

Issue 1 Changes
Response from Somerset Valley Friends of the Earth

1.0 Monitoring and review changes

1.1 The monitoring B&NES has suggested looks at meeting housing need and employment space creation, types of space and net jobs change in order to assess whether the targets are being met (delivery) and also to assess whether the targets remain relevant (appropriate targets) in order to inform reviews (B&NES 24, para2). B&NES has now proposed area-specific job targets and associated job indicators. However, its monitoring will not look at the homes/jobs ratio, as it is aiming for achieving that ratio by 2026 and it expects it not to change substantially.

1.2 We consider that the homes/jobs balance by sub-area is an important measure of the effectiveness of the relevant policies in the Core Strategy, in order to reduce travel and mitigate the impact of climate change, a key pillar of Government planning policy, and to avoid unnecessary negative social impacts on communities, such as in the towns and villages of the Somerset Valley area, where an excessively high ratio of homes to jobs is proposed in the first place .

1.3 If the housing targets are met, yet job creation is under-par, with no need to respond to a homes/jobs indicator within the monitoring process, there will be no appropriate response at review.

1.4 We do not consider that it is sufficient to make assumptions for the sub-areas based upon the economic growth forecasts from the OBR as well as from bodies such as Oxford Econometrics. If B&NES is to respond to local conditions, which is its justification for rejecting LEP and Regional housing/jobs figures, we feel it must back this up with adequate monitoring of the performance and delivery in the sub-areas. Without this, the justification is weak at best.

1.5 Somerset Valley Friends of the Earth considers that it is important to monitor the relationship between resident workforces and jobs

2.0 Suggested change

2.1 Somerset Valley Friends of the Earth suggest the addition of sub-area homes/jobs ratios as indicators and that the homes/jobs ratio at sub-area level be monitored.

3.0 Housing target increase to 11,500 and contingency

3.1 Somerset Valley Friends of the Earth takes the view that the identification of 200 uncounted housing capacity units in the SHLAA does not justify increasing the housing provision.

3.2 B&NES has put forward arguments that relate the housing number to the capacity to generate jobs in the District in Topic Paper 9 and elsewhere. This does not tie in with increase of dwelling numbers because it looks as if more can be fitted in.

3.3 B&NES now appears to argue that unless one of the key pillars for consideration is unsound, the matter of contingency should not be re-visited (B&NES 26, para 2,4). We consider that the strategy for provision of dwellings in the Somerset Valley area and the chosen jobs/homes ratio for that area is a key matter which is unsound.

3.4 We can see no convincing argument for why the homes/jobs ratio of 2.7 for the plan period should be considered appropriate for the Somerset Valley area when it is accepted that the homes/jobs ratio is already unacceptable in the area and that out-commuting is high and car use for trips to work very high. It is difficult to find the information required to be able to say exactly what the present ratio is for the Somerset Valley area.

3.5 Using the B&NES figures from the local economic assessment (SD4/E7, Appendix 2, paras 7.33 and 7.37), the homes/jobs ratio is 1.34, but this uses a 2008 figure for jobs and a 2001 figure for homes. There were a considerable number of homes built in the Somerset Valley area between 2001 and 2008. Combining the 1.34 ratio with the planned increase in homes and jobs for the Somerset Valley area leads to a ratio of 1.44. However, factoring in the changes to the number of homes built in the Somerset Valley area between 2001 and 2008 and factoring in changes to the employment offer in that time increases the ratio further. Add to that the discrepancies in the evidence base regarding job losses (Smart Economic Growth para 4.35 and Table 4.4) and the possibility of much higher numbers and large margin for error (lower and upper manufacturing job loss figures of 400 to 1000 in Smart Economic Growth para 4.34), the ratio could already be higher still and higher in the future.

3.6 We note that at the Options Stage, one of the two options provided a jobs/homes ratio of about 1:1 for the Somerset Valley area and the sustainability appraisal considered this to be the more sustainable option.

3.7 We have argued that B&NES has failed to appraise the capacity of individual sites in the SHLAA correctly and that it has disregarded matters that have a bearing on environmental sustainability, local economy and social benefit when working out site capacities. Further, we consider it unrealistic to assume, as B&NES appears to, that all the SHLAA sites can be delivered. The SHLAA is riven with caveats and uncertainties, such as the need for parking assessments to determine whether a site is deliverable. We have pointed to uncertainties and problems with delivery of individual sites in our February representation regarding the SHLAA.

3.8 We have submitted much information relating to the unsuitability of the overall spatial policy for Radstock, which hinges on the delivery of the RAD 1 site and associated road infrastructure as the catalyst and is part of a long-standing ambition associated with delivery of this suite of sites on the part of B&NES. We have submitted much

information relating to what we deem the inappropriate allocation of RAD 1 for housing in the SHLAA. We have pointed out the nature of the drivers behind delivery of this site and spatial policy and suggested that there are major drivers at play that are not planning-based .

4.0 Somerset Valley Friends of the Earth suggested changes and actions

4.1 Somerset Valley Friends of the Earth suggests the following:

1. The overall housing number should not be increased, but decreased, pending review, and subject to a contingency that allows for higher numbers if they can be provided in an environmentally sustainable way
2. The Somerset Valley sites in the SHLAA and the strategic spatial policy for the Somerset Valley area should be re-appraised as part of the Placemaking Plan process and associated boundary review (CD5/27, para 4.15a)
3. The present jobs/homes ratio in the Somerset Valley area should be presented and used in economic analysis by B&NES and further socio-economic investigations undertaken to determine the homes/jobs ratio that can be achieved for the sub-area in a socio-economic and environmentally sustainable way
4. The number of houses to be allocated in the Somerset Valley should be reduced to bring the homes/jobs ratio into line with the 1.39 homes/jobs ratio if that ratio is found to be sound in the light of sub-area circumstances and environmentally sustainable (or other appropriate ratio in this context)
4. The homes/jobs ratio in the Somerset Valley area should be monitored and housing numbers adapted on review in a way that maximises take-up of local jobs by local people, reduces in- and out-commuting and is environmentally sustainable