

Radstock Action Group

**The deliverability/developability of the sites
in the SHLAA (CD4/H14)**

A Response To The B&NES SHLAA Statements For The Somer Valley

1. We regard the B&NES assessment of the relationship between self-containment and self-reliance as articulated in the Somer Valley session for the Draft Core Strategy, as indicative of the acceptance that the SHLAA statement can only be delivered at the expense of the future sustainability of Radstock. It revealed that the authority accepts that the only result of the proposed housing is based on the premise that there will be unsustainable out-commuting over the entire period and that Radstock will become a housing development of dubious quality, on a cross roads for major roads in the Somer Valley.
2. We regard this as unacceptable for the reasons we have already stated in our initial response; others, particularly looking at the economic merits of such a scenario may well conclude that housing in such a setting may not be particularly easy to sell and that they might be better off concentrating their development plans elsewhere. The provision of affordable housing seems likely to be threatened due to economic pressures related to this very same scenario. Thus the aspirations of the Core Strategy/SHLAA are immediately called into question.
3. We find it extremely difficult to comment fully on the Radstock Site Assessments as it is increasingly the case, as illustrated at the Somer Valley session, that key issues are not open to public scrutiny and we have to accept B&NES assertions.

For example:

- a. There has been no attempt to define the likelihood of the HCA funding any aspect of the housebuilding for RAD 1. The Inspector should not confuse the money which is likely to be forthcoming for the deeply unpopular road scheme with possible HCA funding for homes on the site. Should the HCA choose to apply its own criteria for funding, RAD1 would fail the test and if this were to come about, then the social housing would presumably be undeliverable.

- b. Given the poor levels of accuracy and the misleading statements made by the council in the Somer Valley session, we doubt the accuracy of many of the statements contained in the parts of the SHLAA site assessments pertaining to Radstock.

For example, reference is made to Clandown School which has not been in use as a school for at least five years; reference is made to planning permission for three houses within the curtilage of Five Acres and states that the permission has lapsed – what it fails to state is that two of the three houses have been built, thus contributing to the housing numbers in Radstock. This means that houses which are being built continuously are not being added to the total and will force consideration of other building site developments to meet targets which are not being adjusted as building takes place; despite assertions from B&NES to the contrary, there is no up-to-date Safety Audit of the proposed new road scheme which B&NES has agreed as an essential part of new housing on RAD1.

- c. Additionally we cannot detect a clear and definable set of criteria relating to the suitability of any given site for housing development and suggest that site assessments vary according to a range of political rather than social or economic values which will always be subject to changing whims of elected policy makers. Such confusion guarantees less certainty and militates against a firm assessment of the chances of deliverability.
- d. The exact extent and boundaries of the Somer Valley remain unclear. This means that we cannot check whether the same area has been used for all measurements such as levels of unemployment, house purchase patterns, household spend patterns. Unless these are all dealing with the same area then we cannot make any conclusive judgments about their validity and thus about whether or not housing is being rationally addressed.

- 4. Many of the sites have clearly provided employment and they are being converted into housing thus determining the fate of Radstock and the continuing decline of employment possibilities in the town. It will be the balance between employment and housing which will underpin housing development to a very large degree.
- 5. S106 requirements quoted in several cases suggest that new residents welcome packs and free bus tickets should be provided. This reveals a very simplistic and superficial attitude to the problem which obviously informs this requirement, illustrating the lack of self-reliance/sustainability forecast

for the town and a recognition that car travel is likely to worsen, public transport infrastructure declining too and this making the housing unattractive to potential purchasers or renters.

6. At the Somer Valley hearing, the council stated that there is a new planning application in existence in relation to RAD1 – this is not true. The defensive stance of B&NES underlines that the site is not necessarily deliverable and that their constant modification of plans reflects that the housing may well not be deliverable within a framework which adequately reflects the issues referred to in Core Strategy Strategic Issues 5.12
7. The jobs numbers throughout the Draft Core Strategy refer to data available when it was written, since which time there has been a nett loss of jobs in the area. Thus any job creation will first have to recuperate that loss prior to creating additional jobs to address new residential developments. Is it reasonable or realistic to expect investment in the type of housing in the Site Assessments given the poor employment prospects coupled with poor communications with the rest of the Somer Valley and the wider region.
8. A previous inspector determined that only 50 homes should be built on the site during the period of the report. There is no argument made to support new numbers on the scale suggested and it is questionable whether such high target numbers are achievable.
9. A number of key elements of the original scheme have been abandoned by B&NES. For example, the principle of pepper potting of social and private housing has gone; according to B&NES at the recent exhibition held to promote their idea for RAD1, member of the public were told there would be no parking dedicated specifically to residents and that they would have to park on the public highway; the individual units in the old, now abandoned Bellway plans are at the smallest end of the regulatory requirements for sizes of rooms; infrastructure and services for new residents have now all but disappeared. It remains to be seen what the approach of any new developer will be to such requirements. Contrary to statements at the Somer Valley day of the examination, no actionable planning permission currently exists, a new planning application has yet to be submitted. The authority appears to think that they have a developer; any plans will have to go through the permission process and it is likely

that there will be considerable public opposition.

10. B&NES Core Strategy suggests that throughout the Somer Valley they will enable up to 2,700 new homes to be built, but these will be matched by only 1000 new jobs. These figures call into question the deliverability of the whole project as it lacks definition, clear strategic under-pinning and a lack of detail.
11. A reading of the Site Assessments suggests that Radstock has been 'raided' for any possible 'housing patches' It is doubtful whether any builders will emerge to construct any dwellings at all let alone affordable housing on many of these sites which are challenging in terms of topography, space and contamination issues. Construction will be more costly and will be unlikely to be as attractive as large expanses which require relatively little remedial work and which are often far more tied into transport and services infrastructure.
12. Were Radstock to have all the building indicated as possible in the Site Assessments, there is every indication even from the remarks made within the Site Assessments that there would be major negative impact on roads and thus on the quality of life for those who live and work in the town. Even trying to construct on these sites would present very challenging logistical problems.
13. The current interest being expressed by B&NES in live-work units should not be allowed to distract from the real issue. For the majority of currently and potentially unemployed people this is not a solution and, given the unattractive character of the Radstock that will emerge it is unlikely that anyone looking for a live-work unit would choose the town which will be plagued by transport and traffic problems and suffer from congested housing developments of poor quality.
14. Radstock developments are based on the principle that GBBR proposals will benefit the area and will be reflected in planning. We doubt it – B&NES is the authority which, recently, one week opened a short stretch of bus lane on the A367 coming into Odd Down, at enormous expense, only then to preside, with total equanimity, over a 25% cut in daytime bus services between Radstock and Bath on the A367.

15. Decontamination costs not acknowledged on RAD1 whereas they are cited as a reason for some other sites being unsuitable for development. It is known that the decontamination processes will be complex and challenging and the costs will be very high, but nowhere is this acknowledged in RAD1. Either B&NES is going to abandon adequate decontamination or a developer willing to undertake this activity will have to be found. There will certainly be considerable public concern if there is inadequate decontamination.
16. The reinstatement of the railway is of particular relevance to any possible housing development in Radstock. It was, therefore, unacceptable to hear B&NES stating that the terminal could not be built in the area covered by RAD1. The railway path is protected for sustainable uses and it is likely that covering it with houses will breach this protection. We are equally dismayed that the reinstatement of the rail-link to Frome appears to have been taken out of the Draft Core Strategy though it was voted to put it in following work on JLTP3 and the inclusion in the RUS as a stakeholder aspiration.
17. Flood risk remains an issue especially for RAD1 and with at least one person known to us and resident in Waterloo road, having been refused house insurance because of the flood risk, it seems questionable whether flood risk has been adequately addressed for new developments in the centre of town.
18. The Post Office site in Radstock is designated (RAD5) for redevelopment as housing – this will be a loss of 60 jobs. When will the planners decide that the replacement of work places by housing has reached saturation point and call a halt? Unless we know the answer to this question, doubts must remain over any judgments as to the deliverability or developability of any sites.
19. Unfortunately, once the Site Assessments have been examined, the draft Core Strategy appears increasingly as a piece of carefully constructed rhetoric which doesn't match the reality of B&NES wish to deposit all its housing requirements in Radstock which will be changed beyond recognition. Once this becomes apparent to developers and the general public, criteria for deliverability and developability will also change beyond recognition.