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AN OPEN LETTER TO NRR AND BELLWAY

This Open Letter to NRR and Bellway is also being copied to BANES Councillors and Norton Radstock Town Council. We will make your responses public in the interests of open debate, transparency and good principles of consultation.

Many people in Radstock have recently received a full colour flyer from NRR/Bellway regarding the current planning situation.

The NRR website reminds us that the goals of the 'regeneration plan' include 'A more attractive and vibrant town centre with strong local focus' and the 'establishment of a successful pedestrian and vehicular movement framework'. But we have yet to see evidence to back up the claims we are expected to rely on.

The leaflet hides the realities of the new proposed development, which appears to have little to do with the best interests of Radstock and makes misleading suggestions which do not reflect the realities of what is going on or what local people need and want – people are not opposed to development but they would like it address their needs for a sustainable environment, affordable housing and respect for the built and natural environment, coupled with positive acknowledgement and incorporation of the substantial and valuable history and heritage of the town.

In view of this, we would like to put the following to both NRR and Bellway for their comments and look forward to receiving replies from both companies.

We have divided the questions into sections but would like to underline

that we realise responses may need to overlap two or more sections; also that the sections do not reflect any order of priority but are in alphabetical order by title of section.

1. Economic Benefits and Potential, including Social Impact

- 1.1 Where is the £2 million economic boost going to come from and who will benefit? We would like to know what the economic boost will boost and the precise geographical area that will benefit. The business case for the development proposals has not been publicised and we think it's time that it was - we have yet to hear what it is.
- 1.2 How many and what 'employment opportunities' will be generated as claimed by the leaflet? Where will they be?
- 1.3 What research has been done to ascertain how existing local businesses will be affected and how the attraction of other towns will affect the social composition of Radstock should these proposals go ahead?
All we have, at the moment, is an unsubstantiated prediction that is not supported by data/empirical evidence.
- 1.4 We would like either NRR or Bellway or both to provide evidence of other developments Bellway has undertaken, in small semi-rural town environments where the predicted social benefits have come to fruition.

2. Historic Built Environment and Cultural Heritage

- 2.1 It appears that the opportunity to make Radstock an attractive centre for tourists and visitors because of its historic buildings, railway heritage and ecological importance has not been tested. Could NRR explain whether this alternative means of regeneration was explored and if so where the evidence can be seen? If not, please could NRR explain why not?
- 2.2 There is a general presumption, stated in PPG15 (and the Listed Buildings and Conservation Areas Act) and reinforced in the courts, that development in a conservation area must 'preserve or enhance' the conservation area and this is a key principle. We would like an explanation of how this is being honoured in the current proposals.
- 2.3 Radstock town centre has been described as the best preserved mining town centre in the country. The central conservation area includes a range of listed Victorian buildings and yet this appears to have been ignored in the proposals which will compromise the structures themselves and which are totally out of sympathy with the aesthetic of the town. What is the justification for undermining the built environment which contributes so greatly to making Radstock special in historical and mining/industrial heritage

terms?

3. Natural Environment

- 3.1 The leaflet refers to 18 acres of 'empty and derelict land'. In reality, the land provides a home for a valuable range of species of plants and animals and is the site of many important railway buildings which reflect the industrial heritage of the area. PPG17 (Planning Policy Guidance 17) implies that a site is well used if it is used by wildlife. We would like an explanation as to how a site can be 'empty and derelict' and at the same time, substantially be made up of four UK priority habitats (Calcareous grassland; River: Hedgerow: Open mosaic habitat on post-industrial land), hosting nationally scarce species some of which use only this site in the region.
- 3.2 The claim that ecological land is 'empty and derelict' is not new, nor is it an accurate reflection of the value of the site. The use of such terms for an ecologically valuable site is certainly misleading the public. Could you justify the use of such terminology or else reassure us that you are going to clarify the fact that, by no criteria relevant to ecological and environmental enhancement or preservation, could this site be described as either empty or derelict?
- 3.3 According to the leaflet, 48% of the land will be saved for wildlife. But this incorporates a substantial amount of the poorest habitat which will not support a high wildlife value. How does NRR/Bellway think any wildlife will be able to survive to take advantage of this rather dubious claim? We would like the evidence to support this claim made public. It is already proven that the fine-leaved sandwort colony translocated to the mitigation area is failing and the habitat is clearly unsuitable. In the view of BANES' ecologist the benefits do not outweigh the harm. Has either the NRR or Bellway any evidence to counter this view or is there a degree of 'greenwash' in the proposals being put forward?
Could the NRR also let us know what steps will be conducted, after any development to ascertain the survival of species and then, what steps will be taken if the monitoring shows deterioration of threatened species using the site?
- 3.4 How does the alleged 'strict Ecological Plan' ensure 'protection and management of a wide range of animal and plant species'? All the evidence so far is that have a negative impact on them, upsetting the biodiversity and ecological balance of the whole area.
- 3.5 There is incontrovertible evidence of bats roosting in the Victoria Hall. There has been no more than a walkover survey which is not adequate for recording the number of species or roosts. There

should be dawn and emergence surveys to ensure accurate data. For example, a walkover survey is unlikely to have discovered roosts of crevice dwellers such as the rare Nathusius' pipistrelle, which will be roosting locally (timing of recorded calls on site in 2006 confirms this). Although the bat was recorded, the information was not released before the committee decision and so it was not part of the councillors' deliberations. How do you intend dealing with the requirements to protect bats?

4. Health and Safety

- 4.1 Have the findings of the most up-to-date flood risk assessment exercise, carried out in June 2008, been taken into consideration and, if so, how?
- 4.2 The use of non-porous surfaces across the site will severely heighten the already serious flood risk to the area, increasing the flood risk and drainage/run off problems.
- 4.3 How do the developers (either NRR or Bellway) propose to deal with the potential contamination stemming from contaminants already on the land?
- 4.4 Why is it necessary to site a sub-station in the middle of a residential development and very close to actual dwellings?
- 4.5 The old Planning Office was demolished because it was deemed unsafe for human use in time of flood. What are your proposals to ensure that there is adequate sub-structure to prevent subsidence and other related problems in the case of Block F.
- 4.6 What are your proposals for safeguarding people along the river edges, given some of the risks indicated?
- 4.7 How can public safety and private householder security be ensured if low enough light levels for light-sensitive bats are to be maintained?

5. Housing

- 5.1 The overcrowding together of the homes (largely two bed flats with a limited number of houses) will be matched by significant noise and air pollution from the new road system. How does this match the claims made continuously about high quality and how does it observe the design code established in the first outline planning application?
- 5.2 The leaflet refers to the number of homes in the first stage being 50. We now know from the planning application (08/02332/RES) that the proposal is for 83. Do you intend issuing clarification on this point or will you be satisfied to continue to mislead the public about it?

Can we expect similar rules to apply in other potential areas/sites

- of development?
- 5.3 How affordable and sustainable will the housing be? What do you consider to be a proper definition of affordable housing?
 - 5.4 How does NRR/Bellway justify putting so many homes so close together? How will the practicalities of parking in this situation be addressed?
 - 5.5 It appears that a very high proportion of the total social housing will be concentrated in one area. Please comment on the justification for this, especially in relation to the Government's requirement that 'estates' should be avoided and that there should be a mix of social and private housing across new developments.
 - 5.6 Why in a proposed brand new development, allegedly promoting the best environmental practices, is there nothing in the way of substantial energy saving design and fittings? We would like to know why there is lack of energy saving devices such as solar panels/photo-voltaic devices for energy conservation, for example. How can the developers justify plans which are not up to the standards set in the Regional Spatial Strategy?

6. Infrastructure

- 6.1 The leaflet claims that there will be 'improvements to the road networks'. Not exactly - the new road layout will bring all the Frome Road traffic straight past the Victoria Hall and into the Street, almost certainly leading to irreparable damage to the historic town centre buildings and to the small traders whose shops will be filled with the noise and fumes of traffic travelling in both directions.
- 6.2 How can driving a brand new main road through the centre of the town lead to 'an attractive and vibrant town centre', particularly given the fact that it will divide the current community and town centre in two?
- 6.3 How do the current plans fit with the local improvements and the wider strategies on public transport, including the Greater Bristol Bus network?
- 6.4 There is adequate evidence already that the new road system will not work, if only for the simple reason that large, articulated vehicles will be unable to negotiate the small scale of the centre of Radstock. Why are you intent on pursuing this plan?
- 6.5 How much population growth is envisaged to achieve the critical mass to trigger the provision of services for the burgeoning population posited in the proposals? How does this match the need to make Radstock a sustainable community meeting the needs of local people and businesses?

7. Public Consultation

7.1 According to the leaflet, the work now being undertaken follows 'many years of extensive discussions with interest groups and the people of Radstock about the form and content of the development' - unfortunately there is virtually no evidence that the public was widely consulted or that their views were reflected in the final plans and designs. In fact, every time that local people are asked, they express their opposition to almost every aspect of the proposals - so strongly have they felt about the matter that they voted out two key BANES councillors who had supported the NRR proposals, and elected, in their place, two others who put opposition to the plans at the centre of their election campaigns. In a parish poll organised to get a clear indication of their views, voters also made it clear that they were not in favour of the plans; on the occasions when short, hastily constructed 'consultations' have been run, there has been equally strong opposition. There is no evidence that meetings and petitions expressing other visions for Radstock have been addressed. We would like evidence that the plans are the result of the repeatedly expressed views of local people being listened to and respected.

8. Corporate Social Responsibility Policies

Could both companies elaborate on how these developments reflect their Corporate Social Responsibility policies?

Overall, we cannot reconcile the proposals with the regional recommendations not to develop our area on sustainability grounds, nor with the declared aim of regenerating the area.

We look forward to receiving your replies.

Amanda Leon
Secretary, Radstock Action Group

Signed on behalf of Radstock Action Group