

Matter 1B
Appendix 1
ID/7 1B_Appendix_ChangeRep

Respondents 821 and 822
Cam Valley Wildlife Group and Somer Valley Friends of the Earth

Contents:

Text submitted in response to placemaking changes and the proposed major change of the addition of paragraph 6.41a.

The major part of this submission is not in the recorded Schedule 1 submission, 822/PCV/1.

822/PCV/1 text is is grey; the unrecorded text is in black

Somer Valley Friends of the Earth
Representations on the Core Strategy changes

6.41a

Also reference to Twerton and Newbridge placemaking

Regarding the announcement of the forthcoming SPD on opportunities for heritage assets to mitigate, or adapt to, the effects of Climate Change, and incorporating comment on changes to the text regarding heritage features in Bath (placemaking change).

6.41a The Core Strategy seeks to enable the appropriate modification of heritage assets, including the World Heritage Site in order to reduce carbon emissions. A forthcoming Supplementary Planning Document will identify the opportunities for heritage assets to mitigate, and adapt to, the effects of climate change. These include enhancing energy efficiency and allowing greater use of renewable energy. This will give applicants clear guidance on the acceptability of a range of potential modifications, the SPD having weighed the benefit of a number of modifications to mitigating the effects of climate change against any harm to the significance of heritage assets.

The combination of the Government's new climate change public policy statement (PPS1: Climate Change) and the opportunities that the SPD may present will have a bearing on development in the District. The reference to the World Heritage Site suggests strongly that this additional paragraph relates to areas and sites as assets in addition to individual buildings.

Had examination of the role of heritage assets in climate change mitigation and adaptation been a background document, we would have made representations accordingly. It would appear that this matter may now be examined through the Inquiry process. We feel that this may be a result of the failure of B&NES to adequately address the 'frontloading' approach flagged up in the Somer Valley Friends of the Earth response to the Draft Core Strategy and to provide a robust evidence base before the Draft Strategy was launched (see Production of the Core Strategy and impact upon content and appraisal - SVFRepresentation1- Draft Core Strategy response)

We note that there have been additions regarding heritage features in Bath, including the importance of Brunel's Great Western Railway feature in Twerton and Newbridge. Radstock Railway Land is also an important former GWR feature, being part of the GWR since 1850 and sporting original GWR features.

Radstock Railway Land is an important landscape feature, one of the distinctive green landscape features extending right into the heart of the town. It provides a characteristic and appropriate setting for the vast bulk of the remaining extant railway heritage features of the town of Radstock, covered in the first paragraph on Historic Environment in the Core Strategy, paragraph 6.38 - "*Bath & North East Somerset's outstanding historic built, cultural, landscape and archaeological heritage assets and their settings are well documented and will continue to be preserved or enhanced.*" It is clearly a very important heritage asset, both with regard to industrial heritage and to natural heritage, which are inextricably linked, both in the present day and in terms of how the historic use and position in the landscape has been instrumental in the

formation and continuation of the high value natural resource that comprises this site. It is the former industrial use of the site and its location at the centre of a former railway hub intimately connected with mining that has allowed the very special biodiversity resource to form and flourish. The biodiversity makes use of industrial heritage features, which form vital elements of the habitats and features that support the extraordinary range of animals and plants found on the site, including species vulnerable to extinction. The addition, 6.41a, seeks to modify heritage assets in order to reduce carbon emissions. The Government's new Climate Change policy seeks to put greater emphasis on biodiversity (which helps to reduce emissions in its own way) but also illustrates the need for good land use policy that reduces the need to travel and so forth.

The use of this site as a mixed development will increase out-commuting and looks like it will cause the loss of more jobs than it will generate. Alternative use would be more in line with the overarching and specific strategic aims set out in the Core Strategy and we would expect such alternative use to be examined in the forthcoming SPD. Alternative use of this site has not been examined since the B&NES Local Plan Inquiry. B&NES rejected the Inspectorate's recommendations at that time.

The Core Strategy on historic environment, 6.39 applies to the RAD1 site, and we would hope that the SPD will look at the RAD 1 site in this context.

The role that the RAD 1 strategic development site could play in reducing out-commuting through alternative use that that assumed in the Core Strategy has not been investigated and also has a bearing on the climate change issue.

The industrial and natural heritage features can be seen as an important part of the tourism 'offer' that is a key strength to be used in realising the potential of the town of Radstock and reduce its reliance on out-commuting by promoting local businesses/retail. This would have even greater potential if combined with provision of a rail link into the heart of Radstock, a feature ruled out by the (non-actionable) development given outline and partial full permission, which B&NES seeks presently to enable. An increase in local businesses can be promoted through a range of measures, which can include area 'branding' that incorporates industrial and natural heritage in order to increase its attractiveness to businesses wishing to relocate and independent retailers. This would accord with Policy SV3- 3h and recognise the strengths that the Cores Strategy states that it seeks to address in order to realise the Somer Valley area's potential, "*High quality natural environment in and surrounding the towns*" and "*Mining Heritage - basis for recreation (disused rail lines) and tourism (especially Radstock)*".

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October 2011