

Excerpt from Somer Valley Friends of the Earth Objection to applications for extension of time limits for outline applications, Radstock Railway Land :11/02329/REN & 11/02346/CAR, amended, 11th August 2011

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4.0 PPS4: Planning for Sustainable Economic Growth

4.1 PPS4 has also been introduced since approval, and the applicant refers to it to support their case. However, there are a number of statements and policies within PPS4 that do not support the proposal, including paragraph 9 on the overarching planning objective, paragraph 10 on planning objectives to help achieve sustainable economic growth, and policies EC1, EC4, EC5, EC7, EC9 and EC10.

4.2 Paragraph 9.

This paragraph states that the Government's overarching planning objective is sustainable economic growth, and this is defined as "*Growth that can be sustained and is within environmental limits, but also enhances environmental and social welfare and avoids greater extremes in future economic cycles*". Clearly, Government thinking on sustainable growth includes a concern for environmental limits and welfare, in line with the climate change agenda. The proposed development acts against an agenda that seeks to constrain development within environmental limits and enhance environmental welfare. The Planning Inspector pointed out the value to the community of using the bulk of the site as a nature reserve and was clear that rail would not be precluded by inclusion of a sustainable transport route in the site-specific policy. Expansion of this idea to include an industrial heritage reserve and railway also fits the environmental and social welfare elements flagged up in the definition. The carbon emission-rich development scenario that increases the role of Radstock as a commuter town at the cost of a resource of high cultural and environmental value does not fit so well.

4.3 Paragraph 10

This paragraph is concerned with Government planning objectives to help achieve sustainable economic growth, which includes

- reducing the need to travel, especially by car
- delivering more sustainable patterns of development; and
- responding to climate change, in particular through attention to *PPSI: Planning and Climate Change*

It seeks to promote the vitality and viability of town and other centres as important places for communities through a variety of measures, including promoting regeneration. The policy stresses that the aim should be offering a wide range of services in an attractive and safe environment, and remedying deficiencies in provision. The proposed development stimulates a higher need for services whilst not delivering them; the outline documents were clear, that it was only after substantial knock-on development that services would be provided. Even with alterations to the road infrastructure, it is unlikely that the road system would be able to support this level of development without severely compromising the attractiveness and safety of the local environment. The system proposed will add heavy traffic, noise and pollution to a presently lively shopping street, making it less attractive to shoppers and visitors and introducing a barrier between the shopping and social areas. The historic and architectural heritage of Radstock centre and its local distinctiveness is not enhanced and the aim of conserving and enhancing these would be better served by abandonment of the development and embracing alternatives.

4.4 PPS4 includes a set of policies, a number of which, it can be argued, are not being complied with for Radstock, which means that there is not a sound context in which to plan development. This vacuum has led to the pursuance of the proposed development model, with B&NES putting the spatial strategy for the town in the hands of NRR.

4.5 Policy EC1 advocates using evidence to plan positively. This has not been done. A local economic assessment with a robust evidence base for understand existing business needs and other matters has not been done, either at outline or since. There is a reliance on urban design theories and a rather crude assumption that economic benefits will flow from the presence of people and redesigned urban infrastructure. The updated EIA says that the local economic assessment shows certain out-commuting characteristics, yet a B&NES' Principal Economy Enterprise and Business Officer in a recent talk on the first steps towards an Economic profile for Radstock, confirmed that out-commuting information is presently out of date and based upon the 2001 census. The outline application undertook only 'initial socio-economic studies', which were notable by their paucity. The EIA supplement has added nothing. There is no up-to-date economic and market data for retail such as over-trading, sales forecasts, quantitative and qualitative need, and so on. Alternative uses such as that recommended by the Planning Inspector have still not been examined. The IEEM guidelines stipulate that exploration of the socio-economic value of sites with high ecological and associated community value should be included in analyses; we consider that the cultural value associated with industrial heritage and the economic value of a future rail link could only serve to boost the socio-economic value of an alternative use of the site. Without adequate baseline information and analysis, the socio-economic case is merely theory, and in this case a theory that has not even any examples to back it up.

4.6 Policy EC4 advocates competitiveness and consumer choice through enhancing existing markets and enhancing the established character and diversity of town centre. This proposal does not do this either. There has been little analysis of the economic functioning of Radstock Town centre. In terms of the retail hierarchy, Radstock sits below Midsomer Norton and reports commissioned by B&NES have stressed that it should not compete to the detriment of that centre. The outline application used Norton Radstock data in its analysis. This was not appropriate for a development that was supposed to promote the regeneration of Radstock, a significantly smaller and distinct area with a different function to Midsomer Norton. Analysis of business needs and retail performance should not have been based upon data that is mainly concerned with the retail performance of the larger centre.

4.7 Policy EC5 advocates a scale of site and travel generated that is proportional to the role, function, hierarchy & catchment of the centre. The role of Radstock centre is described as serving the surrounding local area. It is disproportionate to increase housing in Radstock by 10% through a development that will increase it further still, with few jobs produced, and with out-commuting, congestion and town centre pollution already high. The assessment of the impact of this development upon the existing centre has been derisory at best, appropriate travel studies have not been conducted and the transport analysis provided is unreliable. The policy also advocates ensuring that sites are capable of accommodating a range of business models in terms of scale, format, car parking provision and scope for disaggregation. The car parking provision that will effectively serve the existing local shops is significantly lower than that presently provided and a significant proportion of the alternative provision is much less convenient.

4.8 Policy EC7 advocates supporting sustainable rural tourism and leisure developments that benefit rural businesses, communities and visitors and which utilise and enrich, rather than harm, the character of the countryside, its towns, villages, buildings and other features. One of the benefits

claimed at outline was making the town more attractive to visitors and tourists. It is widely believed in Radstock that the proposed development does harm to the character of the town, and does not enrich it. The continual problems of financial viability are flagged up in the comment from the B&NES Development and Regeneration Team. The economic climate is not good and the national economic forecasts on recovery disappointing. There is a £1 million shortfall and what we know of the Linden Homes designs is not encouraging. Enhancing the existing site to develop a top class visitor resource with open space, wildlife and heritage interest and access by rail would not harm that character, but would add a new, complementary, dimension to the changing face of Radstock. Although the element of the policy, "*recognise that in areas statutorily designated for their natural or cultural heritage qualities, there will be scope for tourist and leisure related developments, subject to appropriate control over their number, form and location to ensure the particular qualities or features that justified the designation are conserved*" does not presently apply, English Nature's opinion was that the 'borderline' SSSI site could be managed up to SSSI quality. If this were allowed to happen, this part of the policy would apply. The potential to reap benefits in this instance are high because the wildlife and biodiversity for which the site is most valuable would benefit from, rather than be harmed by, human footfall. The development proposal completely wipes out this potential and reduces the valuable habitat to a strip that runs alongside a road and housing.

4.9 Policy EC9 refers to the Town Centre Health Check Indicators. Indicator A13, *State of the town centre*, states that *environmental quality should include information on problems (such as air pollution, noise, clutter, litter and graffiti) and positive factors (such as trees, landscaping and open spaces)*. The development will increase air pollution and noise; the bus stops will be located outside retail/commercial premises, cluttering a major new pedestrian route with stands, seats and waiting passengers; trees have already been removed from the site and will not be replaced; it is likely that further trees will be removed; and what was once, and could be again, a wonderful nettle-free flat open space for gentle walking will be reduced to buildings, a road and a mere strip of grassland. the remaining open space is a steep tussocky hillside, a low quality green space.

There has been no attempt to update the environmental quality assessment for pollution. It is assumed that it will follow the predictions at outline, based on the assumption that the traffic analysis was correct. However, the 'proving' of this traffic matter compares non-comparable factors and is at odds with other data not presented. B&NES has issued nitrogen dioxide pollution monitoring data for central Radstock, but the yearly figure it has released for 2010 does not correspond to the raw monthly figures after the bias is applied, as it should. The given yearly figure after the bias has been applied is 32 microgrammes per cubic metre, but the result of applying the bias to the average of the monthly figures is 35.5 micrograms. The ceiling at which an Air Quality Management Area must be declared is 40 micrograms.

4.10 Policy EC10.2 states that all planning applications for economic development should be assessed against the set of impacts:

- a. whether the proposal has been planned over the lifetime of the development to limit carbon dioxide emissions, and minimise vulnerability and provide resilience to, climate change
- b. the accessibility of the proposal by a choice of means of transport including walking, cycling, public transport and the car, the effect on local traffic levels and congestion (especially to the trunk road network) after public transport and traffic management measures have been secured
- c. whether the proposal secures a high quality and inclusive design which takes the opportunities available for improving the character and quality of the area and

- the way it functions
- d. the impact on economic and physical regeneration in the area including the impact on deprived areas and social inclusion objectives [where is the analysis? where is the evidence against the Inspector? where is the comparison with alternatives?
 - e. the impact on local employment

This is primarily an economic regeneration scheme. There is little in the proposals for the community bar pavements, traffic lights and a package that will put some of our most valued shops out of business. There is little hope of any roll-over funding capable of putting in community facilities, if there is any at all, once the claw-backs have been taken care of.

Taking the policy points one at a time,

Point a) the sustainable build rating of BRREAM 'very good' was already out-of-date when the application was granted, having already been superseded by the equivalent of BREEAM 'Excellent'. Developments of this size are now expected to meet much higher standards. This, in combination with the low jobs:houses ratio, the lack of commitment to the incorporation of carbon-reducing technologies on buildings such as solar panels, and the loss of carbon-sinking habitat to hard surfaces, acts against limiting carbon dioxide emissions; these will be significantly increased, not least by the larger role the town will play as a dormitory town. Brown roofs, whilst part of the ecological mitigation package, simultaneously remove space that could be taken up by photovoltaic cells and other solar panels, which acts against the capacity to limit carbon dioxide emissions.

Vulnerability to climate change for wildlife, biodiversity and ecosystem stability is compromised by loss of valuable habitat and important species to development. It is important that a variety of habitats is maintained throughout the landscape and that corridors such as this that connect to a wider network through former industrial and other links are retained. River corridors can only do so much - they do not support the sorts of habitats found on sites such as this. Mitigation measures through habitat creation are of limited use and do not properly compensate for losses. They are not adequately tested for efficacy. In addition, upkeep of elements such as brown roofs and replacement track bed habitat can be both expensive and difficult to enforce.

Resilience of ecosystems and the natural world to climate change is challenged by losses of such sites and the opportunities they present for linking particular habitats over long distances that would otherwise not be linked (calcareous grassland in this case). The Government recognises the importance of aiding it, not least because it supports us and aids the retention of species-rich natural systems that sink carbon and help with cooling.

Point b) the three most important points in respect of this site for point 'b)' are

- the effect on local traffic levels and congestion(negative)
- accessibility to public transport (worse, especially for people with heavy shopping bags whose last stop is likely to be Radco, and
- securing public transport opportunities (the elimination of the option of train due to the combination of built development and ecological mitigation, which will take up all the space within the site and outside it to the south).

Point c) it is the opinion of many in the town that this development will be detrimental to the character and quality of the area and the way it functions.

Point d) the impact on the economic and physical regeneration in the area is a matter of debate, with the developers putting forward an economic theory backed by little evidence applicable to the town itself (as opposed to Norton Radstock or wider). Alternative uses and locations for development have not been examined regarding impact on the economic and physical regeneration

of the area.

Point e) the impact on local employment is small in terms of jobs created, but poses an significant risk to local businesses and businesses from further afield passing through the centre. The outline assumed nil impact on existing businesses, but local traders completely disagree. They have a strong trading community spirit and there are some who do not fear a direct impact upon their own businesses, but are opposed nonetheless, due to the impact on the other businesses around them. What one trader described recently as a "lively" centre for business is threatened by the heavy noisy traffic, rising pollution and reduced parking permitted by the outline application with detail. The draft road orders also show reduced parking and other trader inconvenience and disbenefits. The jobs created by the development are pretty negligible compared with the job demand the proposal will create; we note that jobs during construction were tied in to an agreement at outline that a proportion of the firms and workforces would come from the 'local' area. The 'local' radius is so large that Swindon and Cardiff were included!

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