

Appendix 1 The individual sites

1.1.0 RAD.1

Delivery of RAD1 hinges on securing planning permission. Somerset Valley Friends of the Earth and Cam Valley Wildlife group have submitted representations setting out the view that there have been various changes to national planning policy, to the site, to a pertinent UK BAP habitat definition and to development proposals that indicate that it would not be appropriate to consider that permission should or would be granted for the scale of development on the land that B&NES desires. We have argued that there are too many uncertainties surrounding the development and that extension of the outline planning permission, which is live but not actionable, is not possible. We argue that the cumulative impact of further developments that are part of the regeneration case has not been examined. We have argued that the site is not suitable for development and that the allocation should have been re-examined as part of the SHLAA process. We consider that this was not done. There have now been further changes that have a bearing on the capacity to deliver housing on this site.

1.1.2 The road system that B&NES and the HCA propose to provide instead of the applicants has been changed in design. There will now be two-way through traffic including heavy lorries on the Frome Road, which was to be closed under the outline plan to all through traffic bar buses and was to provide a riverside residential and shopping area of a character that will now be totally changed, thus removing a further stated benefit of the outline proposal whilst also reducing revenue to be gained from sale of the private residential 'waterfront' apartments and so reducing scheme viability. Impact on existing local traders will still be negative, whilst the gains to traders in newly constructed shops will be less than envisaged in the original outline permission, thus further reducing the benefits that were deemed to outweigh the considerable ecological losses - these in turn now have a higher perceived value due to the urgency of the need for ecological adaptation to the effects of climate change that has more recently been subsumed into Government Policy. It is possible that noise levels in Frome Road will be high enough to reach the level at which permission is normally refused and which breaches the WHO limits. Part of the proposed development adjacent to Frome Road already suffered this level of noise at outline. This could also have financial implications through a need to improve build standards to mitigate this in the case where permission was given nonetheless.

1.1.3 Delivery of RAD1 causes a policy conflict regarding the protection of the railway route and puts into sharp focus the need to work with Mendip, the neighbouring Authority, regarding the implications for Mendip of delivery of the NRR site, which lies close to the border with Mendip. The rail feasibility study commissioned by B&NES has not been completed, but Simon de Beer, speaking for B&NES on Day 6 of the Inquiry, pointed to an amendment to the Core Strategy that could open the door to rail. There remains some doubt regarding the rail issue. Officer Rab Smith, speaking for B&NES on Day 6 of the Inquiry said, with regard to the Radstock railway issue, that the space for a terminus was covered by the existing permission, so any terminus would have to be

outside Radstock. This means that it would be outside B&NES as well. There is no suitable location between the southern tip of RAD1 and the B&NES boundary and the southern end of RAD1 is already too far away from the centre to promote satisfactory use of any station. There is no scope for any railway line passing through the site to a terminus elsewhere in Radstock, which is supported by the statement made by Rab Smith. Any such opportunity is ruled out in the masterplan for the site, which includes ecological mitigation land to be managed solely for ecological use in perpetuity on the trackbed that is not developed. Even the national cycle network cycle route will not pass over this to exit the site, leaving no link after development (drawing submitted by Linden homes as part of the application for extension of the outline application). The removal of the possibility of rail within the plan period could be said to work against Objective 1, bullet 2 of the CS regarding enabling, through location of development, the fullest use of public transport. Rab Smith for B&NES said on Day 6 that it was unlikely that there would be a compelling business case to attract patronage for the £44 million cost. He stated that rail operators would not consider promoting this line. It should be noted that first Great Western has said that it would welcome the opportunity to operate a line from Radstock. It paid for work that identified cost above £40 million, but community group-based projects can achieve the same ends for lower costs, as has been demonstrated elsewhere and there is much enthusiasm for rail in the town.

1.1.4 B&NES claimed on Day 6 of the Inquiry that the Council is happy with the mitigation for impact on the commuting route between SACs regarding RAD 1 and that funding from the HCA to enable the project and the road proposals to go ahead had been arranged. Regarding the first of these claims, there have been no documents added to those on the B&NES website in respect of the application for an extension of the outline permission, for which adequate mitigation is a condition, and the B&NES ecologist who deals with planning matters has not been consulted and is not aware of any information regarding this matter or progress upon it (pers. comm. 1st February 2012). The following questions have been sent to the ecologist:

Is there any progress regarding the light mitigation regarding dark corridors on the Radstock NRR/Linden Homes development site?

Has the Council received light contour mapping?

Has the Council received any revised site layout of lighting design?

Has the matter of protecting the Foxhills boundary from light incursion been addressed to the satisfaction of the Council sufficient to provide a dark corridor of sufficiently low lux for horseshoe bats ?

Has the matter of control of lighting on private and commercial properties been addressed to the satisfaction of the Council sufficient to ensure the preservation of dark corridors, including on the Foxhills boundary, of sufficiently low lux for horseshoe bats?

Have the developers announced to the Council their intention to address the above issues differently than it was for the outline application they have applied to have extended?

Until a reply is received, we are assuming that what B&NES means regarding being *happy with the mitigation* is that it is happy to pre-judge its decision on satisfaction of

the conditions regarding mitigation with reference to bats.

Radstock Action Group has questioned the allocation of funding for the affordable housing, as it has not found evidence that this has been agreed. There were claims a few years ago that funding for affordable housing was allocated through the Kickstart 2 programme, but the HCA's funding was slashed resulting in a much reduced offer to NRR/Bellway. The £4.3 million funding at that time was, however, awarded for both affordable and market housing pending handover if development started on time, despite the claim that it was for affordable housing.

1.1.5 The cost of the road scheme to be paid by B&NES and the HCA indicates that the outline application was not financially viable, which was an element which Councillors were insistent on before giving approval. This undermines the validity of the original outline consent and puts into question the integrity of NRR, the company set up by B&NES that it nominated as the preferred developer to deliver its landholdings and realise their asset value, was allocated as the vehicle to deliver the Railway Land outline application, and was the agent by which the planning of Radstock centre would be determined and delivered.

Funding for the road was agreed at a total of £1.2 million to deliver the road scheme permitted at outline which NRR and Bellway Homes were to deliver. £400,000 of this is to come from B&NES (which would have donated £150,000 under the Section 106 agreement for the outline application). However, in the NRR/Bellway Regeneration case setting out the costs of its proposals to show financial viability in 2007, the cost for *Off-site public realm and highways, including Frome Road diversions and a new footbridge to school* was a mere £675,000. This £675,000 was to pay for a greater amount of infrastructure than the £1.2 road scheme will - the £1.2 million did not include the cost of the bridge and one of the bus stops. It would appear from these figures that the case for financial viability was significantly flawed. The work of the company that assessed this viability based its assessment upon information provided by the applicants (the Councillors insisted that the applicants provide evidence and a separate regeneration case document, which were produced very shortly before the committee meeting).

1.2.0 RAD.3

1.2.1 RAD.3 is currently an employment site adjacent to a car sales retail site on the A362; the retail site extends to the entrance road to the Mill Road industrial estate and lies opposite another current employment site, Ryman's engineering. Loss of this employment space suitable for small/medium size business expansion well connected to the road network, the town centre, and to any future rail terminus on RAD1, is in conflict with Core Strategy Policy SV1 3c, which protects land in existing business use. It appears from the SHLAA that housing only is proposed for this site. The site hosts a building that has historical and architectural value in the context of the town. Its loss would be contrary to Policy SV3a.

1.2.2 The apparent assumption in the SHLAA that the anticipated reduced parking standards will not lead to parking displaced on-street is dubious, due to the bridges connecting the site with the parking opportunities in Waterloo Road and the public car park in between, if not developed for housing (RAD4).

1.2.3 Residential use has the potential to conflict with SV3 1d, as this site is directly adjacent to a summer and winter bat roost used by a range of species including both species of horseshoe bat, which are light sensitive. The proposal is for 50 dwellings at similar in size and massing to the RAD1 development, which is three-storey in the central area. Lighting would be at significantly higher elevations than the adjacent river corridor, yet no action to overcome constraints has been identified in the SHLAA.

1.2.4 Traffic from the proposed 50-dwelling residential development would far exceed present traffic generation at peak times and would mainly feed into the congested town centre area. Under the recently revised road proposals, traffic is most likely to travel northward from the site to the centre, adding to pressure on the A362/A367 junction. The traffic analysis is based upon 2009 traffic data and yet the SHLAA, dated May 2011, concludes that a Transport Assessment is required to consider the impact on local roads and further afield. We consider that assessing the impact in the context of the centre of Radstock should have been done as part of the analysis that determines suitability. We think that addressing the impact of traffic would count against inclusion of this site for housing.

1.5.0 RAD.4

1.5.1 B&NES takes the view that *the need for the existing car parking and open space needs to be established but neither would appear to be essential*. We suggest that it should have been possible to establish car parking and open space needs as part of the LDF process and as part of the SHLAA assessment. The assessing part appears not to have been given the attention it needs. Given the confidence that B&NES appears to have in the longstanding regeneration case, that included the future development of land in B&NES' and other ownership in central Radstock, this could be thought surprising.

1.5.2 The *incidental open space* referred to in the SHLAA is a well used and pleasant open area. Groups of teenagers, parents with small children, and people sitting on the grass/grassy humps to eat their lunch backed by a tree-covered 'batch' (former spoil tip in a valley bottom - a unique feature of the local heritage) is a common site in the summer. The ambience is of high quality and suits well the NCN 24 cycle path which crosses it, giving an inviting feel to cycle path users of benefit to the town in a 'gateway' position. It is also a feature of one of the four Radstock heritage walks and presents an opportunity for a heritage board pointing to six important heritage features in that location and much more in the immediate surrounds and further afield. Sections 2, 3 and the last paragraph of section 9 of the leaflet for the Radstock Heritage walk 4, the Whitelands Walk, is specific to the open space and its immediate vicinity (see end of this document)

The green space provides a pleasant setting for the now-developed RAD 4a rank of cottages, complementary to the townscape. This informal green space would be well suited to 'village green' status and provides a good alternative to the formal Miner's memorial garden with its hard surfaces, herbaceous borders and benches.

This space is an important feature in an area which the Green Spaces strategy points out suffers from a lack of accessible green spaces. Its removal for housing development would decrease the quality of the public realm, conflicting with CS Objectives 4 and 6.

The development of this space conflicts with Policy SV1, 1a and 8a and works against Policy SV1 1b. It also conflicts with Policy SV3 1b, 3a, 3c, 3d, and 3f and looks to work against policy 3g (if an informal leisure area constitutes an amenity).

1.5.3 What the SHLAA describes as the *site frontage to Waterloo Rd* is a B&NES-owned public car park adjacent to the Miners' memorial garden and almost opposite the highly acclaimed and much-visited museum, which has no car parking facilities of its own. It is used for coach parking and as a drop-off point for school and community group visits to the museum. This is the only turning point for the coaches.

In addition, on a Sunday, the public Waterloo car park is filled by Jehovahs Witnesses attending the Kingdom Hall opposite. As Waterloo road is an on-road section of the Radstock - Shoscombe arm of Colliers Way, National Cycle Route 24, any increase in on-street parking on a Sunday is undesirable from a cyclist safety point of view. Waterloo Road also leads to two residential areas at Tynning and Whitelands.

We believe that these local considerations count against delivery of the site through unsuitability on planning grounds. It conflicts with CS Objective 4, bullets 1, 9 and 10 and with Objective 3, bullet 3.

1.6.0 RAD.5

1.6.1 The Post Office Sorting office is a major employer in Radstock centre, with over 60 people employed. Redevelopment of this site would entail loss of this employment site and of an amenity used by local people and businesses collecting and sending parcels.

1.6.2 Office use is identified in the SHLAA for this site. The identification of a need for office space in the centre comes out of the analysis that suggests that diversification of the employment offer is needed, but there are a number of problems. The measure of demand for office space in central Radstock is unclear and there appears to have been no analysis of how competition with Frome, 8 miles away in Mendip, which has ample vacant accessible and cheap office space, would affect uptake; lack of uptake could lead to conversion to residential use.

1.6.3 The capacity of the site to provide sufficient employment places to replace all of the 60+ Post Office jobs that would be lost is unclear. This employment location is close

to the bus routes and a cycle network. The bulk of travel is in journeys to work, so 'man-for-man' replacement is important. There is absolutely no guarantee that the sorting office would relocate within Radstock.

1.6.4 The site is not large enough to accommodate sufficient car parking space to cater for 60 replacement workers and 15 flats; the implications of the combination of this with the allocation in the SHLAA of all three of the public car parks in Radstock for development without replacement of the bulk of the spaces is a worry. The parking implications have not been assessed. We think that the above factors would constitute a planning hurdle that cannot be overcome and work against delivery.

1.7.0 RAD.6

1.7.1 Development of half of this site for housing this site would remove a public car park. The evidence base regarding retail sales in Radstock shows clearly that passing trade is a significant element - this requires easy access to parking. Radstock comprises a collection of settlements on the hills and valley sides and the 2001 Census showed that 78% of journeys to work from the old Radstock Ward (pre-governance review) were by private car (destinations both within and outside the Midsomer Norton/Radstock area). This demonstrates reliance on private cars by local people and the importance to traders of car parking in the centre. The Radstock traders are very unhappy with the plans for reduced car parking that will result from the revised road changes to facilitate development in the town. Some of the traders feel that the impact of the changes will cause them to go out of business. Loss of further public car parking space can only serve to increase pressure on the existing traders and discourage take-up of any new retail premises on the RAD1 site should it be delivered. This works against a healthy centre and so against Objective 4 of the Core Strategy.

1.7.2 The SHLAA appears to suggest that reduced parking standards would be acceptable, but also says that it cannot lead to vehicles displaced on-street. On-street parking would be likely on Church Street as a result of residential development with reduced parking standards. Normal parking standards would decrease housing numbers and site viability, given that it is also assumed that the existing community uses of two buildings would be redeveloped as part of the site proposals and one of these buildings is an old traditional local building of value to heritage and town character.

1.8.0 RAD.7

1.8.1 Delivery of RAD 7 entails raising early 1960s buildings to three storeys for the purpose of providing flats. This does not seem to be a realistic proposition as the buildings are unlikely to be structurally sound enough to do this without at least underpinning, which is very expensive. There may also be further costs associated with the existing businesses and residents.

1.8.2 The existing buildings are out of keeping with the rest of the town centre as they are and the northern end of RAD7 is in an area of high noise and air pollution levels. It is

difficult to envisage any developer taking on this proposal.

1.9.0 RAD.12, RAD.13i and RAD 13ii

1.9.1 Allocation of RAD.12 under GDS. NR13 has not resulted in delivery of this site for mixed use, yet an employment plot immediately adjacent has been granted permission for housing, despite being located outside the housing boundary.

1.9.2 The RAD12, RAD13a and RAD13b developments appear to be part of a ribbon development in Coombend which has already started through planning permissions. This location is subject to pinch points in both directions and a difficult exit into the Town Centre. The SHLAA identifies a number of significant difficulties regarding 13 a and b and it is unclear from the assessments whether or not any commercial element would be retained on these sites. Housing development would replace employment opportunities, accompanied by higher traffic volumes.

Radstock Heritage walk 4 leaflet:


1 The Pit Wheel, Waterloo Road

The pit wheel is one of two identical sheaves which were situated at Kilmersdon Colliery, one of the last to close in 1973.

Across Waterloo Road is the Market Hall, now Radstock Museum. The Market Hall was built in 1897/8 at a cost of £2,500 for Messrs Coombs the local brewery owners. Used as a covered market on Saturdays, it is said that anything from a parsnip to a piano could be purchased there.

2 Along Waterloo Road and next to the Market Hall is a red brick building, the former offices of the Coombs Brewery Company built in 1898. It is now an electrical shop. The open area opposite this shop was where the Somerset Coal Canal connected Radstock to the Midford Locks area in the 1790's. The canal had fallen into disuse by 1815 and the towpath was subsequently used for horse drawn coal dillies (mini wagons on rails). In 1873, on this same route, the Somerset and Dorset Railway (S&D) connected Radstock to Bath and later became the London Midland Scottish Railway (LMS). The northbound station and platform was closest to Waterloo Road and the southbound platform opposite. A footbridge over the track was provided for the public, whilst railway staff used the trackbed crossing. 1902 records show that on a typical Saturday some fifty trains passed through this station in a 12 hour period, and further traffic of course passed through the adjacent Great Western (GWR) line. The double set of level crossing gates crossing the main road often caused traffic chaos.

On the north side of Waterloo Road are two remaining cottages. For many years Herbert Yelling ran a local taxi service here serving the railway station. The modern flat roofed two-storey building is the telephone exchange standing in the grounds of the former Market Yard. In this yard, before the market hall was built, wheeled market stalls were stored. These were wheeled along Waterloo Road on Saturday for open air markets outside the Bell Hotel. The market yard housed a weekly cattle market and many other events including travelling entertainers, fairs and boxing prize-fights. Small workshops and retail shops lined the perimeter of the yard, one of the better known being the workshop of Walter Phillips, carpenter and undertaker. Opposite the Market Yard, the imposing red brick Radco Furnishing



3 The new houses of Pine Court stand on the site of the former S&D railway line and train sheds, and Pine Court is named after the Pines Express that passed through Radstock twice a day on its journey between Bournemouth and Manchester. Beyond these houses is the waste tip of Ludlow's Colliery, where spoil was tipped before a tramway was built to take waste up to the Tynning area at the top of the hill.

Further along Waterloo Road, to the north (left) are terraced cottages, built of local white liassic limestone ('white lias') and originally with Welsh slate roofs. These cottages, which are very characteristic of the area, were built in the late 1800's by the Waldegrave family to house the increasing need for local workers (mostly miners). The terraces have both architectural and social interest. The projecting houses at either end were originally occupied by colliery officials, watching over the workers in the rank and exercising a subtle form of social control. Waldegrave Terrace, higher up the side of the hill, is a good example of the local style. Manager's houses were typically detached and located in aloof positions above the town.

The houses in Pines Way lie adjacent to the perimeter area of the Radstock Wagon Repair Company. An embankment formerly ran along the back of Pines Way and Pine Court carrying the tramway for the coal dillies and the waste to be taken up to the Tynning waste tip. Beyond Pines Way a buttress wall that carried the tramway across the railway line is still visible.

4 Climbing Tynning Hill on the left-hand side are new houses standing on the site of the former Co-operative transport depot. Just beyond this and now converted to flats, is the former Radstock Co-operative processing dairy serving the many Co-op owned farms in the area. At the back of the yard are the stables where the delivery horses were stabled. The pair of houses further up the hill housed the Co-operative Society Transport Manager. The modern housing development to the left of the hill covers former meadows used to graze the Co-op horses and cattle.

5 An estimated two and a half million tons of waste from Ludlows, Tynning and Middle pits was dumped here. In 1881 it was estimated that a third of output was waste, caused partly by the fact that the coal seams here are very thin and in order to create a workable space much waste had to be removed. The batches were planted with Scots Pine and Larch. These trees favoured the soil, enhanced the appearance of the waste tips, stabilised the waste against slippage and provided a ready supply of timber for pit props to shore up underground workings. Three further batches in this area have recently been levelled and grassed since the demise of the Coal Board and the closure of the Collieries in the 1970's. The land closest to Stoneable Road was once the Limestone quarry where white lias building stone was excavated around 1830/40.

To the right (east) was the site of the original Tynning Pit, sunk in 1837 and bought by the Waldegrave family ten years later. This was a deep working pit (1007 feet) with two pit shafts and a Cornish Beam Engine to pump out water. Underground flooding caused problems, and on 9 October 1876, men were drowned here when water broke through from the adjacent Writhlington Pit workings. The last coal was 'wound up' on 11 November 1909. No trace remains of the large colliery site.



6 Carry on along the road

In front of you are two of the original four terraces of Whitelands remaining today. The Upper terraces on the flat ground to the north (now demolished) were conventional two storey terraced cottages. This same flat area was also used in the 1960's as a site for mobile homes to house miners from the Durham area.

The surviving Lower Whitelands terraces are unusual due to the length of the terrace and the three-storey height. Dating from the 1840's, these were the first purpose-built miner's terraces in Radstock forming a separate community shielded from established residents in the old historic core. Radstock miners enjoyed better housing conditions than their more urban colleagues elsewhere. Note the long garden allotments to the front and individual privies to the rear, and most families kept a pig.

Follow on down the hill and cross the former LMS railway line and canal route. Through the footpath sandwiched between the animal feed mill and sewage works. Cross over Wellow Brook and turn right back to Radstock.

7 The woods to the left mask yet more colliery waste, adjacent to the site of the former Upper Writhlington Colliery. Opened around 1805 the pit ceased working in 1898. The offices, owner's house and blacksmith's shop remain as private dwellings. This site is rich in ferns and fossilised remains can be seen in Radstock Museum.

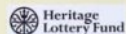
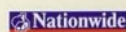
8 Half a mile further on the right is the old Corn Mill. Almost opposite the mill stood four or five cottages which suffered almost continuous flooding during winter months which must have been awful for the occupants.



9 Leave Mill Road.

Almost opposite is the former Ludlows Colliery. Sunk in 1782, the last coal dug here was on 19 March 1954. This was a big pit, employing (in June 1936) 375 men. It was nationalised in 1947 and subsequently modernised. Because of long underground haulage distances (there were over 11,000yds of 2ft gauge track underground) a 1947 report (never implemented) recommended diesel locomotives be used underground. After closure the red brick pithead baths continued to be used by Writhlington Miners, and survive today along with other nineteenth and twentieth century buildings, now converted to light industrial uses.

Continue back to Radstock past the timber yard standing on the site of the old sawmill. Around the corner and right over Sheepwash Bridge, so named because sheep were driven through the river here to wash them before they were presented for sale at the market. Back past the Old Bakery to the wheel.

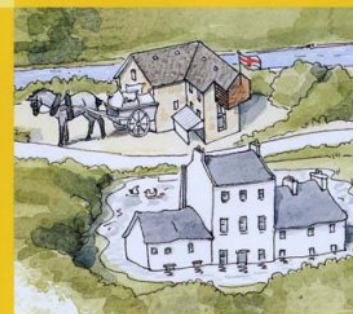


Design: Justin Folke, 01225 7168347
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Yellow Route

Radstock

Whitelands Walk



A circular walk of one and a half a miles taking around one hour

One of four walks exploring the built and natural heritage of Radstock