

***NLS CONSERVATION GROUP**
ADVICE NOTES FOR CONSULTATION RESPONSE

These are some pointers to help you focus on main areas of response to Banes and help you fill in a comments form as part of consultation process.

Don't worry about filling out which questions/page/paragraph etc at the top of the comments form

1. Speak in plain English and say what you want to say
2. The RSS doesn't say it has to happen, other options have evolved since then, eg, brownfield
3. Council needs to be taking a more flexible approach to standards so that more brown field sites can be developed, deliverability will then be increased
4. Buffer required for World heritage site
5. Part of the aim of the urban extension is to regenerate Twerton but how are the 2 things going to be actually linked across a brook/valley/trees?
6. If the 2 can't be linked, the 'Urban extension' is actually going to be an 'outward commuter belt'
7. Use their wording, eg 'good thing to regenerate Keynsham,
8. Students: Council has not given sufficient weight to on campus accommodation.
9. 50 dwellings/hectare is a high density, need to check what is at Poundbury and Newquay.
10. Government has encouraged discussions at early stages, eg Duchy & Banes, but this appears to be overly prescriptive in terms of 1 landlord delivering the Greenfield site.
11. Plan uses farmland which is a valuable source of food production
12. Coalmines: evidence of stability, are we satisfied that enough research has been done on this
13. Poor consultation process, documents missing or unavailable. Local authorities have a duty to involve
14. Landscape character assessment/Heritage site impact, has any montaging been done?
15. Need to ask for recent assessment of empty properties, have BANES done one as should be done before any new houses built. Also, local area agreement and Climate Change targets
16. Highlight series of contradictions on numbers, gone from needing 1000, to 1500, to 2000
17. Flexibility on area of search is not evident
18. How does the Core Strategy fit with the Sustainable Community Strategy?
19. The other really important document that must be in place BEFORE the core strategy consultation is the SHLAA infrastructure delivery plan
20. If there is an incomplete Infrastructure Delivery Plan, how do they know putting all the houses in one place is best.
21. This particular Green Belt doesn't just divide 2 cities; it divides a MAJOR CITY and a WORLD HERITAGE SITE- so its an exceptional situation.
22. The Landscape and heritage around NSL is very hilly, why build on a ridge?
23. The Slope faces North so passive solar gain would be very difficult.
24. The site is the gateway entrance to the World Heritage Site, plans could affect status (Unesco)
25. How do you join the Urban Extension to Bath?, would need bridges, ??cost
26. jobs and transport/roads and infrastructure – evidence of numbers/analysis

You may want to summarise/ classify responses under specific headings such as:

Fit with RSS and Sustainable Community Strategy?

What flexibility, if any, is there with respect to the RSS requirement for a 2,000 dwelling urban extension to Bath? How does this proposal fit with the Sustainable Community Strategy for Bath which must lead the core strategy?

Landscape and Heritage Impact? It is recognised that this proposal will have a significant impact on the Bristol/Bath Green Belt as well as the Bath World Heritage site and setting of the historic village of Newton St Loe. Is the proposed development capable of providing sufficient amelioration?

Scale? Is it right therefore to expect just one location to provide 2,000, given the above constraints?

What are the proven viability thresholds for the different infra-structure and community needs?

Deliverable? Whether this site is deliverable and viable remains to be seen as neither the Infrastructure Delivery Plan or the Strategic Housing Land Availability Assessment (SHLAA) have been completed/ made available.

Process? Important documents have been unavailable or available too late in the consultation process. Also, a final decision may also prove to be premature until the RSS is finally adopted by the Secretary of State.

In general, make the response Punchy, use headings, retrofit Questions