



SUPPLEMENTARY STATEMENT

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.

*

The following items supplement Radstock Action Group's statement in opposition to the latest application under the Reserved Matters.

A close comparison of the documentation submitted by the applicant reveals that despite the discussions and recommendations of the April Development Control Committee (DCC) to send the plans for further modification and discussion, the outcome has been to make only modest changes in favour of addressing the objections/concerns of the committee.

The following objections and comments are not an exhaustive account of all the shortcomings of the latest plans but have been chosen to highlight the refusal to recognise that any proposed developments should take into account the local aesthetic, the character of the local conservation area, and in the case of this latest round of submissions, should attempt to address the real concerns of the DCC which has already refused to accept the plans at its last meeting.

Radstock Action Group wishes to highlight the following new and some continuing problems with the proposals as illustrated by the drawings submitted by the applicant:

1. On Block B, the monopitch roof has been made more visible than previously. The composition of this roof is described as 'Gravel bed brown roof to simulate railway track bed'.

Radstock Action Group is opposed to this type of 'brown roof' which the developers have introduced to address the required environmental mitigation. The idea that the wildlife (for example, lizards) living on the current railway track bed would/could migrate and survive on such a roof, on top of a three storey building is laughable.

2. On Block B, some wood cladding has been changed from horizontal to vertical.
3. Also on Block B, some cladding now goes down to ground on the North East elevation where it previously stopped at first floor – therefore, more wood is being used, not less. All this despite the fact that there appeared to be a general consensus at the Development Control Committee that wood cladding is not suitable for the Radstock town centre, conservation area.
4. Block B will now have dark grey railings, window surrounds and down pipes. We do not regard this overall grey design as congruent with or complementary to the colours of the town centre, nor do we accept the 'dark grey, coloured metal standing seam roof', which will add to the sombre appearance of the site.
5. We are particularly angry that the plans state, 'Timber boarding added to elevations in accordance with discussions with the planning officer'. We do not understand why the planning officer has discussed and agreed *more* timber as opposed to less and believe it is time to reject the whole proposal for timber cladding.

Radstock Action Group has requested a copy of the notes of the Development Control Committee where the last application was discussed. The planning officer for the case was not present there, and clearly he was not informed accurately of the reasons for the DCC not accepting the plans as they stood in April.

6. On Block D, in the words of the plans, 'Boarding retained to monopitch in accordance with discussions with planning officer' displays the same complete refusal to address the original concerns
7. Also on Block D, there are some changes to vertical from horizontal cladding
8. Block D will also have large amounts of dark grey trimmings as on B.
11. On Block D, balconies have been removed from second floor rooms, thus restricting light and variety. The only possible explanation for this move has to be to save money
12. Block D has timber boarded doors with glazed highlights, despite objections to timber boarded doors at the earlier DCC
13. Block D also has dark grey colour GRP (Glass Reinforced Plastic) canopy with metal ties, thus giving an even more grey appearance to the buildings.

Furthermore, in support of the original papers submitted by Radstock Action Group, we would like to restate that the proposals contravene many of the principles and specifics of the Local Plan.

In spite of what appears in the report the plan contravenes the following the Radstock Action Group July 2009: **08/02332/RES** Supplementary

clauses given on P64 Footnotes paragraph A:

D2, D4, NR2, NE1, NE10, NE14, BH2, BH5, BH6.

BH7. Has no relevance to the plan.

The remaining policies listed as supporting the plan appear to have been included only because of their "get out clauses", they do not in any way support the plan.

In specific terms we would highlight the following contraventions as typical of the way the Local Plan is being flouted:

1. 'Developments will only be permitted if:

D2b 'the character of the public realm is maintained or enhanced and the development is of high quality design'.

This plan is clearly out of keeping with the surrounding conservation area.

2. The Local Plan requires (D2f) that, 'the proposed development will not cause significant harm to the amenities of existing or proposed occupiers of, or visitors to, residential or other sensitive premises by reason of loss of light, or increased overlooking, noise, smell, *traffic* or other disturbance'.

This plan will certainly cause an increase in traffic disturbance, noise and smell. The 83 dwellings will bring with them at least 150 cars in an area already congested and short of parking. The construction will swallow a third of the available parking spaces and thus have a major impact on local businesses.

3. According to D4, Development will only be permitted where:

(D4a) 'it responds to the *local context* in terms of *appearance, materials, siting, spacing and layout; reinforces or compliments attractive qualities of local distinctiveness; or improves areas of poor design and layout*'.

We have already explained at considerable length that the proposals are totally at odds with the dominant aesthetic/design features of the centre of the town, the conservation area.

4. NR2 /4 states, 'Safeguarding the former Railway corridor as a sustainable transport corridor under Policy T9 incorporating the national cycle network where this is compatible with safeguarding the track-bed which is of significant nature conservation value.'

The Association of Train Operating Companies (ATOC) have recently announced (since the last DCC where the proposals were considered) that restoring this railway is on their list of priorities. That ATOC have announced support for re-opening the track will inevitably mean that finance may become available.

Sustainable transport links are clearly essential for the future well-being of Radstock Action Group July 2009: **08/02332/RES** Supplementary 3

the town and are in accordance with the aspirations of the Local Plan; it is essential that steps are taken not to close down key options.

5. NE1 states, 'Development which does not either conserve or enhance the character and local distinctiveness of the landscape will not be permitted'. It is incumbent on any applicant to detail the ways in which the plans conserve or enhance local character or distinctiveness. To date the applicant has failed to do this.
6. NE10 states that 'Development which would adversely affect, directly or indirectly, species which are internationally or nationally protected or the habitat of such species will not be permitted'.

There is clear evidence that the last bat survey failed to describe the true situation re bat use of the site. A new, accurate survey is needed.

7. NE14 states that 'Development will not be permitted where:
 - i It (is) subject to flooding, causes flooding elsewhere or where it would impede the flow of floodwater unless the hazard can be mitigated.
 - ii It causes net loss in storage capacity.
 - iii the run off from the development would result in, or increase, the risk of flooding of watercourses, ditches, land or property.
 - iv it would prevent the maintenance of the channels of watercourses; it would result in watercourse instability; or
 - v the existing drainage system on the site are adversely affected, or the land drainage on the site, when developed, is inadequate.

All planning applications located within an indicative floodplain shown on the proposals map or where there is other evidence that it is at risk from flooding should be accompanied by a flood risk assessment.'

A recent Environment Agency re-assessment of flood risk in this area on this site is being ignored by planners. A new assessment of this site is needed.

8. BH2 states 'Development affecting a listed building *or its setting* will only be permitted where it would:
 - i) Preserve the buildings special architectural or historic interest
 - ii) Preserve any feature of special architectural or historic interest
 - iii) Retain the historic form and structural integrity of the building.
 - iv) Respect the character of the building in terms of scale, style, design, and materials; and
 - v) Not adversely affect the buildings contribution to the local scene including its role as part of the architectural composition.

9. BH5 states that 'Development which affects a building or structure on the list of Locally Important Buildings will not be permitted where the contribution of its context, local interest or historical associations is not adversely affected.'

In both (8) and (9) the plans are clearly in contravention of the Local Plan's stated policies.

10. BH6 states that 'Development within or affecting a conservation area will only be permitted where it preserves or enhances the character appearance of the area, in terms of size, scale, form, massing, position, suitability of external materials design and detailing. Particular attention will be given to:

The impact of the proposed development on the townscape, roof scapes, massing, and relative scale and importance of buildings in the area;

The relationship of buildings to open space and historic grain;

The removal of unsightly and inappropriate features that detract from the character of the conservation area.

And by implication not including features that are unsightly or inappropriate.

We maintain that these plans are in contravention of these requirements.