



Planning Application: Radstock Railway Land 08/02332/RES

To be considered in conjunction with the submission dated 19.03.09

Objection from Radstock Action Group to the current proposals

Radstock Action Group opposes the latest version of the Reserved Matters in relation to the railway land in Radstock.

1. Preamble

- 1.1 Radstock Action Group has attempted to respond to this latest application in the limited time available; identifying changes has proved problematic, not simply because they seem to be insubstantial but also because they have been very poorly identified in the on-line documentation where we are obliged to do most of our examination of documents.
- 1.2 Once more, there has been no attempt to alert the public to the latest application which should be open to public scrutiny and comment. It is totally unacceptable that there have been no public notices posted either on the site, or in the local press or other media. Only those who had already been in communication with BANES Planning were notified of the latest developments.
- 1.3 This submission is to be read in conjunction with our previous submissions, particularly the one for the Development Control Committee of 15 April 2009, which contained our original objections as an appendix. We are forwarding this entire submission which forms an appendix to this current submission.

In particular, we re-emphasise the importance of reading this response in conjunction with the Local Plan.

- 1.4 We note that there have been some concessions to major concerns voiced at the last application stage surrounding these reserved matters and whilst we welcome these, we do not regard them as substantial nor reflecting any genuine increased understanding of the concerns of objectors.
- 1.5 We wish formally to complain about the minutes of the Development Control Committee of 15 April 2009, since they do not represent an accurate or adequate record of the discussion and decisions made on this issue. We are particularly concerned that the Case Officer for this

proposed Radstock Development was not present at the Development Control Committee and do not believe that he could have acted on the decisions of the committee without further briefing. We have, therefore, requested information on what he was told which enabled him to manage the ensuing stages of this process.

The minute states the decision as 'Defer consideration for further negotiations with regard to the proportions of the palette of materials'. We suggest that the debate was far more specific and targeted in its outcomes than this minute suggests and cannot, at this point, have any confidence in the activities currently being undertaken in relation to the decision which the Development Control Committee made when the matter was last discussed.

- 1.6 Radstock Action Group is not opposed to sustainable development which will benefit residents and businesses in the town. We have yet to see any evidence from Bath and North East Somerset or the developers (NRR/Bellway) to suggest that the business case for this current development has been made and call upon the council to reject this application which disregards the worth and potential of the town.
- 1.7 We consider it totally inappropriate that any decision in relation to this major project should be recommended to be taken under delegated powers. Such a move would reflect a lack of commitment to open and transparent debate with key stakeholders, whether residents, businesses or tourists/visitors.
- 1.8 Radstock Action Group remains opposed to the totality of the current proposals for the development of the railway land and calls upon BANES to clarify their position on the building of a new road as a part of this plan, and to justify running major traffic through the town centre under the guise of creating a new high street around which the current housing proposals will be built.

2. Radstock: General Background Statement

- 2.1 Radstock, in its outstanding natural setting, is increasingly being recognised as a key component of the heritage and future business and tourism potential of the area covered by Bath and North East Somerset. Whilst clearly different from Bath, its history as a centre of industrial and cultural activity, provides breadth to the region, not least through the conservation area at the heart of the town ('The best preserved mining town centre in the country') and the natural environment offering significant habitats to valuable plant and animal species.
- 2.2 Even Bath and North East Somerset Council has embarked upon a strategic review of the market towns of Radstock, Midsomer Norton and Keynsham – a review which according to a briefing and discussions that Radstock Action Group had with the appointed consultants (NEW

Masterplanning) will set the strategic objectives for the foreseeable future.

- 2.3 Given the decision, publicised since the April meeting of the Development Control Committee, to embark on this review of market towns, it appears at the least paradoxical to be pursuing a small scale, piecemeal planning proposal which may well limit the options available to strategic planners and will also set a tone to the proceedings, indicating a lack of vision, a lack of commitment to best practice and potential poor use of resources.
- 2.4 Also since the April Development Control Committee, it has become public knowledge that RADCO (Radstock Cooperative), which occupies a very large site right in the centre of Radstock, appears to be set on closing the store and redeveloping the business elsewhere in the town. This will have a very substantial impact on the town centre.
- 2.5 Furthermore, there are substantial indications nationally that there is renewed interest in the redevelopment of older railway routes. Such developments could benefit Radstock but would be impossible should the railway corridor be built over.
- 2.6 Radstock Action Group wishes to see BANES taking steps to pull together all the different strands of current proposals for the town and to acknowledge that it would be very ill-advised, and certainly not in the best interests of the future of the town, to allow any development decisions to be made, even at reserved matters level, until there is a proper strategic report on the impact of the separate strands.

3. Wood Cladding

- 3.1 Much debate in relation to the last submission of reserved matters centred on the unsuitability of wood cladding in the centre of the town; it was suggested that such design was out of keeping with the substantial, well-proportioned buildings of the conservation area where the new buildings are proposed, especially as there is no tradition of such materials in Radstock; there is no doubt that such materials would detract from the visual aspects of the town.
- 3.2 It is, therefore, totally unacceptable that the applicants should continue to pursue such proposals. They clearly recognise that there is widespread opposition to the design and have stated in their 'Justification of Design Approach for Use of Timber Boarding on Facades' that:

'The use of timber boarding is now restricted to the monopitch roofs of Flats D and B. The timber cladding will be heat-treated Thermowood, a natural wood that retains the original brown tone of sawn wood.

It was considered that restricting its use to parts of the mono-pitch buildings Blocks B and D would be appropriate, augmenting the

'brown roofs' and supplementing the use of render on these more contemporary style blocks. The timber boarding will emphasise the architectural massing on the 'monopitch' gable ends and the bays that project over the front entrances'.

- 3.3 Leaving aside the lack of clarity and transparency in the above statement, it is clear that the real problems remain. This type of finish will be unsightly and conspicuous in an undesirable way, as it will not complement any of the buildings in the conservation area.
- 3.4 It is particularly worrying as the two buildings referred to will be those reserved for social/public housing rental/use and will thus further identify the fact that the applicants intend breaching the government requirements that social housing should be indistinguishable from other housing in the development and that it should be pepperpotted not clumped together in specific buildings.
- 3.5 These wood clad buildings will be the very first aspect of Radstock to be visible to visitors arriving via the cycle track. With their inevitable incongruous and misleading appearance they will do nothing to encourage visitors to stop off in the town, neither will they suggest that the town has a buoyant and valuable conservation area of historic and cultural worth.

4. Sedum Roofs

- 4.1 In connection with the points above about ensuring that social/public housing should be indistinguishable from other surrounding housing stock, we would also raise the question of the choice of sedum monopitch roofs. We oppose them on the grounds that they do not meet the ecological and environmental imperatives of the site and are mere window dressing for a set of proposals which are environmentally unsustainable and, in addition are aesthetically inappropriate in this area of notable architectural worth.
- 4.2 We think it is essential that far more detail is made available of the reasoning behind such roofs being chosen, since they may be high well become very unsightly and, to date, there is no evidence that they will offer any mitigation for the damage done to local ecology.
- 4.3 The retention of timber cladding and sedum roofs together on two buildings is particularly inappropriate and shows a total lack of insight into planning, conservation and building heritage and natural/environmental considerations.
- 4.4 We would like to see the exact specifications for the sedum roofs and evidence that the shortcomings reported in the literature of some previous building programmes have been addressed. Furthermore, we suggest that it is essential that responsibility for maintenance is clarified at this stage.

5. Stylistic and Design Considerations

- 5.1 In addition to our objections regarding the materials chosen and the ways in which they have been applied to the site, Radstock Action Group wishes to oppose the designs incorporated in the latest application.
- 5.2 Whilst some modifications have been made, the overall impact of the development will still ruin the town centre, being at odds with the appearance of the conservation area and adjacent buildings. Where there have been modifications, the remaining buildings with sedum roofs and wood cladding will be even more conspicuous and incongruous.
- 5.3 Detail in relation to windows, cills and lintels are still unacceptable with cladding of various materials being used to suggest lintels and cills which are clearly not functional and which look absurd, being tokenistic attempts to meet local opposition to inappropriate design. They lack the proportions and relationship with windows which the original buildings had and which combined beauty of design with function.
- 5.4 We remain opposed to the use of wooden entrance doors and regard them as second rate, open to vandalism and inevitable high maintenance.
- 5.5 Overall, the designs still do not complement nor enhance the local area. Whilst we would welcome thoughtful designs which bring new, high quality buildings to the town, these buildings must be rejected as they will rapidly appear dated and irrelevant to a historic town such as Radstock, as can be seen by looking at similar developments in other places.

6. The Local Plan and the Regional Spatial Strategy

- 6.1 The Local Plan and the Regional Spatial Strategy are the two foremost strategic documents for the area.
- 6.2 In the case of the Local Plan, our objections to the application still stand and we are not convinced by the assertions in David Audsley's most recent statements which state that there are no breaches of the Local Plan and that, 'the detail of scale, appearance and landscaping are consistent with the outline planning permission and would not adversely affect the character and appearance of the Conservation Area, nature conservation interests or any other interest of acknowledged importance'.
- 6.3 Following a court ruling the Regional Spatial Strategy appears to be on hold. Until such time as its status is reaffirmed and/or necessary modifications made, we request the council to suspend any further decisions on major projects which should be contributing to the execution/implementation of the Strategy.

6.4 In the case of both documents, it is the responsibility of the planning authorities to respect their requirements and to commit to best possible implementation. In the case of the Radstock proposals this would be far from achieved, should these reserved matters be accepted.

7. Conclusion

7.1 The changes identified since the last application are at best tokenistic. They do not constitute any change of intention on the part of the applicants; they represent a lack of transparency, continued lack of engagement with local people and other key stake-holders and are at odds with the values which lead to proper exploitation of natural and historic built resources.

7.2 BANES, the NRR and Bellway has each expressed the view that it is one or both of the other parties in this alliance which is responsible for the decisions which continue to cause major disquiet and outright opposition amongst those who live and/or work in Radstock, as well as with many people who know Radstock either through having lived in the town previously or having visited as tourists. We urge these three to meet, if necessary with external facilitation, to identify ways in which they can be involved in developing Radstock along sustainable lines with the support of stakeholders. Additionally we call upon BANES Planners to request that the business case for the current proposals be made within a prescribed timescale, failing which the whole matter must be thrown out, if this has not already happened by other steps.

7.3 BANES Planning must ensure that the same respect and value are given to Radstock as are accorded Bath. We believe that if the criteria which are used to make decisions about major projects in Bath were applied to Radstock, this whole project would be rejected and a more satisfactory solution found to the needs of Radstock both in the immediate future and for the longer term.