

Issue 1
Appendix 1
Respondent 822, Somer Valley Friends of the Earth

Contents:

first two paragraphs from one of the on-line submissions on the Draft Core Strategy by Somer Valley Friends of the Earth, concerning soundness and legal compliance (822/1)

excerpt from the material submitted on the same on-line form by Somer Valley Friends of the Earth as part of that submission (822/1), but not recorded by B&NES in the Schedule 1 responses

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Somer Valley Friends of the Earth

Production of the Core Strategy and impact upon content and appraisal

not legally compliant, not sound

not justified, not effective, not consistent with national policy

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Our opinion is that the baseline information supplied to the public has not been available to it is the right types and quantities early enough in the process and has not complied with PPS 12 in this regard; the Statement of Community Involvement includes that information is provided to the public and we assume that this statement, although vague, means that it is compliant with Government guidance governing the production of the LDF and the Core Strategy; we are inclined to think that, therefore, the production of the Core Strategy does not comply properly with the SCI.

Somer Valley Friends of the Earth raised the problem of inadequate baseline information with the Secretary of State at the Pre-production stage of the Core Strategy development, and received a letter from Government Office of the South West expressing its concern that indeed the council was not complying with the front-loading evidence-based approach, and its hope that the Council would rectify this before the Options stage. The council did not rectify this by the Options stage and went on to consultation and a decision upon which options would be taken forward without sufficient evidence for adequate public consultation. The evidence base is insufficient even now at this late stage and key information is not available; information needed includes data on noise and air pollution, the Green Infrastructure Strategy and a comprehensive identification of the existing green infrastructure, an audit of the biodiversity resource and condition of local wildlife sites; meaning ful data on the types of housing provision that it is feasible to provide on sites in areas such as Radstock where there is a need to address out-commuting and air quality issues; and job statistics (losses of jobs in the Radstock and Midsomer Norton area and in the Somer Valley area between 2006 and now (as the jobs increase proposed is on the 2006 level and many jobs have been lost here since 2006). Although a six week period has been given for consultation on the Draft Strategy which has included the Christmas period and so has been sub-ideal, the problems associated with the preceding stages have meant that members of the public wishing

to respond to the Draft have undertaken within that six-week period a task that would have been smaller had the front-loading approach advocated in PPS12 been adopted by the Council.

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Text of response to Options document by Somer Valley Friends of the Earth:

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

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Overview

The Core Strategy Spatial Options consultation suffers from the same flaws as the Core Strategy Launch document in two key ways. These are the insufficiency of the evidence base at this stage and the failure to adequately integrate natural environment matters into the overarching spatial vision for B&NES.

There is an insufficient evidence base to properly inform the public or, indeed, to properly inform decisions on the Council's own preferred options. This works 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 launch document specifies a number of B&NES studies that are either not published or not yet complete, the Business Growth Land Study, a Retail Strategy study, a Housing Needs study, a Built Sports Facilities Strategy, and a Playing Pitch Assessment. Of these, only the first two have been completed. The Business Growth Land Study makes various analyses, but itself is not informed by sufficient data. For example, no data is available on earnings in local areas in B&NES. Given that the study forms part of what is described as an "ambitious growth agenda", such local data is important when considering the options presented by B&NES in this round. Somer Valley FoE has not looked at the Retail Strategy in any detail at this time.

The launch document promised an SHMA for the District, to provide information on the current housing stock and on the demand and need for additional housing by size, type and tenure. A strategic housing market assessment has been provided in the Evidence Base for the West of England, not for the District. Consultation has been done on a B&NES Strategic Housing Land Availability Assessment (SHLAA), but no assessment of the findings has been released. This CallforSites consultation document states that the assessment findings of the SHLAA will be particularly relevant to the generation of strategic options for delivering new housing as part of the strategy. The SHLAA will not only identify available land, but also re-examine existing proposed sites and assess the developability/deliverability of sites. It sets out an approach to the assessment of dwelling capacities in the District that might be pursued in developing the LDF.

The B&NES Green Spaces Strategy failed to address key PPS17 issues, yet no other strategy has

yet been worked up to fill these gaps and the information upon which this would be based does not appear in the Evidence Base. The Core Strategy document flags up Green Infrastructure and Nature Conservation in several lists of policy tools, but there appears not even to be consultation documents on these available, which suggests that these are to 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.

Such key documents should have rightly been available in the last round of consultation to enable the front-loading process required in Government planning policy to take place. It is ridiculous that they are still not available at the point where the public is being asked to put forward opinions on strategic development options.

There is a need to work up the Core Strategy in tandem with other strategies. There are still unplugged holes in the strategic approach. There is 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 upon which we depend.

The natural environment and its role in the Spatial Vision for Bath and North East Somerset

The proposed Spatial Vision for B&NES starts by saying that it is the spatial expression of the Sustainable Community Strategy and the Council Vision. It then flags up vibrant communities and an exceptional urban and rural environment in its vision for 2026. The Government's account of Sustainable Communities clearly includes biodiversity and wildlife matters, which appear to be absent from the Spatial Vision for the District. The UK Sustainable Development Strategy includes the following to illustrate the point:

As the Deputy Prime Minister made clear in a statement in February 2005:
“Creating Sustainable Communities means putting sustainable development into practice. Sustainable Communities must combine social inclusion, homes, jobs, services, infrastructure and respect for the environment to create places where people will want to live now and in the future.”

It goes on to say that Sustainable Communities embody the principles of sustainable development at a local level by *balancing and integrating the social, economic and environmental components of their community, meeting the needs of existing and future generations, and respecting the needs of other communities in the wider region or internationally also to make their communities sustainable.*

If part of a local area is of wildlife and biodiversity value, it is an environmental component of that community, whether it be in a rural or urban setting. The Sustainable Development Strategy also flags up the importance of an environmentally sustainable physical environment as one of the five key drivers of Sustainable Communities. Such a physical environment and the need to meet the needs of existing and future generations requires that the value and quality of the natural environment is respected and nurtured. In order that this happens, it needs to be part of the Vision.

To leave out the need to conserve and enhance the wildlife and biodiversity resource in the UK from the Vision suggests that this aspect does not have the high and equal importance in B&NES that the Government gives to it in its various policy documents.

The impact of climate change on biodiversity and ecosystems will be significant, yet this is not even acknowledged in the B&NES Headline Objective, "Tackle the causes and effects of climate change". Ecosystems become less stable as they lose biodiversity; unstable ecosystems are more vulnerable to change; they fail to operate properly under adverse conditions and even collapse. It is those ecosystems that help to sink carbon, that provide sources for new medicines, that allow habitat to continue to support insects that pollinate crops and prey on crop pests, and that help maintain the sort of countryside and wild spaces that people enjoy now and have a right to enjoy in the future. Biodiversity as *"a key issue in everything we do ...a main thread"*, as envisaged by the B&NES Chief Executive at the launch of the B&NES BAP, *Wildthings*, appears to have been sidelined. To *"provide homes and jobs in a balanced way in sustainable locations"* and to *"maintain the diversity and high quality rural environment"*, are the only part of the B&NES Vision that seem to apply and they are insufficient to do justice to the importance of nature conservation in the UK and B&NES.

If the B&NES view is that matters of wildlife and biodiversity have a lesser relevance to Sustainable Communities in B&NES, then the Vision needs to incorporate a wider sustainability model.

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