



Planning Application 13/02436/EOUT and 13/03786/EFUL

Applications: Former GWR Railway Line, Frome Road, Radstock

To be considered in conjunction with objections to 13/02534/CA; 13/03787/CA

OBJECTION from Radstock Action Group

Radstock Action Group wishes to object to this Planning Application.

Our objections will largely be covered under the following headings:

1. Road, Traffic and Transport
2. Health and Safety
3. Housing and Built Environment
4. Natural Environment
5. Heritage and Cultural Assets
6. Consultation and Community Involvement

This application is the latest version of a tired and outdated set of proposals which have nothing to do with the best interests of Radstock and everything to do with Bath and North East Somerset's wish to protect Bath at the expense of the rest of the area covered by the authority. It is characterized by a lack of consultation, it repeats old ideas which have already been rejected by local residents, businesses and visitors and it fails to take account of the urgent need for quality housing for local people, jobs for local people and a new infrastructure to render the town sustainable and ready for business.

The situation is further complicated by the authority's failure to get approval for the Core Strategy. Our reference points are, therefore, the Local Plan 2007 and the National Planning Policy Framework. We recognize that some may see in this arrangement, the opportunity to give a free rein to developers who can argue that neither the Local Plan nor the NPPF is binding in the current situation.

We wish to make it absolutely clear that Radstock Action Group is definitely in favour of the construction of housing to meet local needs and we welcome all moves which lead to sustainable regeneration in Radstock. We are opposed to inappropriate development in which housing is of a basic standard, is located in inappropriate sites and is not supported by infrastructure development. We regard the current proposals as Bath-orientated, that is they use Bath as the central reference point for all development, the notion of worklessness will be resolved by continuing to use Radstock as a dormitory for Bath workers, incoming residents who commute to Bath (and Bristol) will conceal the fact that unemployment amongst Radstock people is not addressed.

Above all, the road proposals must be rethought. They will not do other than bring increased traffic into the conservation area, diminish the safety of drivers, their passengers and

pedestrians, through the introduction of a range of measures including roundabouts which will do nothing to help the situation.

Our objections cite the documents available on the B&NES website, plus the Local Plan and the NPPF plus other documentation as relevant. It is not possible to examine every single item in the paperwork. Our aim is to give examples of the short-comings of the scheme.

ROAD, TRAFFIC AND TRANSPORT

At the centre of the current proposals is the introduction of a newly constructed road into the centre of the town. A number of justifications for such a move have been put forward but not in a coherent, unified statement.

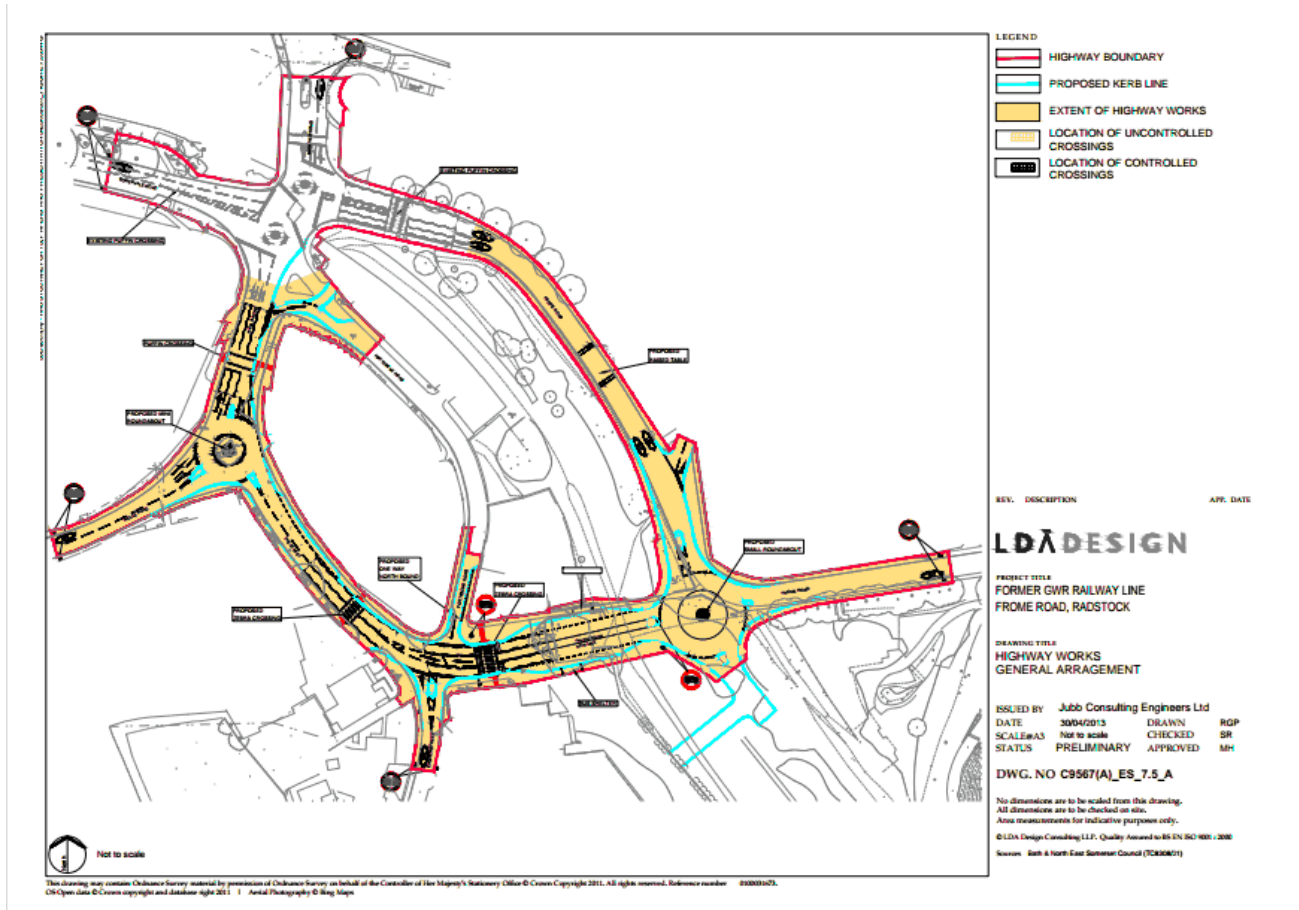
Instead:

1. The reasons given for the proposal are contradictory – on one hand we are told that the aim is to speed up through traffic, whilst much is simultaneously made of the intention to introduce a 20mph limit – we know from the models produced earlier in favour of the road that in order for through traffic to make faster progress through Radstock, it would have to break the current 30mph speed limit.
2. The proposals fail to observe best road-planning practices, insofar as they intend bringing new through traffic into the centre of the town when the priority should be to diminish the amount of traffic.
3. Within the very limited area involved, the implementation of this scheme will involve the installation of:
 - i. Two new roundabouts in addition to the two already in existence at the bottom Bath Road at the junction with Somervale Road, bringing the total number to four. The new roundabout at the base of Wells Hill will mean that all incoming traffic from Wells direction, wishing to gain access to Haydon or the new road will have to negotiate a right turn on this roundabout at the bottom of a very steep hill. In addition, traffic flow in Fortescue Road will be reversed so that it emerges at The Street roughly opposite RADCO. All such traffic, including Bath and Welton bound will be obliged to turn left (ie. In the opposite direction from that it needs to go in) and then do a 180° turn at the new roundabout at the bottom of Wells Hill in order to proceed. This is definitely not in accord with road regulations which do not support the inclusion of such manoeuvres in their recommendations. Of course, from time to time, the occasional vehicle will undertake such an operation but if this is built into a complex road system it can only cause danger and delay.
 - ii. Two new pedestrian crossings, one in the Street and one in the new road, outside the Victoria Hall plus, according to the Senior Planning Officer in an email of 19 July 2013, improved crossing opportunities with narrowing of Fortescue Road. Signalised crossings will be the three current ones, the others will be without signals. In other words, all traffic in the area will be subject to a stop-start regime as pedestrians and roundabout users seek to get around,
 - iii. Two-way traffic into one of the two principal shopping streets, namely the Street. This system will have to contend with the through traffic introduced by the creation of a new road, will be subject to problems resulting from the new traffic roundabout at bottom of Wells Hill
4. A weight limit is proposed for the new road link. However, as with speed limits, it will not be possible to enforce it and Radstock can expect the presence of the usual heavy vehicles using the Frome Road and coming down from Haydon.

This table lists some key shortcomings in some of the relevant paperwork. It provides a clear illustration of how poorly the plans have been put together, and a very casual attitude towards presentation. These are purely illustration of an overall lack of care, contradictions and inconsistencies plus the absence of an overall strategic viewpoint:

Document	Issue
Highway Works General Arrangement Drawing C9567(A)_ES_7.5_A dated 19 July	Drawing not to scale so doesn't truly represent the congestion that will result from the arrangements.
	20mph speed limit throughout the town as indicated: Must be enforced. How? If enforced will make the projected improvements in traffic speed impossible, as the calculations already showed that you would have to break the speed limit in order to gain improvements as forecast – so what is the point
	Pedestrian crossings – in total looks like 6 (despite statement from B&NES that it will be 5) but no pedestrian lights at bottom of Bath Hill where it is almost impossible to cross safely. None at new roundabout at Frome Road. No indication that the crossing outside RADCO is being moved; no crossing points around new Wells Road roundabout. Is raised platform in Frome Road supposed to enable pedestrian crossing?
	Roundabouts – two old ones and two new ones. One of current mini-roundabouts appears to be in the wrong place or is it being moved?
	Traffic flow – traffic coming down from Kilmersdon/Church Street and wishing to get into Fortescue Road will have to negotiate two way traffic from proposed new link to The Street. No traffic management but an apparent central reservation in the road outside youth club etc – how is there room for this at that point?
	How is any of this going to speed traffic and eliminate congestion
	What is the empty label in the proposed new link road?
	Bus shelter – what about on the opposite side of the road for buses in the opposite direction. There will not be room for central reservation, two bus stands and traffic – everything will be at a standstill
Illustrative layout Drawing NO. 3484_0003_DSP_1.3	This does not tally with previous drawing. How can these documents be taken seriously as the basis for a major development
Parameters plan access and movement DWG. NO. 3484_1004_ES_1.	7As with above doesn't show two existing mini-roundabouts

The following is a graphic summary, from the application paperwork, of the above objections.



Whilst the situation will involve pedestrians, cyclists and others in increased congestion on the roads and pavements, there is the additional problems which will be encountered by public transport users. Bus services to and from Radstock are already subject to poor timetabling, high fares and delays. There is absolutely nothing in these proposals to address the basic infrastructure needs of those who already live and work in the town, let alone an acknowledgement of the fact that the new bus stop arrangements will be unable to deal with any increase in bus frequencies, in the unlikely event of there being any.

Parking for those coming to Radstock town centre is going to be very difficult. According to the plans and discussions with B&NES officers, any new housing built in the town centre will not have dedicated parking and the general public will be able to use it too. This will not compensate for the loss of parking in Fortescue Road, the Street and the Victoria Hall car park. It appears that whoever put together these proposals is oblivious of the fact that it is often impossible to park in Radstock during the day. The proposals will deter people from coming into town and further weaken the situation for traders. People wishing to go to the doctor, churches, and other public amenities in the town will find it almost impossible. Regeneration cannot happen unless residents and visitors are confident that they will be able to park.

An equally important issue with the current proposals is that they will certainly rule out the reinstatement of the rail link to Frome. This is acknowledged by the applicants. The reinstatement of the rail link should be a priority for any future regeneration plans for the town:

1. Regeneration depends on Radstock being fully accessible to businesses and customers alike. Tourism which has the potential to play an increasing role in Radstock's regeneration will certainly be encouraged by ready rail access. Given the current and

inevitable road problems, rail is the obvious solution. Not only because it will link Radstock and Frome but because once in Frome, access is readily available to Westbury and all routes to Bristol, the South West and London. Connectivity is the key to the successful regeneration of the town, the renewed railway would be a huge kickstart. It would also fit with the Council's declared intentions to discourage road use.

2. Although it is a declared intention of B&NES to consult and listen, the Council has chosen to ignore the very widespread public support for reinstatement and has also failed to make any serious steps towards a positive feasibility study.
3. B&NES should consider successful reinstatements and learn from them, rather than permitting a scheme which rules reinstatement out.

All the above quite clearly contravene the Local Plan, for example, in relation to transport and access policies:

In the Local Plan, Local Transport Plan, A2.15 and 16 are clearly contravened by the proposals. For example:

'It is essential that transport policies are fully integrated with land-use planning. Planning decisions on land-use will impact on the strategy in the Local Transport Plan and similarly the transport strategy will have implications for development plan policy.'

Similarly, the five key themes of the Local Transport Plan relate to:

- the continued overview and management of road traffic in the District to minimise the adverse impacts of traffic;
- the ongoing promotion of better public transport and walking, cycling, safety and community togetherness;
- management and control of parking;
- the involvement of the public in the transport planning process with a view to successful implementation of transport and behavioural changes;
- the improvement of the local environment across the District through a transportation programme in sympathy with the World Heritage status of Bath, its immediate surrounds, the two Areas of Outstanding Natural Beauty and the distinctive character of the towns and villages.'

As already illustrated, the proposals do nothing to support any of these themes, preferring to put forward a series of suggestions which will wreck the distinctive character of the town, increase the adverse impacts of traffic, including by bringing it into the centre of town, discourage community togetherness by creating barriers to visiting the town and moving around it freely without risk from traffic. Additionally, behavioural change in these circumstances is impossible.

The traffic proposals are also in contravention to the section of the Local Plan entitled 'Access', Policy T.1 states clearly that the Council will encourage the development of balanced communities by, amongst other things:

- 1) Seeking to reduce the adverse impact of all forms of travel on the natural and built environment;
- 2) Seeking to maximise the safety of all types of movement;
- 3) Seeking to support the local economy through the provision of enhanced transport facilities;
- 5) Seeking to reduce the growth and where possible the overall level of traffic by measures which encourage movement by public transport, bicycle and on foot, including traffic

management and assisting the integration of all forms of transport; and

6) Seeking the improvement of existing and the provision of new public transport facilities.

The Transport and traffic plans for Radstock do not conform to many of the requirements of the NPPF.

For example:



In Section 2, *Ensuring the vitality of town centres* (p.7), in (23) local planning authorities should:

- Recognize town centres as the heart of their communities and pursue policies to support their viability and vitality
- Where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity

Section 4 (p.9) *Promoting sustainable transport*, 'The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel' (29) or 'Encouragement should be given to solutions which support reductions in green house gas emissions and reduce congestion. (30). On p.10 the NPPF talks of giving 'priority to pedestrian and cycle movements' and the need to have 'access to high quality public transport facilities'.

(40) on p. 11 states that 'Local authorities should seek to improve the quality of parking in town centres so that it is convenient, safe and secure'.

Radstock Action Group has requested answers from the Transportation Team to a number of questions, as below. The email was followed up with a phone call to Transportation which said they would be replying, but no reply has been received. This clearly makes certain aspects of the response impossible.

 **Amanda Leon** <amandaleon5@gmail.com> 24 Oct ☆  
to Transportation ▾

Dear Transportation Team

(Various Roads, Radstock and Westfield) (20 M.P.H. Speed Limit) Order 201-) Reference PEV9591/TJ.

With reference to the above, please could you clarify the following:

1. Can an A road be subject to enforceable 20mph limits?
2. Do the proposals cover any A roads? We assume that Frome Road, Bath New Road, Wells Road are all A roads and that the proposed new road through the centre of Radstock will also be A status.
3. Could you point out where we can see a map which indicates the limits of these proposals
4. Are the proposals legally binding?
5. What measures will be put in place to enforce the proposals should they be accepted?
6. What signage will be required to implement these proposals if agreed?

Many thanks

Amanda Leon, Secretary, Radstock Action Group



Parking Issues

We are extremely concerned that even Gary Lewis, the Highways Officer for B&NES, has expressed very profound concerns regarding the parking implications of the new scheme. In his statement on 13/03786/EFUL, dated 1.10.13, page 2, he states:

'I have concerns over the level of parking proposed.

In terms of public parking, previous applications have provided better for the loss of the existing public car-park (50 spaces), whereas this proposal provides only 14 public spaces. I would suggest that this minimal level of parking is likely to be taken up by local employees and (potentially) commuters to Bath, leaving nothing for shoppers and other visitors.

Although I accept this might be controlled by limiting parking duration, it is not discussed in any depth in the Transport Assessment and does require full justification. This should be made in consideration of the capacity of the town centre as a whole including existing car parks and on-street provision. The T>A> mentions the under-use of Waterloo Road car park however reports received from residents suggest there is not significant capacity here. This assertion therefore needs to be supported by current survey work given increased demand which will have arisen from other recently consented development in the area which is reliant on the use of public parking (ie. The extension of the Kingdom Hall, Printing Works gym).

I am also not comfortable with the assessment of parking for the development itself. This Authority does not differentiate between the parking needs of affordable and private occupants, and I see no reason why parking should not be allocated as per the guidance of the Local Plan across the board. Given the sustainability of this area (Area 2), I am of the view that parking can be provided with the minimal level of parking of 1 space per dwelling as agreed for past applications. A greater level of shared/public car parking could then be considered. There appears to be little mention of parking for the employment elements of the development

In summary, there are a number of issues which require clarification and/or further justification before I can finalise a highways recommendation'.

Whilst his remarks, of themselves, are extremely worrying, as residents in Radstock, we would like to add that the amount of parking available is becoming increasingly inadequate. This is partly due to the tremendous success of the new dance activities in the Victoria Hall throughout the week, and the welcome arrival of various other businesses. For example, the new café on the Bridge (Coffee Top) attracts lots of custom and the nearest car-parking is in Waterloo Road. Whilst it is true that in the past Waterloo Road car park might have been described as underused, this is certainly no longer the case. Cars are often to be seen parked in areas of the space where technically it is not allowed, cars can be seen waiting for spaces to become available and Waterloo Road itself is now used intensively as an overflow for at least 200m up the road – not a good development as this hinders traffic flow. It goes without saying that on days when the museum is being heavily used, the problems are even greater. The Victoria Hall car park and the car park behind the Children's Centre are always full.

Ideally, residents in the centre of the town should not need to be car-owners, but until there is a radical transformation both of public transport and the number of jobs within walking distance, many households will require not one but multiple cars. This situation is exacerbated by current housing policy which is driving more residents into each home.

This situation shows that the attempts to put even more housing into this extremely overcrowded space is unwise and does not address the core strategic issues.

Radstock has seen a radical increase in tourist interest over the past few years. It is to be hoped that this trend will continue, but unless potential visitors can be confident of finding parking, they will not come to the town. The same problem is equally acute for shoppers who enjoy the varied niche shops and services that thrive in Radstock. But, as was proved by the

last Wessex Water works which effectively drove cars out of the town centre, unless there is somewhere for parking, people quite simply will not come. The regeneration of Radstock includes the nurturing of the retail and other services. Car parking is an essential component.

HEALTH AND SAFETY

Clearly issues of Health and Safety are not confined to one part of the plans. As has already been seen, increased traffic congestion, leading to increased air and noise pollution will be a danger in the current road and traffic proposals.

Road Safety Audit

The Road Safety Audit was only eventually obtained by Radstock Action Group following a Freedom of Information Request.

Of very considerable concern is the statement contained which says, 'A Combined Stage 1/2 Road Safety Audit on a similar scheme was undertaken in February 2012 and an Exception Report prepared in the same month however the scheme has since changed and the details provided to the Audit Team could only be considered for a Stage 1 Audit'. There is, therefore, a lack of sufficient research and proposals. Stage 2 should contain a detailed account of how the matters raised in Stage 1 have been addressed. There are a number of issues raised in Stage 1. We regard them as addressing only a part of the concerns that the proposals bring forward. In our view, the absence of the Stage 2 report is sufficient grounds for rejecting this whole report.

We have already outlined our major concerns, in the section on Road Traffic, but wish to draw attention to the absence of any attempt to address:

1. The particularly dangerous situation that will arise at the junction of Wells Hill and The Street as traffic seeking to turn right into the Street has to negotiate a danger corner with an extreme and wrong camber for the operation.
2. The safety issues raised by having all Bath-bound traffic turning out of Fortescue Road going to the same roundabout and doing a 180° turn

These dangers impact on both drivers and pedestrians.

We await the publication of Stage 2, in order to see how all the issues raised in Stage 1 are to be resolved and to see whether further issues have emerged.

On-site contamination issues

An additional source of concern is the unsatisfactory way in which land and water contamination issues are addressed by Jubb. These issues are clearly of concern to Corinne Atwell, B&NES' own Scientific Officer, Contaminated Land Environmental Services, as published in an email from Corinne Atwell and dated July 11, 2013.

Radstock Action Group has consulted a Contamination Specialist who has confirmed our worries.

Our principal concerns are as follows:

- We accept that the Jubb Phase 1 is adequate but we regard Phase 2 as unacceptable.
- Phase 2 should be based on and driven by the preliminary Conceptual Site Model developed in 2013 by the Phase 1 risk assessment but in this case the intrusive site investigation used in phase 2 was undertaken by another consultant for a different client in 2005. The phase 2 investigation undertaken by Jubb in 2013 therefore does not conform to the basic principles of a tiered risk assessment defined within the Model

Procedures for the Management of Land Contamination, CLR 11.

- Any intrusive site work undertaken as part of a phase 2 investigation and subsequent detailed risk assessment should take into account the outline plan for site development and place particular emphasis on areas where sensitive pollutant linkages are likely to exist. There is no evidence that the limited site investigation undertaken in 2005 was developed in accordance with this basic principle detailed in BS 10175 -2001 Investigation of potentially contaminated sites-Code of practice.
- The Remediation Strategy has no relevant technical data to underpin it. It is simply a review, an academic exercise, of available options but makes no recommendations apart from the fact that further investigations need to be undertaken. It shares this recommendation with all the previous contamination reports for the site written in the 1990s and 2000s.

Given the scale of the project, far more work is clearly required before any decisions can be made. The risk assessment which is required in all matters relating to remediation of the site prior to development has not been followed through. Until such processes are completed there will be no reliable way to assess either the sustainability of the proposals or their costs. B&NES cannot consider granting planning permission in these circumstances.

The paper P9856/G201/A submitted with 13/03786/EFUL does not address these issues satisfactorily.

Flood Risk

1. Whilst the Environment Agency has doubled the risk of flooding, it appears that little has been done to address the fact that the risk will only go up in the current situation of global warming and climate change.
2. These applications propose building very close to the major watercourses of Radstock. We question the wisdom of this and can certainly introduce B&NES to at least one person who lives in Pine Court, on Waterloo Road, who has been refused insurance on the basis of flood risk.
3. Similar risk has been seen in the grounds of St Nicholas School which were flooded last winter during a period of heavy rain.
4. Given the amount of land identified by the SHLAA, we propose that a new approach be taken to identifying sites through which Radstock can rightly get the new housing it requires.
5. Reference is still included to the Bellway reports. In addition, the 'Radstock Culvert Condition Survey' (by Faber Maunsell for the NRR) is dated 2002 but appears to be presented as adequate for building which cannot commence before 2014 – a period of at least 12 years having thus elapsed since the report was written.
6. The reports tend to be following predetermined protocols and fail to acknowledge the reality of the situation Radstock.

HOUSING AND THE BUILT ENVIRONMENT

The provision of affordable housing for local people is central to any moves to regenerate Radstock. The current proposals (both applications) may well deliver a reasonable number of homes but they are on an unsuitable site and B&NES should be addressing some of the issues raised by the SHLAA in order to ensure that the housing is suitably located and not perched in the middle of a site where it will be surrounded by traffic, frustrate moves to reinstate the railway line and put pressure on local facilities, including through the lack of parking and infrastructure.

As the Local Plan makes absolutely clear, the building of homes is a priority which must be addressed in tandem with the wider needs of the community.

Objections to the housing proposals fall, therefore, into the following sections, not a particular order:

1. The centre of Radstock is a conservation area, materials should be used to match the current buildings, but this has not been done, reconstituted material will be used, at least in some places, instead of white lias which would match the buildings in the centre.
2. The pitched roofs such as those in the three storey block alongside the Victoria Hall overpower the scale of the original buildings.
3. As far as it is possible to see, the affordable housing is primarily situated in blocks of flats which mainly abut the road system, despite the requirement to pepper-pot social and private housing. In addition, of 70 units proposed for Area 2, 47 are affordable, thus well exceeding the 25% required over the entire site. This runs the risk of those in social housing being isolated from everyone else (See Design Statement part 3, Section 4).
4. The vision referred to in Design Statement 1 1.2 states that there is a need for a new 'heart' for the town. This is totally untrue, the centre of Radstock is holding its own in a very difficult economic climate and is characterized by the presence of churches, the Victoria Hall, a wide range of shops, a pub, food outlets, doctors' surgery, bus stops, a children's centre, a post office and a bank. These would, in most people's view, constitute the very essence of a town centre. This new 'heart' is a bogus argument.
5. Claims made in the same statement, Section 2 p.10 are clearly wrong. For example, the scheme also strikes a balance between the wider regeneration benefits to Radstock and promoting biodiversity and preserving the natural heritage of the site.' Unfortunately the buildings proposed for Site 2 would certainly negate all these claims. Whilst it is true (ibid) that one objective is to 'bring into use the under-used and vacant sites within the town centre and to enhance the public realm' the proposals fail to say how this will be achieved. The only under used space is the railway land and there are well-supported proposals for this area to be incorporated into a reinstated rail link to Frome and retaining the open space for educational, recreation and environmental purposes. As far as we are aware, there are no other vacant sites in the town centre.
6. In order to try and sell this development to local people, B&NES and its partners have repeatedly stated the total untruth – namely that Radstock people will be the top priority for social housing – this is not the case, they will have to compete with potential residents from allover the authority's area.

NATURAL ENVIRONMENT

The applications require the removal of a valuable piece of open land in the centre of the town. There are many reasons why this is not acceptable. These applications are put forward as part of the regeneration of Radstock but, over the many years that the debate has been going on, there has been ever decreasing attention paid to anything other than the provision of housing and the introduction of an entirely new piece of road. It is unlikely that anyone favours the leaving of the land vacated by the railway; a very considerable opportunity to enhance the centre of Radstock through the development of open, public green space (plus the reinstated railway will be lost. The site has already been identified repeatedly as providing a habitat for rare invertebrates and for reptiles and valuable plants, as well as possible bat use. It provides a link between the various areas of the town.

This is a direct contravention of the Local Plan as follows:

Urban Design (Local Plan A5)

Urban Design Objectives(p.24)

The middle column below indicates how the Local Plan envisages the role of the Urban Design Objectives as listed in the first column. Our comment is in the third column

Character A place with its own identity	<i>To promote character in townscape and landscape</i>	Nothing could be a more locally distinctive pattern of
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	<i>by responding to and reinforcing locally distinctive patterns of development, landscape and culture</i>	development. Landscape and culture than the railway land – covering it with houses will obliterate these valuable characteristics
Quality of the public realm A place with attractive and successful outdoor spaces, incorporating public art	<i>To promote public spaces and routes that are attractive, safe, uncluttered and work effectively for all in society, including disabled and elderly people.</i>	The plans for the housing as contained in 13/03786/EFUL are diametrically opposite to the principles of this objective.
Diversity A place with variety and choice, within sites and within close proximity	To promote diversity and choice through a mix of compatible developments and uses that work together to create viable places that respond to local need.	Housing on this site does not promote diversity or provide a mix of compatible developments – unlike the reinstatement of a rail link and the use of the green space as a public amenity

Community Facilities & Services (Local Plan B3)

B3.5 states that, 'Land and buildings in community use are a valuable local resource. If they are displaced by redevelopment or change of use then it is unlikely that they will return to community use'. This will most certainly be the case for the railway land.

Policy CF.1 states that development 'involving the loss of a site used, or last used, for community purposes' will only be permitted under certain conditions.	None of these conditions is met in the case of Radstock Railway Land. For example, one of the conditions is that 'alternative facilities of equivalent community benefit will be provided'. Readers are referred to the other three clauses (Local Plan p.54)
B3.16 Bath & North East Somerset Change 21, 'Vision for a Better Future', as outlined in the Overall Strategy, seeks to ensure that a range of educational opportunities will be accessible to all members of the community, regardless of age or location. This is also a key objective of the Local Plan.	A suitably organized and developed site could provide an educational facility for everyone, local residents and visitors alike. The land boasts a unique array of wildlife which could be the core of a new education centre, possibly set alongside the buildings serving a reinstated railway. The Local Plan devotes a lot of space to formal schooling as a part of education. The development of the railway land to include educational purposes would complement this and ensure that all ages in the community are catered for.

The Natural Environment (Local Plan p.157)

C2,1 states that, 'The District's high quality environment is a key asset, adding to the quality of life of residents, attracting visitors and contributing to the prosperity of the area. The distinctive villages, diverse landscapes, rich biodiversity and historic character reflect centuries of human settlement and agricultural use' and continues in C2.2 'Sustainable development requires effective protection of the environment and prudent use of natural resources'.

Radstock provides a good example of the existence of a rich and distinctive biodiversity and planners should observe these clauses by ensuring the future of the railway land as a home for the natural environment rather than breaching these principles by building over it. As Policy NE.1 says, 'Development which does not either conserve or enhance the character and local distinctiveness of the landscape will not be permitted'. Building on this land would be a

breach of this policy.

Policy NE.4 (Local Plan p.162) states the conditions under which development will be permitted. The current proposals are certainly in breach of (i) which says that development must not have 'an adverse impact on trees and woodlands of wildlife, landscape, historic, amenity, productive or cultural value'.

The railway land has already been talked of in terms of SSSIs and, though, to date, this has not been granted, it is clearly a Locally Important Site (p.165) and it should, therefore, not be threatened by this development. This also applies to the section on 'Locally Important Species and their Habitats'.

Unfortunately, according to some sources in the week beginning 4 November, works going on on the site are already challenging these policies by allegedly seeking to remove reptiles, and certainly wrecking these delicate habitats, despite there being no planning permission.

The NPPF makes similar statements in relation to the conservation and enhancement of the natural environment, claiming that the planning system should 'contribute to and enhance the natural and local environment' by (p.26):

- protecting and enhancing valued landscapes, geological conservation interests and soils;
- recognising the wider benefits of ecosystem services;
- minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability;
- and
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Thus the redevelopment of the railway land as proposed, is also in breach of the NPPF.

HERITAGE AND CULTURAL ASSETS

Radstock is a town with a long and illustrious history as shown clearly in the archaeology reports. Its major claim to fame and its development as the centre of the Somerset Coalfield have left a legacy which is second to none. As English Heritage has pointed out, it boasts the 'best preserved mining town centre in the country'. Around and within the conservation area, there is evidence of the complex role and functions, it fulfilled as a mining town. Engineering and heavy industry came to the town with the mining traditions, not to mention such crafts as glove making and printing activity.

The railway initially built to serve the mining industry was adopted as the key means of transport for those who had to go elsewhere to work, and for those who opted for a day out. Evidence of this is to be found in a range of publications, and in the film which Radstock Action Group made with Community Chroniclers, viewable at:

http://www.radstockactiongroup.org.uk/film_next_stop_radstock.php.

These valued assets will play a key role in encouraging tourists to the town, whether they are rail enthusiasts, historians, museum visitors, or simply wanting to see a very special place. And yet, approval of these planning applications would most certainly put paid to the unique character of the town. They are assets of which local people feel justifiably proud.

The Local Plan points out (p.173), 'One of the key objectives of sustainable development is effective protection of the environment and the prudent use of natural resources. *This includes conservation and enhancement of the built and historic environment*'. (our italics).

C3.2 states, 'The District's towns and villages are diverse in character reflecting their history, location and size. The character, layout and form of groups of buildings and streets and spaces make a significant contribution in engendering a sense of place and adding to the quality of life in town and country. The identity of settlements should be conserved and enhanced through regeneration, enhancement of the public realm and a high standard of new design.' In Radstock's case, it is the particular lozenge shaped centre of the town which makes it unique, its layout is designed for a particular scale of activities and certainly not for a new through road and the housing which will overpower the attractive and small-scale of this late Victorian town.

'C3.3 PPG15 'Planning and the Historic Environment' emphasises the need for 'Environmental Stewardship' which involves the protection of all aspects of the historic environment. It describes how our historic buildings, landscapes and sites are an irreplaceable record of our past. They are a central part of our cultural heritage, sense of identity and contribute significantly to our quality of life'. It is, therefore, inexplicable that the authority could be contemplating agreeing the applications.

The Local Plan continues in C3.4 'The Historic Environment forms a backdrop to everyday life and it is often the more 'ordinary' features that create local distinctiveness. The historic environment is of immense importance for the cultural and economic well-being of the nation. It is a source of livelihood and a generator of wealth and prosperity. The Local Plan will therefore seek not only to conserve our 'finest assets' but also to take account of the whole of the historic environment in the development process.'

And yet, there is a proposal to run a new section of main road, through the centre of the historic heart of Radstock and its conservation area, and bringing threats to the integrity of the Victoria Hall which is the key civic building in the town and was certainly not built, well over 100 years ago, to withstand main road through traffic.

In relation to cultural and heritage assets, the applications, if passed would be in breach of C3.1, C3.2, C3.3 and C3.4.

Additionally, further on in the same section, the Local Plan draws attention to 'Locally Important Buildings' of which many are cited in the Archaeological Reports published in relation these applications. Thus, for example, C3.30 and C3.31c elaborate the importance of these buildings and highlight the policy BH.5:

POLICY BH.5

Development which affects a building or structure on the list of Locally Important Buildings will only be permitted where:

- i) the architectural interest and integrity of the building is conserved or enhanced;***
- ii) the contribution to its context, local interest or historical associations is not adversely affected.***

Clearly this has not been taken into consideration in relation to a range of Radstock buildings,

including the Victoria Hall.

Then follows detailed consideration of how Conservation Areas will be dealt with. Additional consideration of this in relation to proposed housing is to be found elsewhere in this objection.

Overall, the complete failure to observe the above Local Plan statements which would be the only result of passing the applications, and would certainly suggest very selective use of the Local Plan to care for our local assets.

The NPPF follows similar arguments in relation to 'Conserving and enhancing the historic environment' (p.30, Section 12) RAG would like, particularly to draw the attention of readers (130) 'Where there is evidence of deliberate neglect of or damage to a heritage asset the deteriorated state of the heritage asset should not be taken into account in any decision'.

The NPPF states in 131:

In determining planning applications, local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness.

The current proposals are a breach of these guidelines, as they would result in the marginalization of the current buildings in the conservation area and the overpowering of the sense of their worth by a highly unsuitable housing development.

Consultation and Community Involvement

We wish to draw attention to the lack of meaningful consultation and involvement which has continued to characterize this project. We are exceptionally disappointed that *some* elected members and *some* officers see fit to ignore our comments and requests, mostly for clarification, and that a failure to respond appears to be acceptable.

The following are just a selection of the ways in which B&NES and its partners have been reluctant to enter into any form of dialogue with people:

1. When the latest event was held allegedly aiming to involve people, a display held in the Working Men's Club was deliberately described as an 'exhibition' not a 'consultation' thus removing any obligation on the part of the authority and its partners to take into account any of the comments made.
2. RAG asked, under a Freedom of Information request for details on the application for and allocation of Pinch Point Funding for the new road. The whole application is predicated on the erroneous assertion that there is a pinch point in the town, Applicants were required to undertake to publish the paperwork on their own website. B&NES did not do this, despite a clear instruction that 'they must publish a version excluding any commercially sensitive information on their own website within two days of submitting the final bid to the department' This was not done. The paperwork was only available on a third party website:
<http://www.travelwest.info/sites/default/files/documents/Radstock%20Pinch%20Point%20Fund%20application.pdf>.
Even more serious, the application stated, 'The existing local highway network is heavily congested with significant queuing experienced.' This has never been the case. Traffic queues in the rush hour periods, as it does in all settlements, but even B&NES own modeling has failed to illustrate that there is considerable queuing beyond what might be expected, especially given the lack of public transport.

The application also states that, 'in addition to the road improvements, it is proposed to amend and enhance provision for cyclists, pedestrians and public transport, via a comprehensive scheme of highway enhancements'.

B2b states that there is planning consent for a road system – this is not the case.

The publication of all information relating to this application took place after the award had been made. Had announcements been made, as required, prior to the submission of the application, local people would have had the opportunity to comment and present a different point of view from that put forward by B&NES.

In summary, this application was less than honest in its assessment of the situation, it had not given local people the opportunity to comment and manifestly failed to publicise the process that was being undertaken. Further evidence of the lack of regard for any views that might not accord with those of the authority.

3. According to the NRR, 'NRR has maintained dialogue with groups and individuals in the area during the period since they acquired the land in 2001. Presentations, updates and briefings to groups such as the Chamber of Commerce, Residents Association, Town Councils etc. have taken place on a regular basis throughout and ensured information and engagement with wider communities'. Nothing could be further from the truth. IN fact, emails to representatives are ignored or answered in a desultory or positively offensive manner.

