

Issue 1 : Is the planned district-wide scale of provision for jobs and homes justified and is there sufficient flexibility to reflect uncertainties in forecasting and changing circumstances?

Statement by Somerset Valley Friends of the Earth

1.1 Somerset Valley Friends of the Earth (SVFoE) feels that B&NES is trying to fit the results of the evolving evidence base to a strategic framework that was decided upon in the absence of that evidence, resulting in an overly-ambitious approach to job creation and failure to get to grips properly with the environmental agenda. We think that knock-on implications regarding housing provision and spatial planning will ultimately impact the Strategy's ability to protect the District's natural resources and environment. The group feels that B&NES is being over-optimistic about economic performance and, as its calculations of the increase in housing numbers hinges almost entirely upon additional housing required for additional workers, the number of dwellings that the District should accommodate. However, this assumes that B&NES is correct in its assumption that the ageing population, one of the factors that is a key driver of change (CS 5/7, Paragraph 1.12, Demographic change) has a negligible effect, that the social impact of any out-competing of local people by migrants in CD6/S10 is not of importance regarding decisions on housing supply and that the 2001 Census 70% resident workforce used for the proof of the 1.39 homes to jobs ratio (CD6/S10, para 6.23 - 6.25) still applies.

1.2 Our response on legal compliance (822/1) was supported in the same document by earlier detailed submissions by the group and by Cam Valley Wildlife Group. This supplementary submitted material has not been included in CD7/2. The SVFoE points included that the evidence base was inadequate at that time, that B&NES was in danger of pursuing aspirational development models that failed to meet sustainability criteria and that these would fail to protect the natural resources and environment (Appendix 1_SVF_DCS, page 4, paragraph 3). In paragraph 2 of 822/1 the group put forward the view that the evidence base was still insufficient at the Draft stage, and that key information was not available. The group's fears regarding an aspirational approach appear to have been borne out, with the evidence base being produced in stages throughout the process, far too much of it appearing after the Draft was consulted upon and there still being significant holes in it, regarding environmental impacts and strategies and the economy of the Somerset Valley area. The SHLAA is dated May 2011, well after the deadline for consultation submissions on the Draft Strategy . Cam Valley Wildlife Group submitted material to B&NES setting out the case that the SHLAA has failed to take environmental considerations properly into account in the identification process , yet has not been accompanied by re-examination of allocated sites in the way prescribed in PPS 4, EC 1.3 d (CD2/5) in order to address these deficiencies. For this material, which was not entered in the schedules of responses, see Joint response by respondents 821 and 822 to to matter ID/7 1B, Paragraph 2.7.1, line 12, and Paragraph 2.7.4, line 9, the latter of which refers to section 2 on pages 3,4,5 & 6 of the joint response, respondents 821 & 822, ID/7 1B, Joint response, respondents 821 & 822, ID/7 1B, Appendix_supplementary for that matter.

1.3 The group feels has put forward the view that that the approach to site allocation and spatial planning in the Midsomer Norton and Radstock area in particular has been sub-standard and that the actual capacity of the Somerset Valley area for business, retail and residential development has been overstated. This capacity, along with infrastructure and service delivery has a bearing on the total number of dwellings that can be delivered in the District and the degree of flexibility required in the District. Somerset Valley FoE has put forward the case, in responses reported and unreported in the schedules of responses (see Joint response by respondents 821 and 822 to ID/7 1B), that the ecological capital is overstated, the environment is under considerable threat, and it has been degrading. It has put forward information pointing to a considerable level of constraint to development and to poor infrastructure, which includes poor connection to the motorway network and public transport. It is not convinced by the reliance mainly on Great Mills in Midsomer Norton, the Peasdown Business Park, Midsomer Norton High Street and RAD1 as the job generation opportunities and is concerned regarding the impact of these on traffic levels and air pollution in Radstock centre in particular. Nor does it see evidence presented that shows the real impact of the allocation of a number of town centre sites in Radstock. The Midsomer Norton Town Centre Regeneration Plan appears to be an aspirational document, not that dissimilar to the aims in the Norton Radstock Community Partnership Challenge Fund submission in 1996 and the approach in the B&NES Local Plan; the underlying problems of the area and of implementation of policy that has seen out-commuting of 50% (B&NES Local Plan CD5/1, paragraph B2.27) rise to 60% in the wider Midsomer Norton and Radstock area (CD4/E6, section 1 paragraph 3), are not being tackled and the B&NES approach appears to have changed little. The group wonders how committed B&NES is to Midsomer Norton High Street, having just allowed expansion of the fiercely competitive Tesco store at Old Mills, Midsomer Norton. The lack of any economic studies for Radstock ahead of these decisions on housing capacity and spatial development in Radstock centre is particularly worrying, as is the lack of examination of credible alternatives, which are only now starting to be taken seriously in discussions regarding the economic direction of Radstock. The investigations into economic issues in Radstock is still at a fairly early stage. B&NES has not 'disproved' the socio-environmental case put forward by the Planning Inspectorate in 2006 regarding development of RAD1 (formerly NR2), set out in Appendix 2_Inspector's report, paragraphs 5.90 (not precluding a rail link), 5.91 (close to SSSI status and further work not undermining the 1999 findings), 5.92 (level of priority given to re-use), 5.93 (need to fully safeguard areas of significance for nature conservation), 5.94 (argument against use for regeneration and confine any development to areas not of significant value), 5.95 (low housing capacity), 7.123 (importance to a considerably lower number of rare and scarce species than were subsequently reported from 2005 survey work - these numbers were included in the unrecorded material sent by SVFoE in response to the Draft Core Strategy - see Joint response by respondents 821 and 822 to ID/7 1B, paragraph 2.7.4 , line 3, and Joint response, respondents 821 & 822, ID/7 1B, Joint response, respondents 821 & 822, ID/7 1B, Appendix_excerpts, paragraph 3.3, lines 25 - 30. The Nature Conservation-related Green Infrastructure opportunities of the Somerset Valley area are found almost entirely on former industrial sites and yet it is these same sites that are targeted for development. The enhancement and creation of cohesive functioning ecological networks in the Somerset Valley area and

linking it to networks south of the District is almost entirely dependent on utilising these brownfield opportunities. The mapping of the Nature Areas is based upon work that did not include brownfield habitats or UK Biodiversity Action Plan Priority habitat, Open Mosaic on Previously Developed land (see Joint response by respondents 821 and 822 to ID/7 1B, Joint response, respondents 821 & 822, ID/7 1B, Appendix_excerpts, 3.3, line 5 and 4.1, line 9) and so opportunities for enhancement through the Nature Area improvement route do not apply to this area in the main. Therefore, the plans for delivery of homes conflicts with delivery of CS Policy CP6 in the Somerset Valley area. The group feels that the ratio of 2/5 job per dwelling for the Somerset Valley area is unacceptable, given that the area already has high out-commuting and considering that ratios of 2/3 :1 and c 1:1 are proposed for the rural areas and Bath respectively, and that it and may even be over-optimistic.

1.4 The group raised the issue of compliance with RPG 10 (CD3/3) in Appendix 1 of the submission that was only partially reported in Schedule 1 in 822/1 (see Joint response, respondents 821 & 822, ID/7 1B, Appendix_excerpts of the Joint submission by respondents 821 and 822 on matter ID/7 1B, paragraph 2.2, bullets 3 and 4). The group took and still takes the view that the RPG 10 approach of concentrating development in the Principal Urban Areas (PUAs) of Bath and Bristol, and in urban extensions to the PUAs (RPG 10 Paragraph 3.2, Policy SS 2), is a more sustainable option in principle than the policy adopted in the Core Strategy, especially in the light of other regional and national policies. However, B&NES argues against extending the PUAs on environmental grounds. We consider that this approach is equally applicable in the light of the Draft RSS and Government policies. We consider that B&NES has not provided a convincing argument for sustainable absorption of the level of development planned for the Somerset Valley area, where good facilities and services do not always exist and where the proposals do not provide them and where the proposals increase the disparity between jobs and homes, such as in Radstock; we consider that its evaluation of spatial planning opportunities and impacts in the Somerset Valley area, Radstock in particular, has been poor - the following RPG 10 (CD3/3) policy is relevant to this argument - CD3/3 Policy SS 5; Paragraph 3.13; Policy SS 6; Paragraph 3.61 (Radstock sits in a rural hinterland and itself retains a distinctive rural nature); Paragraph 3.65 (scale of growth); Policy SS 19 (balanced mix of homes, jobs, services and facilities); Policy EC 6 (protect vitality and viability of existing centres); Policy TCS 1 (sustainable tourism, complement and enhance local environment to an appropriate scale; promote special cultural and heritage features); Policy TCS 2 (new cultural and leisure facilities in areas of under-provision and maximisation of positive benefits for the environment, communities, economy and visitors; identification and protection of recreational open spaces); Policy HO 5 (properly determine housing capacity including consideration of physical and environmental constraints).

1.5 In the context that the job creation plan using Smart Growth is overly ambitious, fewer houses would be needed for workers. B&NES appears to suggest that providing more housing than is needed to cater for the extra jobs taken up by B&NES residents (70% residential workforces assumed) would increase in-migration, increase out-commuting, and have a negative social impact in B&NES. It seems to us that it is

important to know what the socio-environmental impact are likely to be in the case where housing targets are achieved but where there is failure to meet job targets, and how high the risk of this is. It would appear that, if B&NES is correct regarding Green Belt development, a contingency for lower housing numbers is just as important as any contingency for higher numbers in the present economically unstable times and varying economic forecasts. We do not believe that to leave the matter of contingency until the second part of the plan period is a sensible approach, which we cover in paragraph 2.1 below.

1.6 Further arguments relevant to the above statements are made in paragraph 2.1 below.

2.1 We set out our comments in connection with Topic Paper 9 (CD6/S10) as a separate document, Appendix 5_TP9Comment which we summarise here with reference to individual paragraphs in the appendix:

1. Somerset Valley Friends of the Earth has read Topic Paper 9 and has drawn up its understanding in Appendix 3_TP9, section A, which we include in case the Inspector considers it necessary to look at it to be clear on our understanding of B&NES' view at any point.
2. The group has drawn certain conclusions about its understanding and points out matters that we are unable to draw conclusions from or are unclear about in Appendix 3_TP9, section B.
3. The group considers the anticipated housing delivery rate to be over-optimistic and not properly assessed in the SHLAA (Appendix 5_TP9Comment, Paragraphs 2.3, 2.4, 2.7)
4. The group considers that delivery of brownfield housing numbers is over-optimistic (Appendix 5_TP9Comment, Paragraphs 2.5, 2.11, 2.12, 2.13, 2.14 & 2.15.)
5. The group considers that an aspirations-led approach in the absence of sufficient baseline information and evidence has hampered B&NES efforts to evaluate constraints and realistic delivery figures (Appendix 5_TP9Comment, Paragraphs 2.6, 2.7, 2.11 & 2.18)
6. A joint Bristol/B&NES urban extension may be a more sustainable option and reduce the risk of the area becoming a commuter area for Bristol, especially regarding increased role of the Somerset Valley area as a dormitory area Appendix 5_TP9Comment, Paragraphs 2.7 & 2.17, 2.18)
7. There is insufficient weight given to the social and economic contribution of wildlife and ecosystem services (Appendix 5_TP9Comment, Paragraphs 2.8, 2.11)
8. The group considers the anticipated job creation to be over-optimistic and that the economic downturn is likely to impact negatively on the Somerset Valley area in a disproportionate way (Appendix 5_TP9Comment, Paragraphs 2.9)
9. The group cannot see justification for the view that increased social impacts from migrants out-competing residents in the housing market will have no economic impact on the District (Appendix 5_TP9Comment, Paragraphs 2.9)
10. The group considers that the planned district-wide scale of provision for jobs and homes related to those jobs is not justified because the provision of jobs appears overly-

optimistic and provision of those houses would increase out-commuting from the District whilst further impoverishing the nature conservation resources of the District and increasing pressure on the environment; this would act against Climate Change policies set out in CD2/2. It considers the environmental impact on the Somerset Valley area to be unacceptable and that B&NES has failed to properly examine the role that Radstock will play regarding its contribution to the housing figures Appendix 5_TP9Comment, Paragraphs 2.10, 2.11 & 2.18)

11. The group considers that the contingency of review in the second part of the plan period is not sufficient (Appendix 5_TP9Comment, Paragraphs 2.11)

12. The group considers that the arguments that B&NES makes against Green Belt development should be applied equally to other parts of the District, particularly the Somerset Valley area, that the CIL should be used to level the playing field regarding Green Belt, greenfield and brownfield development, and that some Green Belt development may be more sustainable than some brownfield development is assumed to be; (Appendix 5_TP9Comment, Paragraphs 2.12, 2.13, 2.14, 2.15, 2.16, 2.17 & 2.18)

13. The group considers that there is an unacceptably high pressure on brownfield development that will lead to failure to meet other objectives (Appendix 5_TP9Comment, Paragraphs 2.14).

14 The group considers that the present spatial approach and housing allocation in Radstock hinges on delivery of RAD1 and the road infrastructure that enables it, that this should be reviewed in the light of national policy PPS 1: Planning and climate change (CD2/2), PPS4 (CD2/5), the White Paper, *The Natural Choice: securing the value of nature* (see Appendix 4_article), the 2011 UK Biodiversity Strategy, *Biodiversity 2020: A strategy for England's wildlife and ecosystem services*, the view of the Inspectorate in 2006, the likelihood of achieving an extension on the non-actionable outline permission for RAD 1 (see Appendix 5a_REN) and the risk to Radstock town from non-delivery on an alternative use of the site through planning blight should deliverability of the present development model be included as an option within the Core Strategy. The group considers it inappropriate to leave these decisions to the Placemaking and Green Infrastructure SPDs Appendix 5_TP9Comment, Paragraphs 2.8, 2.11, 2.15 & 2.18)

15. We do not believe that to leave the matter of contingency until the second part of the plan period is a sensible approach (Appendix 5_TP9Comment, Paragraph 2.11)

Issue 1 has the following appendices:

Appendix 1_SVF_DCS: first two paragraphs of the response recorded in 822/1 of Schedule 1 followed by some of the supporting material submitted on the same on-line form, but not recorded in Schedule1

Appendix 2_Inspector's report: relevant chapter excerpts from the Inspector's report on the B&NES Local Plan

Appendix 3_TP9: SVFoE understanding of the B&NES statements, views and conclusions set out in Topic Paper 9 and the group's conclusions about that understanding

Appendix 4_article: Article from British Wildlife, August 2011, on the Defra White Paper, The

Natural Choice: securing the value of nature.

Appendix 5_TP9Comment:- SVFoE comment in connection with Topic Paper 9

Appendix 5a_REN : SVFoE summary comments regarding the application to extend the 2008 outline permission for development on RAD1.