G) Failure to consider the potential of Combend, Clandown and Writhlington, Radstock.

- (soundness):** H) P86 There is no appreciation of the resilience of Radstock people, and the tightly Knit communities

of long-settled families who outnumber the 'incomers'. Since the visits of John Wesley and the Evangelical revivals, the churches have nurtured community action and self-help and this should be acknowledged.

l) The emphasis should be on how 'Radstock will continue to provide'

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 4.23

Reference: 226\2

Respondent: Radstock Action Group

Representation The statement in 4.23 that 'the highway network whereby the town is situated at the meeting point of (soundness): a number of busy roads, compromising pedestrian environment and severely compromising the creation of a strong sense of place in the centre' is a dishonest and misleading one. BANES is currently involved in attempting to build a new road straight through the heart of the town which is also a conservation area. All the issues identified in the above statement are true, but will become even more of a risk if the road is ever built. Local opinion has been shown to be opposed to this and we regard it as unsound to suggest other than that the owner of this core strategy, the authority, is minded to worsen rather than improve the situation.

Additionally, the building of a main through road, through the centre of a community is regarded as very poor practice in planning terms and is counter to the thrust of the Core Strategy.

Change sought to make sound: Insert in 4.23 that substantial action is required to reduce through traffic in the town centre, as it compromises pedestrian safety, will damage buildings in the conservation area. The diminution of traffic will enable the community to feel more united and will encourage greater use of the retail and business facilities in the town centre.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 226\3

Respondent: Radstock Action Group

Representation The statement in 4.23 that 'potential flood risk' poses a risk to achieving the ambitions of Radstock, is (soundness): true. What this fails to state is that the authority is determined to build housing on an area where the flood risk has been deemed to double in the latest flood risk assessment. Senior members of the community remember the land adjacent to the railway line flooding regularly. A river runs through the town and its capacity to flood is legendary; it is incumbent on the authority to attempt to minimise the risk rather than increasing it.

Change sought to make sound: Insert in 4.23 that there will be greater care taken in identifying sites for development and that any development must be subject to rigorous examination in the light of flood risk assessments.

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Policy SV3: Radstock Town Centre Strategic Policy

Reference: 9\1

Respondent: Ms Sarah Mercer

Representation I have read some of the strategy and my only comment is about improving public transport links (soundness): between Radstock and Bath (for commuters) and Radstock and Bristol (for commuters and shoppers).

In the 5 years that I have lived in Radstock it has been an ongoing struggle to commute to work in Bath (I have now learnt to drive and bought a car). The bus links to Bath are expensive and lengthy as buses get caught up in general traffic (despite the new 'bus lane' at Odd Down) and First Bus has no season ticketing which serves to increase length of time buses spend at each bus stop, plus making journeys more expensive.

Similar for Radstock to Bristol. Currently undoable if you work in Bristol as 178 service lengthy as takes in many rural villages and Keynsham and expensive and lengthy (as above).

Change sought to I would like to see some light transport scheme looked at for this area ie a tram using some of the
make sound: former railway line into Bath.

We need either a fast bus along the A39 or utilisation of the former railway line.

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 182\8

Respondent: Meadow View Residents Action Group

Representation J) Although the JLTP3 has been amended (P132) to include consideration of the practicalities of re-

(soundness): opening railway lines such as the Radstock to Frome Line, which has only been inoperable for about ten years, the Core Strategy makes no mention of this.

In fact there is little consideration of the contribution of railways to reducing congestion, carbon emissions and air pollution. Re-opening the Radstock-Frome line would not only reduce traffic on Somerset roads, but make commuting to Reading, Swindon and London possible, and open up the area to tourists, which would meet the spirit of Strategic Objective 7.

Change sought to 4.17 a Should include the railway option as per the JLTP3 provision but more precisely stated.

make sound: 4.23 The risk in the first para. Will be intensified if the planned diversion of the A362 through the street is permitted. Radstock will be reduced to a glorified crossroads with boarded up shops because pedestrians will be too much at risk from juggernauts to shop safely. Instead the A362 should provide as it currently does, an informal 'by pass'. Efforts should be made by signage elsewhere to persuade heavy vehicles not to use the A367.

SV3 P87. 2a) Is illogical. There is already planning permission for 210 houses on the former railway lands. If only 200 dwellings were built in Radstock town centre before 2026 this will stifle all growth. Already 20-30 year olds have to live with their parents as they cannot find affordable homes. The NNR Planning permission breached the local plan provisions. If it were removed from the equation, this problem would be avoided.

3b) Rail should be included in sustainable transport.

1.) Policy SV3. Add'2d conserve the former GWR rail track and an appropriate area for a future railway station and car park near the Brunel Shed and encourage steps to be taken towards re-opening the line.' P87

2.)MNR1.4 Preserve the GWR railway line Radstock-Frome and facilitate a professional feasibility study for re-opening it as a commuter service.

Phasing: 2010 onwards Cost tba Funding Delivery as for MNR1.2

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 226\4

Respondent: Radstock Action Group

Representation NEW Master Planning was commissioned to produce town centre plans for the three market towns of Radstock, Keynsham and Midsomer Norton. They fulfilled their brief for the latter two but failed to produce anything at all for Radstock, owing to factors which are not relevant here. The result is that the statement in SV3 is a dangerous generalisation and is not the basis for any strategic development. Compared with the statements for Midsomer Norton and Keynsham it lacks specifics and is made up of general aspirations which might be used against the best interests of the town because they do not actually commit the authority to a set of meaningful goals and policies for the town.

It cannot be said to be consistent with national policy because it is made up of a series of generalisations which carry no weight and are open to resulting actions being inconsistent with national policy on renewal, regeneration, road building and creation of jobs and homes.

Change sought to make sound: Produce a Strategic Policy based on a sound business plan as originally intended by Bath and North East Somerset. Substitute this for the current SV3

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 245\5 S

Respondent: Environment Agency

Representation Policies SV1, SV2 and SV3

(soundness): The Radstock Town Centre (SV3) area lies partly within a flood risk area. BANES in the sequential and exception test report have justified this on the basis of needing to meet wider sustainable development principles and to support regeneration. The inspector should ensure that they are satisfied that BANES have applied appropriate weight to these other sustainability considerations compared to flood risk. We are pleased to see that a sequential approach will be taken to new development within the SV3 policy area and that it is detailed in the report that development proposals for all the policy areas within the Somer Valley will need to give consideration to all sources of flooding when they come forward. This will be important to ensure any local flooding issues (e.g. surface water and sewer flooding) are adequately considered.

Change sought to make sound: N/A

Representation (legal compliance):

Change sought to make legally compliant: N/A

Reference: 292\11

Respondent: Bath Avon River Corridor Group

Representation A lack of recognition of the factors that can create a synergic relationship between these towns and others in the district to the overall benefit of the whole and the infrastructure and land use support they will need.

Change sought to make sound:

Representation (legal compliance):

Change sought to make legally compliant:

Reference: 298\12

Respondent: Liberal Democrat Group

Representation Policy SV3, 3b

(soundness): To underpin the sustainable transport strategic objective.

Change sought to make sound: "Ensure that linkages to green spaces and sustainable transport routes are prioritised and protect the openness of former railway routes".

Representation (legal compliance):

Change sought to make legally compliant:

Plan Reference: Paragraph 4.28

Reference: 169\6

Respondent: Norton Radstock Town Council

Representation The DPD is not deliverable as it does not embrace sound infrastructure planning. The absence of a **(soundness):** Master Plan for Radstock when Midsomer Norton and Keynsham have them, is not sound. No consideration appears to have been made with regards to the movement of residents of the Somer Valley for Social & Domestic activities.

Change sought to A Master Plan for Radstock and consideration of other infrastructure areas such as access to NHS **make sound:** Services and Education in order that a sound infrastructure plan can be produced.

Representation (legal compliance):

Change sought to make legally compliant: