

Objection to Planning Application: 12/05418/FUL
Erection of foodstore and petrol filling station with associated development

Radstock Action Group wishes to object to the above application. Whilst we argue that such a permission would have very serious negative consequences for the whole Somer Valley area, we concentrate on the matters as they impact on Radstock.

General Remarks

1. Radstock is a very special place. It has an outstanding town centre, is surrounded by beautiful countryside, and maintains a range of small shops and a supermarket, all of which combine to present an attractive retail offer which is complemented by its pubs, cafés, service sector and cultural offering including the museum and library. Opportunities for walkers and cyclists are well established and continue to attract new visitors to the town.
2. Radstock needs regeneration, including workplaces within the town and more housing. It would benefit from improved public transport and from less dependency on Bath for work opportunities.
3. Radstock Action Group views the tourist potential of the town as a major asset. This major asset will be seriously compromised if the Authority allows inappropriate development in the area. One has only to consider the negative impact on the countryside surrounding Peasedown to know that such 'shed-like' developments as the 'Bath Business Park' bring few jobs and present an eyesore to those enjoying the natural amenities for miles around. To agree this application would further diminish the area and could be construed as the start of even more serious out-of-town development.
4. Radstock needs to retain its special character which includes its vibrant town centre. Shops are at the heart of any thriving community and Radstock is no exception. But a major superstore, amongst the biggest in the country, would only serve to destroy the trade in the town.
5. As a part of the Somer Valley, we wish to work closely with all those who are involved in developing the commercial, tourist and employment potential of the area, aiming to encourage public transport links, innovative employment opportunities and variety in all the local towns and villages that make up the area. Maintaining the distinctiveness of each and every community will be central to the success of this plan.
6. On two separate occasions in the past 15 months, B&NES has rejected planning applications from Tesco, 12/01999/EFUL and 11/03824/FUL, one to build a new store in Bath and the other to build an extension to the Paulton store. We regard the grounds for rejecting the applications as perfectly valid and equally so, with the exception of the matter of the gas-holders, for this application by Sainsbury's to build in Westfield. Copies of the two relevant documents are attached to this application.

7. Our response cannot hope to address all of the many problems that are apparent in this application. We do not have the resources that are available to a large corporation such as Sainsbury's and our comments are, of necessity, only able to look at some of the many negative impacts that the granting of planning permission would have on Radstock.
8. Radstock Action Group deplores the presence of so many deskstudies. It would be entirely irresponsible of any planning authority to grant planning permission on the basis of so many limited and tokenistic statements regarding such key issues as archaeology and contaminated land, to name but two.

Major Reasons for objecting to this application

1. *Diminishing Employment Opportunities*

- 1a. The application is for a development on land designated for industrial use. By removing this land from industrial use, and its replacement with retail, there will be a loss of jobs. Sainsbury's have already said that there will be a maximum of 100 full-time equivalent jobs composed of 50 full-time and another 100 part-time. This is fewer than are currently employed on the site.
- 1b. Furthermore, there will be additional job losses as traders in the town centre of Radstock are forced to close or scale back their operations.
- 1c. Paulton provides clear evidence of the negative impact on a small town centre of a major supermarket – the town centre has declined to almost nothing and jobs have gone, the character of the place has been diminished.

2. *Traffic Impact*

- 2.1 The application states that there will be 461 car parking spaces, plus 25 disabled people's parking bays and 30 cycle spaces. There is no provision being made for public transport on the site, with the applicant citing the current public transport arrangements as suitable.
- 2.2 Supposing that each of the car parking spaces is used at least once every two hours and that the store is open for 12 hours per day, except Sunday when it is likely to be six then this would produce roughly 36,000 inward and the same number of outward journeys per week. We have deliberately kept this to the conservative side, but suspect that the volume would be much higher. The roads through Radstock are already constantly busy and cannot withstand such massive increases. There will be increased risk to other road users and pedestrians, plus vastly increased noise and air pollution. This is unacceptable and contradicts the Local Plan, for example, in B6.29 and B6.30, together with Policy ES.9.
- 2.3 This will be exacerbated by the arrival and departure of delivery and service vehicles.
- 2.4 Increased risk will be created at the junction of the main road with the entrance/exit and will slow down other traffic which is passing through.
- 2.5 The fabric of buildings in the town centre is already suffering from the effects of pollution, as noted by the continued presence of Radstock in the English Heritage At Risk register (www.english-heritage.org.uk/publications/har-2012-

[registers/sw-HAR-register-2012.pdf](#)).

3. *A Threat to our Town Centre*

- 3.1 As already noted, the arrival of a very large retailer who will sell far more than foodstuffs, will lead to further pressure on our local independent traders who, together, provide a unique and increasingly diverse range of products and services. Once a few are forced to close, a continuing spiral of decline is inevitable and we will be left without a town centre.
- 3.2 Roughly one third of the goods will be non-food items, so threatening hardware stores, clothing sellers, kitchen and household appliances, gardening equipment providers and so on.
- 3.3 Of course, the applicant claims their presence will enhance other retail activity – this will not be the case, as shown in other places, such as Shepton Mallet.
- 3.4 Sainsbury's own list of primary and secondary catchment areas shows clearly that they intend this to be a regional store and that the local population is almost irrelevant. Given the fact that they cite Frome as one of the secondary catchment towns, there is very serious cause for concern since Frome has a very large Sainsbury's already, but will be 'out-classed' by any new outlet as proposed in this application.
- 3.5 The proposal is at odds with government commitment to keeping shop in town centres. The sequential test as clearly stated in the House of Commons SN/SC/1106 which is discussed further later in this document, is not met.

4. *Environmental and Building Practice Concerns*

- 4.1 The BREEAM pre-assessment statement in the application reveals that the applicant will do as little as possible in terms of good practice in relation to building materials and environmental impact issues as they can get away with if they are to be given planning permission.
- 4.2 For example they are not seeking Indoor Air Quality credit because, in the words of their own assessment, 'This credit is not possible to achieve given the car park represents an external source of pollution within 20 metres from the store'; Reduction of CO2 emissions is not sought; credits for standards for water management are not sought Anyone reading the pre-assessment need only look at the explanations offered or why certain targets are not achievable or the applicant is not seeking credit to be aware that this development would not be anything more than a very basic operation and would certainly not win any plaudits for enlightened best practice in environmental terms. Such developments will only harm an already stressed natural and built environment.
- 4.3 We note with alarm the statement that 'the site lies within a likely zone of mining influence and it is considered that past coal mining activities may pose a risk to the proposed development. Notwithstanding this, it is reported that any ground movement from the past underground coal mining activities should have ceased'. This does not mean that the contamination threat has disappeared.
- 4.4 Similarly, the complacent approach to the issue of Radon does not reveal an in-depth analysis of the exact impact and whether or not any remedial work is

- possible.
- 4.5 We also viewed with concern the statement in the conclusion that 'the site was considered to be of moderate environmental sensitivity predominantly due to the reported presence of the underlying Secondary A Aquifer and the close proximity to a number of springs and a drain. In addition, the site is reported to be within a DEFRA Nitrate Vulnerable Zone.' There follows a complacent and groundless statement that no serious threats were identified during the assessment, an assessment which is described as follows 'it was noted that the extent of the site investigation was restricted due to the operational factory buildings and live underground services'. This total lack of commitment to a real survey of all relevant issues should be grounds enough for rejecting the application.
5. *A Deliberate Attempt to distort the Worth of Radstock and to ignore the Obvious Damage to Radstock and other communities*
- 5.1 The conclusions for the retail statement include the following:
'Overall, in the light of our detailed analysis, it is concluded that the proposed development: satisfies the sequential approach to site selection; will not give rise to significant adverse impacts on investment in the town centres or their continued vitality and viability; will significantly improve expenditure retention in the Midsomer Norton/Radstock catchment area in line with the emerging Core Strategy goal of achieving greater self containment'.
There is absolutely no supporting material for any of these assertions.
- 5.2 'The impact assessment has considered the potential impact of the proposal on the defined centres of Midsomer Norton and Radstock. The assessment demonstrates that the proposal will not result in an unacceptable impact on: any proposals for investment in Midsomer Norton or Radstock town centres'. It most certainly does not.
- 5.3 We found the retail assessment of Radstock inaccurate, misleading, patronizing and unconvincing. In the interests of the continuing viability of the town the retail statement should be rejected.

The Local Plan (Adopted 2007) – its relevance to this application

Despite the existence of the adopted B&NES Local Plan, the application contains numerous proposals which are contradictory to the Plan or which will promote infrastructure changes which are at odds with the declared overall strategy. We have selected a few points here to illustrate this and would like to emphasise that we find nothing in this application which supports the ideals or the strategic objectives which allegedly underpin the Local Plan:

- A1.2 states 'The Local Plan will also help protect and enhance the character of places that are locally valued and identify areas which would benefit from improvement'. The introduction of a huge supermarket such as that proposed will have the opposite effect, endangering the viability of places which are valued, in particular, the town centres of Radstock and Midsomer Norton plus the many surrounding smaller shopping centres, as well as leading to the deterioration of

the same areas through the introduction of huge volumes of traffic, both private cars and delivery and service vehicles.

- Section B2 identifies four building blocks underpinned by the themes of sustainability, partnership and inclusion (p.37):
 - *Business creation and growth*: Supporting the creation of new businesses and promoting sustainable economic growth in key future employment sectors.
 - *Community Regeneration*: ensuring that all sections of the community of Bath & North East Somerset can participate in and benefit from the area's prosperity
 - *Environment and infrastructure*: Seeking an integrated approach to transportation issues which will meet future economic needs and maintain a high quality of life locally.
 - *Skills and Training*: Promoting a lifelong learning culture amongst employers and the workforce which will address skills shortages in an ageing workforce.

The current application directly contravenes these objectives by militating against sustainable economic growth and the creation of new businesses, rather tending to destroy current businesses and taking space which is designated for industrial use. Additionally, the application makes it clear that there is no intention of being involved in an integrated approach to transportation, choosing instead to avoid any public transport improvements and favour private car use which will simply diminish the quality of life of those who live in the area, owing to worsening air and noise pollution and increased traffic congestion. The application deals only with the facilitation of the use of private cars, many of which will be coming from very considerable distances as detailed in the primary and secondary catchment area statements. Furthermore, with the loss of industrial employers in favour of retail which will use very limited numbers of unskilled employees with no chance of skills enhancement, there will be a loss of declared intentions of encouraging skills development in high tech employment situations. Amongst those bodies to have declared that they favour this approach is the B&NES backed Radstock and Westfield Economic Forum which has repeatedly stated that we need to develop employment opportunities where young people can either take on apprenticeship type roles or develop skills whilst working. We should be encouraging new industries into the area to promote such objectives, but with land being given over to supermarkets we will lose current industrial employers and deter others. Table 2: Business Employment Change and Floorspace Requirements (p.40) provides graphic evidence of the dangerous spiral of loss of space and opportunities since 2001. It quite simply is inappropriate to be proposing retail in a situation where industrial is being lost at such an alarming rate.

- According to B2.37 'The Council will therefore strive to ensure that the managed

reduction in industrial floorspace does not unduly erode the number of local employment premises which are still capable (or potentially capable) of offering viable accommodation to business occupiers in terms of location, condition, layout, vehicular access, accessibility to employees, environmental and "bad neighbour" issues, etc.' And yet this application will certainly erode the number of local employment spaces.

- According to the section (B5) on **Shopping** (p.73): B5.1 Shopping is a fundamental part of day to day life. The availability of a good range of convenience and comparison shops makes an important contribution to people's quality of life. Convenience shops are those that sell essential goods, principally food, and comparison shops generally sell durable goods e.g. clothes, shoes, electrical items etc. B5.2 The strategy of Balanced Communities means providing for a choice and diversity in shopping, ensuring that it is accessible to all especially those without a car. B5.3 Shopping provision is primarily focused in town, district and local centres which also provide a range of other services and facilities. PPG6 (Town Centres and Retail Developments) and the JRSP stress the importance of maintaining and enhancing the vitality and viability of these centres, as they are able to meet the various shopping needs of residents and visitors in the most sustainable way. The need to travel is reduced and opportunities for walking, cycling and using public transport are increased. B5.4 In addition shopping provision within these centres makes an important contribution to a vibrant and vital public realm. New retail development required should be directed towards existing centres in order to help ensure that their vitality and viability is maintained and enhanced.

This application will destroy the vitality and viability of Radstock town centre which currently boasts a good array of independent traders who are doing their best to survive the current economic climate. It will also encourage car usage at the expense of walking, cycling and using public transport, since once local shops close, people will be forced to travel further afield. It is certainly true that our town centre 'makes an important contribution to a vibrant and vital public realm' but this will be brought to a halt if a major supermarket is built. Even where the supermarket doesn't stock the same items as our local shops, they will be left in limbo as those who are forced to close by direct competition leave a hollow town centre which will be increasingly abandoned by services such as the bank, offices and other commercial ventures which will experience lesser footfall and become economically unworkable.

- **C2 The Natural Environment** (p.157) puts much emphasis on the value of the high quality environment, 'adding to the quality of life of residents, attracting visitors and contributing to the prosperity of the area' and yet this application would degrade the beautiful natural environment of the Somer Valley area, particularly of Radstock ('the best preserved mining town centre in the country') as it is subjected to increased traffic, which will compromise the outstanding built environment of the town centre and deter visitors. With a rumoured three applications for supermarkets in the pipeline, all within a couple of miles of the

town, Radstock will become marooned by commercial sheds which will diminish the tourist offer that this town needs to make in order to prosper. To agree the current application would merely be the start of this decline. We urge B&NES to consider the sustainable nature of small scale tourism and local town centres and reject any moves to make a corridor of retail and commercial which could stretch eventually from Peasedown to Midsomer Norton and beyond.

As C2.6 states, 'Landscape contributes significantly to the identity of an area, forming the setting for day to day life, in village, town, city and countryside. It is a resource for recreation, a reservoir of historical evidence and an environment for plants and animals. National guidance and the JRSP strongly promote the recognition of the distinctiveness of local landscape character as reflected in the local topography, pattern of tree cover, field size, nature of boundaries, form of settlement and building design and materials'. Much of this will be lost as the presence of a huge supermarket further compromises the health of our natural environment. Recreation will not be easily found in an area dominated by the traffic volumes and through traffic which is arriving at one point, shopping and then departing without ever taking advantage of all that our town and the surrounding area has to offer.

Town Centre First Policy – the view of the government at national level

The House of Commons Standard Note: SN/SC/1106 dated 17 May 2012 and authored by Christopher Barclay (www.parliament.uk/briefing-papers/sn01106.pdf) contains a very clear statement that the Government is retaining the Town Centre First Policy. Radstock Action Group draws the attention of Planning to the following sections: 2 (The Government's Town Centre First Policy 2011-12), 3 (The NPPF) and 3 (The Portas Review of the High Street) and notes that the government is currently looking at ways of reinforcing the Town Centre First Policy. We regard the current application as being totally at odds with the requirements of Town Centre First policy as defined in this document.

For example:

- Local authorities should 'promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres' (3.23 p.4), 'where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity' (3.23 p.5)
- Despite the assertion in the application that it meets the sequential test, it quite clearly does not given the account of the sequential test in 24 (p.5). Local planning authorities 'should require applications for main town centre uses to be located in town centres'.
- When assessing applications for retail (which are not in accordance with the Local Plan which, as clearly shown in other parts of this objection, the application is not) there should be assessment of (p.5):
 - the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
 - the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider

area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time the application is made.

- Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the above factors, it should be refused.

Conclusion

We entirely object to this application. It is inappropriate to the needs of local communities, flies in the face of the Local Plan and national policy. We urge B&NES to throw it out and to return to meaningful discussions with the people of Radstock and other communities in the Somer Valley in order to establish some priorities for the creation of a real strategic plan for the area which has so much to offer. Bath is a world-renowned city. It has the good fortune to be complemented by a richly varied and unique region boasting history, great natural surroundings and industrial heritage. All this will be weakened if a proposal such as this is approved. We very much regret that it has not been possible to answer all points in detail but we will be happy to clarify should this be necessary.