

Matter 1B
Appendix 2
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Respondents 821 and 822
Cam Valley Wildlife Group and Somer Valley Friends of the Earth

Contents:

Summaries and excerpts from 33 pages of information submitted on the B&NES on-line response form to support the response to the Draft Core Strategy by Somer Valley Friends of the Earth - response partially reported in 822/1 in Schedule 1 (CD7/2) :

1. Summary of Somer Valley Friends of the Earth comment on the Core Strategy Spatial Options Consultation
2. Summary of Somer Valley Friends of the Earth response to the Core Strategy Launch Document
3. Summary of Cam Valley Wildlife Group response to the B&NES Core Strategy Launch Document, with quotes
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1.1 Summary of the Somer Valley Friends of the Earth comment on the Core Strategy Spatial Options Consultation (October 2009), January 2010 :

- The Core Strategy Spatial Options consultation suffered from the same flaws as the Core Strategy Launch document in two key ways - the insufficiency of the evidence base at that stage and the failure to adequately integrate natural environment matters into the overarching spatial vision for B&NES.
- the B&NES approach worked against Government policy that the LDF should be worked up by means of a front-loading evidence-based system and with proper community involvement as part of a sustainable approach to planning and development in the UK
- the public was being asked to put forward opinions on strategic development options without appropriate information
- PPS17 issues were not addressed and that the group feared that the cited policy tools, Green Infrastructure and Nature Conservation would be retro-fitted to a fairly well worked up spatial strategy in the hope that natural environment policies will be sufficient
- the operational experience of the B&NES Local Plan has shown that such policies, whilst giving the appearance of being robust, were not sufficient to conserve, let alone enhance, the District's nature conservation resources
- there was a danger of repeating the mistake of pursuing aspirational development models without sufficient attention to environmental strategies and matters, resulting in a growth agenda that fails to meet sustainability criteria and a framework that fails ultimately to protect the natural resources and environment
- the Sustainable Development Strategy flagged up the importance of an environmentally sustainable physical environment as one of the five key drivers of Sustainable Communities; wildlife and biodiversity resources are part of that environmental component; the Vision needed a broader sustainability model
- the impact of climate change on biodiversity and ecosystems was not acknowledged in the B&NES Headline Objective, "Tackle the causes and effects of climate change"
- the Midsomer Norton and Radstock area had suffered from under-investment and significant deprivation for too many years
- there was a possibility that the planned redevelopment of the Railway Land in Radstock would not pan out as planned and that the railway option would be a feasible one
- travel studies and other studies for the Midsomer Norton and Radstock area were needed and the dormitory role issue needed clarification; a key issue in the RSS Panel's Report was that strategic growth associated with Bath should not be directed towards the Norton-Radstock area and that the regeneration of the area based on local growth should be encouraged
- the retail strategy forecasts suggested that there was not much scope for population increase in Midsomer Norton and Radstock without increasing out-commuting for shopping
- no evidence was put forward to support the assumed economic growth in the

south of the district was desirable or would not have adverse consequences that outweighed the benefit and there would be negative impacts upon the wider environment through increased travel

- B&NES pointed to greater need for public support for Option 1, but the double taxation (precept covering services received without precept by Bath residents) combined with B&NES' failure to invest sufficiently in the area should not be an excuse for allowing unsustainable development in the area in order to deliver housing targets in less politically challenging locations
- alternative uses of Radstock Railway Land could increase the tourist and visitor potential and the spin-offs associated with rail and with a site of high biological, heritage, educational and community value, as opposed to those associated with the creation of an urban block built environment in the proposed development model.

2.1 Appendix 1 of the Somer Valley Friends of the Earth response to on the Core Strategy Launch Document, 17th December 2007.

2.2 Appendix 1 was a copy of the Somer Valley Friends of the Earth comments on the B&NES Core Strategy Launch Document, 17th December 2007 which made the points that both GOSW and Somer Valley FoE shared concerns over the way in which the Core Strategy was being prepared in Bath and North East Somerset as part of the new Local Development Framework. Concerns were listed. It called for a comprehensive list of quality of life indicators and a raft of studies. Section titles include Key ambitions, Delivering the growth agenda and addressing the challenge of climate change, Quality of life, Economic prosperity, Inbuilt bias in the system that needs to be addressed, Location and allocation of housing, Access to jobs, shops, amenities and services, Transport infrastructure, Green infrastructure, Design and location of development, Waste, Energy and Pollution, It flagged up range of things including:

- B&NES' acceptance of the disparity between housing and jobs in the Norton Radstock area without demonstration of how the Midsomer Norton, Radstock and Environs area could be made significantly more attractive to employers
- the proximity of the area to two SCTCs (Bristol and Bath)
- inevitability that any further significant development in the Norton Radstock area would only serve to increase the role of the area as a dormitory area, and increase out-commuting, which would be against regional policy as set out in RPG 10 and in the Draft RSS and would work against the authority's three key ambitions of sustainability, inclusivity and distinctiveness
- the growing disparity between housing and jobs/services in Peasdown and Paulton
- the need to undertake a range of studies, including comprehensive travel studies, as set out in RPG 10 (CD6/S10, Paragraph 3.13)
- that the failure to address the matter of adequate baseline information suggested that deferral of any plans for further development in these areas may be necessary pending appropriate up-to-date information and after measures to bring transport and other infrastructure up to a reasonable standard had been

undertaken

- that it seemed foolish for the authority to simultaneously condone the removal of the potential rail link on NR2 [now RAD1] while simultaneously advocating development in the area
- a one-size-fits all prescriptive hierarchical approach is on its own insufficient and a comprehensive appraisal of the benefits and deficits resulting from development in individual areas or on individual sites is necessary to deliver sustainable development and respond to the challenges of Climate Change
- the Somer Valley Strategic area needs promotion as a distinctive location and visitor destination; it would appear to be best suited to an innovative approach encompassing sensitive ecologically friendly development, small-scale employment opportunities, distinctive small businesses, especially 'green' businesses and those associated with 'green' activities; this would complement the industrial heritage and rural feel of Radstock in particular
- the value of wildlife and biodiversity in social, economic and environmental terms needs to be properly considered, studied, and appreciated
- comprehensive consideration of strategies for the Somer Valley area requires appropriate up-to-date information and research

3.1 Appendix 2 of the Somer Valley Friends of the Earth comment on the Core Strategy Spatial Options Consultation (October 2009), January 2010.

3.2 Appendix 2 was a copy of the Cam Valley Wildlife Group response to the B&NES Core Strategy Launch Document, 17th December 2007, in which it called for:

- an audit of the district's biodiversity resource and review of the quality of designated areas and the AONBs regarding wildlife and nature conservation
- coverage of all PPG 17 items, which was claimed by B&NES would be covered by the Green Spaces Strategy and the Sports Facilities Strategy, but clearly was not (function of open spaces as havens and habitats for flora and fauna, including wasteland and derelict land, accessible countryside in urban fringe areas, civic spaces, burial grounds and so on)
- delivery of protection of wildlife and enhancement of the wildlife and biodiversity resource in line with the Authority's duties under the NERC Act and Government policy
- to adequately quantify and qualify landscape features and open spaces for the purpose of review of the nature conservation resource
- recognition of the irreplaceable nature of certain wildlife sites and habitats in the District
- robust urban capacity studies including proper evaluation of the potential of sites to support wildlife and biodiversity of value to the District
- development in the Core Strategy of a robust evaluation, management and monitoring process, identification of deficiencies in supply and identification of key sites and opportunities, with incorporation into the Strategy

- evaluation of the socio-economic benefits associated with the district's wildlife and biodiversity resource
- reasoning to be produced to support rejection by B&NES of the sustainable' development locations identified in the Draft RSS
- re-examination of the implication in the Core Strategy that even though Norton Radstock has too many houses for the jobs available it would be OK to carry on building more homes without the associated jobs, which would increase out-commuting
- examination of the post-industrial area within the proposed new town park (Midsomer Norton) before deciding on its actual location and consider other options such as the flatter land to the immediate north of the proposed park.

3.3 Appendix 2 set out details of the policy areas not covered with reference to the scope and coverage of particular documents that would be part of the evidence base and pointed to BRERC mapping as of some help. It pointed out the early stage of habitat mapping by the Post-industrial Sites Working Group within B&NES WILDThings, the shortcomings of use of the the Nature Areas alone to enhance the biodiversity resource, the importance of links between Nature Areas, and the importance of not seeing these as adequate replacement for resources lost to development elsewhere in the District, for it would defeat the issues that the Nature Area system was meant to address. As an example of past failure in this regard it stated that a certain capacity for development was simply assumed for Radstock Railway Land in the Urban Housing Capacity Study for the B&NES Local Plan, on the basis that an application for a certain level of development had been received and that the site was allocated for mixed development in the Wansdyke Local Plan and blamed this failure for the bringing forward of unrealistic plans for the site, leading to a decision that ran contrary to Local, Regional and National planning policy regarding nature conservation and biodiversity. It pointed out that the monitoring of the wildlife resource of the District and with regard to landscape features of value to wildlife was woefully inadequate. It pointed out that Working With the Grain of Nature, a biodiversity Strategy for England, included, as desired outcomes, biodiversity and species conservation on brownfield sites and the understanding and acceptance of how brownfields can make a positive contribution to the green elements of urban regeneration; it pointed out that these are valuable resources in the Somer Valley area and play an important part in supporting the biodiversity of the District. It highlighted the Midsomer Norton, Radstock and Environs area as particularly rich in industrial heritage and with some fine examples of sites that have become important parts of the ecological network. It stated that *"Radstock Railway Land stands out as an exceptional example of the intermarriage between industrial and natural heritage, having become a nationally important wildlife site¹ supporting at least 24 UK BAP Priority species, 4 UK BAP Priority Habitats and a further 65 species that are nationally rare or scarce within a total of over 140 B&NES Priority Species and Habitats. In addition to this, it plays a very valuable role in the wider ecological network, helping to support small transitory local sites and designated sites*

¹ Using IEEM guidelines, as recommended by the Government, the site qualifies as of International significance (EU important), but if this is not accepted, it certainly qualifies as of National significance (UK important)

within the district and outside it and acting as a hub of the local network. One of its roles is in linking up SACs and bat roosts over a wide area both north-south and east-west², thus enabling genetic exchange so that otherwise isolated populations can remain healthy. Although this site is the subject of a redevelopment proposal, the proposal may not come to fruition. It is important that, for the purposes of the Core Strategy, that the site is considered without reference to the current proposals as well as with reference to them".

3.4 It highlighted other potentially important areas/sites and went into some detail regarding the poor quality and provision of open green spaces in the Somer Valley area. It pointed out that the Brighter Futures Partnership responsible for the Community Plan for the Somer Valley area had obviously not taken on board environmental issues adequately and had shown through choice of invitees some resistance to bringing in people with environmental knowledge. It described the importance of recognising the possibility of a dual industrial and natural heritage reserve on Radstock Railway Land and associated tourist/visitor and educational provision and pointed out how this was in line with all three of the B&NES Key ambitions for the District. It included, as a summary, an overarching view and a list of key matters that the group felt needed to be addressed:

"Summary

Cam Valley Wildlife Group believes that there is much work to do as the LDF and the Core Strategy is worked up, and that there is a pressing need to ensure that sustainability issues permeate and underpin the Core Strategy. Wildlife and biodiversity considerations will need to be carefully considered as part of that process. Built development and the infrastructure that supports it can be placed in a variety of locations, but wildlife and the sites that support it are, once removed, often irreplaceable and extremely difficult or impossible to recreate. For that reason, it is necessary to consider this resource in the first instance rather than treat it as an adjunct or, worse, a constraint to development. It is a resource to be embraced and celebrated, and it can and should be utilised to help create a better B&NES. Cam Valley Wildlife Group has identified a number of Key things that we consider B&NES must do when producing the Core Strategy:

- The identification of green infrastructure and audit of the biodiversity resource of the district, using a comprehensive and cohesive approach that draws on a diverse range of studies, uses up-to-date information, and brings in the B&NES Ecologist, 'Wild things' and local groups, making sure that the work is well resourced.*
- Identify deficiencies in the ecological network and opportunities (specific and in principle) to contribute to its creation and enhancement. Develop a robust evaluation, management and monitoring process*

² This is supported by radio tracking data

- *Put in place strategy designed to ensure the conservation and enhancement of the wildlife and biodiversity of the district, address the challenges of climate change in relation to the ecology of the district and the region; implement PPS 9 and uphold our international obligations at local level; and indicate in the Core Strategy that the council will properly resource Wild things and other initiatives and programmes with a wildlife/biodiversity element*
- *Ensure that assessment of the capacity of locations for development is conducted in a comprehensive and robust way from first principles, with wildlife and biodiversity considered at the earliest stage, including assessing the capacity for placing affordable housing outside present village boundaries and ensuring that the role that urban fringe and village perimeter areas play in supporting wildlife are recognised*
- *Take a pro-active approach to building in biodiversity by design, both through a spatial strategic approach and at individual development level*
- *Assess brownfield sites with a view to biodiversity and species conservation and promote the understanding and acceptance of how brownfields can make a positive contribution to the green elements of urban regeneration*
- *Assess the contribution that the wildlife and biodiversity resource of the District can make to the economy; examine the tourist potential of the Midsomer Norton, Radstock and Environs and the socio-economic potential of Radstock Railway Land without, as well as with, reference to the current proposals, using appropriate studies to inform the process*
- *Put in place a raft of robust policies that ensure that developments will deliver the minimisation of energy consumption across the board, including the minimisation of embodied energy in building materials*
- *Examine the environmental impact of the allocation of homes to the Midsomer Norton and Radstock area, taking into account the need to preserve its unique industrial heritage and the wildlife value (and potential wildlife value) of the area; audit and re-assess the natural green spaces of Radstock ward and use proximity of populations to green spaces as a guide rather than number of green spaces in a ward where appropriate*
- *Take a cohesive approach to nature conservation and the value of sites, irrespective of location, and ensure that the wildlife and biodiversity agenda is fully integrated into the plans, strategies and policies in the LDF, including with reference to planning in urban areas"*

4.1 Appendix 3 of the Somer Valley Friends of the Earth comment on the Core

Strategy Spatial Options Consultation (October 2009), January 2010.

Appendix 3 was the response from Post-industrial Sites Working Group of the Wild things Partnership to the Core Strategy Launch document, which set out some detailed argument and called for B&NES to "Confirm that B&NES recognises the relative importance of Post-Industrial sites to the biodiversity of the UK and that proper account will be taken of this at an early stage when determining the development capacity of all pieces of land whether "green field" or previously developed". It warned that mapping of UK BAP habitats in Avon did not include mapping of the new UK BAP Priority habitats, of which Open Mosaic Habitat on Post-industrial Land was one. It concluded with:

"Conclusion

The gamut of Government policies and guidance leads to the conclusion that it is imperative that policies and strategies are drawn up to reverse decline and to both conserve and enhance the wildlife and biodiversity resource, in line with our international obligations. The new NERC Act puts responsibility for effective action onto Local Authorities. As a document that sets the context for the other plans in the LDF, it is vital that B&NES commits in the Core Strategy to the creation of a fully-functioning ecological network that not only functions within the authority but also responds to the wider picture, forming good links with the wider ecological network and linking into higher level strategies. It is essential that the Core Document puts in place a commitment to achieving protection and enhancement of the resource, that it puts in place a strategy for addressing the challenge of climate change in respect of the resource, and that it also commits to evaluation and monitoring as an essential part of the process. At the same time it must act to address the problem of the marginalisation of wildlife and biodiversity within the local planning framework and fully integrate the Local Biodiversity Action Plan, Wildthings, into the wider strategy. This would, of course, require an appropriate level of officer support.

We hope that, in working up the Core Strategy, the Council will take the advice of its Chief Executive, given at the launch of the biodiversity action plans in 2000, to make biodiversity a key issue and accept the help and guidance of the Wild things Partnership."

5.1 Text 4 of the Somer Valley Friends of the Earth comment on the Core Strategy Spatial Options Consultation (October 2009), January 2010

Text 4 (which should have been changed to Appendix 4 and included in the listed Appendices) was the Cam Valley Wildlife Group response to Spatial Options, January 2009

The group

- pointed to the lack of information provided since the Launch document
- expressed concern that strategic decisions about where development could and should take place could not be taken without adequate information, and to do so worked against the front-loading approach that the Government required

- suggested that the lower level development models presented by the Council for the Cam Valley Wildlife Group area (the catchments of the Cam and Wellow Valleys) were likely to be less detrimental to wildlife and biodiversity
- drew the Council's attention to the fact that the biodiversity resource within the Cam and Wellow catchment areas had been underestimated and undervalued in the past
- referred the Council to its response to the Launch document in full, on the basis that there had been no significant change