



8 Colliers Rise, Radstock BA3 3AU
www.radstockactiongroup.org.uk

Conservation Area Consents: 13/02534/CA and 13/03787/CA
Former Gwr Railway Line, From Road, Radstock

Demolition of bridges/underpass, former forge/wagon works, railway platforms and wall in connection with the development of the former Gwr railway land.

Radstock Action Group **objects** to this Conservation Area Consent.

1. These proposals are on a scale that will radically change, beyond recognition, the character and townscape of Radstock. These changes of great magnitude involve the removal of significant parts of the town's built heritage and history and, therefore, require a very considerable debate. These CACs simply do not reflect the seriousness of the situation or enable all relevant matters to be taken into account.
2. Radstock is a unique town with a unique history. The railways played a key part in the development and servicing of the North Somerset Coalfield of which Radstock was the centre.
3. Additionally, despite the railway having been closed for several decades, there is very considerable support for its reopening, in order to provide a passenger link between Radstock and Frome. There is little doubt that such a move would provide a genuine kick start for the regeneration of the town. At the same time, the tourist interest in the town (an interest which is growing noticeably) would be well-served by the retention of the standing features of the previous railway lines.
4. We, therefore, urge B&NES to reject these CAC applications and consider addressing the genuine value and potential of those structures, not as dead remnants but as significant parts of the valuable history of the coalfield. At the same time, we urge B&NES to pay attention to the requirements and undertakings of the Local Plan (2007), the NPPF and comments made by agencies concerned with the built heritage, including the archaeology reports. In the absence of an agreed Core Strategy, we have no alternative but to look to the two other documents which provide recognized guidance.
5. In addition to the heritage and railway reinstatement cases, retention and enhancement of these structures would certainly contribute to 'the vitality of the town centre', as required by the NPPF.
6. In the following pages, we seek to highlight some of the matters that make the proposal unacceptable but must stress that this is not an exhaustive list. Unless otherwise stated, all remarks relate to all the structures it is proposed to demolish.
7. Radstock Action Group (RAG) entirely supports the regeneration of the town and believes that this will only be achieved by retaining its distinctive character alongside new developments. This can only happen if the planners embrace the

principles of Sustainability described at length in all current planning policies, national and local.

8. The overarching consideration is that none of this demolition would even be up for debate, if there were not a planning proposal to run a main road through the town and build a housing development. For this reason, it has been necessary at some points, to refer to the wider planning application.
9. We regard the submission of the second CAC as lacking in clarity and declared aims. The application should confirm by list whether or not the same structures are referred to in both applications. We have failed to find such a list.
10. In conclusion, these proposals if accepted would signify a lack of commitment to the sustainable regeneration and development of the historic town of Radstock. A rethink is required.

This section identifies policies and statements contained in a range of documents. The current proposals are in contravention of too many policy statements to permit detailed consideration of them all. Here we seek to identify some typical examples of the contraventions.

Local Plan A2.2	
Sustainable Development is about seeking balance Ensuring a high quality of life by promoting the development we need for a healthy economy and meeting social needs whilst at the same time conserving the environment ...	As will be seen elsewhere in these objections, the removal of structures as proposed, puts our built environment at risk. The long term implications of such actions have not been considered, despite the requirements stated in this clause. It certainly appears that the provision of improving 'the economic, social and environmental well-being of the area and its inhabitants' (A2.5) is not considered in the current plans and that RPG for the South West is ignored.
Local Plan A2.14.7	
Provision for economic development in Norton-Radstock should primarily be for local employment needs, addressing current imbalances between housing and employment provision and aiding regeneration	The tension between the need for housing and the need for jobs is acknowledged and yet the impact of the removal of key aspects of town heritage and history will certainly be at odds with the aspiration to match housing, jobs provision and regeneration. There is absolutely no indication any where in the proposals as to how generation will be aided by these demolitions which are at the centre of the house building proposals. We urge B&NES to look carefully at more sustainable solutions to the housing requirements rather than bringing further traffic and overcrowded development into the open spaces of the town centre – if they did, the proposed demolitions would be an irrelevance.
Local Plan Policy D.2	
This policy, conditions under which development will be permitted	It is not possible to divorce the demolitions of key features of the historic past from the proposed development to which they are linked. In total, they negate the character of the public realm – this is in direct contravention of D.2 particularly sub-clauses b), c), d) and f). The policy states clearly that the public realm must be maintained or enhanced. Further attention is drawn to this in the section of the Local Plan entitled 'Townscape'.
Local Plan A5.56	
Definition of townscape	The current proposals are at odds with the principles stated in this section. For example, the proposals do not reinforce 'established patterns of built form, spaces and movement routes'.
Local Plan C3.1	

<p>'This (protection of environment) conservation and enhancement of the built and historic environment'.</p>	<p>This requires a wide and imaginative approach to the words 'historic environment'. Whilst everyone can appreciate that Bath has a clearly visible historic environment, care must be taken to acknowledge the historic environment of other settlements. Radstock's town centre is acclaimed as the 'best preserved mining town centre in the country' and it would be inappropriate to disregard the structures and artefacts which bear witness to its past as the centre of the North Somerset Coalfield which owed much to the complex rail system which was put in place to transport goods, and later passengers who were either going to work or for days out.</p>
<p>Local Plan C3.2</p>	
<p>'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'.</p>	<p>By demolishing the structures in favour of new housing, the shape, character and layout of the town's conservation area and beyond, will be lost. Not least because the underpass has long served as a fully pedestrianised route between the centre and the Frome Road. Whilst planners might argue that this route will remain open, it will, if the plans go ahead, no longer be a good route for pedestrians who will have to contend with through traffic on a new road bringing main road through traffic into town.</p>
<p>Local Plan C3.3</p>	
<p>Environmental Stewardship' involves the protection of <i>all</i> (our italics) aspects of the historic environment. 'Environmental Stewardship' is recognized within the Local Plan – historic buildings, landscapes and sites are an irreplaceable record of our past. They are a central part of our cultural identity, sense of identity and contribute significantly to our quality of life.</p>	<p>Notwithstanding the apparent endorsement of the definition of environmental stewardship, there is a danger that, if these demolitions are permitted the endorsement will be nothing more than rhetoric. RAG understands that the town needs homes, but more thought must be given to their location, since the current proposals certainly put in jeopardy the heart of the cultural identity and hence quality of life. We believe that local people deserve quality homes in a town which has a history and character, fostering a sense of civic pride. As the Local Plan seeks to argue, it is the sum total of all parts that adds up to a settlement being worth living in and caring for. In addition, Radstock is keen to build its presence as a tourist destination. There is unquestionably very great interest in railway history which encourages large numbers of visitors, but in addition the prospect of reinstating the railway would enable more visitors to come both by their favoured means of transport and without increasing the presence of private cars in the town centre.</p>
<p>Local Plan C3.4</p>	
<p>This clause acknowledges that 'The District's landscape is the product of complex historic processes and past land-uses and therefore, in varying degrees, has historical importance'.</p>	<p>Radstock, as the centre of the North Somerset Coalfield, was at the centre of mining and engineering feats which must be remembered. The local communities lived as miners and engineers, as families surviving hardship, growing their own food and using the railway as a source of employment, a means of contact with the outside world, a means of conveying goods in and out of the town and, later as a means of</p>

..... 'it is often the more 'ordinary' features that create local distinctiveness'	going to and from work and for leisure trips. It was indeed a complex picture and it should certainly not be destroyed. The remains of the railway and associated buildings in Radstock should be tended and enhanced, rather than obliterated. What will there be to give the town 'local distinctiveness' if everything is sacrificed to an unprepossessing housing development and a new road right through the middle of our history?
Local Plan D5.6	
There are proposals to re-open the best preserved line, that between Radstock and Frome	Despite the acknowledgement of the value and condition of the railway line between Radstock and Frome, the current proposals would effectively put paid to any chance of this happening. There are numerous examples of such schemes being undertaken elsewhere in the country and in Europe and yet, there has been no constructive consideration of the possibilities in the case of Radstock/Frome. Whilst it has been argued by those in favour of demolishing the structures that a renewed link would be built further along towards Kilmersdon end, this in no way acknowledges that there is already much to make the present site more appropriate in terms of engineering, passenger access and blending into the historic record of the past railway.
NPPF	
General principles of achieving sustainable development p.2)	The NPPF identifies three dimensions to sustainable development (p.2): economic, social and environmental. The current CACs and related planning applications are a clear breach of each of these. We refer the reader to the definitions of these three for further detail, but underline the principles of supporting growth and innovation, accessible services that reflect the community's needs and support its health, social and cultural well-being, contributing to protecting and enhancing our natural, built and historic environment. The wish to demolish the features in these applications reveals a total lack of commitment to such principles.
NPPF	
Core Planning Principles (p.5)	The Core Planning Principles are all based on the requirement to achieve sustainability. Unfortunately, there is no attempt to meet these requirements in the current applications. For example in (17): <ol style="list-style-type: none"> 1. planning must 'take account of the different roles and character of different areas supporting thriving rural communities'. Radstock certainly boasts 'intrinsic character and beauty of landscape' which should be respected. 2. this section also calls for planning to 'conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution

	<p>to the quality of life of this and future generations.</p> <ol style="list-style-type: none"> 3. encourage multiple benefits from the use of land in urban and rural areas, recognizing that some open land can perform many functions – unfortunately the current applications will contribute to the total loss of a valuable piece of open land. 4. Despite the requirement, there is no attempt to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities to meet local needs.
NPPF	
2. Ensuring the vitality of town centres (p.7)	<p>This section illustrates the importance of basic principles of town centre safeguarding and developing, none of which will be served by the current proposals:</p> <ol style="list-style-type: none"> 1. recognizing town centres as the heart of their communities and pursue policies to support their viability and vitality. RAG agrees with this principle and argues that the net impact of the current proposals will be to diminish the character and function of the town centre 2. reflecting the individuality of town centres – this will not be achieved by taking out the parts which make it distinctive and which bear witness to its history 3. where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity. We challenge the planners in this case to show how this is being done. This proposal relies on a lack of planning and will do nothing to encourage economic activity. It will rather remove various sources of economic activity by lessening tourist potential and the possibility of sustainable transport which would encourage more businesses and mitigate against continued out-commuting.
NPPF	
4. Promoting sustainable transport (p.9)	<p>The implications of the current proposals of which the CACs are a part are at odds with the principles of promoting sustainable transport: reducing congestion; giving priority to pedestrian and cycle movements; minimizing journey lengths for employment, shopping leisure, education and other activities. The reduction of Radstock to a commuter dormitory will serve none of these. Without the proposed housing there will be no need to demolish key parts of the history of the town.</p>
NPPF	
12. Conserving and enhancing the historic environment (p.30)	<ol style="list-style-type: none"> 1. ‘The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation’ Elsewhere we argue that the proposed demolition will eliminate heritage assets which should be

	<p>retained in the interests of tourism and the local economy, cultural profile and sense of place. This clause supports the retention of significant assets.</p> <p>2. Arguing that the state of the items whether due to neglect or damage is a legitimate reason for removal is dismissed.</p> <p>All clauses in this section are highly relevant to these CACs and we suggest that it is the responsibility of planners at B&NES to take these requirements seriously and reject the proposals.</p> <p>3. We draw attention to the statement in 133, 'Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent' except to serve public benefits. The current applications fail to show, in any way, what public benefits may accrue – building a housing dormitory certainly doesn't bring public benefit to the people of Radstock whether residents or businesses or visitors. The onus is on the applicant and the planners to illustrate any public benefit at all.</p> <p>Please note that these are only examples of how the applications are in conflict with the NPPF's wish to conserve and enhance the historic environment. We suggest that the decision makers look carefully at all clauses and consider that these applications are a blatant challenge to a national planning policy.</p>
NPPF	
Plan-making: Local Plans (p.37)	<p>1. The decision makers must observe that 'Local Plans are key to delivering sustainable development <i>that reflects the vision and aspirations of local communities</i>. Planning decisions must be taken <i>in accordance with the development plan</i> (our italics). B&NES must show if they accept these applications, why they are breaching their own Local Plan.</p> <p>2. Under 157 (p.38) the NPPF indicates that the Local Plan should 'identify land where development would be inappropriate, for instance because of its environmental or historic significance, and 'contain a clear strategy for enhancing the natural, built and historic environment'. The Local Plan manages, albeit sometimes in rather vague terms, to endorse these requirements but in practice there is a danger that they will be ignored. Radstock would be a prime victim of such moves.</p>
Archaeology Assessment Report 1	

<p>by Oxford Archaeology and submitted in relation to the planning applications. This report will be referred to as AA1.</p>	
<p>Industrial Heritage (p.19)</p>	<p>Para 1 of this section refers, in relation to ground railway features, to 'some significant surviving features that can tell us a lot about the railway land and its history'. The report highlights the level of neglect that such features have been subjected to but B&NES should bear in mind the NPPF statements referring to neglect and damage not being key to determining that a structure should be disposed of. It is important to note that the AA1 refers several times to the impossibility of viewing features as the land is overgrown. A remark on p.25 'As the railway setting will not be restored' suggests that Oxford Archaeology may have been given inaccurate information, or that the agency issuing the brief has revealed that the authority has already made decisions which are still the subject of discussion. Additionally, it appears that any further investigations would be hampered by the contamination of the ground (p.34).</p> <p>Radstock Conservation Area is on the English Heritage 'At Risk Register' where its condition is described as 'Very bad' with a 'deteriorating trend'. This is confirmed by AA1. We request B&NES to take the matter in hand and exploit the fine heritage, including the structures now under threat of demolition to the benefit of the town, in accordance with the requirements of both the NPPF and the Local Plan as referred to above.</p>

Appendix: Copy of letter to Eric Pickles:



8 Colliers Rise, Radstock BA3 3AU

The Rt Hon Eric Pickles MP
Secretary of State for Communities and Local Government
House of Commons
London SW1A 0AA

24 September 2013

Dear Eric Pickles

We read with interest your decision on Application 12/P/0712/CA/13c, Tropicana, Marine Parade, Weston super Mare. Your decision and the reasons cited in your letter to Richard Kent and dated 5 September 2013, are particularly relevant to the current situation in Radstock, which falls into the unitary authority of Bath & North East Somerset (B&NES). We wish to ask you to intervene on behalf of Radstock by applying the same criteria in the case we will outline in this letter. We will be pleased to elaborate on the situation further, but regard it as essential to begin with an outline of the problems.

Radstock was the centre of the North Somerset Coalfield and boasts a conservation area which includes the town centre, described by English Heritage as 'the best preserved mining town centre' in the country. Such elevated status has not deterred B&NES from continued attempts, over a prolonged period, to damage the town irrevocably by entertaining unacceptable proposals which will lead to the history and heritage assets being totally lost. This reflects a general unwillingness to listen to local people and to press ahead with unsustainable development lacking suitable infrastructure and threatening the much valued town centre.

Unfortunately, this extraordinary town centre is now the object of a number of applications for Conservation Area Consent and Planning which will seriously damage the character and attractiveness of the town, whether to businesses, tourists or local residents and hence impact on the local economy and regeneration prospects.

The three applications are as follows:

1. *The buildings of the former Victorian Infants School*
13/03682/CA and 13/03668/OUT: Erection of 6no 2 bedroom dwellings with associated parking, cycle store, refuse store and children's play space following demolition of previous school premises
2. *The remains of the railway works and associated buildings at the centre of the rail network*
13/02534/CA: Demolition of bridges/underpass, former forge/wagon works, railway platforms and wall in connection with the development of the former Gwr railway land.
3. *The Old Bakery*
The Forthcoming proposal to demolish the Old Bakery and replace with new-build housing, comprising <13 dwellings.

We would like to draw your attention to the following:

Demolition and the Local Plan

1. As you state in your letter, the NPPF Paragraph 126 states that, 'Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.' B&NES acknowledges this in its own Local Plan¹ (2007:Chapter C3: The Built and Historic Environment). For example, the Plan states in 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'.
2. Similarly, in C3.30 the Plan states, 'There are other buildings and structures in the District that have not been listed nationally but are of particular local importance either for their architectural interest, their contribution to the local environment, or for their historical associations. For these reasons they are worthy of conservation and enhancement. Examples include non-listed farm buildings, mining structures, nonconformist chapels and former schools.'

These are just two examples of statements in the Local Plan which would lead the reader to believe that it would protect important settlements like Radstock. However, all three of the above planning proposals, which have the apparent support of B&NES, are at odds with the express aims of the above quoted paragraph. The demolition of the above structures, both buildings and railway structures certainly do not accord with the Local Plan.

Deliberate Neglect or Damage

According to the English Heritage *Conservation Areas at Risk Register*² The Conservation Area is in 'Very bad' condition, its vulnerability is 'Medium', the Trend is 'Deteriorating'. It is not a new entry and B&NES has been reminded already of the issues surrounding the At Risk Register and has chosen to do nothing to improve the situation.

Harm of Demolition

In C3.31, the B&NES Local Plan sets out the criteria to be used when selecting for their list of locally important buildings. The current applications would certainly challenge these criteria and their use in 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.

Sustaining and Enhancing the significance of Heritage Assets

You argue that in accordance with Paragraph 131 of Section 12 of the NPPF, local planning authorities, in determining planning applications 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 contribution to local character and distinctiveness', noting that this includes CAC applications.

We consider that in all three cases under discussion in this letter, there are sufficient grounds to argue against their demolition on the grounds already cited by you:

1. The reinstatement of the rail link to Frome, incorporating much of the old trackway in the conservation area, would yield great economic benefits to residents, businesses and the

¹ http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Local-Plan/local_plan_141108_web_version.pdf

² <http://risk.english-heritage.org.uk/register.aspx?id=5020&rt=0&pn=1&st=a&ctype=all&crit=radstock>

economy in general. Radstock's development as a tourist destination would be greatly enhanced by better transport infrastructure and as is clear nationally, increased use of and redevelopment of rail is very much at the forefront of transport strategic objectives and meets with very considerable public support.

2. The old Infant School building is currently in poor condition but merits redevelopment, perhaps as residential with some educational/youth facilities included.
3. The Old Bakery is a substantial building which could be redeveloped with housing and a range of community services which would enable viable use as per the NPPF.

Your letter states that you do not 'consider that the public benefits of demolition and reinstatement of beach and seawall outweighs the harm that would be caused to the Beach Lawns Conservation Area by the building's removal at this stage given the current potential for redevelopment. The Secretary of State also considers that the refurbishment of the Tropicana would preserve and enhance the character and appearance of the Conservation Area'.

We argue that if the same approach is applied to Radstock, the harm that would be caused to the Radstock Conservation Area by the above structures' removal would outweigh the benefits suggested by would-be developers. We also argue that the refurbishment of all the assets proposed for demolition would preserve and enhance the character and appearance of the Conservation Area.

It has not been our intention in this letter to elaborate a complete set of arguments in relation to the urgent need to address the current threats to Radstock's Conservation Area and to its regeneration, whilst preserving and enhancing its character.

We would like to ask you to consider the contents of this letter and to support our request for help in improving the wonderful assets and potential of the town, as we continue to oppose totally unacceptable proposals which are at odds with the NPPF and the Local Plan. We will certainly be able to furnish you with detailed evidence in support of our case.

Yours sincerely

Amanda Leon, Secretary, Radstock Action Group

Cc: Jacob Rees-Mogg MP
Paul Crossley, Leader B&NES
Members of B&NES Development Control Committee: Gerry Curran, Liz Hardman, Eleanor Jackson, Les Kew, Malcolm Lees, Douglas Nicol, Bryan Organ, Martin Veal, David Veale, Brian Webber, Ian Gilchrist, Manda Rigby plus reserves: Rob Appleyard, John Bull, Sarah Bevan, Sally Davis, Jeremy Sparks, Vic Pritchard, Nigel Roberts
Simon Allen, B&NES Councillor
Members of Radstock Town Council
Ian Lund, B&NES Team Leader Historic Environment
Sarah James, B&NES Senior Planning Officer
Rebecca Roberts, B&NES Planning Officer