

## 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.

1. Write what we wish to say then retro-fit the questions on the Core Strategy document.
2. Don't give alternatives
3. Speak in plain English
4. The RSS doesn't say it has to happen, other options have evolved since then, eg, brownfield
5. 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
6. Buffer required for World heritage site
7. 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?
8. If the 2 can't be linked, the 'Urban extension' is actually going to be an 'outward commuter belt'
9. Use their wording, eg 'good thing to regenerate Keynsham, ie work our preferred options into their wording. ie 1000 on brownfield sites in Bath,
  - a. other 1000 spread between 3 key areas, Keynsham, Radstock, SW Bristol.
10. Students: Council has not given sufficient weight to on campus accommodation.
11. 50 dwellings/hectare is a high density, need to check what is at Poundbury and Newquay.
12. 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.
13. Use of farmland which is a valuable source of food production
14. Coalmines: evidence of stability, are we satisfied that enough research has been done on this
15. Poor consultation process, local authorities have a duty to involve
16. Landscape character assessment/Heritage site impact, has any montaging been done?
17. 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
18. Highlight series of contradictions on numbers, gone from needing 1000, to 1500, to 2000
19. Flexibility on area of search
20. SUSTAINABLE COMMUNITY STRATEGY – THE MOST IMPORTANT DOCUMENT THAT SHOULD BE THE DRIVING FORCE FOR EVERYTHING ELSE, THIS DOCUMENT MUST BE SET FIRST, NOT AFTER the core strategy AND SHOULD BE RUNNING ALONGSIDE THE RSS. In order to produce it there should have been local community and local strategic partnership participation, eg police, fire brigade, hospitals etc. (**currently only available online**)
  - a. How does the Core Strategy fit with the Sustainable community Strategy?

21. The other really important document that must be in place BEFORE the core strategy consultation is the SHLAA infrastructure delivery plan. Mark Pollock said this appeared to be incomplete. Mel phoned BANES to ask for it on 23.11.09 and was told it is due to be published at the end of the week and that someone would call her back.
22. If there is an incomplete INFRASTRUCTURE DELIVERY PLAN, how do they know putting all the houses in one place is best.
23. This particular Green Belt doesn't just divide 2 cities, it divides a MAJOR CITY AND A WORLD HERITAGE SITE, AN EXCEPTIONAL CITY.
24. The Landscape and heritage is very hilly, why would you build on a ridge?
25. The Slope faces North so passive solar gain would be very difficult . The site is the gateway entrance to the World Heritage Site, What is the view of English Heritage?
26. How do you join the Urban Extension to Bath?, would need bridges, ??cost
27. Statement of Community Involvement is a guide that has to be followed by the council, if can prove the process is not being followed they have to start again.

***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?

The original draft RSS proposed an urban extension of 1,500 dwellings and the Council has in the past recommended 1,000 dwellings. 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 Infra-structure Delivery Plan or the Strategic Housing Land Availability Assessment(SHLAA) have been completed.

Process?

In view of the above the consultation period should be extended to allow these important studies to be taken into consideration. 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 Qs, send copies to:***

MP and future MPs  
 All BANES councillors  
 Everyone in NSL  
 Press and media