

29.1.09.

Planning Department,
Oswestry Borough Council,
Castle View,
Oswestry.
SY11 1JR

For the attention of Mr. Tim Rogers.

Dear Sir,

PROPOSED REDEVELOPMENT OF BURBIDGE SITE.

I write on behalf of the Cambrian Railways Trust to comment on the applications to develop this site. Some of the documents have failed to download from the Council's website, and the developer has not been able to provide us with a copies. Also we have not yet had an opportunity to visit the existing buildings. These comments are therefore based on a limited examination of the documents in the Council's front office, so we apologise if there are relevant sections we have missed, or misunderstood. If so, we would be pleased to be corrected, and to withdraw or amend our comments. For such a large and important proposal, we trust the Council will take into account any representations received after the formal deadline, as far as is reasonable.

Outline Application 09/15869/OUT

The plans show a new pedestrian/cycle route outside the application site, on the railway land which the Trust is about to lease. In fact it is marked down the centre of the railway track right into the platform at Oswestry station, which is clearly impossible as we pointed this out to the developers in an e-mail dated 20.6.08. Unfortunately our comments have not been taken into account, and are not mentioned in the report on consultation feedback. Indeed the very existence of the Heritage Railway project is hardly acknowledged in the application, even the benefits it could bring by attracting visitors to the development and providing sustainable transport opportunities.

The Trust is committed to co-operating with Shropshire County Council or others to construct a cycleway/footpath along the railway corridor, subject to railway operating and safety constraints. For the section alongside the application site (from the Whittington Road bridge to the Davies & Metcalfe crossing), there should be little difficulty in locating a cycleway on the east side of the railway. South of the Davies & Metcalfe crossing part of the alignment indicated becomes impractical, but the Trust would be pleased to assist with seeking alternatives. Meanwhile, because of the implied threat the re-opening of the railway, the Trust wishes to make a holding objection until an amended plan is submitted showing the cycleway in an acceptable location.

There are only limited user rights over the Davies & Metcalfe accommodation crossing. It is possible that it could be used as a public pedestrian crossing, subject to the construction of gates, signage, and any other safety measures required by Her Majesty's Railway Inspectorate – but safety concerns may be raised due to its proximity to the new level crossing on the medical centre access road; it would also probably need to be included in the Trust's forthcoming Transport & Works Act Order. Again we would be pleased to co-operate with the developer subject to technical and safety constraints.

The developers have confirmed by e-mail that they would bear the costs involved in the above works.

Alternatively, the documents suggest that pedestrians could use the existing footbridge. It may well be more logical for the footbridge or the new level crossing to be used, via the front of the works building, instead of the Davies & Metcalfe crossing. It would also seem better to have a bus lane here, giving buses a direct route to the town via the medical centre, instead of doubling back on themselves.

The proposal includes road works underneath the Whittington Road bridge. There is limited headroom for vehicles, and evidence that the girders have sustained collision damage over the years. A condition should be imposed that the details of any work under or near this bridge must be agreed in advance with the railway operator, and in particular that the road level must be no higher than existing.

The application includes the demolition of all unlisted buildings on the site, including the former loco running shed. The 19th century brickwork side walls with round-topped window openings remain, but it was re-roofed in the 1950's. These walls have the potential to be retained and adapted for a new use as part of the development, and could result in a building of great character, retaining historical links with the town's past, and making the development stand out from other modern retail developments with which it would be competing. In June 2008 we suggested that the developers investigated this option, but they do not appear to have done so. We urge that there should be a presumption against their demolition, and that any outline approval should include a condition requiring the retention of this building to be assessed as part of application for approval of reserved matters.

Listed Buildings Consent application 09/15870/LBC

Sections 9 and 10 of the application form are confusing, but accompanying documents show that the application is for the demolition of large parts of a Listed Building. This was not apparent to us at the consultation state.

Only indicative schemes are given for replacement buildings, and further applications are intended in the future. Effectively, permission is being sought to demolish listed buildings without any commitment about what, if anything, is to go in their place. Neither is any indication given of the proposed alterations to those parts of the listed building which would remain.

The applicant's Heritage Statement gives an excellent account of the history of the railway works, but then proceeds to argue that parts of it do not contribute to its historical importance, and that the complex as a whole is typical of industrial buildings of the period and is not uncommon. This completely misses the point. The works is uniquely important because of its context, and the survival of all its parts.

The "Cambrian Railways Conservation Management Plan" (Donald Insall Associates/Govannon Consultants, 2004) states in para. 3.2.4 "The Oswestry station building is a rare surviving example of the headquarters of a secondary railway system, and the Oswestry works have been described as 'one of the least altered and most intact examples of a purpose-built railway works.' These elements are remarkable as survivors rather than for their technical merit." Section 3.3 emphasises the distinctive characteristics of Cambrian Railways buildings, and says the Oswestry "station buildings and the works are **the best surviving examples of their type in the UK...**", categorising them as "**Nationally Significant Features**". In section 3.5 it is states that "The main buildings (including the station, goods shed, signalbox and works...), the platforms, trackbed, footbridge and associated features both on and off the railway (such as the institute on Gobowen Road) all survive in **a unique group**. The buildings are handsome and generally in good condition, contributing **a major townscape feature**.... Although in disparate ownership the potential of the Oswestry site to illustrate the scale and complexity of a regional railway headquarters remains."

For many years the Trust has been pressing for the designation of a Conservation Area to include the above structures, but without such a designation the local authority was powerless to prevent the recent demolition of the Institute. We have also been pressing unsuccessfully for a proper conservation strategy for the whole railway works complex, in view of various recent unsympathetic alterations and piecemeal proposals.

Bays 1 and 2 were constructed soon after the Cambrian was taken over by the GWR in 1923, and as such they illustrate a significant episode in Oswestry history, and demonstrate the development of the works during its 100-year railway life. The steel frame and lattice trusses (formerly with corrugated steel/asbestos cement cladding and patent glazing) are typical of GWR construction of the period, as used for loco sheds, warehouses, etc. – but, far from being commonplace, they are probably the only surviving examples in Shropshire and mid/north Wales. Around the same date, the GWR constructed platform canopies at Oswestry of similar materials; although these have all gone, the Trust has been fortunate in obtaining steelwork from the canopies

of the grade II listed buildings at Wolverhampton Low Level station, with which to build replacement canopies. The application appears to give no reasons for taking down the historic steelwork and replacing it with modern portal frames – perhaps it is considered easier or cheaper. The “illustrative views” of the replacement building show something with an appearance totally out of character with the remainder of the works, which would seriously compromise the visual impression of a complex with industrial origins.

Instead of this proposal, the original elements of the building should be retained and repaired, and the design and materials of the elevations should be based on its 1960’s appearance. Similar buildings are valued in their heritage context elsewhere, and there is no difficulty in sourcing replica materials and components [see for example enclosed Steelway leaflet]. The signage and external landscaping should also be sympathetic and not assertively modern as indicated.

The Sheet Room and Gasworks are older parts of the works complex, and although altered they are basically intact, and eminently restorable. The reason given for seeking to demolish them is “to create an improved access” and “enabling a sustainable use to be established for the more important Bays 3 and 4”. In fact the site layout shows their site used only for car parking, and the proposed use of the adjacent buildings is not defined. This proposal is completely unjustifiable.

We find it astonishing that proposals are being made to demolish significant parts of an important listed building complex for no good reason, and without details of what will replace them. It is completely contrary to conservation philosophy, and would seriously undermine the efforts of Oswestry to encourage tourism based on local heritage. It would be even more astonishing if, as implied by the applicant, local authority and English Heritage officers have supported such proposals.

We urge the Council to reject this application and encourage a revised scheme which enhances the heritage context of the site, and adapts the existing buildings instead of destroying them.

In the event of the application being approved despite these considerations, we urge the Council to impose a condition that the materials from any demolished buildings should be offered to an appropriate railway heritage organisation for re-use, and that specialist dismantling and transport should be carried out at the developer’s expense.

Yours faithfully,

Henry Thomas (Trustee)
On behalf of the Cambrian Railways Trust.