

**Bath and North East Somerset  
Core Strategy  
Spatial Options – October 2009**

**A Response from Radstock Action Group**

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**1. Introduction**

- 1.1 Radstock Action Group welcomes the opportunity to comment on the Spatial Options in the draft Core Strategy. Given the fact that the construction of the official questions contained in the document does not give adequate opportunity for contributing specific suggestions, we have divided our response into separate sections.
- 1.2 'General Remarks' explains some of our concerns about both the methodology and the content of the document. The third part of our response deals specifically with the questions posed in the document and the fourth part outlines our own vision for Radstock – a series of proposals and ideas partly prompted by remarks in the Spatial Options and partly the result of our work over the past two and a half years, including many discussions with people in Radstock.
- 1.3 Radstock Action Group recognises that regeneration and development are essential for the prosperous and enduring future of the town and we hope that our response will encourage renewed determination to develop partnerships and creative solutions to the challenges facing not just Radstock, but the whole district.
- 1.4 We would welcome the opportunity to elaborate on our response and discuss future ways forward for our proposals.

## 2. General Remarks

- 2.1 The Draft Core Strategy Spatial Options document contains lots of interesting ideas, all of which are to be welcomed for debate, but it is, in many respects, an unsatisfactory consultation document for the reasons given in this section.

Nonetheless, we wish to state that we would like it to form a step in a renewed commitment, on the part of the local authority, to resolving the challenges involved in the regeneration of Radstock and as a way of producing a more integrated and forward looking strategic plan for the whole district, a plan in which Radstock can play a positive role, based in its distinctive history, current community and potential as a centre for living and working.

- 2.2 Respondents are asked to address a large number of questions, most of which require 'Yes/No' answers. If this is really all that is required, then surely a questionnaire would have been sufficient.

We are concerned that there is little encouragement to state views rather than simply answer Yes or No; we fear that this oversimplified formula will enable the manipulation of responses in inaccurate ways and actively discourages respondents from putting alternative views

As a result, we have often had to reply that as far as the statements go, they may be acceptable but that they really do not address the key questions which face the district, and Radstock in particular, in the period covered by the strategy.

- 2.3 Much of the text is very general; whilst it often appears reasonable, it doesn't define what will actually happen once the Core Strategy is agreed, it is sufficiently ill-defined to allow multiple interpretations of most points and proposals contained.

- 2.4 At the same time, there is a disconcerting mix of technical/scientific detail which is hard for a lay person to understand and interpret, for example p.37 the table on renewable energy is all but incomprehensible if you cannot calculate the relationship between BANES Potential Capacity Target (MW) and BANES Potential Renewable Energy Generation Target (MWh).

It is unreasonable to expect respondents to be able to deal with such issues with any degree of confidence, without adequate guidance from experts, and we conclude that we run the risk of not identifying all the implications of certain statements, through our own lack of specialist knowledge. It would have been preferable to explain the implications so that reader could be sure they were answering the questions adequately and relevantly.

- 2.5 The authority has a responsibility to clarify what its actual goals are. Frequent reference is made to both PPS and RSS policies, many of which are highly commendable, but it would have been helpful to have had relevant points from these and other major sources incorporated into the Core Strategy in order to be able to assess which points the authority is preparing to prioritise.

Anyone wishing to address the key points of discussion has had to spend many hours cross-referencing to other documents, without any certainty that they

were concentrating on the relevant areas.

- 2.6 In general terms, we believe that the absence of certain data and information is unhelpful. Where reference is made to data drawn from the Indices of Multiple Deprivation, for example, general points have been drawn which are not necessarily accurate for the situation in Radstock. Such highly specific and local information is important if we are to assess the relative merits of different sections; it is misleading to generalise and allow localised situations to be overlooked.

In the case of the Indices of Multiple Deprivation, generalisations in some instances, conceal a very different picture in Radstock. There are inequalities between different areas and settlements of the district but these have been smoothed away in the final statements. For example, life expectancy, education levels, skill levels for jobs are all lower in Radstock, but nothing is said to confirm that these issues will be addressed.

- 2.7 Whilst it is made clear that planning decisions already made fall outside the remit of the Core Strategy which will go ahead and be inapplicable to agreed projects, we do not think that, in the case of Radstock, this is reasonable. If the current NRR/BANES/Bellway proposals go ahead, it will be very difficult, in fact, largely impossible for the aspirations, objectives and vision of the Core Strategy to be applied to Radstock. The town will, instead, be the victim of a new main road and insensitive and unsuitable housing, all of which run contrary to the principles laid down in the Core Strategy, and which will guarantee the irreversible destruction and further decline of the historic town centre. Regeneration will be impossible.
- 2.8 Radstock lies on the very edge of the district and, by definition, often looks towards Frome, Westbury and the South West for links. We are extremely concerned that there is no indication of an awareness of these valuable connections.

It is essential for all aspects of regeneration, development and connectivity that the BANES Core Strategy looks beyond its own area and identifies a future within the South West.

- 2.9 There is quite simply too much unedited and unmanaged information, too many documents are cited, too much reference made to national papers and past policy documents without any attempt to present an integrated statement which enables BANES/the district to put forward its view of itself in the context of national and regional requirements, as reflected in all these sources; the authority should use its professional and specialist expertise to lead and guide on these important issues for which they are/should be suited/qualified. It also appears that on occasions, multiple sources quoted in support of a given point actually contradict each other.
- 2.10 This draft Strategy continues BANES' well-established tradition of being Bath-centric. Whilst we all recognise and are proud of the cultural heritage of Bath, we are dismayed that there is virtually no acknowledgement of the cultural, historical, environmental and industrial riches offered by both the rural areas and the so-called 'market towns'.

2.11 Many of the positive ideas in this consultation document will only benefit Radstock if there is renewed consideration of the current agreed NRR/Bellway proposals. If this development is allowed to go ahead, not only will it be in contravention of most of the principles of this Cores Strategy document, it will effectively ensure that Radstock far from being regenerated will degenerate into a road junction with some questionable housing stock surrounding its core.

We are not opposed in any way to progress and development, but ask BANES to explain very clearly how the NRR proposals for the redevelopment of the railway land can, in any way be regarded as congruent with the intentions, objectives and aspirations of the Core Strategy Spatial Options.

In particular, please could the authority explain how putting a new main road through our conservation area, our town centre, our shops, churches and other public buildings can possibly be a positive step forward. Surely putting main roads through communities went out of fashion in planning circles a long time ago. The results of the most recent traffic surveys have not been published suggesting that they do not uphold this vision of diverting through traffic into a small and vulnerable town centre which was not built to withstand modern heavy goods vehicles, or even cars.

2.12 We have not addressed all sections, not because we are uninterested but because there simply is not a lot of time.

### **3. Responses to Questions asked in the Spatial Options document**

#### **Question DW1: Do you agree with this Spatial Vision for Bath and North East Somerset? (p.20)**

1. There is very little to disagree with as far as it goes, the whole statement is bland in the extreme and does not distinguish adequately between different areas within the authority
2. At one level, no-one could take issue with the aspirations hinted at in the document, but major questions remain unasked and, therefore, unanswered
3. The tone of the approach to Radstock suggests a lack of understanding for and appreciation of the town's past, the value of its cultural and natural heritage, its need for imaginative and creative ideas for regeneration
4. The principal components of a sustainable community as summarised on p.16 are commendable, but as we read the rest of the Core Strategy we wondered how Radstock fitted and found that the reality is that most of these components will be watered down and compromised in reality
5. Questions that arise are many – we have included some of them in our replies to the questions within the document.

#### **Question DW2: Is this the right set of spatial objectives for the District? (p.24)**

1. Whilst it is encouraging to see the six spatial objectives on paper, we would like to ask many questions and request that the authority's final document. We cannot include all of them in our response, but have chosen to include some which, we hope will give a clear indication of some major concerns:  
Q1: How does the authority propose to promote tackling the causes and effects of Climate Change?  
Q2: Is the 'development' referred to in 1.2 (p.21) 'development of carbon efficient policies' or 'development of homes'? Unless we are clear about this, it is impossible to address the means of delivery as the relationship between housing development and carbon emissions policies is unclear.  
Q3: Does the fact that Radstock does not have, at present, 'efficient and reliable public transport' mean that it will not be considered a priority area or that the authority will actively promote better transport links such as the reinstatement of the railway between Radstock and Frome?  
Q4: How can Radstock benefit from 1.7, 'address the local causes of water, air, light and noise pollution and the contamination of land' when the currently agreed NRR project will involve additional noise and air pollution and the contamination of land issue remains unresolved as there are still major questions over the way of treating the seriously contaminated land proposed for development?  
Q5: How can 2.3 be met? It states that the aim will be to maintain 'a broad balance between homes and jobs'. Given the fact that there are far more jobs for new homes in Bath than in Radstock, how can this aim be applied fairly and meet the same objective right across the district?  
Q6: What is the authority's position in the case of Radstock in relation to 2.5 (p.22) where plans agreed will counter regeneration, lead to traffic congestion and discourage businesses and town centre visitors?  
Q7: Where is the definition of 'affordable housing' which reflects and takes into account the needs of the current residents of Radstock, many of whom cannot afford so called 'affordable housing'?

Q8: How do the designs proposed by NRR/Bellway meet the points raised under Strategic objective 4? Current agreed proposals are counter to each of the sub-tems, whether through the splitting of the community by driving a new road through its centre, or enabling building that does nothing to enhance local character and distinctiveness.

Q9: Why hasn't the authority required a realistic and detailed business plan for the currently agreed project for redevelopment by NRR/Bellway? We are in favour of nurturing economic prosperity but without mandatory business plans and their enforcement, this will all, at best, be left to chance.

Q10: Will the authority be supporting the reintroduction of the rail link to Frome to improve access and reduce traffic congestion and transport related carbon emission?

Q11: How does putting a new road through the centre of the town promote good traffic management which will facilitate increased use of public transport?

**Question DW3: Are there any others (please specify) (p. 24)**

1. The most obvious omission from this section is any proposal to develop partnerships with other surrounding areas; along the lines of joined up regional development.

**Question DW4: What are your views on the two District-Wide spatial strategy options? (p.35)**

1. Radstock Action Group supports Option 1, but not without serious reservations.
2. Option 2 puts disproportionate stress (through development) on Radstock and other areas, in order to safeguard Bath.
3. Neither option provides a commitment to the requirement that housing should be matched by jobs; in both options, Bath has roughly 1.5 new jobs per new home, where as Radstock (with Midsomer Norton) gets roughly one job per new home.
4. The only possible interpretation of this is that Bath will have jobs which will have to be done by people living in Radstock and other areas. This is not satisfactory because it will encourage more road usage, travelling outside the home area to work, both of which are contrary to the declared objectives of the Core Strategy and government policy; additionally it will tend to result in those who work in Bath spending in Bath rather than supporting a redeveloped, regenerated Radstock, thus making it less attractive to potential new businesses.
5. One key feature of Option 1, talks about housing and employment development having to be accompanied by major improvements to the strategic transport infrastructure; the question is really to determine what the aim of the transport infrastructure should be. Until this is clarified, it remains a major concern and we ask the authority to put its weight behind such initiatives as rail development and addressing road congestion, particularly as there is nothig planned to counter the incrazed congestion in the centre of Radstock – congestion which will certainly be even worse should current NRR proposals be realised.
6. There appear to be reservations about the development of brownfield sites in Bath. We would support the principle that all brownfield sites should be exploited before moving into greenfield areas; the major caveat is that there should be protection of brownfield sites which have developed ecological/environmental value as the result of being neglected for long periods and that the

archaeological record should not be neglected; the changing face of brownfield sites needs to be monitored to ensure that archaeological and cultural artifacts and evidence are dealt with appropriately and that this will contribute to the promotion of new cultural focuses which will benefit all forms of business and especially the tourist industry.

7. We are concerned about the possibility of creating new jobs under either of the options; especially given the reservations expressed by Ernst and Young and by the BANES Business Growth and Employment Land Study; whilst we fully support the continuation of work in the traditional sectors represented on the trading sites discussed, the way forward must also include a much more imaginative look at styles of working in the future. We wish to support the preservation of the job sites and opportunities on the estates such as Westfield and Old Mills but it seems likely that in addition it will be important to encourage individuals who require to work at home/on-line and who require public work space occasionally in a central location or at major centres/cities to which there are poor transport links at present.
8. We recognise that the two options express only the bare housing and jobs needs of the district, but there is much more to fleshing out these options than this. In order to make progress, we we looked at which of the two options matches our other aspirations best. In terms of our wish to be carbon neutral (or at least having significantly reduced carbon emissions) and self-sufficient, Option 1 is more suitable.
9. New ways of working and emissions-cutting regimes are more responsive to local needs, facilities and infrastructure than blanket statements and policies and we expect to see that an overall vision for the district will acknowledge that diversity of development will be key to success – this requires joined up strategic thinking with local variations and will enable maximum participation by those who live and work in any given settlement or area.
10. We would like clarification on the following questions:
  - Q1: Why is there so little about transport infrastructure in relation to Radstock in the discussion on the Options?
  - Q2: Why doesn't the documentation acknowledge that there is work to be done to bring Radstock up to an acceptable standard of infrastructure before any enhancements can take place? Years of neglect mean that infrastructure issues have been ignored and that much basic infrastructure is missing in such areas as transport and community facilities.
  - Q3: Does the authority agree with the Strategic Health Authority that there are no strategic health requirements? If so, does the authority believe that health provision in the Radstock area is adequately resourced and organised to meet regeneration and development?

**Question DW5: Are there any other reasonable options we should be considering in light of the national and regional policy context and our spatial vision? (p.35)**

1. Coupled with our remarks about lack of employment opportunities, we would like to see a study/consideration of the impact of new working methods/styles and arrangements on potential developments and incoming business in Radstock.

2. Transport will be one key element in the equation – we suspect from remarks made during recent discussions of the potential for a renewed rail link that there would be people interested in homeworking in Radstock if there was also a direct rail link via Frome/Westbury route between Radstock and London, avoiding the need to get to Bath for your journey.
3. Option 1 states that Midsomer Norton and Radstock would have a 'limited role strategically' but we suggest that with new models of working as outlined, Radstock could be strategically important as a centre for new cutting edge working practices which would complement the characteristics of eco-town, many of which would be our goal, even though as an existing settlement we could not fit readily into the full criteria for an eco-town as defined in the Communities and Local Government paperwork "Eco-towns prospectus"

**DW6: Do you agree with the targets suggested by the research or should we aim for higher targets? (p.39)**

1. We should aim for higher targets.
2. As the recent discussions in Copenhagen made clear, the forecasts of the impact of climate change are having to be updated frequently and, if anything, impact has been understated.
3. Additionally, Radstock Action Group would like to see a firm commitment from BANES to supporting it in becoming carbon neutral within the shortest possible time so the bar needs to be set high; we will require backing from the authority for gaining relevant professional expertise and funding; we will need to be aiming very high.
4. The discussion is acceptable as far as it goes, but it is far too vague, and we would welcome answers to the following questions:
  - Q1: What levels of support is the authority willing to give to communities, towns, groups and organisations which establish a broad wish amongst residents and businesses, to progress to implementation of the targets?
  - Q2: What will the authority do to identify funding and expertise to promote renewable energy within specific communities?
  - Q3: How will the authority ensure that if the currently agreed NRR/Bellway development goes ahead, it will be required to meet standards which will actively promote these targets rather than meeting current regulatory minimums?

**Question DW7: Can you comment on any other planning framework to ensure smooth and effective way to support renewable energy production? (p.39)**

1. We have looked at the reports of the Energy Saving Trust Inaugural Rewards and would suggest that there is a more detailed dialogue with both the EST and individual winners, where relevant, to establish how planning frameworks have aided or hindered the plans of the individual projects and the trust generally.
2. We would like to cite specifically Urchfont in Wiltshire which is aiming to take a lead in micro hydrotechnology, and to establish how Radstock might be able to

aim for a similar objective.

3. A similar pattern should be followed in considering opportunities raised by the Whittington and Fisherwick 'journey to a low carbon community'.

**Question DW8: Do you think a local policy should be developed to support retro-fitting? (p.39)**

1. Yes – this is particularly important in towns which have lots of valuable buildings, including in conservation areas, which may seem less attractive homes and workplaces if they cannot provide good surroundings for users/residents; a reluctance to use such buildings could lead to they're being deserted in favour of modern structures; this would be damaging to the life of the community involved, would detract from the tourism potential and disrupt community life.

**Question DW9: Do you agree with the targets suggested by the Research? (p.40)**

1. We welcome the commitment to carbon reduction and support the most stringent targets.
2. The local authority must actively commit to providing specialist professional support in the drive to achieve targets.
3. The authority will need to determine how much of the budget can be focussed on such targets and then actively support local communities in attempting to raise funds for infrastructure/energy saving developments.

**Question DW10: Do you agree with this threshold? (p.40)**

1. Insofar as they set a baseline they represent progress, but we would welcome the adoption of more stringent figures by the authority.
2. All planning applications should be subject to the best practice for new buildings, not just meeting the bare minimum requirements.
3. We have the following questions:  
Q1: How does the authority propose to enforce compliance and will such compliance be required/applied equally throughout the authority?  
Q2: What incentives will there be for communities seeking to respond constructively to both carbon emission limitations and renewable energy developments?

**Question DW11: Do you agree that major development should meet higher targets than national standard? (p.41)**

1. Yes

**Question DW12: Do you agree with threshold or should it be lower? (p.41)**

1. Definitely not lower; higher as per previous comments

**Question DW13: Should the Checklist be required as part of planning applications? (p.41)**

1. Yes

**Question 14: Should use of the South West Sustainability Checklist be discretionary? (p41)**

1. No.
2. The eight points of the Checklist are all admirable; it will be the responsibility of the authority to ensure that they are applied. How does the authority intend to ensure that the high standards implicit in the Checklist are elaborated and applied equitably across all areas of the authority?
3. Such checklists require financial backing. Radstock Action Group looks forward to seeing how the budgets will reflect these priorities, in particular in places such as Radstock which have comparatively high council tax rates. It is essential that budgets reflect the high council tax rates paid in Radstock and that guidance and policies are available to access other supplementary sources of funding.
4. All these points are applicable to and could benefit Radstock. In particular we note 'To ensure that the most sustainable sites are used for development and that the design process, layout structure and form provide a development that is appropriate to the local context and supports a sustainable community'. Will BANES explain whether or not these checklist points are being applied currently to development discussions? If not, when can we expect them to be adopted? It appears that the checklist is now operational and we would welcome the opportunity to hear how BANES is using it.

**Question DW15: PPS25 and RSS Policy F1 set out clear policy direction for the flood risk and SFRA provides the base for the sequential approach in flooding. Do we also need specific local policy in the Core Strategy? (p.43)**

1. Having looked at PPS25, we are in broad agreement but are concerned that in a pre-existing set of buildings, where there is going to be additional development that there should be guarantees that where new development meets the standard for new buildings, it will not be at the expense of existing stock.
2. We couldn't be certain that this is incorporated in the sequential approach; experience in Radstock suggests that there is a tendency to underestimate the flood risk in the town centre, even though the risk level has been changed fairly recently; this in a situation where there has been no significant development but where there does appear to be a very much increased flood risk when judged by observations of water courses in Radstock.
3. Given the uncertainty of the speed of climate change, the authority should adopt the precautionary principle and not go for development where the risks are likely to change and/or are not quantifiable because of lack of satisfactory modelling in the case of introducing new buildings into currently built areas.
4. Can the authority explain how regularly flood risk will be reviewed before the Core Strategy is implemented? This is another area where there is a risk that the

data on which planning is based will be out-of-date thus undermining the Core Strategy.

**Question DW16: Does the proposed core policy for Infrastructure Provision include all the necessary elements? (p.44)**

1. See remarks elsewhere regarding our preference for use of brownfield.
2. At a purely theoretical and general level the sentiments expressed are acceptable. However, we would like answers to the following questions:
  - Q1: Could transport infrastructure statements emphasise the need for continuous support for public transport and avoid the trap of perpetuating a model whereby those in our smaller towns and settlements are automatically regarded as having to commute by car?
  - Q2: How will BANES enable communities to obtain funding for infrastructure? Does the authority expect to be dealing with a centralised pot? Will the authority back bids by local communities for additional funds?
  - Q3: How will the monitoring of infrastructure development be done?
  - Q4: How will the authority ensure that all infrastructure development fits into the wider regional and national picture?

**Question DW17: Does the proposed core policy for Green Infrastructure include all the necessary elements? (p.45)**

1. We particularly support the concept of looking beyond the immediate area and working with neighbouring authorities, groups and individuals.
2. The need to produce detailed plans for the delivery and management of Green infrastructure is no less important for areas not classed as urban extensions.
3. Prioritising the safeguarding and development of green infrastructure is vital in small communities which may be under pressure to take more housing and other building developments; it is wrong to assume that communities in rural and semi-rural settings automatically have access to green spaces; in fact such access is automatically jeopardised by building development unless specifically designated and protected.

**Question DW18: Does the proposed core policy for Safeguarding Minerals include all the necessary elements? (p.46)**

1. This section should include a positive and explicit statement of commitment to recycling of materials wherever possible, including through the encouragement of innovative reuse of precious resources and support for the use of alternative environmentally sound materials.
2. Additionally, whilst we recognise that local stone is essential for maintaining many existing buildings and construction of some new ones, it is important to maintain a positive stance in relation to alternative designs and materials, but only of the very highest standard as defined in CABE 'By Design':

The three central messages of the guide are:

- a. Good design is important everywhere, not least in helping to bring

- rundown, neglected places back to life.
- b. While the planning system has a key role to play in delivering better design, the creation of successful places depends on the skills of designers and the vision and commitment of those who employ them.
- c. No two places are identical and there is no such thing as a blueprint for good design. Good design always arises from a thorough and caring understanding of place and context.

**Question DW19: Do the proposed policy parameter for meeting housing need include all the necessary elements? (p.49)**

1. Guaranteeing affordable housing is absolutely essential; by this we do not mean affordable for people who might think that it would be cheaper to live in Radstock than Bath but for those who are genuinely unable to find anywhere to live owing to costs. It is important to stress that affordable housing doesn't mean of a lesser quality.
2. The idea that housing is becoming more affordable is not born out by the research. Most recently, for example, research commissioned from Lombard Street Research by the Sunday Telegraph, 'The affordability of UK property market has been falling since the middle of 2009 The survey shows that house prices have once again started outpacing the increase in the average family's disposable income.'
3. Any policy must state clearly support for the principle of 'pepper-potting' and build in safeguards to ensure that planners do not change plans post-approval simply so that they can get additional public funding for housing projects.
4. BANES must be committed to high quality housing across the board, housing which meets carbon and environmental safeguarding criteria and which is of top quality design and complementary to existing stock.
5. The inclusion of specific salary bands is not helpful since it suggests that salaries are stationary and/or that only certain levels of earnings will entitle people to aspire to having their own home.
6. Any housing policy must contain specific commitments to young single people who are already experiencing homelessness and disruption owing to lack of suitable accommodation; it is only when young people have assured housing that they will be able to play their full part in work and education opportunities.

**Question DW20: Does the proposed core policy for Gypsies, Travellers and Travelling Showpeople include all the necessary elements?**

1. Presumably gypsies, travellers and travelling showpeople have had the opportunity to feed into the Core Strategy.
2. The tone of the proposed policy framework should be changed to present a positive image of these groups since the use of phrases such as 'the affect on areas' and 'nuisance' only have negative connotations; gypsies, travellers and travelling showpeople are entitled to paces that meet their cultural and social needs.

3. Recognition of practical needs for sites is welcome but is it adequate? We would like to see evidence that those who will be affected by these policies think so.

**Question DW21: Does the proposed core policy for High Quality Urban Design include all the necessary elements? (p.53)**

1. We realise that this is a section about Urban Design, but are concerned that the absence of any specific references to design outside urban settings, suggests that this is of lesser importance. Please add another clause or further elaboration of those who do not fall under the 'Urban Design' heading.
2. The CABE 'By Design' and 'Building for Life' and other organisations' policies and guidelines are all to be commended; the Core Strategy Framework (p.51) must guarantee that such standards will be met – the statement is there but it will need to be firmly elaborated and there must be no exceptions.
3. An authority which covers a huge rural and semi-rural area must include much more specific reference to non-urban design and the needs of non-urban communities. We are pleased to see some acknowledgement of this on p.53 but topography is not the only special aspect of rural and semi-rural areas; it is necessary to state much more firmly that standards will be applied across all forms of proposed design.

**Question DW22: Does the proposed core policy for Nature Conservation include all the necessary elements? (p.55)**

1. Superficially this sounds satisfactory. Unfortunately our experience of the authority's attitude towards nature conservation doesn't give us any confidence that this set of policy elements will be respected. Without the will to enforce the European and UK legislation, it will continue to be the responsibility of individuals and groups to fight for the environment.
2. BANES should actively commit to a policy which sees environmental concerns and protection of the natural wealth of the area as essential and as a complement to the pride and safeguarding exercised in favour of specific Bath built landscapes.

**Question DW23: Does the proposed core policy for landscape include all the necessary elements? (p.56)**

1. This section is particularly vague and does not give the reader any confidence that the landscape will be protected or enhanced.
2. The list of 'Our Sensitive Landscapes' in the box on p.56 would be better left out unless it can be amended to include examples of sensitive landscapes and articulate clearly that the countryside contains sensitive landscapes which cover history and social organisation.
3. The using of Chew Valley as an example of a tranquil area is unwise – it is a tranquil area but so are most of the places outside the urban sprawl of Bath. We suggest that this is made clear in the final document.

4. This is another example of Bath centric thought – too much emphasis on Bath and written very much from a Bath point of view when dealing with areas outside the city.
5. It is essential that care is taken not to arrive at a situation where a series of valued sites are linked by unvalued and unmanaged, even over exploited areas; the key to good landscape development is to make it an overall landscape not a collection of notable items in an otherwise neglected picture.

**Question DW24: Does the proposed core policy for Historic Environment include all the necessary elements? (p.58)**

1. Proposed Policy Framework starts with Bath and fails in the first item to mention anything else.
2. Any policy framework for the Historic Environment which doesn't recognise by name anything beyond Bath, runs the risk of being Bath centric.
3. The key heritage assets in the box on p.57 doesn't even mention that a Roman road and the Wansdyke both run through the area; such levels of disrespect for the history of the whole area are lamentable; there are many more omissions which could be cited.
4. No mention, for example, of the fact that the conservation and surrounding area of Radstock Town Centre has been declared the best preserved mining town centre in the country.
5. How is BANES going to ensure that each place's distinctiveness is preserved if they do not look beyond the very obvious examples given on p.57? The authority is the custodian of a far richer and more varied 'portfolio' than this section would lead a reader to understand.

**Question DW25: Do you agree with the Council's preferred option for protecting the setting of the World Heritage Site? (p.60)**

1. We prefer Option 1 since this is clear and will avoid planning slippage; if there are clear-cut criteria then deviation is less likely.
2. Whilst supporting the principle of a buffer zone, it should be equally clear that this should not constitute an excuse to keep building just outside this zone and beyond, using the buffer zone as an excuse; the policy clearly states that building can continue within the boundary.

**Question DW26: Does the policy framework for a prosperous economy above include all the necessary elements? (p.63)**

1. The mention of 'consideration of the risks of over-concentration of growth in the centre of Bath' is confused and confusing; it appears from the Locational Strategy Options that there is a wish to establish jobs in relation to housing in Bath on a greater scale than elsewhere. Perhaps a definition of 'growth' should be included, at which point it would be easier to comment.

2. Clearly work opportunities are key to a prosperous economy but we regard the models of 'work' which underpin all the statements in this section as outmoded and unimaginative.
3. The section contains no mention of transport infrastructure which is essential for connectivity with other areas and for regional economic development; it would be unwise not to think of wider markets and business collaborators.
4. Thinking of all the settlements in terms of a hierarchy is misleading since it suggests a best and a worst, a top and a bottom. Nothing could be less helpful – one of the key strengths of the district is its tremendous variety which should be exploited to bring about maximum gain across the board.
5. Retail concerns are difficult to comment on and seem dependent as much on shopping being a major pastime at present as on people's needs to shop for essentials. If this were ever to change over-reliance on retail sector would be a major problem.
6. Whilst recognising that the varied forms of business enterprise are best served by being delivered locally (a position we support), it is doubtful that people would choose to come to Radstock should the new road be built through the conservation area, wrecking that sense of social cohesion and community, as well as the distinctiveness of the town which is central to the values of this section. Each locality requires sensitive planning.
7. Taking Radstock as an example: with local retailers uncertain about their future if the road is built, and if unsympathetic development takes place, the authority must recognise that many towns and settlements are already feeling the impact of the recession, having started from a very low economic base. The creation of new spaces must be matched by safeguarding of central and historic locations which might be threatened by new developments.

**Question DW27: Is the hierarchy of centres identified appropriate and if not what changes should be made? (p.63)**

1. As already stated above, the 'hierarchy' idea runs the risk of underselling some communities.
2. Just as the 'character of the central area of Bath might be adversely affected by the over-concentration of new commercial space', so might other smaller town centres be equally adversely affected by inappropriate town centre development.
3. Development of business opportunities on the periphery of any town runs the risk of taking away its distinctiveness, encouraging traffic and destroying town centre activity.
4. We are concerned that the statements about out-of-town and town centre priorities are not well-defined and leave the door open to negative change.
5. The allocation of 'strategic site' status to 'areas of significant regeneration and change' should not be a simple matter of awarding hierarchical status for development proposals; it requires linking up of places, insight into strengths of particular sites with the primary aim of protecting and developing each one's

distinctiveness.

6. 'Maintaining and enhancing the vitality of the viability of the existing network of centres' (p.62) fails to acknowledge the fact that many towns and centres are struggling and have been for some time. We must guard against complacency and over concentration on the 'new'. Much needs to be done to reinvigorate and stimulate communities which have been under-resourced and subject to poor planning.

**Question DW28: Does the proposed core policy for Community Services and Facilities include all the necessary elements? (p.64)**

1. The Main Policy elements listed are all objectives which Radstock Action Group supports but we are worried that the list will turn out to be nothing more than a list. The rumoured closing down of the authority's Youth Service, for example, only strengthens our view that there will have to be a serious change of step if we are to see these elements realised.
2. Similarly, the authority's refusal to safeguard the future of valued community facilities, such as the Victoria Hall in Radstock, suggests that there may be a lot of rhetoric but not much substance to these elements – in particular we would draw the authority's attention to the third, fifth and ninth items and ask that should they adopt them, action should be taken on the Victoria Hall the key community facility of Radstock.
3. There is nothing to disagree with – to see any of these principles adopted and implemented would be a cause for celebration. But it should be stressed that necessary elements require funding, long-term commitment to community needs and a willingness to listen – as well as concrete proposals which are absent from this policy. Can the authority explain how this set of ideas would operate? Will there be guarantees that community services will be provided where they are needed and within easy reach of users? What criteria will be applied to determine that facilities are no longer needed by the community?

**Question DW29: Does the proposed core policy for Accessibility and Transport include all the necessary elements? (p.66)**

1. We welcome support for the reutilisation of redundant railway routes for walking, cycling and public transport and for sustainable transport. This meets our current proposals to work towards the reinstatement of the rail link between Radstock and Frome, going onward to London and the South Coast and South West. BANES has a representative on all the relevant strategic bodies, such as West of England Partnership, and should commit in the Core Strategy to this important public transport initiative. Will the authority be actively promoting the reinstatement of disused rail links including the one between Radstock and Frome?
2. The whole direction is far too Bath orientated; it is essential that the Core Strategy recognises that some key towns including Radstock, MSN and Keynsham are at the boundaries of the district and that both they and Bath will be well served by developing links which do not over-concentrate on travel to Bath.

3. In the context of the Core Strategy it is particularly worrying to see BANES agreeing to a worsening of bus services to and from Radstock and other rural areas, coupled with absolutely no acknowledgement that public transport must be affordable if we are going to succeed in getting people out of their cars.
4. The transport objectives on p.66 include in (6) three settings which need protection from the impact of traffic; there is little in the policy which convinces the reader that this will happen. How will BANES guarantee that there will be a guarantee that areas between sites which fall into one of the three settings definitions will not be penalised for failing to have a specific designation?
5. BANES must adopt a bold and imaginative approach to transport and try to avoid some of the contradictions which are inherent in the current list of elements, for example, committing to never building another huge underground carpark in the centre of Bath – how does this new Southgate carpark do other than suggest that the authority wants to encourage more cars into the centre? A statement that cars are not going to be encouraged must be coupled with action to prevent them going into the centre.
6. It is essential that (1), on p.66, clarifies a commitment to *public* transport rather than suggesting that private cars will be equally acceptable in the framework of housing and employment growth.

### **Midsomer Norton and Radstock Spatial Options**

1. Anyone reading this section might conclude that the area under discussion has little to offer, despite some account of the historic background, followed by general statements about Jobs, Shopping, Community Facilities, Homes and Public Transport.
2. Whilst there is some lip service to the fact that Midsomer Norton and Radstock are two separate settlements, their lumpin together is unhelpful. We support the principle that two neighbours should collaborate and cooperate wherever it is to their mutual benefit, but we fear that the distinctiveness of the two separate towns could be jeopardised by putting them together for the purposes of either consultation or planning.
3. We are concerned that the statements about jobs are already out of date and request that the authority updates the description to take account of the decline of industry and other employment which has been exacerbated by the recession. We also think it important to note that despite relatively good employment figures, the area has a lower than average education and skills base; jobs tend not to be in the skilled high end of the market.
4. The paragraph on community facilities appears to suggest that green space is the central plank of facilities for young people. Unfortunately with youth unemployment and homelessness on the increase, we need something more than a green space.
5. Community facilities are under threat in Radstock and we would welcome a statement in the Core Strategy in which the authority commits to funding an enhanced offer for young people and for other groups too, whether elderly, disabled or in other ways disadvantaged. It is precisely the lack of community

facilities which can lead to growing disadvantage and increases in the gap between advantaged and disadvantaged.

6. The oversimplified statement about house prices is laced with complacency; it is of no relevance to local people that house prices are generally lower than in other parts of the district when they can't afford them at these allegedly lower prices. There is a much more complicated situation in the area than that suggested here. The cumulative impact of years of lack of provision of affordable housing will only be overcome by serious commitment at local authority level. It is really important that regeneration and development do not mask an already very difficult housing crisis.
7. The Core Strategy states blandly that 'there is no operative rail link'. It is worth adding two things here: firstly that the trackbed between Radstock and Frome is still largely intact and that there is very considerable support for the reinstatement of this link and secondly that it should be noted that residents of Radstock would also benefit from good public transport links to places other than Bath and Bristol; it is disingenuous to suggest, in the context of services being seriously curtailed, that there is a relatively good public transport service. Relative to what?

With encouraging initial estimates of the costs of reinstating the rail link to Frome, we believe that this would be a sound investment which should be encouraged by the authority, not simply in the interests of Radstock and the surrounding areas but also because it will lead to less congestion in Bath.

**Question MNR1: Do you agree that Midsomer Norton and Radstock should be classified as 'Market town – RSS policy B towns? (p.147)**

1. It appears that the essential features of a market town are three: already centres for local employment and services; aim of definition is to support greater self-sufficiency; work on the balance between new homes and new jobs.
2. The key question is, 'Would this designation benefit Radstock?' It is difficult to know given the difficulty we have had in identifying details of what constitutes a policy B town. We suspect the attendant status and raised profile would attract wider interest and hence might attract inward investment; it would also provide a useful link between Radstock, Midsomer Norton and Keynsham and facilitate joint activities and planning where this would be of mutual benefit.
3. Will the authority provide further clarification in order to get a more detailed response?

**Question MNR2: Have we identified the key spatial challenges facing Midsomer Norton and Radstock? (p.147)**

1. The list of challenges is a rather unusual mix of general and very specific. Thus on the one hand we have shortage of allotments and on the other general statements about strategic housing developments; we suggest that it would be useful to develop more detailed spatial objectives and then fit in a range of items including the ones currently included in the challenges on p.145.

2. Whilst we wish to develop further working links with our neighbours in the Somer Valley and with Keynsham, we think that in order to retain the distinctiveness of each town and settlement (as opposed to merely stating that they are separate entities), it would be useful not to lump Midsomer Norton and Radstock together. Each of the settlements is distinctive and boasts valuable characteristics which should be nurtured.
3. Each of the challenges identified has a resonance for Radstock, but they do not add up to a strategic package for ensuring the integrated and sustainable development of Radstock.
4. Not only should challenges be seen in terms of competing with other towns, they should also include complementing other towns in an regional overview.

**Question MNR3: Do you agree with the spatial vision and objectives for Midsomer Norton and Radstock?**

1. As far as they go, the vision and objectives cannot be objected to but they tend not to give any sense of which priorities would be driving them forwards. Elsewhere in this response we have stated some of the key characteristics and objectives that we regard as exciting and essential for a forward-looking, sustainable and dynamic future for Radstock.
2. We wish to make low carbon economy and sustainability the key to Radstock's future prosperity and are encouraged by the regular references to these issues throughout the document. We would, therefore, prefer a clearer commitment, with specific policies and milestones, to developing these as priorities within the Core Strategy as it impacts on Radstock.

**Question MNR4: what are your views on the two spatial options for Midsomer Norton and Radstock? (p.153)**

1. We support Option 1 as elaborated earlier in this response.
2. We are surprised that the document attempts to suggest on pages 150 and 153 that that the two options have almost indistinguishable outcomes in terms of meeting Spatial Objectives and getting ticks in the 'Meets objectives' column.
3. But there are certain telling omissions. For example, in Option 1, we are told in the Comments column that Objective 4 involves 'Maintaining physical separation between settlements and local settings and identities'. We agree, but the statement in the Comments column for Option 2, same objective add, 'Improvement in local facilities including leisure facilities is required. Positive contribution to maintaining the natural environment around the town centres.' Why is this not equally applicable to Option 1?
4. We cannot understand why there should be a different comment on Objective 5 – whichever Option is looked at, there has to be attention to discouraging out-commuting. Readers could be excused for wondering whether the incentives which seem implicit in the Comments column for Option 2 are merely a weak attempt to persuade people it is a good idea when it is really meeting the needs of Bath rather than Radstock. The incentives contained in Option 2 Comments column should be applicable, in large degree, to Option 1.

## 4. A Vision for Radstock

- 4.1 Over the past few years, many organisations and individuals have spent a lot of time challenging some of the more absurd excesses of the planning authorities as they impact upon Radstock. There have been successes and it is fair to say that the voice of Radstock is heard and taken more seriously than ever before.
- 4.2 But the debate is really only just beginning. The Draft Core Strategy should provide an opportunity to set down markers for the regeneration of Radstock and we now wish to move to a more ambitious level which will hopefully see the claims of the authority for Radstock to be a centre of good practice for alternative energy and sustainability realised in imaginative and radical ways.
- 4.3 The situation is fluid. This is graphically illustrated, for example, by the albeit brief intention (now withdrawn) for Radco to move out of the current site, drew attention to the value and potential of the area currently covered by the store itself and the car park. In fact, we understand that NewMasterPlanning actually based its whole case on the assumption that this site would become available for meaningful development and regeneration within the overall package that we are working towards for Radstock.
- 4.4 In 2026, we would like to see the following in place for Radstock:
1. A prosperous town having the best employment for a wide range of local people, with a combination, on the one hand, of the traditional smaller scale manufacturing and estate based workshops and factories, reflecting local skills and expertise, and on the other support for a range of other models of working, creative studios, home-working and shared specialist facilities for the use of the whole working community.
  2. Continued commitment to high quality education and training which is so clearly visible in the town at present and including investment in cutting edge technology, so that Radstock is recognised as a centre of excellence for new work, models of employment, offering a range of sophisticated and technical skills and know how for the area.
  3. Sustainable, affordable and environmentally top-standard accommodation, sensitively developed to meet the needs of people living and working in the town with an emphasis on encouraging local work; ensuring that every home created brings with it the opportunity to work either in attached accommodation or suitable in-town facilities.
  4. Successful promotion of Radstock as a tourist destination – the town already boasts an wonderful range of features, the 'best-preserved mining town centre in the country'; an internationally acclaimed museum which attracts visitors from a long distance as well as locally and which has been part of international museum/research work; cycle routes which have the capacity to bring even more visitors into the town; a history going back to Roman times and even earlier; a very valuable natural environment which forms part of the beautiful natural setting of hills around the town; developing links with other European towns.
  5. A proper, forward looking transport infrastructure, including a restored rail link to Frome and the resulting vibrant links with London and the South and

South West towns.

in relation to transport, we recognise that residents and visitors to Radstock are still highly dependent on their cars, whether for leisure, shopping or work. However, we do think that there are better ways to organise parking which will continue to be an essential for the town for the foreseeable future.

Given the experience in Bath Southgate where a three level underground carpark has recently been constructed, presumably in part to safeguard the functioning and aesthetics of street level buildings and activity, we suggest that serious consideration be given to constructing an underground carparking facility in Radstock, thus freeing up valuable street level areas and enabling green space and/or housing and business premises to take pride of place in the town centre. There are a number of sites which could be considered, for example, the RADCO Car Park – we do not propose decreasing the number of spaces and suggest that all facilities should be constructed in such a way that when public transport becomes the preferred option for many more people, some of the car parking spaces could be converted for other, more environmentally friendly uses, whether studios, workshops or other.

By creating sustainable and affordable housing in the centre of Radstock whilst retaining the store and parking, the town centre would meet one of the key aims of the Core Strategy, to get more people living in the centre of town, the eyesore of car parks would be eliminated.

Such developments are dependent on the centre of Radstock not being destroyed by the current proposal to build a new main road through the conservation area, bringing through traffic, noise and air pollution to an area we would like to see ever less involved in having to cope with car and lorry traffic.

6. Radstock Action Group would like to see greater self-sufficiency for the town in terms of energy generation. We would like preliminary studies to be undertaken as soon as possible to enable a full assessment of Radstock's potential to become a net contributor to energy provision at regional/national grid level. We would like to see wind and water power in place and suggest that the hills and rivers of the town should be studied with a view to harnessing their potential. Any profit made from such developments could then be ploughed into the further regeneration and development of the town.
7. By 2026, Radstock's negative impact on the environment/the planet will have diminished drastically; businesses and homes will be properly geared up to eliminate waste and unnecessary use of valuable resources, whilst recycling to a high degree.
8. More of the items we need will be grown/manufactured locally, building on the longstanding traditions of the area in relation to self-sufficiency in food provision.

9. A full range of community facilities addressing the health, fitness and leisure needs of all residents will be available and fully accessible to everyone who lives or works in the town, as well as to visitors. We would like to see an integrated approach to provision which enables volunteers and those seeking work experience to be able to feel that they are contributing to the community.
10. In conclusion, we recognise that this quantum leap will require expertise, commitment and financing. We would like to see the local authority providing constructive support and input at all stages and hope that the Core Strategy will identify ways in which we can move towards this vision for the town.

We know from discussions and from the Spatial Options paper that renewable energy and sustainability are endorsed at an 'in principle' level; we would like to explore the suggestions made that Radstock, with its history of being a centre for energy and innovation, should once again be at the forefront, this time as a model town, pushing forward the meaning of sustainability, self-sufficiency and diminishing negative impact on climate.

We would like to identify partners for such activities, whether those charged with regeneration, growth of strategic partnerships, local authorities, businesses or community groups.

We know that the people of Radstock have the appetite and enthusiasm to regenerate their town but positive backing, including through financial support and professional expertise will also play a central role.

## **Appendix 1**

This appendix contains the Radstock Action Group response to the Great Western RUS Consultation. It is reprinted here as a statement of our views on the importance of rail transport for the future:

### **Great Western Rail Utilisation Strategy**

#### **Consultation**

#### **A Response from Radstock Action Group**

**November 2009**

#### IN SUPPORT OF THE REINSTATEMENT OF THE LINE BETWEEN RADSTOCK AND FROME

1. Radstock Action Group welcomes the opportunity to participate in the debate over the future of rail services in the Great Western Region. We have read the Draft RUS and are encouraged to see that there are proposals to improve services right across the region. We believe that there is an acknowledgement of the opportunities to enhance business by building usage by members of small communities which currently suffer from lack of services and lack of connectivity.
2. This response requests that Network Rail and its partners, in determining the strategic development of rail services in the Great Western region, address the possibility of reinstating the rail link between Radstock and Frome. As we only became aware of this consultation process late on 25 November, our comments inevitably lack detail and we will continue to look more closely at the consultation papers and address new issues as they arise.
3. When Radstock was the centre of the now defunct North Somerset Coalfield, rail played a crucial role in linking the town to the outside world, through the transportation of coal. Once the coalfield closed, the railway fell into disuse but the trackbed is still in existence in certain areas, including Radstock to Frome. Whilst Radstock continues to plan for regeneration, there is no doubt that the introduction of a rail link, as part of an integrated transport system would encourage more businesses and individuals by providing fast and appropriate services to major centres from London through to Plymouth, without having to connect via Bath Spa.

4. We note in 2.2.2:

The Great Western RUS will therefore:

- propose options to achieve the most efficient and effective use of the existing rail network and identify cost effective opportunities to improve it where appropriate
- enable Network Rail to develop an informed renewals, maintenance and enhancements programme in line with the Department for Transport's aspirations and the reasonable requirements of train operators and other key stakeholders
- enable local and Regional Transport Plans and freight plans to reflect a realistic view of the future rail network.

5. We hope that our specific comments will be seen as a contribution to the debate and be born in mind within these parameters.

6. Radstock is situated on the furthest edge of Bath and North East Somerset. This obviously ensures that links with Bath itself feature in strategic thinking, but we wish to suggest that Radstock equally sees itself as having worthwhile and important links to the areas south of the authority, linking it directly to the region covered by rail connections through Frome and Westbury.

7. Together with such towns as Midsomer Norton and Paulton, plus the outlying villages, it comprises a population which is effectively isolated from major transport links. In the past decade or more, the road system has become more and more congested and it now takes up to 90 minutes to reach such key routes as the M4 and M5 by road. Roads are the only option for those wishing to travel outside the area, whether by car or train. Even a journey into Bath by car takes up to 45 minutes and is then followed by the expense and time needed to secure a parking space prior to catching a train.

8. We suggest that if there were better connectivity, including the reinstatement of a rail link to Radstock from Frome, that there would be take up by those wishing to reach as far afield as London, not to mention Bristol and destinations in the South West.

9. A reinstated Radstock to Frome line would facilitate inter-urban links and bring more connectivity without using Bath Spa which appears to be under stress according to the consultation document.

10. Westbury features repeatedly in the consultation document as a place ready for development and with an increased role in connectivity between Bristol/South Coast and London/Thames corridor. The enhanced use predicted for Westbury

Station is good news and could be further enhanced if only a fraction of the commuting residents, of the Radstock and Midsomer Norton, Somer Valley and surrounding districts had access to a rail link. Plus, of course, those requiring rail services for other uses.

11. Similarly there is considerable discussion of South Wales/Bristol/South Coast links needing improvement. A reinstated Radstock line would act as a feeder service and consolidate usage.
12. Branches in the region are already being re-opened for general usage, for example, Wareham – Swanage and Taunton – Minehead.
13. The Parkman Report, which was produced some years ago, emphasized the benefits and practicalities of through trains from Radstock to Swindon. The pressure is now greater as the Trowbridge, Bradford-on-Avon corridor has expanded considerably since then with more building planned, so further road usage would be expected. Already, Wiltshire Unitary District Council has promoted a service between Westbury and Swindon with an extension to Frome.
14. Currently, there no real integrated transport facilities at Radstock, merely bus and cycle, in spite of the town technically being part of the Greater Bristol Bus Network. If rail were included, there would be real choice for commuters, both in and out-bound and reduced road vehicles. An early commuter train (currently starting at Frome) could be changed to start at Radstock, then call at a new Frome Market station before continuing on its current route to London. Trains could run throughout the day bringing Radstock and surrounding areas into immediate contact with the rest of the rail network.
15. Even now, if the line were built, trains could be run to Trowbridge, Swindon, Bath, Bristol via Westbury and as far afield as London without requiring further rolling stock. It is hoped that freight could also be included: protection of links will permit fewer heavy lorries on the road in the future.
16. We realise that it will be necessary to survey extensively to gain proof of potential numbers and are in the process of organising some investigations, still at an early stage. We already have a petition which contains thousands of signatures in support of the railway link; we intend trying now to establish more accurately how many people would actually use any such rail link.
17. Radstock Action Group would welcome becoming part of the Wider Stakeholder Group (WSG) (section 2.3.2). This would then tie Radstock's needs in with the

objectives of the Regional Spatial Strategy mentioned in section 5.2.2.7 and the Regional Economic Strategy section 5.2.3 (page 91).