Bath & North East Somerset Council

Improving People's Lives

Special Cabinet

Date: **Thursday, 1st February, 2024**
Time: **6.30 pm**
Venue: **Council Chamber - Guildhall, Bath**

Agenda

To: All Members of the Cabinet

Councillor Kevin Guy (Leader of the Council, LD Group Leader, Member Advocate for Armed Forces and Veterans), Councillor Tim Ball (Cabinet Member for Neighbourhood Services), Councillor Alison Born (Cabinet Member for Adult Services), Councillor Mark Elliott (Cabinet Member for Resources), Councillor Paul May (Cabinet Member for Children's Services), Councillor Matt McCabe (Cabinet Member for Built Environment and Sustainable Development), Councillor Manda Rigby (Cabinet Member for Highways), Councillor Paul Roper (Cabinet Member for Economic and Cultural Sustainable Development), Councillor Sarah Warren (Deputy Council Leader (statutory) and Cabinet Member for Climate Emergency and Sustainable Travel) and Councillor David Wood (Deputy Council Leader (non-statutory) and Cabinet Member for Council Priorities & Delivery)

Chief Executive and other appropriate officers
Press and Public

The agenda is set out overleaf.

Marie Todd
Democratic Services
Lewis House, Manvers Street, Bath, BA1 1JG
Telephone: 01225 394414
Web-site - http://www.bathnes.gov.uk
E-mail: Democratic_Services@bathnes.gov.uk

NOTES:

1. **Inspection of Papers:** Papers are available for inspection as follows:

Council's website: https://democracy.bathnes.gov.uk/ieDocHome.aspx?bcr=1

2. **Details of decisions taken at this meeting** can be found in the minutes which will be circulated with the agenda for the next meeting. In the meantime, details can be obtained by contacting as above.

3. **Recording at Meetings**

The Openness of Local Government Bodies Regulations 2014 now allows filming and recording by anyone attending a meeting. This is not within the Council's control. Some of our meetings are webcast. At the start of the meeting, the Chair will confirm if all or part of the meeting is to be filmed. If you would prefer not to be filmed for the webcast, please make yourself known to the camera operators. We request that those filming/recording meetings avoid filming public seating areas, children, vulnerable people etc; however, the Council cannot guarantee this will happen.

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4. **Public Speaking at Meetings**

The Council has a scheme to encourage the public to make their views known at meetings. They may make a statement relevant to what the meeting has power to do. They may also present a petition on behalf of a group.

Advance notice is required not less than two full working days before the meeting. This means that for meetings held on Thursdays notice must be received in Democratic Services by 5.00pm the previous Monday.

Further details of the scheme can be found at:

https://democracy.bathnes.gov.uk/ecCatDisplay.aspx?sch=doc&cat=12942

5. Emergency Evacuation Procedure

When the continuous alarm sounds, you must evacuate the building by one of the designated exits and proceed to the named assembly point. The designated exits are signposted. Arrangements are in place for the safe evacuation of disabled people.

6. Supplementary information for meetings

Additional information and Protocols and procedures relating to meetings

https://democracy.bathnes.gov.uk/ecCatDisplay.aspx?sch=doc&cat=13505

Cabinet - Thursday, 1st February, 2024

in the Council Chamber - Guildhall, Bath

A G E N D A

1. WELCOME AND INTRODUCTIONS

2. EMERGENCY EVACUATION PROCEDURE

   The Democratic Services Officer will read out the emergency evacuation procedure as set out in the notes.

3. APOLOGIES FOR ABSENCE

4. DECLARATIONS OF INTEREST

   At this point in the meeting declarations of interest are received from Members in any of the agenda items under consideration at the meeting. Members are asked to indicate:

   (a) The agenda item number in which they have an interest to declare.
   (b) The nature of their interest.
   (c) Whether their interest is **a disclosable pecuniary interest** or an **other interest**, (as defined in Part 4.4 Appendix B of the Code of Conduct and Rules for Registration of Interests)

   Any Member who needs to clarify any matters relating to the declaration of interests is recommended to seek advice from the Council's Monitoring Officer or a member of his staff before the meeting to expedite dealing with the item during the meeting.

5. TO ANNOUNCE ANY URGENT BUSINESS AGREED BY THE CHAIR

6. QUESTIONS FROM PUBLIC AND COUNCILLORS

   Questions submitted before the deadline will receive a reply from an appropriate Cabinet member or an undertaking to respond within 5 working days of the meeting. Councillors may ask one supplementary question for each question they submit, up to a maximum of two per Councillor.

7. STATEMENTS OR PETITIONS FROM PUBLIC OR COUNCILLORS

   Councillors and members of the public may register their intention to make a statement if they notify the subject matter of their statement before the deadline. Statements are limited to 3 minutes each. The speaker may then be asked by Cabinet members to answer factual questions arising out of their statement.

8. MATTERS REFERRED BY POLICY DEVELOPMENT AND SCRUTINY BODIES

   This is a standing agenda item (Constitution rule 3.3.14) for matters referred by Policy Development and Scrutiny bodies. The Chair of the relevant Policy Development and Scrutiny Panel will have the right to attend and to introduce the Panel's

recommendations to Cabinet.

9. BUILDING A FAIR, GREEN, CREATIVE AND CONNECTED BATH WITH NORTH EAST SOMERSET (Pages 5 - 38)

   The Economic Strategy offers a new approach combining challenges and actions across six pillars of Good Work, Inclusive Innovation and Creativity, Greener Economy, Resilient Businesses, Housing Affordability and Stronger Places. The Cabinet is asked to approve the Economic Strategy and to sign off the partnership approach to its implementation and delivery.

10. LOCAL PLAN OPTIONS CONSULTATION AND LOCAL DEVELOPMENT SCHEME (Pages 39 - 474)

    The report sets out the proposed Local Plan options for public consultation and the arrangements for public consultation scheduled to start in February 2024. It also seeks changes to the Council's Local Development Scheme (LDS) which is the Council's programme for the preparation and review of planning policies.

11. SOMER VALLEY ENTERPRISE ZONE LOCAL DEVELOPMENT ORDER - COMMITMENTS (Pages 475 - 486)

    The report sets out the commitments the Council has for the Somer Valley Enterprise Zone.

12. SOMER VALLEY ENTERPRISE ZONE LOCAL DEVELOPMENT ORDER (Pages 487 - 648)

    The Cabinet is asked to adopt the Local Development Order for the Somer Valley Enterprise Zone site to meet the aims of the Local Plan policy SSV9.

13. SOMER VALLEY ENTERPRISE ZONE IN PRINCIPLE STATUTORY MECHANISMS (Pages 649 - 676)

    The report provides an overview of the current progress of negotiations with landowners in respect of the Somer Valley Enterprise Zone (SVEZ).

The Democratic Services Officer for this meeting is Marie Todd who can be contacted on 01225 394414.

Bath & North East Somerset Council		
MEETING/ DECISION MAKER:	**Cabinet**	
MEETING/ DECISION DATE:	**1 February 2024**	EXECUTIVE FORWARD PLAN REFERENCE E 3499
TITLE:	Building a Fair, Green, Creative and Connected Bath With North East Somerset	
WARD:	All	
AN OPEN PUBLIC ITEM		
List of attachments to this report: Economic Strategy		

1 THE ISSUE

1.1 Bath & North East Somerset has a healthy economy built upon unique natural and cultural heritage, strong academic and public sector institutions and a broad and diverse business base. But to ensure a resilient and successful economy for the future, in which all our residents and communities can thrive, we need to address key challenges, including climate change, inequalities and an aging population. The new Economic Strategy sets out a clear vision for a more sustainable local economy, with a new strategic approach built upon six pillars of Good Work, Inclusive Innovation and Creativity, Greener Economy, Resilient Businesses, Housing Affordability and Stronger Places.

2 RECOMMENDATION

The Cabinet is asked to:

2.1 Provide approval for the Economic Strategy

2.2 Sign off the partnership approach to implementation and delivery of the economic strategy.

3 THE REPORT

Background

The economic strategy has been developed with partnership at its heart and incorporates the core aims of the One Shared Vision. Our new Economic Strategy will sit alongside the newly adopted Corporate Strategy 2023-2027, the Climate Emergency Strategy & Ecological Emergency Action Plan and the Joint Health and

Wellbeing Strategy to form the core suite of Council documents which set the direction of our delivery and the outcomes the council are looking to achieve.

The economic strategy sets out a clear vision and direction for BANES' future economy. This strategy represents a new approach, informed by sustainable (doughnut) economics, which prioritises the needs of people and planet. It aims to ensure that we can better meet the social needs of our communities whilst living within environmental limits, delivering the infrastructure, innovation and opportunity needed for our economy to thrive in the future.

The strategy has been developed from a strong evidence base to ensure that action is focused on the issues of greatest impact and addresses the needs of the future. This has been done in close consultation with key anchor institutions. University of Bath, Bath Spa University, Curo and the RUH have all endorsed the plan. Our aim is for the implementation plans, which will flow from this strategy, to be developed in partnership with these organisations - reflecting their role as key stakeholders and major employers within the authority area.

The economic strategy emphasises the importance of economic resilience and sustainability, ensuring that the fundamental foundations of our economy are strengthened, which will in turn support productivity and prosperity. The Economic strategy will deliver on the Council's Corporate Strategy core principles (focusing on prevention, delivering for residents and preparing for the future) through a framework structured around six key pillars to secure sustainable and inclusive development for all:

- We will create a **Greener Economy** that is Net Zero, Nature positive
- We will support our residents to access **Good Work**
- We will establish B&NES as a centre of **Inclusive innovation and creativity.**
- We will create **Resilient Businesses** by building a diverse, creative and sustainable base
- We will address **Housing Affordability** and ensure residents have access to high quality homes
- We will support **Stronger Places**, building resilience and sharing prosperity more fairly

The Strategy includes a ten-point delivery plan highlighting key actions that illustrate our ambitions for the future. Several of these actions are already in train, including work to bring forward new business locations in Bath Quays, Somer Valley Enterprise Zone and the Milsom Quarter.

A ten-point delivery plan for B&NES

1. Scope **community green bonds** to help residents to invest in local projects
2. Increase local adoption of the Real Living Wage and become **a living wage place**
3. **Promote new and emerging developments for businesses** including Bath Quays and Somer Valley Enterprise Zone
4. Deliver the **Fashion Museum project**, and wider Milsom Quarter regeneration to re-imagine this precinct in Bath as a flagship sustainable development

5. Develop a **riverside tech and innovation corridor** that links existing assets from Manvers St to Bath Quays

6. Deliver the affordable housing B&NES needs through the new Housing Plan including the **scaling up B&NES Homes**

7. Identify potential sites for **new affordable accommodation** using our own land assets

8. **Support thriving mixed use centres** including the development of co-working hubs linked to UKSPF, space for startups and small businesses, and cultural & service centres

9. Accelerate **digital infrastructure** rollout, including gigabit, superfast broadband and 5G

10. **Secure connectivity improvements** through the development of a Transport Action Plan that provides accessible, affordable and active options for all areas of the district.

The strategy will span a decade from 2024-2034 and will be supported by three-year implementation plans. These implementation plans will be revised at regular intervals to better align with current government funding cycles. This will serve to strengthen our funding bids and the development of regional projects with our partners.

4 STATUTORY CONSIDERATIONS

4.1 There is no statutory requirement to publish an economic strategy. This report has been produced to support the Council's Corporate Strategy and partnership ambitions.

5 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

5.1 This report sets out our strategic approach. Resources required to deliver the strategy will be identified within implementation plans.

6 RISK MANAGEMENT

6.1 Economic evidence and analysis supporting the development of the Economic Strategy identified risks and challenges relating to availability of business space, housing affordability, aging population, climate change and increasing inequalities in skills and employment outcomes. This strategy seeks to mitigate those risks to future social, economic and environmental wellbeing.

7 EQUALITIES

7.1 An equalities Impact Assessment has been undertaken. The Economic Strategy includes targeted actions to support employment opportunities for individuals with protected characteristics. The strategy also contains a number of actions set out to positively impact those from socio-economically disadvantaged backgrounds.

8 CLIMATE CHANGE

8.1 The Economic Strategy as a whole seeks to respond to the twin challenges facing our climate and natural environment, both through dedicated action for a Greener Economy, and by increasing sustainability actions across all six pillars of action.

9 OTHER OPTIONS CONSIDERED

9.1 None.

10 CONSULTATION

The Council has been working with partners over the past year to develop a new Economic Strategy for B&NES. Members' previous steers have informed development of the Final Economic Strategy, as attached, alongside input from resident engagement (Jan 2023 area-based consultation) businesses (Feb 2023 workshop), the Future Ambition Board (workshops in June, September, and December 2023), Corporate Policy Development and Scrutiny Panel (March and November 2023).

Businesses and partners have been consulted in the preparation of the Economic Strategy. This strategy has been produced in collaboration with:

- The Western Gateway and West of England Combined Authority partnerships enable us to act as a unified voice to national government to drive investment.
- The Future Ambition Board (FAB) has strengthened our relationships with our key anchor institutions in our local economy. The strategy has been developed in close consultation with the FAB. Close partnership working between us is essential to delivering on our strategic ambitions and this will be reflected in the delivery and implementation plans which will be developed in collaboration with key anchor institutions.

Contact person	Jackie Clayton & Louise Morris – Head of Green Transformation Jackielouisejobshare@bathnes.gov.uk
Background papers	The Strategic evidence Base for Bath and North East Somerset informed the Economic strategy. It is published on the Council's public webpage: https://beta.bathnes.gov.uk/strategic-evidence/document-library/strategic-evidence-base-summary-and-full-report
Please contact the report author if you need to access this report in an alternative format	

Building A Fair, Green, Creative and Connected Bath with North East Somerset

An Economic strategy for Bath and North East Somerset 2024-2034

Bath & North East Somerset Council

Improving People's Lives

BATH SPA UNIVERSITY

CURO

UNIVERSITY OF BATH

NHS Royal United Hospitals Bath NHS Foundation Trust



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A word from our Partners -1

Bath Spa University

Bath Spa University is already significantly invested in the city and region's economic growth and sustainability. Our Vice Chancellor's authoring of the Combined Authority's Cultural Plan templates BwNES vision for a 'fair, green, creative, connected' city and county.

Current University major projects such as FWD, The Studio, EMERGE, and our collaborative Further/Higher education partnership with Bath College all directly address the Economic Strategy's guiding 'three themes' of Innovation, Infrastructure, Opportunity. As Sunday Times Inclusive University of the Year for 2023/24, with a commitment to unlocking opportunities for all our 13,000 students on our Bath and London campuses we embody the local, regional and national strategic leadership through partnership that underpins this Economic Strategy.

As one of only five Universities with 'gold mark' status as a social enterprise, Bath Spa is fully engaged with the Economic Strategy's direct addressing of lagging GVA, business growth and innovation. Our collaboration with the Council and considerable investment in the National Centre for Fashion and Sustainability and Locksbrook Creative Quarter articulates all '6 pillars' of the Strategy. We see this collaboration as essential the city and region's sustainable future.

We are delighted to be working so closely with a council also committed to regenerative economics.

University of Bath

The University of Bath welcomes the new collaborative approach to local economic development which underpins the Building the New Bath and Northeast Somerset Economy strategy. As a major anchor institution, the University of Bath plays a key role in the economic, cultural and environmental well-being of B&NES contributing £380m pa to the economy and supporting 5,950 jobs locally. The activities of our students, research and innovation activities contribute to B&NES wider ambitions for health, decarbonisation of transport and the built environment.

Building on our core economic strengths, we now have an opportunity to diversify the local economy to create a vibrant, entrepreneurial corner of the UK and putting us at the forefront of energy transition, decarbonisation, and health industries for years to come. To support this aspiration, we will work with the Council to bring forward a new Innovation Corridor in the City Centre including a commitment to create a new University of Bath Innovation Centre providing the additional space and support needed to retain entrepreneurs setting up fast growing innovative companies delivering new high value jobs for our residents.

The ambition set in this strategy is matched by our commitment to measure and evidence the difference we make. We look forward to sharing this progress as we move forward.

A word from our Partners - 2

Curo

At Curo we are proud to be a partner supporting B&NES to deliver this new ten-year Economic Strategy, and we're particularly pleased to see a renewed focus on housing affordability.

As the largest Housing Association in B&NES, with more than 10,000 homes and an annual turnover of £150m, we understand the major challenges around housing supply and rent levels. The very high ratio of house prices compared to incomes impacts residents and employers; we believe that truly affordable housing needs to be a key part of the solution.

Homes also need be of a high standard, a drive reflected in our own ten-year strategy which prioritises the quality of homes. Our focus on energy efficiency and sustainability will help address fuel poverty and support residents' wellbeing. We will continue to invest in existing homes and build as many new homes as possible each year to 2034, and we support the commitment to a policy framework that enables the delivery of housing provision at scale.

We also welcome the strategy's focus on Good Work; with 700 colleagues we are a major local employer, and we continue to deliver a range of initiatives to help local residents into education, training and employment.

Royal United Hospital Bath

At the RUH we aim to put people at the heart of what we do, striving to create an environment where everyone matters. Everyone means the people we care for, the people we work with and the people in our community. Motivated to understand and help address the many wider determinants of health and wellbeing within our shared place, we believe that by working together with local partners we can build one of the healthiest places to live and work.

Following from the 2019 NHS Long Term Plan and a Health Foundation Report: Building Healthier Communities: The Role of the NHS as an Anchor Institution, the Health and Care Act 2022 later heralded Integrated Care Systems (ICSs) with four main aims:

- improve outcomes in population health and healthcare
- tackle inequalities in outcomes, experience and access
- enhance productivity and value for money
- help the NHS support broader social and economic development.

Our commitment to working together to deliver this shared Economic Strategy for B&NES is made in the knowledge that while our clinical care is important, it actually makes a significantly smaller difference to people's overall health than things like income, employment, housing, social connection and environment

Introduction

On many measures, Bath and North East Somerset's economy is a success story. We are home to significant academic, business, heritage, and natural assets. Our residents are highly qualified, and we have low levels of unemployment. We have sector strengths in knowledge intensive and agricultural industries, and our public sector assets support large scale employment in education and health.

However, we also face distinct challenges. Economic growth in the last ten years has been sluggish and our lower-than-average wages cannot keep up with escalating costs of local housing. Fuelled by inequalities in health, employment, and education outcomes, a two-tier economy is emerging. This is not a sustainable or inclusive model of growth, particularly in the context of the climate and ecological emergencies that we face.

Our current trajectory, if we continue business as usual, is one of deepening inequality where some people and places will thrive, while other residents, communities and places will be left further behind. We will likely see continued slow growth of our local economy, characterised by low wages, and structured around the public sector. Businesses may choose to invest elsewhere, unable to access talent who cannot afford to live locally. Our infrastructure will not meet local needs, creating further pressure on health and social care services, dependence on cars, and growing housing inequalities. The degradation of our natural assets will undermine both environmental and social resilience, reducing the materials and ecosystem services essential to our lives and economy, and reduce opportunities for wellbeing, recreation, and creativity.

We are acting now to change this.

This Economic Strategy signals a new approach to local economic development which prioritises meeting the needs of all our residents and places whilst reducing impacts on our natural resources and environment. Our approach draws on the principles of Doughnut Economics to deliver balanced action that ensures the future Bath and North East Somerset is one which operates in the safe space between the social floor (whereby the needs of all our residents are met) and the ecological ceiling to ensure we do not overshoot our planetary boundaries[1]. Whilst the priorities and actions outlined in this strategy have been designed to address the drivers of slow growth, as part of our new approach, we will not focus exclusively on GVA as a measure of our success. Instead, we have developed a holistic set of indicators which will help us tell a nuanced story of change for our people and planet.

We are at the start of our journey towards a new economy. We are committed to evaluating our progress and sharing learnings to continually refine our approach in order to realise our one shared vision for a **fair**, **green**, **creative** and **connected Bath** ***with*** **North East Somerset**.

The building blocks for change

Developed between November 2022 and September 2023, this strategy is built upon the wealth of data contained in the Council's Strategic Evidence Base and has been informed by consultation with our partners, businesses and residents to ensure our focus is directed on the challenges and opportunities which matter most.

It supports the fair, green, creative and connected Bath with North East Somerset (B&NES) as outlined in One Shared Vision - the statement of renewal developed and delivered by the Future Ambition Board (FAB). This Economic Strategy provides a ten year vision for B&NES to 2034, and will sit alongside the Council's newly adopted Corporate Strategy 2023-2027, the Climate Emergency Strategy & Ecological Emergency Action Plan and the Joint Health and Wellbeing Strategy to form the core suite of documents that set out the outcomes we are looking to achieve.

Our thinking has been guided by the latest sustainable and inclusive economic principles, whilst remaining aware of the wider macroeconomic environment and levers of change available to us and our partners. Three broad themes have been identified as the areas in which we can make the most difference at a local level:

- **Infrastructure** that supports a green and connected future,
- **Innovation** that drives a creative and resilient economy, and,
- **Opportunity** unlocked for everyone so that we are fair and inclusive.

These themes will be delivered through six strategic pillars - the framework for our approach to sustainable and inclusive economic development for all.



We will create a **Greener Economy** that is net zero, nature positive



We will support our residents to access and thrive in **Good Work**



We will establish B&NES as a centre for scientific and health academic excellence, **Inclusive Innovation and creativity**



We will create **Resilient Businesses** by building a diverse, creative, and sustainable business base



We will address **Housing Affordability** and ensure residents have access to high quality homes



We will support **Stronger Places**, building resilience and sharing prosperity more fairly

Delivered in partnership

We are committed to partnership working to create innovative approaches to address challenges and seize opportunity, all of which will be underpinned by our ongoing mission to give all our residents a bigger say and influence over what happens in our district.

We are part of a wider city region and pan-regional partnership.

The Western Gateway and West of England Combined Authority (WECA) partnerships enable us to act as a unified voice to national government to drive investment. Devolution gives access to powers and resources to support local economic growth. This Economic Strategy sets out B&NES priorities and projects, and we will work collaboratively to accelerate action and spot areas for joint working. Building on the Our Future Ambition place prospectus, the strategy will also enable us to articulate our distinct strengths and opportunities, within the context of Invest Bristol and Bath, and across our entire district, including in our rural economy.

Our anchor institutions are major local employers, landowners and spenders with shared ambitions to support the people, businesses and places of Bath & North East Somerset.

Royal United Hospitals Bath, the University of Bath, Bath Spa University, and Curo Housing are key anchor institutions in our local economy. Close partnership working between us is essential to delivering on our strategic ambitions. Through the Future Ambition Board (FAB), we will continue to strengthen these relationships, along with other important partners such as Bath College, businesses and the voluntary and community sector. We will work with all our partners to deliver projects through the Strategy.

The diverse business base, Voluntary, Community and Social enterprise (VCSE) sectors will drive our future economy and understand what is needed to support resilience and prosperity.

We will continue to engage with our businesses of all sizes and sectors to ensure activity remains focused on the challenges in Bath, as well as our towns and rural communities. This means making it easier for local organisations to communicate with the Council and providing clearer structures through which to engage on local issues.

We have good existing links to many of our businesses, but these must be broadened to encompass enterprises of all sectors, sizes and locations. We will work closely with existing networks, such as established representative groups like Bath Business Improvement District, Business West, and 3SG, to strengthen our relationship with businesses and VCSE organisations. We will also explore the creation of new forums to ensure all voices are heard, so we continue to be a Council that gives people a bigger say.

Where are we now

£4.5bn GVA

3.8% growth (2010-2019)

National: 21.8%

192,400 residents

9.9% growth (2011-2021)

National: 6.6%

£32,201 median workplace wages

National: £33,197 (2022)

8,380 businesses

18.6% growth (2010-2023)

National: 29.8%

75% employment rate

+0.8 percentage points growth (2012-2021)

National: 75.5% (+5.0 pp)

56.8% RQF Level 4+

National: 45.5% (2022)

The City of Bath has **a double UNESCO** inscription as a World Heritage City and as **a Great Spa Town of Europe**

In 2020/21 B&NES ranked **2nd to bottom of LAs in England for the largest gap in early years outcomes** between children who do and do not receive Free School Meals[2]

31% of the district **falls within protected landscapes**

Home to 192,400 residents, including a thriving student population, Bath and North East Somerset is a desirable place to live, study, visit, and work. Bath city has particularly strong rail links, providing easy access to the dynamic cities of Bristol, Birmingham and London and connecting us to the rest of the South West. The larger town centres of Keynsham and Midsomer Norton, Westfield, and Radstock in the Somer Valley are built on a proud industrial legacy, boasting strengths in engineering and logistics whilst retaining distinct characters and links to the surrounding countryside.

With over 50% of working age residents having degree level or higher qualifications, we are home to a highly qualified workforce.[3] This is in part credit to our world-leading education providers and research institutions – Bath Spa University, Bath College and the University of Bath – the latter of which was named the University of Year by the Times and The Sunday Times Good University Guide 2023, reflecting the high quality teaching, research and graduate outcomes.[4]

A prosperous new economy

Our skilled workforce are the engine of our business base, composed of 8,535 enterprises[5]. Professional, Scientific and Technical activities is our largest sector (21% of all enterprises) followed by the combined tourism and leisure sectors (14% of local businesses)[6]. We have notable strengths in Creative and Digital, Advanced Engineering and Agriculture and, linked to wider regional strengths, emerging specialisms in Low Carbon, FinTech and Sustainable Fashion industries.[7]

Despite our industry expertise and low unemployment rate (2.6% in B&NES as compared to 3.6% nationally)[8], since 2010, our economy has grown at a significantly slower rate than the rest of the UK (3.8% between 2010 and 2019 locally, compared to 21.8% nationally)[9]. Productivity sees a similar trend, where the GVA per hour in B&NES is over £10 lower than the England figure at £28.45.[10] Like most of the UK, our business base is made up of predominantly micro enterprises (89% of businesses), which are grounded by larger companies such as Wessex Water, Rotork, Bath Rugby and Future Publishing to create a rich business environment.[11] Our leading VCSE organisations, such as Bath and West Community Energy are also a key component of the local business base, pioneering innovative solutions to community challenges to make B&NES a more equitable and sustainable place. The Health and Social Care sector is our biggest employer locally, providing 18,000 (19%) of jobs in B&NES.[12] This is indicative of the high concentration of public sector jobs in the district (19% of employment)[13], many of which are provided by our anchor institutions.[14]



Addressing inequality

Bath and North East Somerset remains one of the least deprived local authorities in the country, ranking 269 out of 317 for overall deprivation[15]. However, there are pockets of deprivation (both Twerton West and Whiteway fall within the most deprived 10% nationally) and patterns of rural poverty are growing.[16] An estimated 19% of children and young people (equating to 7,167 residents aged 0-15) in B&NES live in relative poverty[17]. With the cost of living set to continue to rise, it's estimated 4,000 people will fall into absolute poverty in 2022-23.[18]

Widening inequality in the district can be seen through the gap in attainment for Free School Meals and Special Educational Needs & Disabilities cohorts. Evidence shows these inequalities then carry through to employment outcomes: in B&NES, people with a long-term health condition or illness are over 20% less likely to be employed compared to those without, and there is a 69% gap in the employment rate for those were in contact with secondary mental health services (aged 18-69) and on the Care Plan Approach[19]. Across the life course, women are more likely to be economically inactive, in poor-quality work and experience in-work poverty, and people from ethnic minority groups are more likely to be financially insecure.

Local inequality is also indicated by the lower than the national average workplace wages which contributes to higher levels of in work poverty. In B&NES, 42% of those claiming Universal Credit are in work[20]. High house prices (an average of £356,000 compared to £280,000 nationally), makes owning a property in B&NES out of reach for many, and presents significant challenges for local employers to attract and retain talent.[21]



Greener and more sustainable B&NES

The Cotswolds and Mendip Hills National Landscape (previously known as Areas of Outstanding Natural Beauty) offers an attractive setting for Bath and many of our villages and hamlets. Our outstanding natural environment provides essential services that underpin our economy, from water resources and soils supporting agriculture, to the outdoor recreation that underpins a growing nature tourism offer. Our rich environmental offer is matched by the world class cultural assets in Bath, a UNESCO World Heritage Site, which attracts more than six million visitors annually.[22]

In March 2019, we declared a Climate Emergency and set a target for the Bath & North East Somerset area to be carbon neutral by 2030. This was followed in 2020 by the declaration of an Ecological Emergency, with a target to become nature positive (i.e. reversing declines in biodiversity so that species and ecosystems begin to recover) by 2030.

We have already made significant progress in carbon reduction since 2005, with total CO_2 emissions reduced by almost 44%. [23] Road transport emissions have declined by 21% in the same period, emissions remain high, signalling the high levels of car dependency in the district[24]. 10.3% of households in B&NES own three or more cars (compared to 9.1% nationally), and almost 40% of residents drive a car or a van to work[25].

In response to the Ecological Emergency, we are seeking to increase the area of land managed for wildlife and increase the abundance of wildlife, both through changes in the way we manage our own land and in partnership with land managing businesses. We need to assess, value and grow our natural capital, working with business and other partners to protect and enhance this essential resource as the foundation of our future economy.



A new economy for B&NES

Vision	Bath with North East Somerset: Ambitious Together for a Fair, Green, Creative and Connected City Region					
Pillar	Greener Economy	Good Work	Resilient Businesses	Creativity & Innovation	Housing Affordability	Stronger Places
Objective	Delivering net zero & nature positive and enhancing our natural assets	Supporting residents to access and thrive in good work	Building a diverse, creative and sustainable business base	Establishing B&NES as a centre for scientific and health academic excellence, inclusive innovation and creativity	Ensuring residents have access to affordable and high quality housing	Enabling all people and places to share in prosperity
Priorities that unlock infrastructure, innovation and opportunity	• Build local energy generation capacity and demand for energy saving measures • Support businesses to deliver net zero and nature positive in B&NES • Create opportunities for residents to train and upskill for future green economy jobs • Develop B&NES to be a broad green economy	• Champion good work practices • Increase inclusive pathways into work • Develop an inclusive lifelong learning offer • Facilitate businesses to access the skills they need	• Invest in the infrastructure businesses need • Nurture emerging sectors and specialisms, including culture & creative • Promote alternative business models and community-led action • Support local businesses to stay and scale in B&NES	• Maximise local benefits of B&NES leading innovation assets • Promote B&NES as an innovation testbed • Ensure all sectors and business are supported to innovate • Create spaces for creativity to thrive across B&NES	• Develop housing offer that is accessible and attractive to all • Work with partners to unlock affordable housing • Deliver high quality and sustainable housing fit for future generations	• Promote place-based strengths to drive economic growth in urban centres and rural areas • Support local food supply chains and food security • Improve & invest in sustainable connectivity within B&NES and to the subregion • Drive a sustainable and innovative visitor
Outcomes	Net zero and nature positive B&NES by 2030	Increased economic activity in residents as a proportion of the total population	Improved access to employment industrial/office/retail space across B&NES to meet demand	Increased prosperity for all, measured through Gross Disposable Household Income and healthy life expectancy	Better housing affordability, measured through housing costs as a proportion of income	Improvements in index of multiple deprivation at neighbourhood level, and raised wage levels

Delivered in partnership with B&NES Council – Anchor Institutions – Voluntary and Community Sector – Businesses – Communities – Regional and National Partners

Greener Economy - 1

Objective: delivering on net zero & nature positive and enhancing our natural assets

By declaring Climate and Ecological Emergencies and setting an ambition for the area to be net zero carbon and nature positive by 2030, we recognised that our new economy must be a green economy. We have a duty to protect our natural assets, promote biodiversity, and lead an equitable transition where all communities and residents benefit. Transformative change is required, and this change needs to happen at every level – government, businesses, communities, and individual residents.

This means that all B&NES strategic delivery must be driven by greening all sectors of the economy via the cutting of emissions, reducing impact on natural resources and promotion of biodiversity. The below priorities are designed to support this, complementing the work outlined in the B&NES Climate Emergency Strategy and Ecological Emergency Action Plan.

Outcome: reaching net zero and nature positive B&NES by 2030

We will develop B&NES to be a broad green economy

The green economy encompasses more than the renewable energy and environmental services sectors. The natural resources sector is growing and will continue to do so to deliver biodiversity net gain and nature-based solutions to address climate change and local needs. We will work with businesses to green all our sectors, enabling local organisations to act on new market opportunities to position us as leaders in green inclusive growth.

To start, we will:

- Continue the role out of the Council's climate literacy training, and develop ecological literacy modules, to increase understanding of climate and nature issues
- Work with WECA and regional partners to capitalise on the opportunities of the regional green economy
- Support the work of Retrofit West in developing the business supply chain for retrofit within the district

We will create opportunities for residents to train and upskill for future green economy jobs

The shift to green jobs will impact many of our current professions and businesses[26]. This is an opportunity, creating demand for existing and new 'green skills' which require different types of training and upskilling.

To start, we will:

- Work with WECA's Retrofit Academy to help local people access training for careers in retrofit
- Develop an apprenticeship programme for routes into nature and environment jobs
- Work with our education providers – including schools, Bath College, Independent Training Providers and universities' - to promote awareness of green jobs and green skills to the current and future workforce (such as through the FWD project)

Greener Economy –2

We will build local energy generation capacity and demand for energy saving measures

In June 2023 59% of residential properties in B&NES had an EPC rating of D-G[27] and 16% of neighbourhoods in B&NES are considered energy crisis hotspots, with an average annual energy bill costing £2,288.[28] We can develop new models of efficient, affordable, and reliable energy, building on our existing community-led renewable energy base. By encouraging local renewable energy generation, we can ensure a lower long-term carbon footprint whilst reducing the costs of running a home.



Credit: Bath West Community Energy

To start we will:

- Promote the Energy@Home service to residents on low incomes to increase take up of grant support and advice
- Work with Bath and West Community Energy to increase awareness of their renewable energy projects and support
- Scope community green bonds to help local residents to invest in local projects across our city, town and rural centres
- Explore the development of a Local Area Energy Plan, working with sector and regional partners, to ensure our electricity grid supports electrification and decarbonisation

We will support businesses to deliver net zero and nature positive in their organisation

In 2021 industry and commercial emissions accounted for 13% of greenhouse gas emissions in B&NES[29]. Whilst this figure has been decreasing over recent years, levels remain high. To reach our goal of net zero by 2030, we must help our businesses decarbonise.

To start we will:

- Promote WECA's free carbon surveys for SMEs and Green Business grants to help businesses invest in improving the energy efficiency of their premises
- Develop and promote B&NES as a location for leading sustainable businesses (e.g. with B Corp[30] status)

Good work - 1

Objective: supporting residents to access and thrive in good work

We want all of our residents, regardless of age, gender, profession or personal circumstances, to have access to good work. We define good work as workplaces which adhere to the following seven characteristics: ensures secure work; offers flexible work; pays the Real Living Wage; operates fair recruitment practices; involves employees in decision making; develops staff and supports the mental and physical health of employees.[31] A healthy population is key for a healthy economy. The evidence base is clear that a healthy population supports a productive and prosperous economy and vice versa. One of the strongest relationships between health and the economy is sustaining a healthy workforce as workers in good health are more likely to attend work, be more productive when at work, have higher morale and resilience, and are more likely to engage in education and skills training.

With more employers providing fair and decent jobs, we will further grow Bath and North East Somerset's reputation as a great place to live and work, and attract and retain the top talent needed to support our economy to thrive. Removing barriers to good work and enhancing our flexible skills and training offer, particularly for our more vulnerable residents, is a key measure in addressing inequality and improving wellbeing. This definition is in line with WECA's Good Employment Charter.

Outcome: increase in economic activity for residents as a proportion of the total population and Real Living Wage coverage

We will champion good work practices

This starts with the Council and our anchor institutions as the largest local employers (1 in 5 local direct and indirect jobs are generated through the hospital and our two universities)[32] We will promote the business benefits of good work with our dynamic private sector business base. We must do better for our workers and ensure that all employment is
sufficient and fulfilling.

To start we will:

- Encourage partners, anchor institutions and local businesses to sign up to WECA Good Employment Charter
- Increase local adoption of the Real Living Wage and become a living wage place
- Work with the West of England Combined Authority to deliver the Thrive at Work programme and explore the feasibility of a Thrive into Work initiative
- Promote the Disability Confident Employer scheme to encourage local employers to enhance the recruitment, retention and development of residents

We will increase inclusive pathways into work

In 2021, 5.8% of 16–17-year-olds in B&NES were not in education, employment or training or whose activity is not known (NEET), ranking eighth worst out of all local authority areas in England[33]. We must address these inequalities and ensure that all of our residents are able to access good work. We will do this by collaborating with our education partners and employers to ensure opportunities are more accessible for those in traditionally disadvantaged cohorts.

To start we will:

- Engage with the South West Social Mobility Commission to identify local social cold spots and ways to address them

Good work - 2

- Prioritise projects to address barriers to employment for young people, including care leavers, those with SEND, and those vulnerable to not entering education, employment or training
- Encourage take up of Apprenticeships amongst local business base and anchor institutions
- Involve VCSE sector organisations in devising new, community-led pathways into work which address common barriers to employment (such as travel and caring responsibilities)

We will develop an inclusive lifelong learning offer

Residents must be able to access the opportunities that are right for them throughout all stages of their lives. This will include reskilling, upskilling, and career progression opportunities to ensure that all of our residents at every level access, and adapt to, shifting market demands and ambitions we have for our local economy.

To start we will:

- Use the FWD project, in partnership with our universities and college, to focus on upskilling and reskilling to support progression and career changes
- Increase signposting to the Employment and Skills Pod
- Map future skills requirements, including in major projects and emerging sectors, and work with skills providers on relevant course provision

We will facilitate businesses to access the skills they need

Employers are key drivers of our local skills system. As part of the development of inclusive learning pathways, we will encourage employer involvement in generating demand for local career opportunities to help raise ambition and connect businesses to the skills they need.

To start we will:

- Create and deliver an inclusive Business and Skills plan for Bath and North East Somerset which promotes the uptake of in work support including Future Bright and Midlife MOT and ensure the UK Shared Prosperity Fund (UKSPF) supports B&NES requirements
- Increase diversity in STEM careers by working with local schools and education providers as well as the regional careers hub
- Work with local major manufacturing and engineering bases (e.g. around Midsomer Norton) to showcase career opportunities to young people

Resilient Businesses - 1

Objective: building a diverse, creative, and sustainable business base

If we want to deliver our ambitions, it is essential our business base is resilient to both economic uncertainty and a changing climate, and is empowered to seize sustainable and inclusive opportunities. This means supporting businesses operating in sectors which we have a proud heritage (such as manufacturing) as well as emerging specialisms (e.g. FinTech) with access to finance and tailored guidance, ensuring businesses are aware of how to adapt to our future climate and equipping business owners with the skills and expertise to implement change.

It also means ensuring we have the right infrastructure in place to attract and retain businesses to start and grow in Bath and North East Somerset. Bath Quays regeneration will create a vibrant innovation quarter and campus at the heart of the Bath City Enterprise Zone, working with our universities to create high-wage jobs and using public space alongside the river to give residents and visitors a place to enjoy. The Somer Valley Enterprise Zone will create an exemplar commercial park for new business and employment, and has been designed to support a modal shift in active travel.

Outcome: improved access to sustainable employment industrial/office/retail space to meet demand across B&NES

We will invest in the infrastructure businesses need

To ensure B&NES has the right quality and quantity of space to support existing and future enterprise needs, we need to continue to plan for and invest in physical and digital infrastructure, working closely with the local business base. This will be underpinned by careful planning for the right types of spaces in the right types of locations and land allocations via the Local Plan.

To start we will:

- Promote new and emerging developments including Bath Quays and Somer Valley Enterprise Zone
- Build stronger engagement with businesses so that businesses have a voice throughout B&NES
- Create a ‘Net Zero Nature Positive’ policy for new developments, ensuring that sustainability and climate resilience is at the heart of future

We will nurture emerging sectors and specialisms, including culture & creative

We are seeing the emergence of subsector specialisms in FinTech, Sustainable Fashion, Life Sciences and Health Tech and content production. These will be at the heart of our new economy, creating high-quality jobs alongside opportunities for inward investment and innovation.

To start we will:

- Work with regional partners, defining local and regional spatial clusters (e.g. Bath – Bristol corridor; Somer Valley) to curate business centres in the places where it makes sense to capitalise on new market opportunities, technologies and to strengthen local supply chains
- Develop a cultural strategy for B&NES, linked to the regional plan, that helps cement a resilient culture & creative economy in B&NES

Resilient Businesses - 2

We will support local businesses to stay and scale in B&NES

The number of businesses in B&NES has grown by 23% in the last ten years, contributing to the development of a strong critical mass of thriving entrepreneurs[34]. Invest in B&NES will continue to be a key resource in marketing the raft of support available to help make local businesses a success.

To start we will:

- Increase local participation in regional business growth programmes
- Build a Buy B&NES campaign to showcases local purchasing opportunities to residents and visitors
- Map local public sector spend to identify where there are opportunities for procurement to support local businesses

We will promote alternative business models and community-led action

We have 285 non-profit organisations in B&NES and a strong network of charities, social enterprises, and community groups which play a vital role in providing essential services to communities and encouraging civic participation to address local issues[35]. We will showcase examples of responsible local leadership – such as Bath City Farm - and provide the support for new groups to form and flourish.

To start we will:

- Work with and raise awareness of local networks (including 3SG) to showcase charities, social enterprises and voluntary groups working across B&NES to encourage community-led actions targeted to local issues
- Promote business support aimed at alternative business models, for example from Co-operatives UK and B Lab UK
- Create a local peer support network to connect existing alternative model businesses with those who are interested in changing their business model



Creativity and Innovation –1

Objective: establishing B&NES as a centre for scientific and health academic excellence, inclusive innovation and creativity

We want innovation activity to be inclusive and for all residents to have access to the opportunities and skills for creativity. To us, inclusive innovation means enabling as many people as possible to contribute to and participate in innovation and its outputs[36]. It also means promoting innovation in our foundational economy. Creating routes for sharing knowledge throughout the local business base by opening up assets to smaller enterprises and empowering communities to drive research focus on local challenges will ensure that innovation strengthens links to local opportunity.

Our two universities have high-value specialisms and assets which anchor our local innovation ecosystem. Home to world class business incubation and accelerator services (such as the SETsquared Partnership), the University of Bath are leaders in health and technology research and will play a key role in driving the Riverside Innovation Corridor. Bath Spa University are putting B&NES on the map for creative innovation. As custodians of internationally significant historical fashion collections and cutting-edge research into regenerative textile practices, we will work closely with Bath Spa University to drive the Bath Creative Quarter, a key element of which will be the National Centre for Fashion and Sustainability.

Outcome: increased prosperity for all, measured through Gross Domestic Household Income and healthy life expectancy

We will create spaces for creativity to thrive across B&NES

Bath and North East Somerset is a thriving hub for culture and creativity, boasting numerous cultural attractions and events (such as Bath Digital Festival and Keynsham Music Festival) and a growing cluster of creative businesses. As well as delivering wellbeing benefits, participation in heritage and the arts encourages us to think differently and generate new ideas. We want all residents to have opportunities to pursue creativity in leisure, employment, and community action.

We will maximise local benefits of B&NES's leading innovation assets

We have excellent technology and innovation assets in B&NES, especially in the universities and some of our manufacturing & engineering businesses. It is key that we capitalise on these and make them more accessible so all residents can benefit from their activity to support knowledge transfer and the development of sector and technology clusters.

To start we will:

- Develop a riverside innovation corridor that links existing assets from Manvers St to Bath Quays as scoped in the Enterprise Area Masterplan
- Explore opportunities for increased knowledge transfer partnerships with local businesses
- Work with the University of Bath to build a new Innovation Centre supporting start-up digital, engineering and medical technology companies

We will promote B&NES as an innovation testbed

We are home to an existing 5G testbed which has involved the application of AR and VR technology at the Roman Baths to pilot future approaches to Smart Tourism. By building on our existing and emerging digital strengths (and linking into wider regional assets), we will grow our reputation as the place to conduct inclusive economic, environmental and social innovation targeted at addressing local challenges with global relevance.

Creativity and Innovation - 2

To start we will:

- Promote B&NES innovation strengths and opportunities to investors and businesses online and through events
- Promote provider innovation assets, such as SETsquared Bath, iCast and the University of Bath Innovation Centre, to local businesses
- Promote regional accelerator programmes, such as Hydrogen, Creative Growth Programme and the FWD project business acceleration hubs
- Promote B&NES as a testbed for the development, assessment and implementation of novel solutions and technologies across transport, energy and the built environment

We will ensure all sectors and businesses are supported to innovate

We will support innovation in our foundational economy – the SMEs and large employers that provide many of our essential services and goods – to ensure all firms feel the benefits of improved efficiency and support better life outcomes. We will work in partnership with other public sector anchor institutions to encourage innovation at every level of delivery as well as through procurement.

To start we will:

- Prioritise the foundational economy (e.g. sectors including retail, health) and local services in innovation support, working with partners to draw from good practice and increased data sharing
- Increase uptake of Invest in B&NES and WECA funded management and leadership training for SMEs
- Work with Innovate UK and public sector R&D funding bodies to support more local businesses and entrepreneurs with applications



Housing Affordability -1

Objective: ensuring residents have access to affordable and high-quality housing

In 2022, house prices in B&NES were 10 times annual earnings, creating challenges across the district[37]. The lack of affordable housing in our rural communities threatens the vitality of local businesses and the social sustainability of our towns and villages. In Bath, where house prices are nineteen times higher than the average annual earnings, contributing to its title of joint third least affordable city in the UK, property costs are a significant barrier to attracting talent for local jobs and contribute to employees relocating to areas with cheaper housing[38]. This will likely be a barrier to young people who are just starting work.

Ensuring high quality housing and the adoption of latest green energy solutions and improving water efficiency are important components in reducing costs. In 2020, 11% of households in B&NES were in Fuel Poverty (compared to 13.2% nationally)[39]. With the costs of energy remaining high, it is anticipated that this figure will continue to rise without intervention. Prioritising high quality and affordable housing is therefore key to raising resident wellbeing, retaining wealth locally, and ensuring that living and working in B&NES is attractive and accessible for all.

Outcome: better housing affordability measured through housing costs as a proportion of income

We will develop a housing offer that is accessible and attractive to all

Key to this is updating our understanding of what affordable housing looks like in B&NES, as well as the likely future demand for property. It is estimated that we will see an overall growth of 6,500 households by 2035, with 92% of growth in single people and couples aged over 65. This requires us to take a new approach.

To start we will:

- Deliver a B&NES Housing Delivery Plan
- Scale up B&NES Homes as a local registered provider ensuring programme meets the needs of residents and the economy
- Ensure the new Local Plan policy framework supports the delivery of housing provision at scale to respond to local need

We will deliver high quality and sustainable housing for future generations

This includes ensuring our housing stock meets the needs of different resident groups, for instance those aged 65+ (who accounted for 19.4% of the population in 2021) who will have changing accessibility and service requirements as they age[40]. It also means embracing renewable energy & water efficiency solutions and removing barriers to their adoption where possible, to help lower running costs and reduce domestic emissions.

To start we will:

- Commission house condition modelling to inform future housing condition strategy, to ensure rented homes are decent
- Review and update the Council's strategic approach to improving existing housing standards, focusing on our most vulnerable residents and the future role of property licencing
- Develop and implement an agreed and approved corporate role to promote low-carbon affordable warmth as part of the corporate retrofitting strategy

Housing Affordability –2

We will work with partners to unlock affordable housing

There may be opportunities to use public sector assets for new purposes, taking a creative approach to asset management and development. Areas to explore include housing tenure, affordable housing for workers in the local economy, and optimising space for our thriving student population.

To start we will:

- Identify potential sites for new affordable accommodation in collaboration with partners including Aequus, Curo and anchor organisations
- Work with public sector partners to understand requirements to support housing need
- Work with local Higher Education Institutions on a student living and accommodation strategy, including opportunities on campus



Credit – Mulberry Park

Stronger Places –1

Objective: enabling all people and places to share in prosperity

Delivering a fairer, greener, more creative and more connected B&NES will enable our market towns and villages to thrive alongside the city of Bath. There are many opportunities for our urban and rural communities. Regeneration activities will continue to be designed to increase footfall in the towns, providing a needed boost to the many independent retail and hospitality businesses and supply chains.

Home to over 37,000 residents, rural B&NES is a diverse group of towns, villages, and hamlets with distinct characteristics and landscapes which accounts for over 90% of the district's land area[41]. Each settlement has their own strengths and challenges. Traditionally the rural economy has been based on farming, self-employment and small businesses, which without the right support limits growth potential. Poor public transport and digital connectivity also act as barriers to business and home working, contributing to social isolation and supporting unequal access to essential goods and services. 78% of rural residents commute to work by car[42], and alongside high transport emissions, highlights the need for more local employment and sustainable travel options for our rural communities.

Outcome: improvements in index of multiple deprivation at neighbourhood level, and raised wage levels

We will improve & invest in sustainable connectivity within B&NES and to the subregion

Options are currently limited if you are travelling outside of Bath City, with 78% of journeys to work from rural areas made partly or totally by car[43]. Digital connectivity is also key to ensuring our residents and businesses can keep up with technological advances, but only 42% of residential and business premises have access to full fibre (compared to 48% nationally)[44]. We are committed to delivering on the West of England Digital Plan which aims to maximise the number of household and business premises that have at least a superfast broadband connection by 2026. Ongoing work with the FAB will also support the reduction of digital exclusion through skills and employability training in the digital sphere.

To start we will:

- Accelerate digital infrastructure rollout, including gigabit, superfast broadband and 5G to ensure all businesses and residents across B&NES benefit from improved connectivity to help boost growth and reduce carbon emission associated with commuting
- Promote sustainable and active travel options to support home working opportunities and the visitor economy



Stronger Places –2

- Collectively engage with regional partners and with utilities providers to help achieve targets for increased connectivity for our city centre, town centres and local high streets as highlighted in the regional Digital Plan
- Support delivery of the Joint Local Transport Plan to ensure connectivity improvements in all areas of the district, identifying priority improvements to make in the next four years through an Active Travel Masterplan and a Transport Action

We will promote place-based strengths to drive economic growth in urban centres and rural areas

Many of our rural businesses have links to land, landscape and our strong agriculture base, presenting opportunities for sustainable rural and eco-tourism, food security, horticultural development and AgriTech innovation. We will increase communication lines with all our businesses and engage with existing representative groups (such as the West of England Rural Network) to understand the specific challenges facing different industries in rural areas to enable the creation of targeted support to help all our communities thrive.

To start we will:

- Understand and plan for future employment space demand (industrial, office and retail) through the local plan process
- Seek to understand the role of local nature-based solutions in building environmental resilience and supporting green tourism
- Use business support to support rural diversification and the adoption of green technologies as an economic growth opportunity

Support the High Street Renewal of market towns by creating thriving mixed use centres, including the development of co-working hubs linked to UKSPF, space for startups and small businesses, and cultural & service centres

We will support local food supply chains and food security

The upcoming Food Strategy will develop a plan to access sufficient, safe, and nutritious food, and in doing so, will support food security for all of our residents. Securing food security is crucial both at a district level to increase resilience to global climate and political challenges, and a household level, so that 'good' food is accessible and affordable to everyone regardless of income. We will highlight examples of existing innovative local initiatives, such as the Veg Box Scheme run by the Chew Valley-based The Community Farm, who work with local farmers to supply fresh food sustainably.

To start we will:

- Develop Local Food Strategy, including B&NES Menu to showcase local food production, sourcing, and hospitality
- Work with local producers to understand impact of new regulation and ongoing economic challenges
- Support the uptake and piloting of innovative sustainable and regenerative farming practices

We will drive a sustainable and innovative visitor economy

Our thriving visitor economy is central to the economy, generating over £3 billion in total visitor spend (direct and indirect) in 2021[45]. Support is required to ensure it

Stronger Places – 3

remains dynamic, drawing on innovative business practices to deliver on net zero and nature positive ambitions.

To start we will:

- Commission a time and movement study to better understand visitor behaviour in Bath city centre and where to support the visitor experience
- Engage with Visitor Economy businesses via the Bath Advisory Group and other forums, including those covering the rural areas and the Cotswolds and Mendip Hills National Landscapes, to understand sector aspirations for a resilient visitor economy sector
- Develop a Sustainable Tourism and Visitor Economy strategy that links resilience in the Visitor Economy to sustainable practice and aligns with the Visit West Destination Development Plan and WECA Cultural Strategy



Implementation

This Economic Strategy makes bold commitments which, if delivered effectively, will unlock a greener, fairer, more creative and more connected Bath with North East Somerset by 2034.

The actions listed are not exhaustive, and we expect activity to evolve over time as new opportunities emerge. Strategic delivery of our ten-year vision for B&NES will be supported by a series of three-year action plans which will provide further detail of the phasing of activity and any additional performance targets. To bring focus to delivery, we have identified ten ambitious projects which will bring together stakeholders to deliver on a new economy for B&NES and will be the focus of 2024 activity.

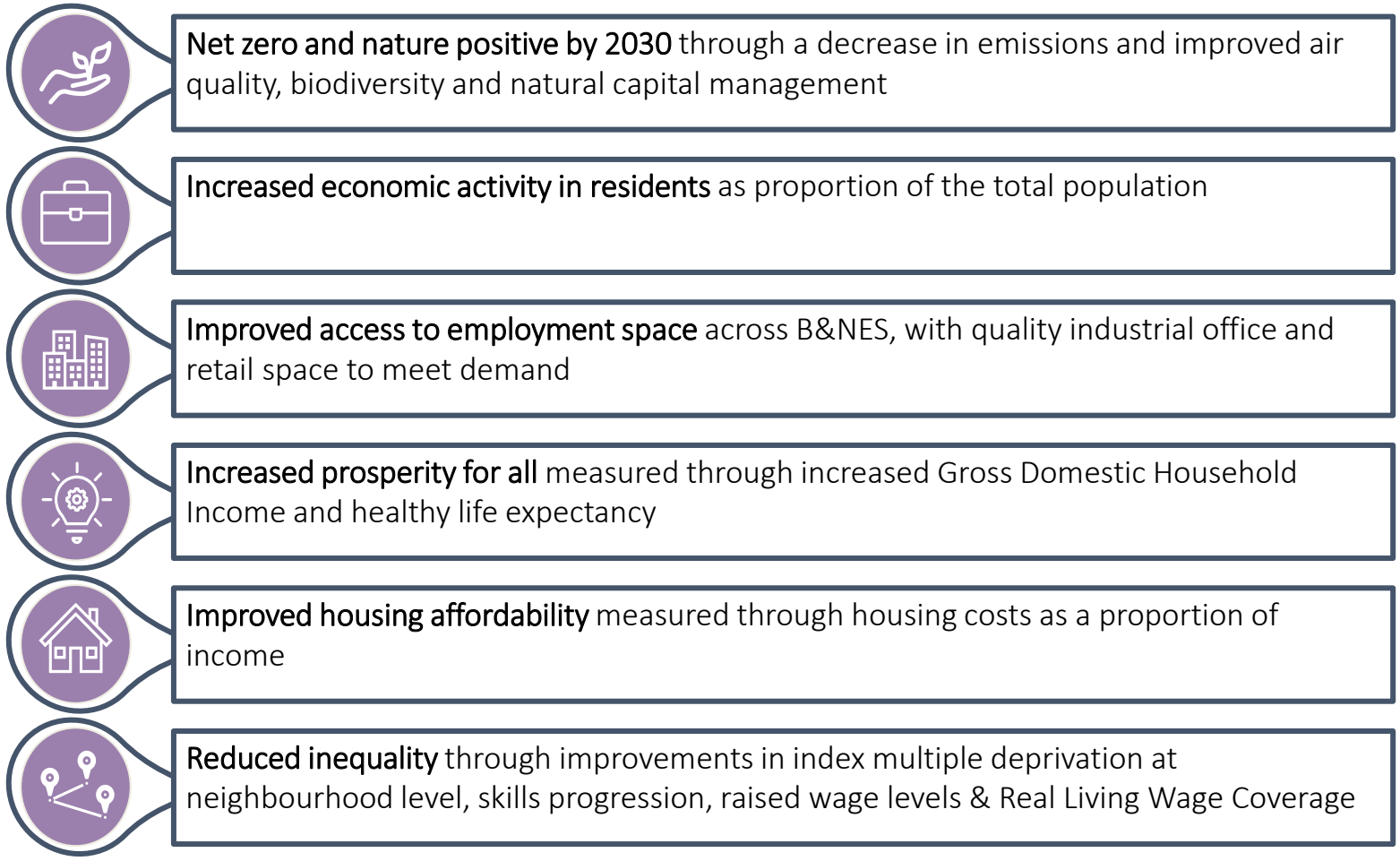


A ten-point delivery plan for B&NES

1. Scope **community green bonds** to help residents to invest in local projects
2. Increase local adoption of the Real Living Wage and become **a living wage place**
3. **Promote new and emerging developments for businesses** including Bath Quays and Somer Valley Enterprise Zone
4. Deliver the **Fashion Museum project**, and wider Milsom Quarter regeneration to re-imagine this precinct in Bath as a flagship sustainable development
5. Develop a **riverside tech and innovation corridor** that links existing assets from Manvers St to Bath Quays
6. Deliver the affordable housing B&NES needs through the new Housing Delivery Plan including the **scaling up B&NES Homes**
7. Identify potential sites for **new affordable accommodation** using our own land assets
8. **Support the High Street Renewal** of market towns by c**reating thriving mixed use centres**, including the development of co-working hubs linked to UKSPF, space for startups and small businesses, and cultural & service centres
9. Accelerate **digital infrastructure rollout**, including gigabit, superfast broadband and 5G to ensure all businesses and residents across B&NES benefit from improved connectivity
10. **Secure connectivity improvements** through the development of a Transport Action Plan that provides accessible, affordable and active options for all areas of the district

Measuring our success - 1

Robust monitoring and evaluation is a critical component of strategy delivery, which will provide us with the tools to communicate our progress and showcase evidence of impact to leverage investment into the district. This strategy outlines six core outcomes, linked to the local pressing challenges highlighted in the Strategic Evidence Base, which will serve as the Key Performance Indicators (KPIs) of our collective action.

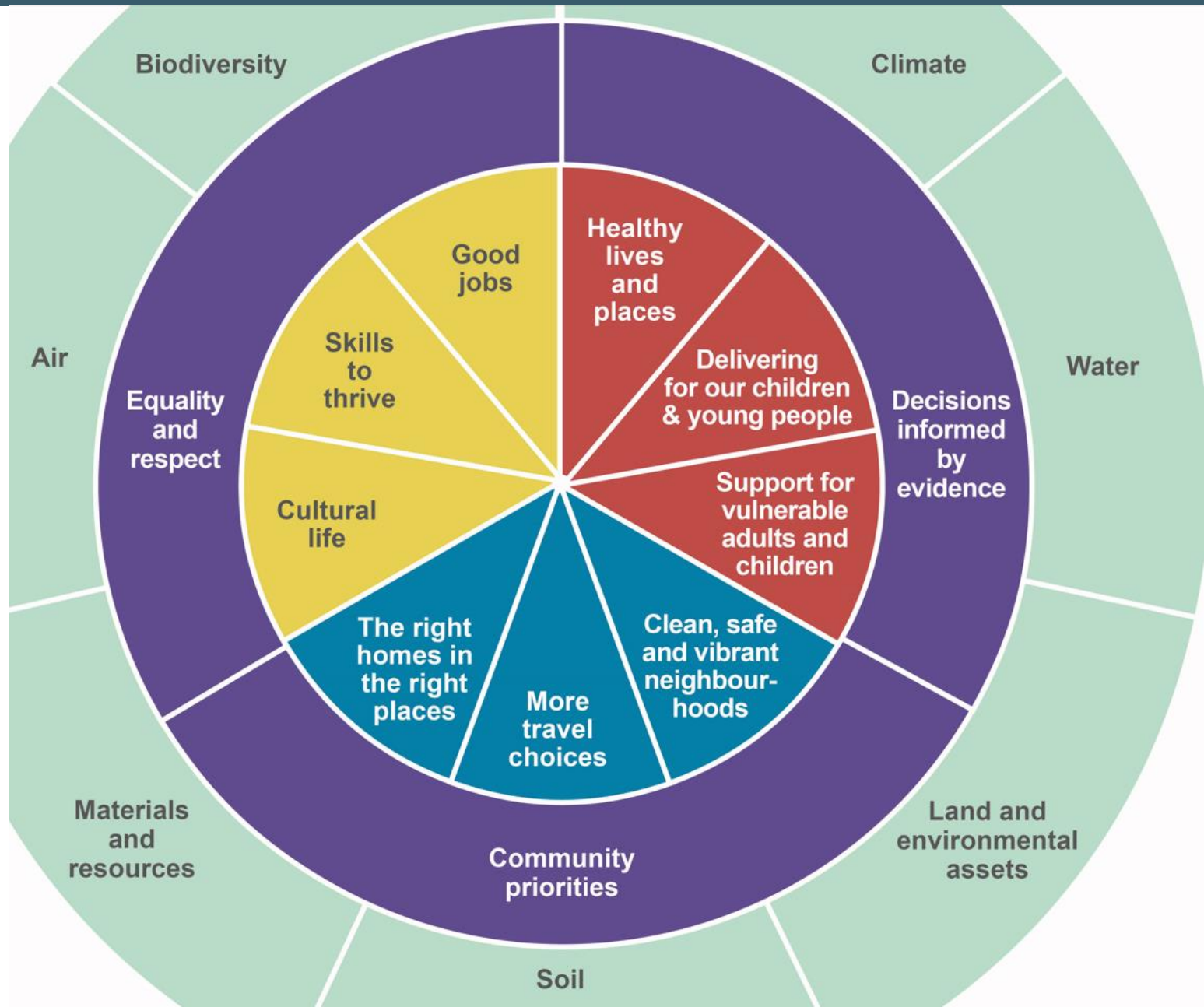


Measuring our success –2

As part of implementation, we will develop a comprehensive Monitoring and Evaluation Framework (MEF) which will enrich of our understanding of what work works, for who, where and why, allowing delivery to be refined to ensure that everyone benefits.

Economic strategy monitoring and evaluation will be framed around the Council's decision wheel. This will enable us to clearly communicate how activity is aligned to strategic priorities as well as its impact on our socioeconomic foundations (inner circle) and the environment (outer circle).

By looking beyond purely economic indicators, we will be able to tell a holistic and nuanced story of change. We will work collaboratively with partners to share learning and develop new data collection processes where required to ensure the full impact on people, place and planet is understood.



References - 1

1 Kate Raworth (2017), Doughnut Economics: Seven Ways to Think Like a 21st Century Economist.

2 B&NES (2023), Strategic Evidence Base

3 B&NES, Strategic Evidence Base, July 2023

4 Ibid.

5 Ibid.

6 Ibid.

7 Invest In B&NES.

8 B&NES (2023), Strategic Evidence Base.

9 ONS (2019) Regional gross value added (balanced) by industry: local authorities by ITL1 region. GVA is an economic aggregate statistic designed to reflect the value of output generated by organisations in an area less the value of inputs used in the production and delivery process. It is a useful measure that is often used to understand local economic growth; however, it should be noted that as B&NES is a relatively small district, the data samples used to calculate GVA are likely lower and sometimes more likely to fluctuate. As such, we have looked at growth trends pre-2021 as the B&NES sector base was more likely to be impacted by the pandemic than other places which have larger manufacturing bases. Moreover, GVA is calculated using worker wages rather than resident wages, so does not account for individuals who may (from Bath) be commuting to employment sites like London, Bristol, or South Gloucestershire.

10 B&NES (2023), Strategic Evidence Base.

11 Ibid.

12 Ibid.

13 Ibid.

14The term anchor institutions is used to refer to organisations which have an important presence in a particular place, typically due to their role as largescale employer, procurers or goods and asset holders. Examples include local authorities, NHS trusts, universities, and large local businesses.

15 B&NES (2023), Strategic Evidence Base.

16 Ibid.

17 Ibid.

18 B&NES analysis of Resolution Foundation (2022) Inflation Nation: Putting Spring Statement 2022 in context.

19 B&NES (2023), Strategic Evidence Base.

20 Ibid.

21 Ibid.

22 B&NES (2022) Journey to Net Zero: public consultation.

23 B&NES (2023), Strategic Evidence Base.

24 Ibid.

25 Census (2021).

26 The ONS defines a green job as ‘employment in an activity that contributes to protecting or restoring the environment, including those that mitigate or adapt to climate change’.

27 B&NES (2023), Strategic Evidence Base.

28 Friends of the Earth (2022), Energy Crisis Hotspots.

29 BEIS (2023), Regional Greenhouse Gas Emissions.

30 Certified B Corporations, or B Corps, are companies verified by B Lab to meet high standards of social and environmental performance, transparency and accountability.

31 This definition is in line with WECA’s Good Employment Charter.

32 Institute for Policy Research (2020), Bath Beyond 2020: Creating a Resilient Economy Together.

33 DfE (2019), NEET and Participation Local Authority Figures.

34 ONS (2021), UK Business Counts.

References - 2

35 Ibid.
36 This definition is adopted from the Connect Places Catapult and UK Innovation Districts Group definition in the 2022 report Opening The Innovation Economy: The Case For Inclusive Innovation In The UK.
37 B&NES (2023), Strategic Evidence Base.
38 ONS (2021) House Price Statistics for Small Areas (HPSSAs); The Independent (2021), Most and least affordable UK cities in 2021 revealed.
39 BEIS (2020), Sub-regional fuel poverty England.
40 Census 2021.
41 ONS (2011) Local authority rural urban classification.
42 B&NES (2022) Journey to Net Zero: public consultation.
43 B&NES (2022) Journey to Net Zero: public consultation.
44 Thinkbroadband (2023) Bath and North East Somerset Superfast and Fibre Coverage.
45 Visit West (2021), The Economic Impact of Bath and North East Somerset's Visitor Economy 2021.

Bath & North East Somerset Council		
MEETING	**Cabinet**	
MEETING	**1st February 2024**	EXECUTIVE FORWARD PLAN REFERENCE: E 3497
TITLE:	**Local Plan Options consultation and Local Development Scheme**	
WARD:	All	
AN OPEN PUBLIC ITEM		
List of attachments to this report: Attachment 1: Local Plan Options Consultation Document		

1 THE ISSUE

1.1 To deliver the Council's spatial priorities arising from the Corporate Strategy and Economic Strategy this report sets out the proposed Local Plan options for public consultation and the arrangements for public consultation scheduled to start in February 2024. It also seeks changes to the Council's Local Development Scheme (LDS) which is the Council's programme for the preparation and review of planning policies.

2 RECOMMENDATION

The Cabinet is asked to;

2.1 agree the spatial priorities of the Local Plan as set out in attachment 1 for public engagement, particularly to support a fairer, more prosperous and sustainable economy and provide for more housing that is affordable

2.2 agree the policy and development location options set out in Attachment 1 (Local Plan Options Consultation Document) as the basis for public engagement

2.3 agree the revisions to the B&NES Local Development Scheme outlined in para 3.3 of this Report

2.4 agree and authorise the Director for Sustainable Communities to carry out the approach to public engagement in Section 10 of this report

2.5 delegate authority to the Director for Sustainable Communities, in consultation with the Cabinet Member for Built Environment and Sustainable Development, to agree textual changes in finalising the Local Plan Options consultation document and the revised Local Development Scheme

3 THE REPORT

Local Plan 2022-2042

3.1 The preparation of a Local Plan enables high quality development to be delivered in a planned and co-ordinated way that will help the council meet its priorities e.g. related to moving towards and maintaining a prosperous, greener and fairer economy, providing affordable housing, moving towards carbon neutrality and better addressing the ecological emergency. It also enables delivery of development to be aligned with infrastructure provision that can be funded or part funded by developer contributions. The council publicised its intention to prepare a new Local Plan by publishing the Local Plan 2022-2042 Launch Document in November 2022. The Launch Document outlined the proposed plan period (twenty years to 2042); scope of the Local Plan; and the arrangements for preparing it.

3.2 Following the WECA Mayor halting work on the Mayoral Spatial Development Strategy (SDS), the B&NES Local Plan will cover all strategic and non-strategic policies relating to the development and use of land across the district. As such it will be a full Local Plan and upon its adoption will replace the B&NES Core Strategy, Placemaking Plan and Local Plan Partial Update (LPPU).

3.3 The Local Plans of the three WECA Unitary Authorities will address the strategic issues that would have been addressed by the SDS. The three UAs are working closely together on our respective Local Plans. Through the Duty to Co-operate we are required to engage constructively and on an on-going basis on strategic cross boundary matters. In accordance with the Duty to Co-operate B&NES is engaging not only with Bristol City Council and South Gloucestershire Council, but with our other neighbouring authorities of North Somerset, Somerset and Wiltshire Councils.

3.4 Having published the Launch Document the next stage of plan preparation is to gather evidence, formulate options (or reasonable alternatives) and to test them through public engagement. This Report outlines the key elements of the Options Document and seeks approval of the Options Document (Attachment 1) as the basis for this public engagement.

3.5 The Council's development plan must include strategic policies to address its priorities for the development and use of land in its area. The primary purposes of a Local Plan are set out in the National Planning Policy Framework (NPPF).

It says strategic policies should set out an overall strategy for the pattern, scale and design quality of places, (to ensure outcomes support beauty and placemaking), and make sufficient provision for:

- housing (including affordable housing), employment, retail, leisure and other commercial development;

- infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

- community facilities (such as health, education and cultural infrastructure); and

- the conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure and planning measures to address climate change mitigation and adaptation.

3.6 Non-strategic policies should be used to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.

3.7 The Local Plan is a key corporate document in helping to address the Council's priorities and objectives that have a spatial or place manifestation. In order to guide the identification of options and ensure the Local Plan delivers the intended outcomes a set of draft spatial priorities are included within the Options Document for comment. These are closely aligned with the Corporate Strategy and are as follows:

Our Local Plan will plan for development in response to local needs to create attractive, healthy and sustainable places in line with the Council's Corporate Strategy.

The Plan will:

- *Create a **fairer, more prosperous and sustainable** economy*
- *Maximise the delivery of housing that is more **affordable***

In doing so, our plans for development must:

- *Enable B&NES to become **carbon neutral by 2030** and deliver a climate resilient district*
- *Protect and enhance nature through facilitating **nature recovery***
- *Improve **health and well-being** outcomes for all, including through planning health promoting and inclusive places and providing for cultural enrichment*
- *Reduce the need to travel unsustainably and enable **improved connectivity** for all through sustainable modes of transport and facilitating locally available services and facilities*
- *Respect, conserve and enhance our **heritage assets** and their landscape settings, in particular the World Heritage Site of Bath and National Landscapes*
- *Align the timely provision of **transport, health, education, social, cultural and green infrastructure** with development*

3.8 Where there are conflicts between these priorities it will be the role of the Local Plan to balance and resolve them. These conflicts and the implications of different options are outlined in the Options Document in seeking the views of residents and other stakeholders.

3.9 In light of the proposed spatial priorities and the primary role of the Local Plan in helping to create a fairer, more prosperous and sustainable economy and facilitating the delivery of housing in response to local needs evidence work has been undertaken to objectively assess the district's economic and housing needs. The Options Document then proposes a range of location and policy options in response to these needs.

Economic and Employment Needs

3.10 The Economic Strategy (considered elsewhere on the agenda for this Cabinet meeting) establishes the strategy for shaping the District's economy and highlights a range of key actions aimed at improving economic prosperity, the sustainability of the economy and ensuring opportunities and prosperity are shared by all. Within this context assessment has been undertaken of forecast economic performance and growth during the Local Plan period, as well as the quality and suitability of existing employment land and premises and the associated requirements for new employment space to meet future needs. The assessment has been undertaken on a sectoral). Ensuring there is sufficient employment space of the right type in the right locations is a key role of the Local Plan, in helping to meet future needs and deliver the Economic Strategy ambition of moving towards and maintaining a prosperous, greener and fairer local economy.

3.11 The study concludes that there is a need to strongly protect existing employment/industrial space, particularly in Bath where there is a shortage of supply. In addition, existing office space should be protected where possible, albeit some of the poorer quality and less suitable stock can be lost (on a case by case basis). Importantly additional high quality office space, suitable for modern occupiers, should be planned for. Most of this need relates to Bath, particularly close to the city centre. Additionally, to meet the needs of key economic sectors a supply of new and replacement space is needed, including innovation and research & development space (in Bath and potentially Keynsham) and industrial premises across the district, particularly in the Somer Valley area.

Housing Needs

3.12 The Economic Strategy also highlights that the lack of availability and affordability of housing is a key issue affecting Bath and North East Somerset and that this also impacts on the performance of our economy and wider sustainability issues. In order to underpin the Local Plan an assessment of housing needs across the District has been undertaken. This study is known as a Local Housing Needs Assessment (LHNA).

3.13 The context for assessing local housing needs is also set by national planning policy, primarily set out in the National Planning Policy Framework (NPPF). The recently published revised NPPF (against which the Council's Local Plan will be examined) makes it clear that the government standard method derived figure of housing need should be seen as an advisory starting

point for establishing a housing requirement for the area. There may be exceptional circumstances, including relating to the particular demographic characteristics of an area, which justify an alternative approach to assessing housing need in which case the alternative approach should also reflect current and future demographic trends and market signals. The standard method figure of housing need is 725 homes per annum, or 14,500 over the twenty year plan period. A locally derived methodology based on the NPPF results in a very similar figure. Therefore, it is proposed to use the standard method based figure as the housing need to which the Local Plan must respond.

3.14 Of the overall need for 14,500 new homes more than 6,000 will be accommodated on sites (mainly brownfield sites in Bath) already committed for development via planning permission or allocated in the adopted Local Plan. A significant element of the projected population growth within Bath and North East Somerset comprises students aged 18-23 and given their accommodation requirements are different to other households should be considered separately from general needs housing.

3.15 Evidence in the LHNA shows that a significant element of our housing need is for affordable housing, particularly in the city of Bath. In line with the NPPF, need is identified for both affordable housing for those that cannot afford market rents or purchase, as well as households that can afford to rent but aspire to own their own home. Evidence supporting the Economic Strategy also suggests that a lack of housing that is affordable for key and other local workers is detrimental to the performance of the local economy.

3.16 In addition to objectively assessing Bath and North East Somerset's needs the council is required to consider and respond to any unmet needs arising in neighbouring local authorities. Through the preparation and recent publication of its Draft Local Plan (Publication of a local plan under Regulation 19 of Town and Country (Local Planning)(England) Regulations 2012/767) Bristol City Council has identified that it is unable to accommodate fully its objectively assessed need for housing. Bristol City Council has therefore, requested that its neighbouring authorities, including Bath and North East Somerset, consider whether they can respond positively and accommodate a proportion of their unmet needs. This Council will need to consider this request in preparing the Local Plan 2022-2042.

Location Options

3.17 As set out in paragraph 3.9 above an element of the housing and employment needs identified will be met on existing committed sites. In preparing the Local Plan 2022-2042 existing allocations in the adopted Local Plan that haven't yet been implemented are being reviewed. The first priority in responding to our housing and economic needs is to utilise brownfield sites, including those that are currently allocated, as well as additional opportunities. However, in order to meet the objectively assessed needs greenfield sites would also need to be brought forward for development.

3.18 A range of new location or site options is identified in the Options Document that could contribute towards meeting the needs for additional housing and employment space, along with the necessary supporting infrastructure. These location or site options are drawn from sites in the Housing and Economic Land Availability Assessment (HELAA), which comprise both those submitted

by landowners, developers and communities, as well as those identified by the council for consideration, location options have been identified. The wide range of HELAA sites has been filtered down to those locations that are considered to be sustainable alternatives or options for potential allocation. This process has been underpinned by the Sustainability Appraisal (that will be published as part of the Options document consultation) and based around key principles, including:

- Sustainable transport connectivity - to minimise the need to travel by car and enable the use of public transport and active travel. This will also minimise carbon impact.

- Climate change and environmental impacts and opportunities – ensuring that options help address climate change mitigation and adaptation, as well as facilitating nature recovery and the protection and enhancement of key natural and historic environment assets.

- Flood risk – ensuring that vulnerable uses are not located in the areas of highest flood risk and that future development does not make flood risk worse and is resilient to future risk.

- Green Belt – considering the impact of locations on the Green Belt. For any Green Belt options, 'exceptional circumstances' would need to be demonstrated to justify removing land from the Green Belt.

- Infrastructure provision – ensuring development is located in areas that can be served by supporting infrastructure in an efficient and cost effective way.

3.19 The location or site options that have been identified are set out in the Options Document. The sustainability effects and carbon impact of each of the location or site options are set out in the Sustainability Appraisal and Climate Impact Assessment that will be published as part of the Options document consultation. The District-wide strategy or distribution of development will be built up from these locations and alternative strategy scenarios are also tested in the Sustainability Appraisal.

3.20 Location options are outlined on a place basis. For each main settlement or place within the district the key issues and priorities are identified. The Local Plan will then seek to address these priorities, including through the development location and policy approach options. A short summary of the key options on a place-basis is outlined below.

Bath

3.21 Bath is recognised nationally and internationally as a double inscribed World Heritage Site (WHS). Both of the WHS inscriptions relate to the whole city. Being a WHS has significant economic benefits especially as the city is an international visitor destination and the city's heritage also provides the inspiration for innovation and change. However, change does need to be very carefully managed in order to ensure the WHS and its outstanding universal value is not harmed. For example, this means that the height of new buildings needs to be carefully considered and guided and the sensitive landscape, including green hillsides within and surrounding the city, protected. However,

given the role of the city as the main centre of population, commercial activity and services and facilities within the District the development needs and pressures are also significant.

3.22 The substantial development needs of Bath; the highly sensitive historic environment; and the limited supply of land means that meeting some needs, over others, must be prioritised. It is proposed that meeting housing needs and those for employment space should take priority over other uses, including Purpose Built Student Accommodation (PBSA) (see options in paragraph 3.27 below). Most of the major brownfield site opportunities within the city have already been identified or delivered, however, there may be some additional development capacity. Site or area options include:

a) For key employment/industrial areas (such as Newbridge Riverside) options to continue to protect for industrial uses or enable intensification with some flexibility to encourage creative industry/businesses.
b) Bath Quays North – allocated in the adopted Placemaking Plan principally for much needed high quality. modern office space. Options to retain the current allocated land use mix, or partly due to delivery issues, enable greater flexibility to facilitate a broader range of innovation-based employment space and some limited housing for economically active people (specifically excluding PBSA).
c) Review of various other allocations in terms of their land use mix/policy approach in order to better facilitate delivery of housing or employment space.
d) Bath Recreation Ground – options relating to maintaining the existing allocation but with some amendments to site requirements for greater clarity, or removing reference to provision of a stadium in this part of the city.
e) Review the approach at Universities' campuses to understand whether there might be scope for further development, including PBSA (see also District-wide policies section below).
f) West of Bath – given the finite capacity of the city to accommodate development to meet its needs options for the growth of the city have been explored. An area to the west of the city in the Green Belt has been considered for a strategic level of development. The NPPF makes it clear that exceptional circumstances must exist to justify changes to Green Belt boundaries. As the location lies close to the city and is relatively well connected through public transport, development here would result in benefits. However, assessment by independent experts commissioned by the Council show that any development in this area would be very likely to cause substantial harm to the WHS. The NPPF makes it clear that substantial harm to the WHS should be 'wholly exceptional'. This means, at this stage, it is unlikely that this location will be identified and allocated in the Draft Local Plan. However, it will be consulted upon to test and understand whether the substantial harm is necessary to achieve substantial public benefits that outweigh that harm.

Keynsham/Saltford

3.23 Whilst Keynsham and Saltford suffer from traffic congestion at peak times both settlements are relatively well connected by sustainable modes of transport, as they lie in a public transport corridor served by bus and rail and

one which is proposed to be the focus of further investment and improvements. Keynsham, in particular offers a good range of services and facilities. As such a range of location or site options are proposed for consultation.

a) Redevelopment of some brownfield sites in or close to Keynsham town centre
b) Greenfield site options for the expansion of Keynsham and/or Saltford, some of which are very well related to the Bath to Bristol corridor, including the North Keynsham area. In addition to housing, supporting infrastructure and employment uses would need to be incorporated. These options all lie within the Green Belt. The NPPF makes it clear that exceptional circumstances must exist to justify changes to Green Belt boundaries. Development in this area would need to be linked to investment in Green Infrastructure provision/improvements, including retaining a green gap separating Keynsham and Saltford

Hicks Gate

The Hicks Gate area lies to the northwest of Keynsham, on the edge of Bristol. Options are proposed for residential led mixed-use development in this location. This land also lies within the Green Belt. The NPPF makes it clear that exceptional circumstances must exist to justify changes to Green Belt boundaries. The land in question also adjoins the Brislington area in Bristol where land is allocated in the Bristol Local Plan for residential development. Therefore, the council would need to work closely with Bristol City Council in maximising the potential for a high quality, comprehensive cross-boundary development, that may also incorporate the relocation of the Brislington Park and Ride onto land within B&NES and enable it to become a proper multi-modal transport interchange.

Whitchurch village

3.24 Whitchurch village lies close to the south east edge of Bristol, but is separate from the city. It is crucial that this separation is maintained. Due to its relatively good sustainable transport connectivity options are put forward for potential development (of varying scales) with the opportunity to provide different benefits to the village. All the development options lie on land currently in the Green Belt. The NPPF makes it clear that exceptional circumstances must exist to justify changes to Green Belt boundaries.

Somer Valley

3.25 The Somer Valley area comprises a network of settlements, all with their distinctive character. It lies outside the Green Belt and is relatively well connected by sustainable transport. Options are proposed at Radstock (north Radstock and East Radstock/Writhlington), Peasedown St John and Farrington Gurney for new areas of development to provide new housing, but also employment opportunities, renewable energy and delivering improved infrastructure. At Midsomer Norton opportunities for strategic levels of housing are very limited. However, a number of potential smaller site opportunities are identified adjoining the town.

Rural area

3.26 The rural areas contain villages of different character, size and sustainability. The Options document proposes that some proportionate growth (nominally 5% over twenty years) should be planned for at the villages best connected by sustainable transport and with a better range of services and facilities. Site options for development are not identified in the Options Document and it is proposed to work with the relevant communities/parish councils in assessing and identifying sites to be allocated to meet local housing and employment needs in the Draft Local Plan. Additionally, the Options Document seeks to enable local communities in villages to bring forward smaller scale community led development if they so wish.

District-wide Development Management Policies

3.27 In addition, the Local Plan will set out policies for determining planning applications across the whole district. The adopted Local Plan includes a range of policies, some of which have recently been updated through the LPPU. Many of these policies remain fit for purpose and will remain unchanged. However, options are proposed for other policies to help ensure they respond to up to date evidence and better achieve the council's corporate ambitions and the spatial priorities of the Local Plan. Some of the key areas of policy options include:

- Maximising the delivery of various types of affordable housing on qualifying sites and emphasising the role of viability established through plan-making.
- Greater flexibility in better enabling affordable housing on rural exceptions sites.
- Ensuring a mix of housing types are delivered in line with the evidence of local need.
- More strictly managing PBSA so that it is delivered only on-campus, or as an option on sites specifically allocated for PBSA (which may lie outside Bath).
- Further reducing carbon emissions associated with development through stricter energy or target emissions standards and stricter embodied carbon standards.
- Better focussing and facilitating renewable energy applications
- Facilitating greater nature recovery e.g. through increased Biodiversity Net Gain requirements.
- Requiring applicants to demonstrate their proposals reflect the principles of planning for healthier places, including requiring a health impact assessment.
- Further emphasising requirements around public transport and active travel as the basis for addressing transport impacts of development
- Strong requirements to ensure the phased provision of infrastructure required to support and mitigate the impacts of development as early as possible in the development process.

3.28 The above section of this report summarises the key options that are set out in full in the Options Document (attachment 1), which it is proposed should be published as the basis for public engagement.

3.29 Preparation of the Options document has been informed by a Sustainability Appraisal, Climate Impact Assessment and Habitats Regulations Assessment. Respectively they identify the sustainability effects, carbon impacts and likely impact on the National Site Network sites (protected nature sites) of the options. Reports of all three appraisals/assessments will be published alongside and as part of the Options document consultation. All three assessments/appraisals are an iterative process applied through all stages of plan preparation and as such they will be used to inform the Local Plan as it progresses to Draft Local Plan stage.

Local Development Scheme

3.30 The Local Development Scheme (LDS) sets out the Council's planning policy work programme over a three year period to assist those who want to engage in the process of local plan preparation. In some cases, the policy changes through local plan preparation also require an associated Supplementary Planning Document (SPD) to be amended and these are also shown in the LDS. The LDS must be kept up-to-date and the main changes are:

- Amendments to the preparation timetable for the Local Plan 2022-2042, as follows:
    - Options consultation (Reg 18) – February/March 2024
    - Publication of Draft Plan for consultation (Reg 19) – December 2024/January 2025
    - Submission of the Draft Plan for Examination – March 2025
    - Inspector's Report – November 2025
    - Adoption – December 2025
- Review of CIL charging schedule and Planning Obligations SPD timetables aligned with the preparation of the Local Plan 2022-2042 (it should be noted that the timetable proposed may need to be reviewed again given that the government is likely to be changing arrangements for developer contributions towards infrastructure provision)
- SPDs – under the new planning system SPDs are due to be replaced by Supplementary Plans. This change is subject to secondary legislation and therefore, there remains uncertainty as to implementation. Timetables for supplementary documents of whatever form (including design guidance/design codes) will therefore need to be kept under review

3.31 The LDS is published on the Council's website and includes a date from which it is effective. Subject to the Cabinet decision the LDS will be updated as set out above and published on the website with an effective date of 12th February 2024 (decision implementation date).

4 STATUTORY CONSIDERATIONS

4.1 Planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise (Section 38(6) of the Planning

and Compulsory Purchase Act 2004, Section 70(2) Town and Country Planning Act 1990).

4.2 Section 19(1B) - (1E) of the Planning and Compulsory Purchase Act 2004 sets out that each local planning authority must identify their strategic priorities and have policies to address these in their development plan documents (taken as a whole). The development plan for an area is made up of the combination of strategic policies (which address the priorities for an area) and non-strategic policies (which deal with more detailed matters).

4.3 In light of the UK Plan-led system, Regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires that Local Planning Authorities must review local plans and the National Planning Policy Framework states that this must take place at least once every 5 years, and Plans should then be updated as necessary. This must in whole or in part be to ensure that policies remain relevant and effectively address the needs of the local community.

4.4 The Council updated parts of its Local Plan (comprising the Adopted Core Strategy and Placemaking Plan) through the LPPU. The LPPU was adopted in January 2023. However, a full update of the Local Plan now needs to be prepared in order to ensure that the needs for development within the district (e.g. for housing and employment space) over the longer term can be objectively assessed and responded to positively.

4.5 The Levelling Up and Regeneration Act (2023) received Royal Assent on 26 October 2023 which will make some changes to plan-making. Regulations by the Secretary of State are required to bring these changes into force. The Government has said local planning authorities (LPAs) must submit their local plans for examination by 30 June 2025 (and adopt them by 31 December 2026) if they want their local plans to be adopted under the current system. If LPAs are not able to meet these deadlines (or if their local plans fail at examination), then LPAs must prepare their local plans under the new plan-making system The Council's new Local Plan is being prepared under the current system and as will be clear from the programme set out in paragraph 3.4 of this Report it is anticipated will be submitted before the 30 June 2025 deadline.

4.6 The first formal stage in preparing the Council's new Local Plan is Regulation 18 of Town and Country (Local Planning)(England) Regulations 2012/767 which provides the opportunity to gather evidence and test options with local communities and stakeholders. The Options Document, included as Attachment 1, articulates the options that will form the basis of this engagement.

4.7 The Planning and Compulsory Purchase Act 2004 requires all local planning authorities to prepare a Local Development Scheme (LDS). The LDS sets out the programme, resources and arrangements for the production and review of statutory planning documents required by the Council. The LDS must be kept up-to-date.

5 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

5.1 The Local Plan Options document has been prepared utilising existing staff resources, led by the Planning Policy team and involving various other teams across the council, and also both council and WECA funding. Council funding has been primarily from the existing Local Development Framework budget, although it has been supplemented in 2023/24 by funds via an agreed facility to draw-down from central reserves. In addition, this council successfully bid for strategic masterplanning funding from WECA and this has also been utilised in preparing the Local Plan Options document. It is currently envisaged that the remaining stages of Local Plan preparation can be funded within existing budgets.

6 RISK MANAGEMENT

6.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making risk management guidance.

7 EQUALITIES

7.1 The Local Plan Options document is subject to an Equalities Impact Assessment (EqIA) which ensures that the council has considered the implications for people with protected characteristics of consultation on the Options document. As set out in section 10 of this report consultation will be widely publicised and the Options document and supporting evidence will be available in accessible formats. Consultation will also include specific and targeted engagement with seldom heard groups and there will be a variety of opportunities to provide feedback.

7.2 The Options document represents an early stage in the preparation of the Local Plan. Throughout the preparation process the equalities impacts of the Local Plan will be carefully considered. At the Options stage the EqIA is primarily focussed on identify and referencing the opportunities for the Local Plan to address equalities issues and the needs of people with protected characteristics e.g. in terms of inclusive design or meeting the housing needs of and access to housing for groups of people with protected characteristics. At the Draft Local Plan (Reg 19) stage the Council will be setting out its proposed policies. As the Local Plan progresses towards the Draft Local Plan the equalities impacts of proposed policies will be identified and considered with reference to appropriate equalities data. The EqIA is therefore, an iterative process that will help to ensure the Local Plan addresses equalities issues and that its policies provide opportunities to ensure development proposals properly address the needs of everyone including people with protected characteristics.

8 CLIMATE CHANGE

8.1 Helping to address the climate and ecological emergencies through contributing to achieving carbon neutrality by 2030 e.g. reducing carbon emissions arising from new development; and facilitating nature recovery are key spatial priorities

of the Local Plan. Policy approaches or options set out in the document specifically aimed at meeting these priorities are set out, including through:

- Locating new development where it is best served by sustainable modes of travel and minimises car travel
- Policy approaches to minimise energy use or carbon emission rates in new development and ensure they are, as a minimum, zero carbon
- Options to help further reduce embodied carbon from all scales of development
- Setting out policies that are aimed at better enabling the delivery of renewable energy installations in the most appropriate locations
- Options to increase Biodiversity Net Gain in new development and working with the Local Nature Recovery Strategy to maximise nature recovery opportunities/benefits

9 OTHER OPTIONS CONSIDERED

9.1 None, given that preparation of a Local Plan covering the district is a statutory requirement.

10 CONSULTATION

10.1 In preparing this Report the Cabinet Member for Built Environment and Sustainable Development and the S151 Officer and Monitoring Officer have been consulted. It has been cleared for publication by the S151 and Monitoring Officer.

10.2 Preparation of the Local Plan Options document (included as Attachment 1) has entailed input form a range of stakeholders aligned with the council's objective of giving people a bigger say, including:

- Community representatives workshops, including parish & town councils, stakeholders and ward councillors, held in January and July-September
- Working with key stakeholders including the universities, RUH and Curo (through the Future Ambitions Board) and the Integrated Care Board/NHS
- Bespoke tailored engagement with a number of seldom heard groups

10.3 Engagement and consultation on the Local Plan Options is proposed to take place over a six week period from 12th February to 25th March 2024 and will be undertaken in accordance with the Council's Statement of Community Involvement. This consultation will be comprehensive and involve a wide range of stakeholders e.g. communities/residents, parish and town councils, statutory organisations, the voluntary sector, developers, as well as seldom heard groups (see paragraph 10.5 below). The engagement activities and consultation will be widely publicised using a range of media/communication channels and ensuring the consultation material is accessible. The Options document and supporting evidence will primarily be available on the Council's website, in accessible formats, as well as in hard copy format at various locations. Comments will be encouraged primarily on-line via a clear and easy to use web-form, but stakeholders will also be able to submit written/paper comments and, where appropriate, verbally.

10.4 Information on the Options and how to comment/get involved will also be provided and explained through a range of consultation events. These will include:

- In person staffed exhibitions in key locations across the District (in or close to settlements where development options are being proposed)
- Webinars primarily relating to key policy topics
- Short videos explaining the purpose of and key messages from the Local Plan, as well as explaining the place-based options

10.5 In addition it is proposed to build on previous engagement with seldom-heard groups with a range of further meetings based around what they said during previous engagement and how we have responded.

10.6 The proposed approach is comprehensive and aligns closely with the council's priority of giving people a bigger say. The issues raised in all of the comments received will be carefully considered in progressing towards the next stage of Local Plan preparation, which is the Draft Local Plan.

Contact person	*Richard Daone, Deputy Head of Planning - 01225 477546*
Background papers	*Equalities Impact Assessment of Local Plan Options*
Please contact the report author if you need to access this report in an alternative format	

Bath and North East Somerset Council

Local Plan 2022 – 2042

Options Document



Bath & North East Somerset Council

Improving People's Lives

Planning for the future of
the place where you live

PREPARING FOR THE FUTURE

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Tell us what you think

We want to hear views from as many people as possible and we want it to be easy for you to tell us what you think.

How to comment

Please comment online via our website:
https://beta.bathnes.gov.uk/local-plan

If you have difficulty commenting online, or you need information in a different format, please let us know and we will be happy to assist.

Please note that we will not be accepting comments via email. All online comments should be submitted via our website.

All comments must be received by 25th March 2024.

1 Introduction

What is a Local Plan and why do we prepare it?

1.1 The Local Plan will establish a strategy and framework for how places in Bath and North East Somerset will change and grow over the next 15-20 years. It sets out planning policies that will shape any development that requires planning permission. The plan identifies the need for new homes and jobs, and the services and infrastructure to support them, and guides where this development should happen and what form it will take. It is about ensuring that we maintain and create sustainable, vibrant and healthy places and communities.

1.2 Change and development will happen whether we prepare a Local Plan or not. We prepare it in order that we can influence and shape the location and form of future development and to help ensure that it is better supported by the timely provision of necessary infrastructure. Without a Local Plan speculative development will take place, in less sustainable areas, and in an unplanned way. We also prepare a Local Plan in order to protect what is special about Bath and North East Somerset, including its unique, high quality and renowned built and natural environment.

1.3 This Local Plan covers the whole of Bath and North East Somerset and will establish the planning framework for the district up to 2042. It will contain a vision, strategy and policies to guide and manage growth and change; and will be the basis for how planning applications for new development are decided. It will also play a crucial role in delivering the Council's corporate priorities, including improving people's lives, tackling the climate and ecological emergencies, and preparing for the future in terms of the economy, responding to housing need and addressing inequalities. The Local Plan will be reviewed around every 5 years and updated where necessary.

How do we prepare the Local Plan?

1.4 We will prepare the Local Plan through consulting and involving communities and a range of other stakeholders – **giving people a bigger say** in how the area will change. Preparation of the Local Plan is governed by legislation and will go through a series of stages which are summarised in the diagram below. The diagram also sets out the anticipated timetable for each stage of preparation of the Bath and North East Somerset Local Plan.

Preparation of the Local Plan		
Stage 1: Launch	October 2022	Launch Document published and consulted on, to commence the preparation of the Local Plan.
Stage 2: Evidence Gathering, Engagement and Options Formulation	October 2022 – January 2024	Extensive gathering and analysis of data, evidence and information on key issues has been carried out. Engagement has been carried out with community representatives and key stakeholders across the district. Policy and site options have been formulated.
Stage 3. Options Document Consultation	February 2024 – March 2024	Consultation on this Options Document.
Stage 4: Preparation of Draft Plan and Targeted Engagement	March 2024 – December 2024	Having taken account of responses received from consultation, and further analysis of evidence, the Council will prepare a Draft Plan. Additional targeted engagement with key stakeholders will also be carried out.
Stage 5: Draft Plan Consultation	January 2025 – February 2025	A Draft Plan will be published, and consultation on this document will be carried out for a period of at least 6 weeks. The local planning authority may make changes to the Draft Plan following the consultation, and may decide to carry out further consultation if any resulting changes are considered to be significant.
Stage 6: Submission and Examination	March 2025	The final Draft Plan will be submitted to the Government along with the supporting evidence base, following which an independent Inspector will be allocated to assess the soundness of the Plan.

Stage 7: Hearings	January 2025	The independent Inspector will hold an Examination into the soundness of the Plan. The Examination hearings will include evidence from anybody who wishes to make a submission on any of the key issues or questions highlighted by the Inspector. The Inspector will consider all of the evidence and representations made through the Draft Local Plan consultation process.
Stage 8: Inspector's Report	June and July 2025	The Inspector will assess whether the Local Plan has been prepared in accordance with legal and procedural requirements, and whether it is sound. The Inspector will publish their recommendations in a Report. If the Inspector has not recommended adoption, the Council can adopt the Plan in line with any 'main' modifications as suggested by the Inspector.
Stage 9: Adoption	November 2025	The Council will adopt the Plan at a full Council meeting.

1.5 This document sets out options or reasonable alternatives for addressing the identified needs and policy approaches to help deliver healthy and sustainable places. Its purpose is to elicit comment and discussion around these options. The comments received, as well as ongoing engagement with communities and other stakeholders, will be used to help shape the Draft Local Plan. It is the Draft Local Plan that sets out the Council's proposed site allocations and policies to shape and guide change and development that requires planning permission.

1.6 The Draft Local Plan is then subject to formal consultation and both the Draft Plan and comments received are submitted for examination by a government appointed Planning Inspector. The Inspector will be examining whether the Local Plan is sound. As defined in national policy the tests of soundness comprise:

- Positively prepared: **comprise a strategy that at least meets identified needs**
- Justified: **based on proportionate evidence**
- Effective: **deliverable over the plan period and based on effective joint-working on cross boundary strategic matters**

- Consistent with national policy: **as set out in the national planning Policy Framework and other government statements**

1.7 Once it has been examined and subject to the Inspector's conclusions the Local Plan can then be adopted. Once it is adopted the Local Plan becomes the statutory framework for determining planning applications.

What opportunities are there to be involved?

1.8 The Council is committed to giving people a bigger say and we have involved community representatives in preparing the Options document. This Options document is published for consultation over a six period, from 12th February to 25th March. We are encouraging all residents and stakeholders to comment on and give your views on the options we have presented, this is a major opportunity to **have your say** and help influence future change. There will be a range of in-person and web-based events to explain and discuss the Options during the consultation period. Please make sure you submit your comments by 25th March.

1.9 We will continue to work with communities and other stakeholders in progressing towards a Draft Local Plan, particularly those places where development may be focussed. Once prepared and approved by the Council later in the year, the Draft Local Plan will also be published for consultation for a period of at least six weeks. As such there will be a further opportunity to submit comments on the Draft Local Plan. The comments received and the Draft Local Plan itself are then submitted for examination by a Planning Inspector. Those individuals and organisations that object to the Draft Local Plan will have the opportunity to participate in the examination.

Structure of this Options Document

1.10 The Options document basically comprises chapters which set out:

- The issues and challenges facing the area;
- The overall priorities of the Local Plan (what it is seeking to achieve);
- The development needs that should be planned for;
- The approach to a District-wide strategy;
- Chapters setting out options for growth and change in specific parts of and places in the District; and
- A chapter setting out options for policies that would apply across the whole of Bath and North East Somerset in determining planning applications.

2 Bath and North East Somerset Issues, Challenges and Spatial Priorities

2.1 The Local Plan will set out a strategy and planning policy framework to help guide and shape future development and change, whilst also enabling greater climate and environmental resilience and protecting and enhancing our high quality natural and built environment and key assets. In guiding change the plan will be seeking to address key issues and challenges facing Bath and North East Somerset and its communities.

2.2 New development can provide an opportunity to shape and improve places e.g. by providing infrastructure needed by existing communities and creating environments that promote health and well-being. The place we live in can fundamentally influence our health and well-being, and shaping our communities in this way provides an opportunity to influence and establish positive behaviour, healthier lifestyle habits and inclusive communities. Planning for climate and environmentally resilient places will also help to reduce health risks.

2.3 The key issues and challenges facing Bath and North East Somerset and its communities are summarised below and alongside the Council's corporate priorities they have shaped the spatial priorities for the Local Plan – that is the outcomes we are seeking to achieve. In the Local Plan Launch Document, published autumn 2022, the proposed central policy aims of the Local Plan were outlined. These have been incorporated into the spatial priorities outlined at the end of this chapter. These spatial priorities will drive the site allocations, policy framework and therefore, what the Local Plan will achieve.

Key issues and challenges facing communities

2.4 We have undertaken research and consulted with community representatives and stakeholders to identify the key issues and challenges facing the District and places within it. Some of the key issues, many of which are closely inter-related, are identified below.

Housing Affordability and the Economy

2.5 Across Bath and North East Somerset we know that housing affordability is a key issue. Many residents are finding it difficult to access decent housing, either to buy or rent, because prices are so high. Evidence shows that the impact of high house prices is exacerbated by average median workplace wages in Bath and North East Somerset being lower than those nationally. As a result across Bath and North East Somerset the average house price is eleven times average workplace earnings and in Bath it is nineteen. The lack of housing that is affordable for residents and workers affects not only people's quality of life, but also has a direct impact on our economy.

2.6 In addition to the lack of affordable housing communities also raise the requirement for smaller dwellings, both for smaller households wanting to access their first home, as well as for older people that are seeking to downsize.

2.7 Work underpinning the Economic Strategy shows that Bath and North East Somerset has a resident workforce that is highly skilled, unemployment levels are low and we are home to some nationally leading and significant businesses and economic sectors. However, evidence also shows that our economy is under performing (with growth being below that of the West of England and the UK for longer than the last ten years) and median wage levels are low. The causes of economic underperformance are complex, but in terms of the issues the Local Plan can seek to address these will include a lack of housing that is affordable and an insufficient supply of employment land. These are challenges that need to be addressed to create a prosperous and sustainable economy for the benefit of our residents.

Climate and Ecological Emergencies

2.8 Bath and North East Somerset declared a climate emergency in 2019 and is aiming to be carbon neutral by 2030. Four strategic priorities guide action to reduce emissions – decarbonising homes, decarbonising buildings, increasing renewable energy generation, and decarbonising the council's own operations. Achieving this goal will be challenging, but there are many opportunities for planning to support this journey. It is important that action is taken at all spatial scales, both individually and at a neighbourhood or more strategic scale. From a planning perspective this includes energy use and carbon emissions arising from travel, existing buildings (e.g. retrofitting of energy efficiency measures) and new buildings (operational energy and embodied carbon in its construction). Additionally planning can help facilitate increased regeneration of renewable energy, through free standing installations, as well as on buildings.

2.9 Action on climate change must also consider planning for climate resilience. The changing climate will bring an increased likelihood of flooding, overheating, and extreme weather events that are likely to become more frequent. Reducing the impact of these changes on our communities and businesses will be critical, and there are opportunities to achieve this alongside reducing emissions, improving people's health and wellbeing, and supporting nature recovery.

2.10 Bath and North East Somerset declared an ecological emergency in 2020 in recognition of the significant declines in species and habitats recorded globally, nationally, and regionally. The council is aiming to be nature positive by 2030 and has set 3 priorities:

- Increase the extent of land and waterways managed positively for nature across Bath and North East Somerset

- Increase the abundance and distribution of key species across Bath and North East Somerset
- Enable more people to access and engage with nature

2.11 Further information is set out in the council's Ecological Emergency Action Pan. The Nature Positive ambition requires innovation in planning, including use of new decision making tools, new more joined up and integrated planning policy that delivers for people and nature. There are increasing opportunities for local people and business to engage with and benefit from a more robust and resilient natural environment, where natural processes and features are protected, created and enhanced to benefit communities and sustain nature.

2.12 The district has outstanding landscape character, including the Cotswolds National Landscape and Mendip Hills National Landscape. The district also supports nationally and internationally important heritage assets including the City of Bath, which is a double inscribed UNESCO World Heritage Site, and many areas of wildlife significance, including internationally important bat sites in and around Bath and at Compton Martin, and the internationally important bird site at Chew Valley Lake. Access to the countryside and the natural environment which can sometimes be challenging is highlighted by residents as being important for quality of life and physical and mental health and well-being.

Health and Well-Being

2.13 Bath and North East Somerset remains one of the least deprived local authorities in the country, ranking 269 out of 317 for overall deprivation. However, there are inequalities within the district, communities that experience deprivation (both Twerton West and Whiteway fall within the most deprived 10% nationally), and patterns of rural poverty are growing. Life expectancy is 9 years lower for men and 5 years lower for women in the most deprived areas of Bath and North East Somerset than in the least deprived areas. An estimated 19% of children and young people (equating to 7,167 residents aged 0-15) in Bath and North East Somerset live in relative poverty. With the cost of living set to continue to rise, it's estimated 4,000 people will fall into absolute poverty in 2022-23. This will exacerbate existing needs including fuel poverty (11% of households live in fuel poverty in the district) and food insecurity. Inequalities is a concern that has been raised by communities, including in relation to an ageing population and people living longer with multiple health and social care needs.

2.14 Whilst the health of people in Bath and North East Somerset is generally better than the England average, residents still have important health and wellbeing needs that the built and natural environment can play a role in addressing. There are significant levels of obesity amongst both children and adults in Bath and North East Somerset, meaning that whilst obesity is below the national average more adults in the district are overweight than not. Large numbers of both children and adults are not physically active. In relation to cardiovascular and respiratory health, Bath and North East Somerset has high numbers of residents with hypertension and asthma. Residents also self-report higher rates of anxiety and loneliness compared to the England average. In addition, the rate of hospital admissions in those under 18 years for mental health conditions is significantly higher in Bath and North East Somerset than nationally.

Transport and Connectivity

2.15 Communities have made it clear that traffic congestion and being able to access attractive walking and cycling opportunities/infrastructure, as well as frequent and reliable public transport are key challenges across much of the District. This is particularly true in the rural areas where improvements are needed to the connectivity of villages to the cities and towns in Bath and North Est Somerset and the surrounding area. Further investment across the district is needed in public transport and active travel infrastructure including improvements to existing active travel networks to make them safer and more attractive, thereby encouraging greater use.

Culture and community identity

2.16 Cultural activity plays an important role in people's health and well-being, as well as contributing to community identity and vibrant, attractive places in which to live. Across Bath and North East Somerset the cultural offer is varied and this is an issue highlighted by stakeholders that needs to be addressed e.g. through protecting existing cultural and community facilities, seeking to provide new and enhanced facilities where needed and considering the important role of public spaces of different types. Cultural and creative industries also play an important role in our economy and an increased contribution from this sector should be encouraged.

2.17 Communities have identified that they value a sense of community identity and belonging, which is important in reducing social isolation and loneliness and creating healthy, vibrant and inclusive communities. The availability of high quality, accessible public spaces and community infrastructure are important in achieving this and are influenced by the planning system. Maintaining community identify and local distinctiveness are challenges that the planning system has an important role in addressing by protecting landscape character, respecting local building styles and materials and setting a framework for the design of public spaces.

B&NES Council Corporate Priorities

2.18 We adopted the B&NES Corporate Strategy in July 2023, which sets out our overarching strategic plan. The corporate strategy sets out that the Council's overriding purpose is 'to improve people's lives'.

2.19 In order to define and show how we will deliver the overriding purpose the Council has two core policies, three principles and nine priorities. These are set out in the Corporate Strategy, but can be briefly summarised as follows:

- Two core policies of tackling the climate and nature emergencies and giving people a bigger say
- Three principles, amplified through commitments as follows:
    - Preparing for the Future – we will work towards a resilient, sustainable economy that is fair, green, creative and connected
    - Delivering for Local Residents - we will continually improve frontline services across our communities, whilst protecting the most vulnerable
    - Focusing on Prevention - we will invest in prevention across all services to tackle inequalities and improve local areas
- Nine priorities which set how we will improve people's lives. These priorities are not listed here, but many of them are related to what the Local Plan is seeking to achieve as summarised in the diagram below.

2.20 The spatial priorities of the Local Plan are shaped by the Council's Corporate Priorities, as well as addressing the key issues and challenges outlined above. It is clear that a transformative approach to plan-making is required to help deliver against these priorities and the council's commitments.

Key B&NES Strategies and Delivery Plans

2.21 Alongside the Local Plan there are a range of other key strategies and plans that the Council is preparing which will help deliver our overriding purpose and core priorities. Many of these strategies and plans are relevant and relate to the Local Plan and the Council will ensure alignment, wherever possible, of the Local Plan with these strategies and delivery plans. These comprise:

Strategy / Delivery Plan	Status	Owner
Corporate Strategy	Adopted	B&NES
Climate Emergency Strategy	Adopted	B&NES
Health and Wellbeing Strategy and Implementation Plan	Adopted	Health and wellbeing Board
Economic Strategy	In development	Future Ambition Board
Business and Skills Plan	In development	B&NES
Green Infrastructure Strategy	In development	B&NES
Integrated Care Strategy	Adopted	BSW Together
Children and Young People Plan	Adopted	Health and wellbeing Board
Bath Swindon Wiltshire Implementation Plan	Adopted	BSW Together
Health Improvement Framework	In development	B&NES
School Organisation Plan	Adopted	B&NES
Ecological Emergency Action Plan	Adopted	B&NES
Climate Emergency Action Plan	Adopted	B&NES
Journey to Net Zero Transport Plan	Adopted	B&NES

Housing Delivery Plan	In development	B&NES
Transport Delivery Plan	In development	B&NES
Active Travel Masterplan	In development	B&NES
Tree and Woodland Strategy & Action Plan	In development	B&NES

Doughnut Economics Model

2.22 The Council is looking to use the Doughnut Economics Model in underpinning our approach to improving people's lives and particularly in preparing for the future. We will utilise Doughnut Economics in helping us to ensure we are tackling the climate and ecological emergencies and in moving towards a more resilient, greener and fairer economy. This means doing things differently to how they were did in the past and carefully evaluating our decisions and actions in order that they seek to meet or address our social and economic foundations or needs, without exceeding environmental limits or capacity. This approach is articulated through the Bath and North East Somerset decision-making wheel.

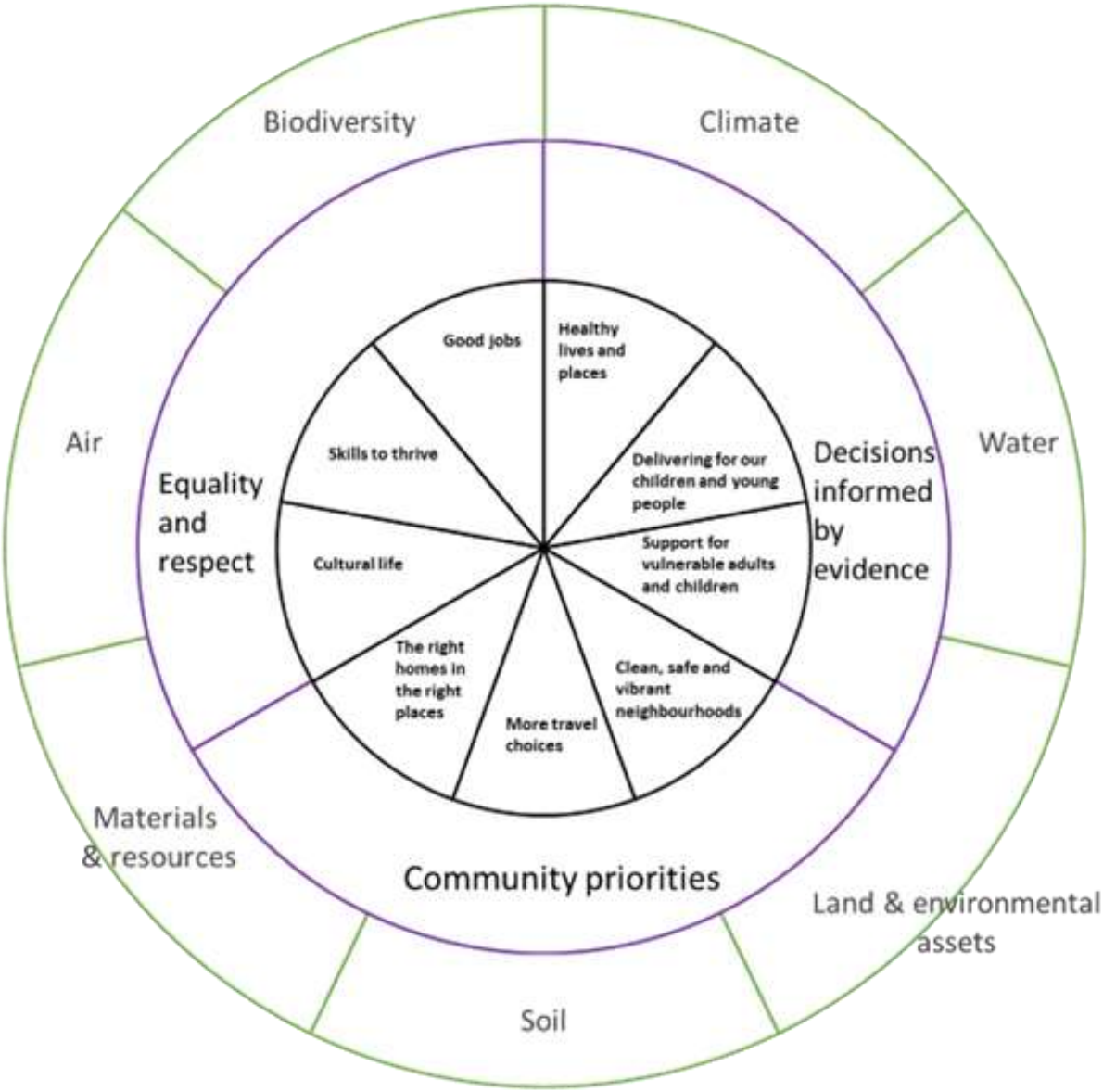


Figure 1: Bath and North East Somerset decision making wheel

2.23 The Doughnut Economics Model and the social foundations and environmental limits set out in the decision-making wheel are closely reflected and incorporated into Sustainability Appraisal of the Local Plan. Local Plans are statutorily required to be subject to Sustainability Appraisal in order that the sustainability effects of the plan can be understood, assessed and demonstrated against a wide range of sustainability objectives, as well as identifying how negative effects can best be mitigated. At this stage of the Local Plan preparation process Sustainability Appraisal is particularly valuable in understanding the sustainability effects of different alternatives or options and therefore, fundamentally informs decision making moving forward to the Draft Local Plan. In addition to undertaking the Sustainability Appraisal we have also undertaken a Climate Impact Assessment of the key spatial options. This tool enables us to understand the comparative impact of different options principally in terms of likely carbon emissions. It will also underpin decisions on the Local Plan. As such it is another vital element of ensuring the Local Plan helps us to tackle the climate and ecological emergencies.

Spatial Priorities for the Local Plan

2.24 The Spatial Priorities for the Local Plan shape and articulate what it is the Local Plan will achieve. As set out above they have been informed by the key issues and challenges facing the area and our communities and are also shaped by the Council's corporate strategy. The Local Plan will seek to help deliver spatially what we aim to achieve through our other key strategies and plans set out above and more widely, centred on improving people's lives. The spatial priorities of the Local Plan are set out below.

Our Local Plan will plan for development in response to local needs to create attractive, healthy and sustainable places in line with the Council's Corporate Strategy.

The Plan will:

- Create a fairer, more prosperous and sustainable economy
- Maximise the delivery of housing that is **affordable**

In doing so, our plans for development must:

- Enable Bath and North East Somerset to become **carbon neutral by 2030** and deliver a climate resilient district
- Protect and enhance nature through facilitating **nature recovery**
- Improve **health and well-being** outcomes for all, including through planning health promoting and inclusive places and providing for cultural enrichment
- Reduce the need to travel unsustainably and enable **improved connectivity** for all through sustainable modes of transport and facilitating locally available services and facilities
- Respect, conserve and enhance our **heritage assets** and their landscape settings, in particular the World Heritage Site of Bath and National Landscapes
- Align the timely provision of **transport, health, education, social, cultural and green infrastructure** with development

2.25 These spatial priorities are clearly linked back to and will help deliver on the Council's overriding purpose and the core policies, principles and priorities established in the Corporate Strategy. The relationship between the Local Plan spatial priorities and the Corporate Strategy are illustrated in the diagram below.

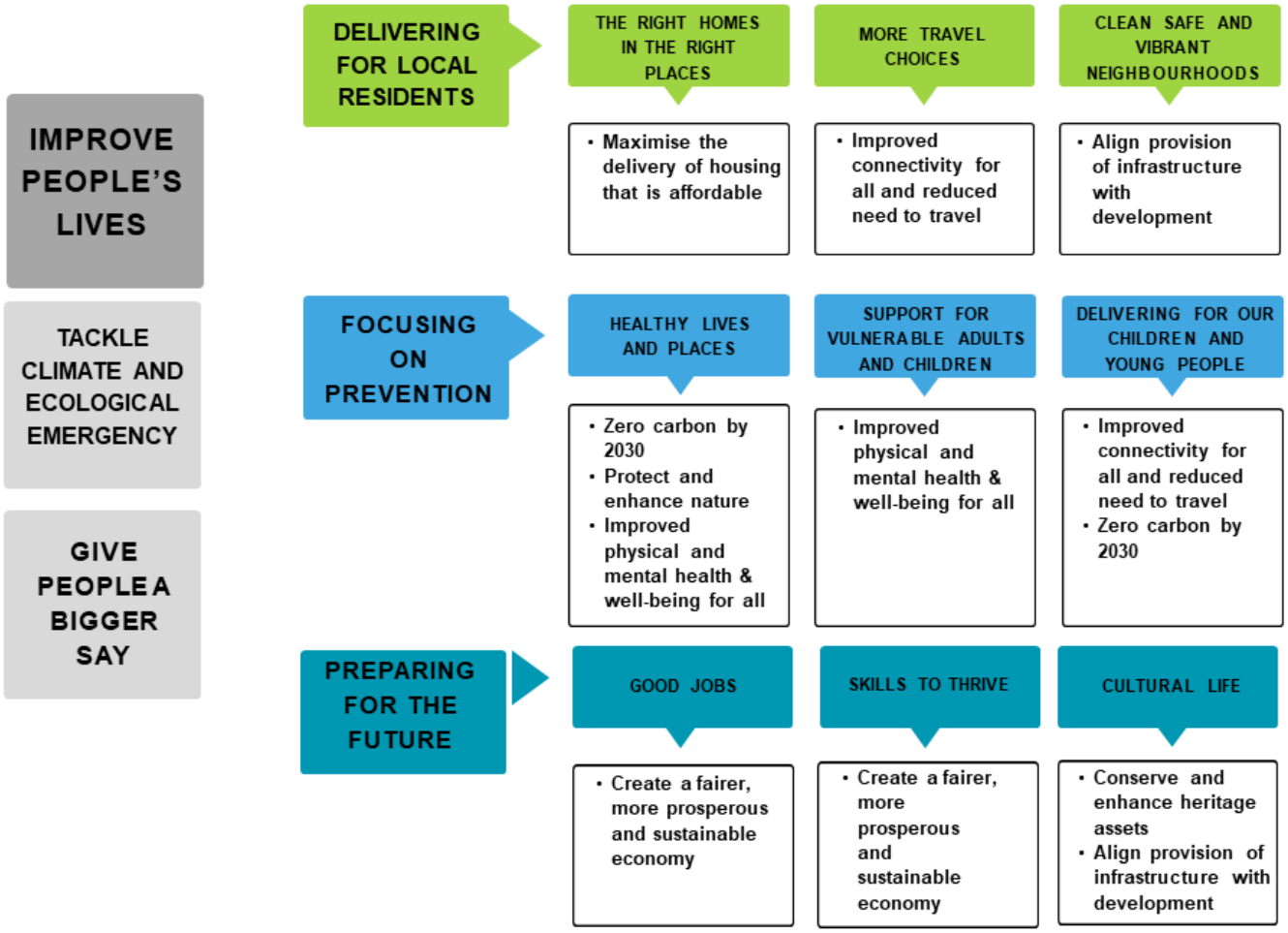


Figure 2: Diagram showing relationship between Local Plan spatial priorities and the Corporate Strategy

2.26 The spatial priorities underpin and will be delivered through the Local Plan site options and policy approaches set out in the chapters that follow. They are also unpacked in various parts of the Local Plan Options document and in the evidence base, including through Transport Vision and Objectives. The Transport Vision and Objectives set out in greater detail what we are seeking to achieve in respect of our transport policies and projects, that seek to improve connectivity within and between existing places, and align with and support development.

2.27 As set out above the overarching priority of the Local Plan will be to plan for development in a way that delivers sustainable and healthy places. What we mean by sustainable and healthy places will need to be set out in the Draft Local Plan. The definition will draw from and reflect the spatial priorities for the Local Plan, and also other strategies including the One Shared Vision, which focuses on delivering places and communities that are fair, green, creative and connected. Through consultation on the options document you can comment on the proposed spatial priorities of the Local Plan and also the definition of sustainable and healthy places.

Q: Do you agree with the scope of the spatial priorities outlined above?

Q: What do you think are the key elements of a sustainable and healthy place?

3 Key Requirements in Bath and North East Somerset

3.1 Drawing from the issues and challenges facing Bath and North East Somerset; the spatial priorities of the Local Plan; and a range of evidence, the key requirements or needs that the Local Plan must respond to are set out below. These key needs include:

a) Forecast job growth in key economic sectors and the associated need for employment space in order to help foster a prosperous, greener and fairer economy

b) The need for housing to address existing and projected changes in the population and to respond to the needs of different groups

c) Measures to help tackle the climate emergency that can be facilitated through the Local Plan

d) The urgent need for and to facilitate nature recovery and enhancement across the district

e) The needs of health and well being and the role places can have influencing health outcomes

f) Transport requirements that are pivotal in making the district more sustainable and delivering other societal benefits by enabling movement and connectivity for all by public transport and active travel

The above list of key needs is not exhaustive. It is also important to note that whilst the Local Plan will seek to respond to all of these needs, there may be occasions where there is conflict between them. In these circumstances a key role of the Local Plan is to establish a framework for balancing these needs and to prioritise addressing them.

Jobs and Employment

3.2 The Council has prepared an Economic Strategy which identifies key issues facing the local economy such as lower than average wages, recent economic under performance resulting from, in part, lack of space for businesses to grow and low productivity, as well as the availability of housing that is affordable. It outlines how the council is taking action to change this and drawing on the principles of Doughnut Economics will seek to transform the Bath and North East Somerset economy to one which is more prosperous, greener and fairer. Through the Economic Strategy the Council will focus its actions in three broad themes:

- **Infrastructure** which supports a green and connected future
- **Innovation** that drives a creative economy

- **Opportunity** unlocked for everyone so that we are fair and inclusive

As such the strategy includes a focus on developing Bath and North East Somerset to be a leader in green inclusive growth, upskilling residents and providing them with the opportunity to access and thrive in good work and outlines how the council will work with businesses and enable local organisations to act on new market opportunities.

3.3 For the Local Plan and in the context of the Economic Strategy, evidence relating to the 'Future Economic Needs Assessment and Office and Industrial Market Review' has examined trends and forecasts in economic sectors and the space requirements to be planned for. It notes that the district has experienced relatively weak economic performance over the 20-year historic period compared to both the sub-region and national averages and it is likely that a lack of supply of suitable employment sites and premises has contributed to this position (including industrial, warehousing and offices), It reports of firms unable to locate or expand in the area, and some companies having to relocate outside the Bath and North East Somerset area in order to find suitable accommodation.

3.4 Key growth areas for jobs based on the forecasts are in the human health and social work employment sector; accommodation and food services (hotels, restaurants and bars etc); Information & Communication and Professional, Scientific & Technical sectors. The latter sectors in particular are those that can help drive innovation and a more creative economy. In terms of sectors with a significant influence on employment land the evidence suggests there will be some decline in manufacturing and a decline in Transportation & Storage, alongside growth in the sectors outlined.

3.5 Analysis undertaken has highlighted the ongoing need to deliver office, some industrial and warehousing space and hybrid business space suitable for meeting modern occupier requirements, set against low levels of existing supply and historic development. This has created a challenging environment for potential and existing occupiers to fulfil their commercial property requirements within Bath and North East Somerset, and in particular, the city of Bath.

3.6 In terms of office floorspace the evidence notes that it is also possible that additional floorspace will be released to the market as a result of workplace transition following the rapid increase in hybrid working following the Covid-19 pandemic. However, there still remains a degree of uncertainty over the long-term trend. Market evidence also indicates a strong preference for high quality modern space with excellent amenity provision for workers. Additional space released to the market may require refurbishment in order for it to be attractive to modern occupiers. It has been noted that the loss of some of the sub-standard stock can support the market to develop new space through improved rents and values.

3.7 In terms of industrial floorspace, there is currently substantial under-supply in Bath City, Rural Areas and Somer Valley. The evidence notes that given the constraints within Bath City, the Keynsham sub-area is likely to need to play an important role in meeting some demand. Keynsham may also have a role in providing Research & Development space for growth sectors that can't be accommodated within the city. At the same time as developing new areas, it is acutely important to protect existing industrial estates and sites.

3.8 In relation to warehousing and logistics space historically there has been a lack of warehousing development activity that has taken place across Bath and North East Somerset. This is due both to its relative unattractiveness to modern occupiers and constrained land supply in the right locations, with the right access and infrastructure provision.

Need for Housing

3.9 The Economic Strategy also highlights that the lack of availability and affordability of housing is a key issue affecting Bath and North East Somerset and that this also impacts on the performance of our economy and wider sustainability issues. In order to underpin the Local Plan an assessment of housing needs across the District has been undertaken. This study is known as a Local Housing Needs Assessment (LHNA). The context for assessing local housing needs is also set by the National Planning Policy Framework (NPPF).

3.10 The overall need for housing in B&NES is for 725 new homes per annum, or 14,500 over the twenty-year Local Plan period. This figure is derived from calculations by the government, which is based on population and household projections which are then adjusted upwards to take account of the affordability (or unaffordability) of housing in B&NES. This is known as the 'standard method' housing figure. The standard method figure can vary year on year if the level of housing affordability changes e.g. if house prices rise or fall or incomes change. However, it is unlikely to change significantly when new figures are published next year.

3.11 The standard method housing figure is taken as the advisory starting point for determining local housing need and for establishing the housing requirement (amount of housing to be planned for) in the Local Plan. The Council appointed consultants to undertake a local assessment of housing need, which as required by government is also based on population and household projections and take account of market signals or affordability. Their assessment identifies a similar, albeit slightly lower, level of overall housing need.

3.12 Importantly their analysis shows that a significant proportion of projected population growth and therefore, overall need for new housing is comprised of projected growth in the student population.

3.13 The accommodation requirements of students are different to those of the rest of the population and for those aged 18-23 (primarily undergraduate students) are typically provided through student bedspaces e.g. in the form of Purpose Built Student Accommodation (PBSA). Given the significant student population growth it is proposed that the associated accommodation requirements are considered separately from general housing need in this Local Plan. The provision of additional student bedspaces in PBSA would reduce the amount of general needs housing required (see paragraph 3.17 below).

3.14 Based on population projections the LHNA suggests a growth in the student population aged 18-23 of around 7,300. This would equate to around 370 student bedspaces per year. Although it is appropriate to establish the overall student housing need using the projected growth of student population based on long term trends, it is also important to ensure alignment with the future growth aspirations of the University of Bath and Bath Spa University. The Council continues to work with both universities to understand their projected growth aspirations, however they are only able to provide projections up to 2030, leading to significant uncertainly during the second half of the Plan period. A set of scenarios based on different levels of growth are set out in the Student Accommodation Topic Paper.

3.15 The LHNA also provides more detail on the size, type and tenure of housing that is needed, including information on the need for affordable housing (key findings are summarised in paragraphs 3.16 to 3.19 below).

3.16 The plan period runs from 2022 to 2042. Some additional housing is already planned to be built on sites with planning permission and sites allocated for development in the current adopted Local Plan which runs until 2029. Sites with planning permission or allocated are known as existing commitments. Homes to be delivered on the existing commitments are deducted from the housing requirement to calculate the number of homes required to be planned for on new sites through the Local Plan. The spatial distribution of homes to be provided by existing commitments is illustrated in the map below.

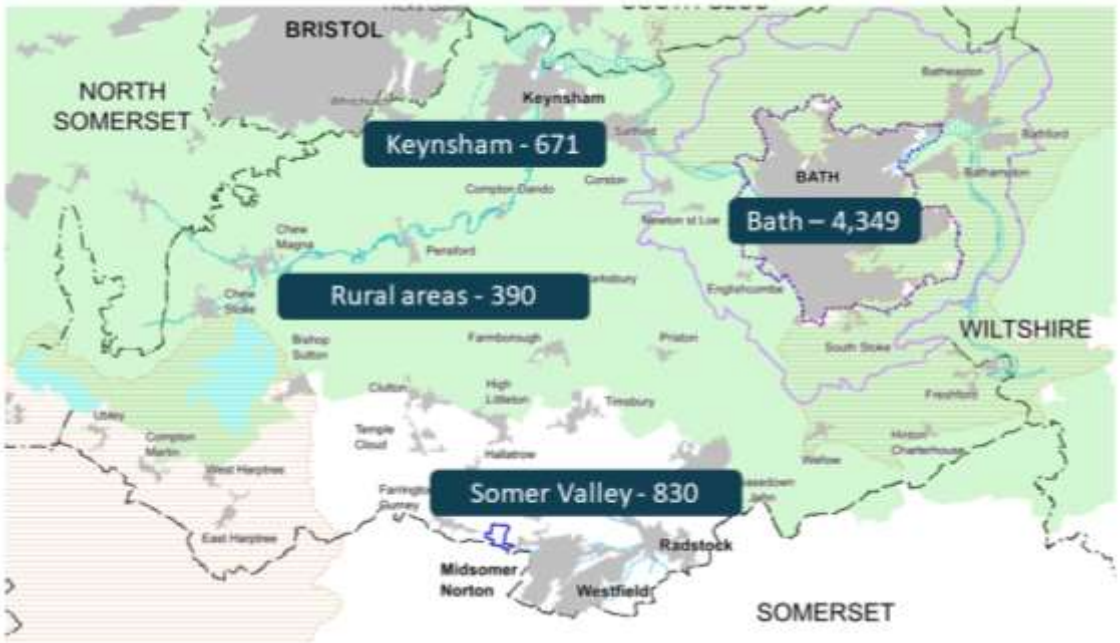


Figure 3: Map showing existing housing commitments

3.17 In preparing a Local Plan we are able to make an allowance for housing likely to be delivered on small windfall sites, that is sites that will provide less than ten homes and will be granted planning permission without being specifically allocated for development. A windfall allowance over the plan period has therefore been calculated. Up until 2029 and for the remainder of the adopted plan period the existing figures from the published housing trajectory have been used. Beyond 2029 a realistic and relatively cautious approach has been taken based on past rates of delivery. Small sites permissions have reduced over the past two years and therefore this is taken into account in the future allowance. The small windfall sites allowance will be kept under review in light of annual monitoring of housing delivery and permissions. Further detail is set out in the Housing Topic Paper.

Overall housing requirement	14,500

Existing Residential Commitments (including small sites with planning permission)	6,240
Expected Small Windfall sites (excluding small sites with planning permission)	2,080
Sub -Total	8,320
Housing to be planned for on new allocations (includes accommodation for students which needs to be considered separately)	6,180

3.18 It is not just important to plan for the overall amount of housing that is needed. The LHNA identifies that there is a significant need for housing that is more affordable in Bath and North East Somerset and this corroborates evidence underpinning the council's Economic Strategy. Affordable housing, as set out in the NPPF, has two main components i.e. housing that is needed for households that cannot afford market rents or prices to purchase, plus those households that can afford market rents but aspire to own their own home but cannot afford to do so. Based on both of those components the total need for affordable housing in Bath and North East Somerset is very significant and represents 77% of total housing need in the city of Bath and 31% of total housing need in the rest of the district.

3.19 Typically, the need for affordable housing of those that cannot afford to rent or buy will be met by either social rented accommodation or shared ownership homes (where the household buys a part share in the property). For those that can afford market rent but aspire to home ownership their need is typically met by either shared ownership or a discounted market housing product, such as First Homes (homes available to first time buyers at a discounted price). The LHNA provides more detailed information around the different types of affordable housing need in both Bath and the rest of the district. This shows that in Bath 36% of overall future housing need is from those households that cannot afford to rent or buy and 41% is from those that can afford to rent but aspire to home ownership. The equivalent proportions for the rest of the district are 21% and 11% respectively.

3.20 With regards to the type and size of housing that is required across the district the LHNA provides useful information split between the city of Bath and the rest of Bath and North East Somerset. More detailed information for specific places or parishes can be gathered through Local Housing Needs Surveys. The LHNA identifies the largest proportion of housing that is needed is for 3 bed houses (around 50% of overall housing need) in both the city and the rest of the district. There is also significant need for smaller dwellings, 1 and 2 bed flats and houses, (more than 26% of overall housing need) for smaller households e.g. younger people and older people looking to downsize.

3.21 Finally, the LHNA also provides useful information on the significant need for more specialist housing for older people, both market and affordable housing, as well as information on needs of those with particular accessibility requirements.

Need arising from neighbouring authorities

3.22 The NPPF requires authorities to respond to and assist in meeting the unmet needs arising in neighbouring areas, as requested through the Duty to Co-operate, where it is reasonable to do so having regard to the principles of sustainable development. In responding to this requirement the capacity of Bath and North East Somerset to accommodate its own housing need, as set out above, in a sustainable manner is highly relevant.

3.23 At this stage and with the exception of Bristol City Council the neighbouring authorities to Bath and North East Somerset have confirmed they are seeking to meet their objectively assessed need for housing within their respective administrative areas. As such there is no request to help meet any of their unmet need. Through the preparation of its Publication Draft Local Plan Bristol City Council have confirmed that they have capacity to provide around 1,925 dwellings per annum, or 34,650 over their Local Plan period. This capacity does not fully meet their locally derived housing need of 2,503 per annum or 45,054 over the Local Plan period. Bristol City Council have therefore, formally written to B&NES Council and also their other neighbouring authorities of North Somerset Council and South Gloucestershire Council, to request that we explore whether we could accommodate a proportion of their unmet locally derived need of 10,404 homes. B&NES Council response to this request will be carefully considered through the preparation of our Local Plan.

Climate Change

3.24 In 2019, B&NES Council declared a climate emergency, setting the ambition to lead the district to carbon neutrality by 2030. The Climate Emergency Strategy sets out the four strategic priorities, which are to: decarbonise buildings; decarbonise transport; increase renewable energy generation; and decarbonise the council's own operations. Planning should facilitate retrofit of existing buildings to improve energy efficiency, net zero new build developments, and increased renewable energy generation and storage to support our climate change ambitions.

3.25 Action to mitigate climate change cannot be taken in isolation of also considering how the district will adapt to the changing climate. Appropriate retrofit of heritage assets and increased renewable energy generation must be designed for the future climate, ensuring that their use continues to be sustainable. Improved resilience in the district can be achieved through an increase in nature-based solutions and green infrastructure, also supporting a range of further outcomes including health and wellbeing and active mobility.

3.26 As part of the Climate and Ecological Emergency Strategy we're developing an Energy Strategy that builds on studies identifying enabling greater renewable energy capacity through the community energy approach as the best delivery model. Aside from the Core Strategy targets of 110MW electricity and 165MW heating, there is a widely used target of 300MW installed capacity across the authority area that was identified to be of the scale needed to help the area become carbon neutral. However, varying external factors relating to decarbonisation of the grid mean that this figure is likely to vary with time.

3.27 The Council is part of a successful bid for Innovate UK funding for the West of England area that will enable the development of a Local Area Energy Plan in collaboration with the District Network Operator, that will identify detailed energy needs in terms of demand and infrastructure relating to the energy grids. This will help us to further refine our approach to planning and identify priority areas for delivery.

3.28 The constraints relating to grid connections (in particular those above 1mw) remain a consideration in the short term for planning, although changes in the way reserved capacity queues are managed means that larger connections may be possible in shorter timescales and should not therefore be seen as a barrier to large renewable installations.

3.29 There is an opportunity to utilise the emerging microgrid model for improving the carbon neutral new build policy adopted as part of the Local Plan Partial Update (LPPU). This model could further reduce the need for offsetting as part of the policy and enable greater carbon reduction. Given the greater electricity generation and consumption on new build properties due to electrification of heat and transport, consideration should be given to stipulating that new builds need to have a 3-phase electricity supply.

Nature Recovery

3.30 The Government is committed to an internationally agreed '30 by 30' target to protect 30% of our land and seas by 2030. In addition, the following targets are set in the government's 25 year environment plan:

- restoring 75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition, securing their wildlife value for the long term
- creating or restoring 500,000 hectares of wildlife-rich habitat outside the protected site network, focusing on priority habitats as part of a wider set of land management changes providing extensive benefits

- taking action to recover threatened, iconic or economically important species of animals, plants and fungi, and where possible to prevent human induced extinction or loss of known threatened species in England and the Overseas Territories

- increasing woodland in England in line with our aspiration of 12% cover by 2060: this would involve planting 180,000 hectares by end of 2042

3.31 These targets are reflected in the nature recovery targets set for the West of England, which have been adjusted for Bath and North East Somerset.

3.32 As set out in the Ecological Emergency Action plan there is a need to:

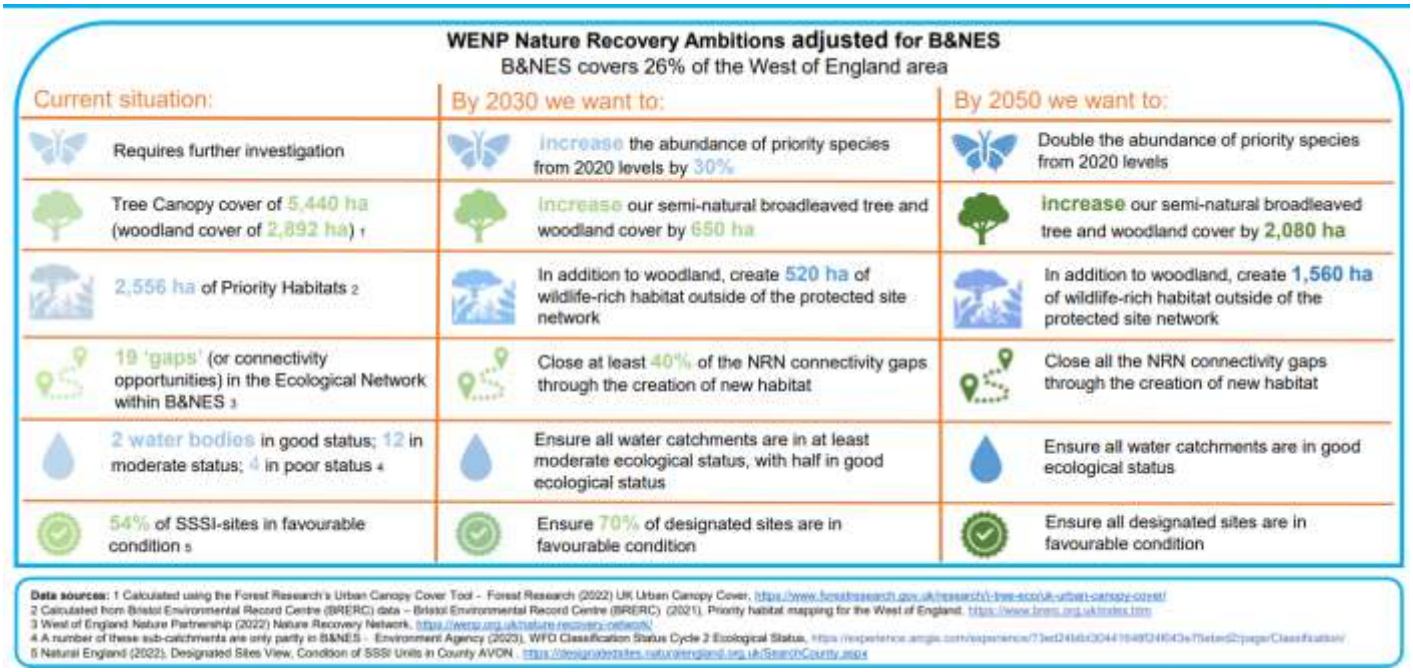


Figure 4: Diagram showing WENP nature recovery ambitions adjusted for B&NES

- Increase the extent of land and waterways managed positively for nature across Bath and North East Somerset

- Increase the abundance and distribution of key species across Bath and North East Somerset

- Enable more people to access and engage with nature

3.33 New development will need to play its part in delivering these ambitions and the council is considering requiring 20% Biodiversity Net Gain (BNG) for all or some types of development.

3.34 The council is also considering Natural England's 'Green Infrastructure Framework - Principles and Standards for England' (Green Infrastructure Framework), which includes standards for accessible greenspace, urban nature recovery, urban greening and urban tree canopy cover.

3.35 It is estimated that we need an additional 86.25 ha of accessible greenspace across Bath and North East Somerset for the new homes (not accounting for the increase in the student population and unmet housing needs in neighbouring authorities) if we are to meet the accessible greenspace standard of 3ha per 1,000 population.

3.36 The Environment Act 2020 stipulates that each region in England must produce a Local Nature Recovery Strategy (LNRS), which will 'establish priorities and map proposals for specific actions to drive nature's recovery and provide wider environmental benefits'. Local Plans must 'take account of' any relevant LNRS.

3.37 The relevant LNRS for B&NES is the West of England LNRS, which will cover the unitary authority areas of Bath and North East Somerset (B&NES), Bristol, North Somerset and South Gloucestershire.

3.38 Once the West of England LNRS is completed, it will be available to guide and inform the delivery of action for nature recovery. The areas mapped that 'could become, of particular importance for biodiversity' within the LNRS will also be used to define areas recognised as being of Strategic Significance within formal BNG calculations.

Needs for Health and well-being

3.39 The places where we live and work have a significant impact on how easy it is for people to live healthy lives, and influence our health outcomes. Therefore, the local plan offers an opportunity to shape development to create health promoting and inclusive places.

3.40 There is a clear emphasis throughout national policy and guidance on health and wellbeing in planning and placemaking. The NPPF states that planning policy should promote health and wellbeing. Paragraph 92 outlines that this should be achieved through promoting social interaction, making spaces safe and accessible, and creating places that enable and support healthy lifestyles. National guidance recognises health as a cross-cutting issue, which connects with and can be promoted by many policy areas within the Local Plan.

3.41 Key priorities of the B&NES Health and Wellbeing Strategy (2023) are to strengthen compassionate and healthy communities and create health promoting places. This includes utilising the Local Plan as an opportunity to shape, promote and deliver healthy and sustainable places and reduce inequalities. It also includes developing the infrastructure needed to build strong local communities and encourage proactive engagement in healthy lifestyles at all ages.

Transport Requirements

3.42 Transport systems and networks are important in terms of what they can enable, including mobility and access. Transport is a key contributor to wider societal benefits such as health and wellbeing, placemaking and economic growth. The choices that are made at Plan-making stage are integral to the sustainability of our District as a whole, such as the Spatial Strategy, where development is located, and how we choose to accommodate travel demand.

3.43 Our District requires mobility of people, goods and services to fulfil the needs of the population who live, work and visit B&NES. This demand for mobility will increase as a result of housing and employment growth to be facilitated through the Local Plan. This presents a core challenge to accommodate this increased mobility need whilst supporting progress towards our Climate and Ecological Emergency commitments.

3.44 We have made significant updates and improvements to transport policy in recent years, including through the LPPU and Transport and Developments Supplementary Planning Document (T&D SPD). Through the LPPU, we have substantially rebalanced transport policy towards sustainable modes, strengthening sustainability requirements for new development and set out detailed guidance in the SPD. We recognise that this is an early stage on our sustainability journey, and we need to continue on this strategic direction through the Local Plan and beyond.

3.45 Bath and North East Somerset has an ambitious vision to deliver the forecast growth within the Local Plan as part of its drive towards the decarbonisation of the transport networks across the district. At the heart of this vision is the need to ensure that people can get to where they need to go, and are able to access the facilities and services that they need, as sustainably as possible. We need to recognise that the UK's approach to transport for the last c.70 years is not working, and we cannot continue to predict and provide for worst case traffic levels with increased traffic capacity, enabling further growth in car usage. We need a change in approach where the transport network is rebalanced in favour of sustainable modes. This means a lot less emphasis on accommodating private car usage than has been the case historically which has led to car reliant communities and our places becoming dominated by cars. This is reflected through the following elements of our Transport Vision and Objectives:

- Positive contribution towards zero carbon mobility and climate resilience;
- Equitable and inclusive access to transport for all;
- Health and well-being of local communities; and
- Create Better Places.

3.46 Our vision includes a presumption against building new roads for general traffic and increasing traffic capacity to deliver Local Plan growth. This is in line with LPPU Policy ST7. Including this in our vision sets a clear expectation that we will hold ourselves to our own high standards. We will ensure that this does not compromise the ability to deliver equitable and inclusive transport for all, by providing people with a range of travel opportunities to enable those that can travel sustainably to do so, potentially freeing up existing road capacity for those that do still need to use it.

3.47 The transport vision and objectives have been developed to underpin and guide the decision-making process for the Local Plan. It has taken account of adopted local policy and guidance including the Corporate Strategy 2023-2027, the Joint Local Transport Plan 4, the Journey to Net Zero Transport Plan and the Spatial Priorities of the Local Plan to create a cohesive framework for sustainable development.

3.48 The Corporate Strategy is the Council's overarching strategic plan and includes as one of its core policies the need to tackle the climate and ecological emergencies. In line with this our transport vision seeks to ensure that growth is delivered as part of the drive to decarbonise our transport network, making a positive contribution towards zero carbon mobility and climate resilience. As one of its core principles the Corporate Strategy also focusses on delivering for local residents. The Transport Vision and Objectives positively responds to this through the creation of more travel choices by improved connectivity for all and reducing the need to travel. Through this integrated approach the transport vision and objectives ensures that the Local Plan aligns with the Corporate Strategy, and broader transport policy aims, creating positive social, economic and environmental outcomes.

3.49 Our approach follows the sustainable transport hierarchy. In the first instance, we seek to utilise the Spatial Strategy, and following site selection process, to locate people close to the services and facilities that they need, e.g. employment, education, retail, leisure, public transport. Reducing the distances that people need to travel for their everyday needs, will increase their ability to make those journeys on foot or by bicycle. Our Transport Strategy for the Plan will provide greater travel choice for people, and enhance their ability to travel by sustainable modes. The Evidence Base documents set out greater explanation of the process we are going through to develop this Transport Strategy.

3.50 We recognise there are a range of challenges and opportunities for transport across the District, and that there is significant variation in levels of connectivity and car reliance. We also recognise that the planning process can only directly apply to new development, or redevelopment, limiting the scope of influence of the Local Plan. However, it is clear that in order to accommodate housing and employment growth sustainably, we must provide transport opportunities that enable people currently making trips by car to choose a more sustainable alternative. Enabling more people to travel by sustainable modes will create the “headroom” in our transport network needed to accommodate increased travel demand from new development in a sustainable manner. Thus, our transport approach will seek to achieve mode shift from existing trips as well as delivering new development as sustainably as possible.

3.51 Addressing the wide range of transport issues and opportunities people face across our District requires a holistic approach, delivered through the Local Plan and a range of transport plans and programmes.

3.52 We have embarked on a programme of transport strategy, scheme identification and modelling as part of the Local Plan process. This Options Consultation is a key stage in this process to set out initial ideas to the community and other stakeholders, to seek views, and to listen to ideas. Following this, we will develop the transport strategies and evidence base as we progress towards the submission and Examination of the Plan.

3.53 Our approach looks at the areas where options for growth are identified, and how people move within, between, and beyond these areas. We have consulted with representatives of the community, and undertaken our own research, looking at the existing issues in these areas and the potential opportunities to support the sustainability of each area. Transport Strategies for each area are being produced that will set out the changes needed to our transport systems to provide the capacity for future growth and increase sustainability of new development. Initial ideas are included within the Evidence Base for this consultation, and they will be developed through the Local Plan process.

3.54 We are also investigating strategic approaches to enhancing sustainable transport across the District. This includes improving the function of the Park and Ride sites to be “Transport Interchanges”, providing a greater range of travel options than car to bus, and into-out of city centre. We are also developing an Active Travel Masterplan for the District, to provide people with improved opportunities to travel by “walking and wheeling.”

4 Bath and North East Somerset Spatial Strategy Principles and Location Options

Introduction

4.1 This chapter sets out the fundamental principles that will guide the strategy across Bath and North East Somerset for accommodating new housing, employment development and supporting infrastructure, whilst addressing climate, nature and health and well-being needs. Sub-areas within Bath and North East Somerset are identified and their potential role is briefly explored, summarising key opportunities and challenges. Finally, site or location options that might potentially contribute to helping meeting the overall development needs (outlined in chapter 3) and therefore, a District-wide spatial strategy are summarised. The site or location options are then explored in more detail in the sub-area and place-based chapters that follow, including consideration of how the options for new development can address issues and priorities identified by communities.

4.2 Bath and North East Somerset has close relationships with the surrounding area. Therefore, the spatial strategy for accommodating development within Bath and North East Somerset also needs to be considered alongside the strategies in neighbouring authorities' Local Plans. The Unitary Authorities in the West of England (B&NES, Bristol City Council, North Somerset and South Gloucestershire), as well as Wiltshire and Somerset, will continue to liaise and co-operate in considering locations for development and the cumulative impacts.

Spatial Strategy Principles

4.3 The spatial strategy or approach to meeting development needs is underpinned by and will seek to achieve the spatial priorities of the Local Plan (outlined in chapter 2). Through the Local Plan the Council is seeking to plan for and facilitate the delivery of housing that is more affordable and allied to that, is ensuring Bath and North East Somerset remains economically prosperous and that the economy becomes greener, more sustainable and fairer. Development needs to respond to local needs and along with supporting infrastructure must progress our transition towards carbon neutrality and climate resilience, protect and enhance nature and promote healthy lives e.g. through minimising the need to travel by car and encouraging movement by walking, cycling and public transport.

4.4 The factors or principles that are particularly important in shaping the choice of locations for future development are summarised as:

- Sustainable transport connectivity
- Climate change and nature

- Flood risk
- Historic environment
- Green Belt impact
- Infrastructure provision – challenges and opportunities

Sustainable Transport Connectivity

4.5 Being able to move around by sustainable means of transport, that is walking, cycling and wheeling or public transport, in order to easily access services and facilities, as well as places of work is vital in seeking to minimise carbon impact and addressing the climate emergency. Around 30% of carbon emissions in B&NES currently relate to transport. Since the covid-pandemic an increasing proportion of people work from home, however, at least some of the time, travelling to work is still an important journey for many, as well as regular journeys to access key services and facilities such as schools or local convenience shops. The maps below from the 2021 census provide a useful indication of the propensity to travel to work by car (as opposed to more sustainable means), as well as the distances travelled to work. The maps show that a greater proportion of people travel to work by car and travel a greater distance in the more rural parts of the District and also the Somer Valley.

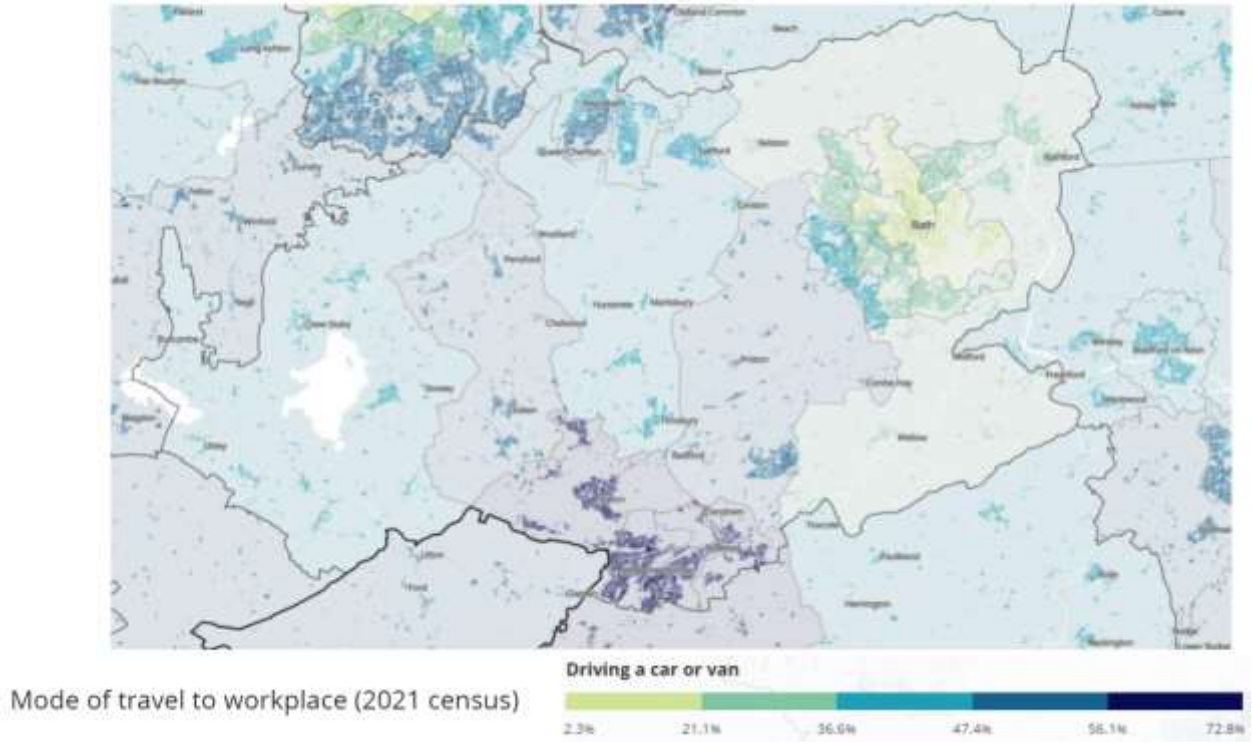


Figure 5: Extract from 2021 census showing mode of travel to work by car

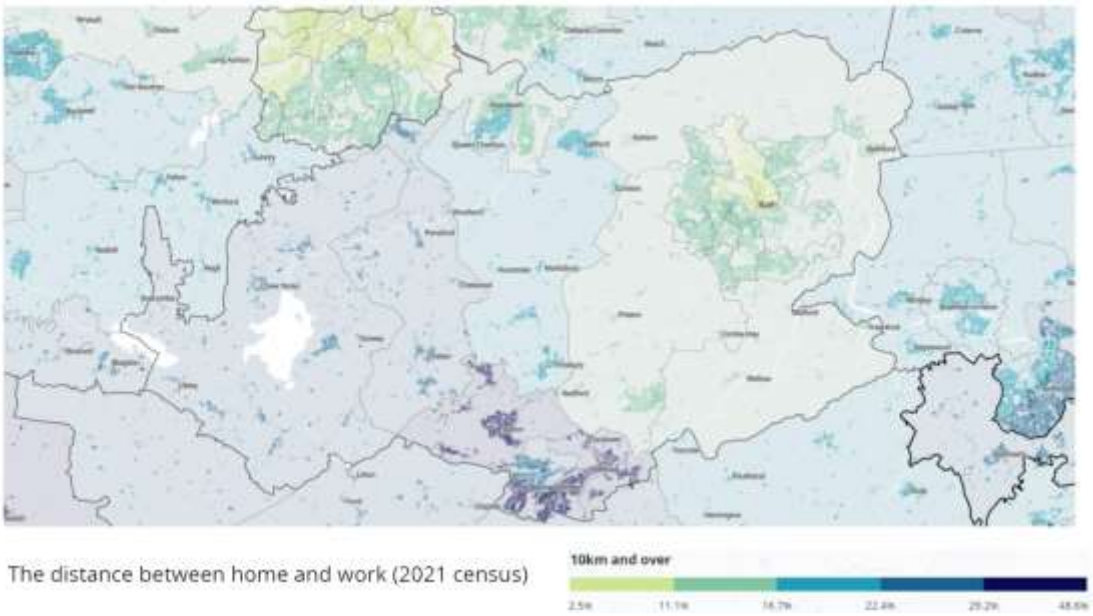


Figure 6: Extract from census 2021 showing distance travelled to work

4.6 Analysis has also been undertaken of broader connectivity of different areas across Bath and North East Somerset by sustainable means of transport to a range of important services and facilities, as well as employment areas. The map below provides a useful indication of the relative sustainable transport connectivity, with the areas in green/yellow as the best connected, moving through oranges and then red for the least well connected.

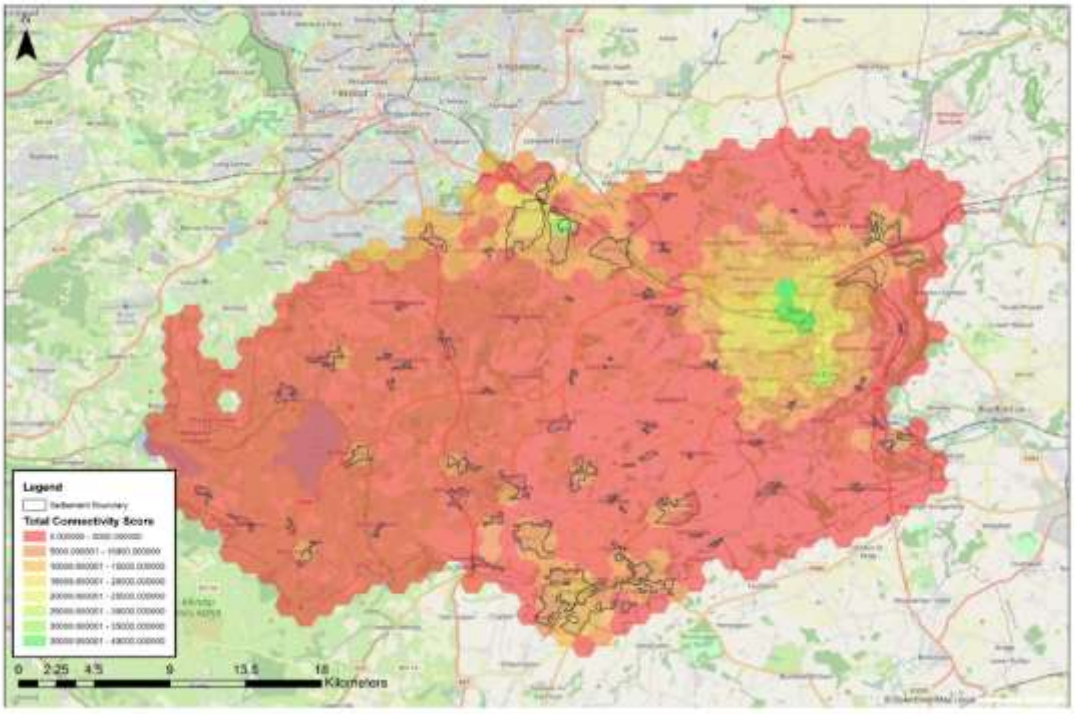


Figure 7: Relative sustainable transport connectivity across B&NES

Climate change and nature

4.7 Tackling the climate and ecological emergencies remains a top priority for the Council. It is critical that any new development aligns with our aims to tackle these emergencies. This will include how development is designed to promote accessible, sustainable transport (as set out above) and how our new and existing buildings continue to be decarbonised. While considering the challenges and opportunities for reducing our emissions, we must also plan for the changes in the climate that we are already seeing and will continue to see. Flooding (see below), overheating and other extreme weather events will increase in frequency and severity. Considering these climate risks is critical to the spatial strategy in order to minimise the potential climate impact in the locations of development.

4.8 The landscape within Bath and North East Somerset enriches people's lives and is an important influence on the location and form of new development. The attractiveness and character of the landscape should be maintained and enhanced for its own sake and because of the role it plays in residents' quality of life and its economic benefits. The quality of the landscape is evidenced through national designations shown on the map below, including the Cotswolds National Landscape and Mendip Hills National Landscape. In addition to these designations Bath and North East Somerset is covered by a range of different landscape characters that are valued by those that live and work in and visit the District, as well as important landscape settings to settlements.

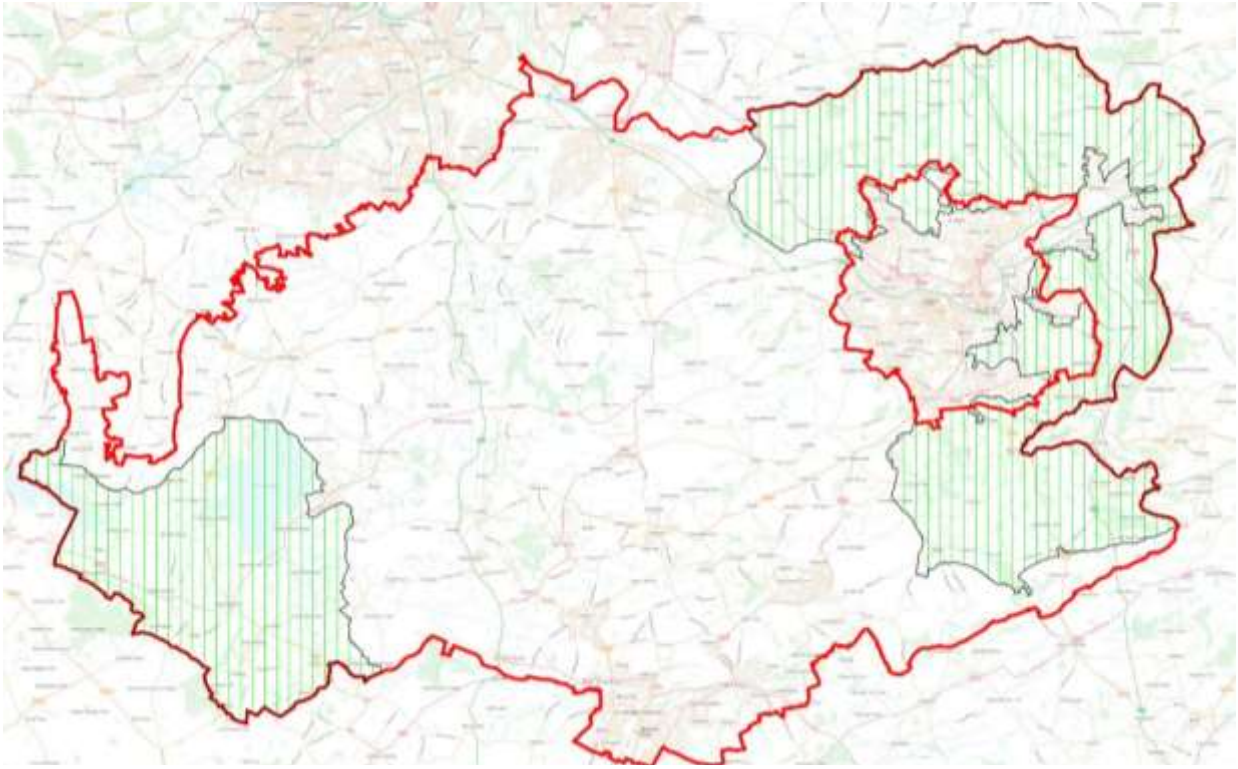


Figure 8: Map of B&NES indicating National Landscapes (green hash), and World Heritage Site boundary (inner red boundary)

4.9 In 2020 we declared an ecological emergency recognising the severity of the degradation of the natural environment and loss of wildlife, the consequences of this, and the urgent need to take action to restore nature . Protecting habitat and supporting nature's recovery (including through Biodiversity Net Gain) are important objectives for the Council. Opportunities to better facilitate nature's recovery are being identified through a Local Nature Recovery Strategy and supported by new and amended planning policy. The need to both protect priority habitats and facilitate nature recovery influence the spatial strategy and locations for development.

Flood Risk

4.10 Bath and North East Somerset includes many waterways. Ensuring that flood risk is properly taken into account is another important factor influencing the location of development and resilience to climate change. Flood risk is initially considered through reference to the Level 1 Strategic Flood Risk Assessment in identifying flood risk areas. The map below is taken from the latest SFRA (2022) and identifies flood risk zones. This informs a sequential approach to development locations, seeking to avoid locating vulnerable uses (e.g. residential development) in those areas at higher level of risk from flooding. The Level 1 SFRA is being updated to inform the Draft Local Plan. For some potential development areas or options a more detailed or Level 2 Flood Risk Assessment may be needed and this will also be undertaken to inform the next stages of the Local Plan.

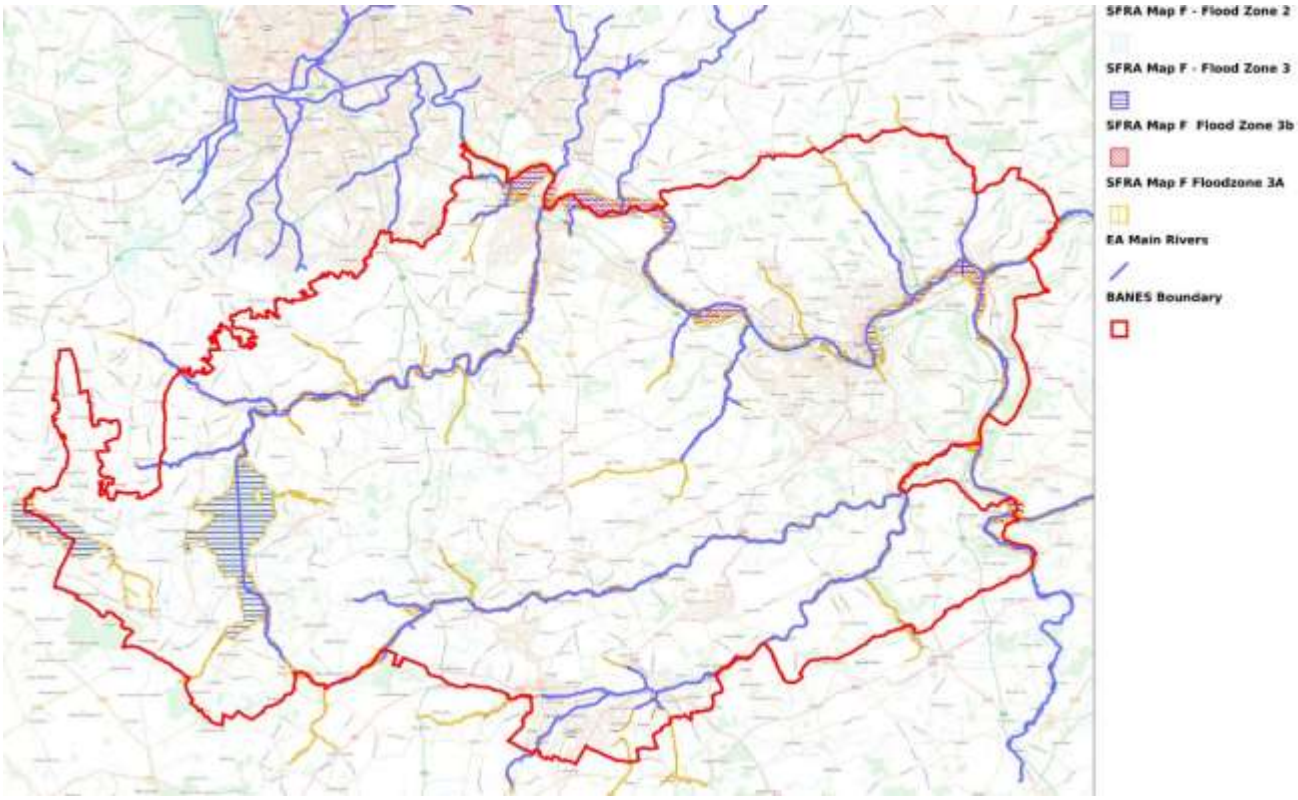


Figure 9: SFRA Flood Zones

4.11 Opportunities to mitigate increasing flood risks resulting from climate change through nature based interventions will also be considered to inform the next stage of the Local Plan.

Historic Environment

4.12 In addition to the quality of its landscape Bath and North East Somerset has an historic environment that is of international and national significance. This is evidenced through a range of designations including the doubly inscribed World Heritage Site of Bath, numerous listed buildings, conservation areas and national Scheduled Ancient Monuments. The need to protect and enhance the significance of these heritage assets, including their settings, is also an important influence on spatial strategy and the location and form of development.

Green Belt impact

4.13 More than two-thirds of B&NES currently lies within the designated Bristol-Bath Green Belt. The Green Belt is designated to keep land permanently open. National policy outlines the five purposes of the Green Belt, summarised as follows:

1. Check the unrestricted sprawl of large built up areas
2. Prevent neighbouring towns from merging into one another
3. Assist in safeguarding the countryside from encroachment
4. Preserve the setting and special character of historic towns
5. Assist urban regeneration by encouraging the recycling of derelict and urban land

4.14 The Bristol-Bath Green Belt was originally designated in the 1960s, primarily in order to check the unrestricted sprawl of Bristol and Bath and to ensure the two cities and surrounding towns do not merge. Land can only be removed from the Green Belt and allocated for development through a Local Plan and only if ‘exceptional circumstances’ exist. The Green Belt in Bath and North East Somerset has remained largely unchanged, although land has been removed principally on the edge of Bath, Keynsham and Whitchurch for development through the B&NES Local Plan (2007) and Core Strategy (2014).

4.10 The Green Belt will be a further important influence on the location of development in the District. Development of land currently within the Green Belt may need to be considered through the Local Plan in order that the evidenced need for further housing and employment development (see chapter 3) can be met. To understand and consider the impact of potential development on the Green Belt an assessment of the Green Belt and the purposes served by different areas of land within it will need to be undertaken. An assessment across the West of England has already been undertaken and

this will form the basis for more detailed assessment to support the Local Plan. The map below is taken from the West of England Green Belt assessment and illustrates the extent to which different land cells serve the nationally defined purposes of Green Belts. Those areas in darker colour more strongly serve a greater number of the purposes. It should also be noted that where development requires the removal of land from the Green Belt measures to improve and enhance the remaining land within the Green Belt will be required. This will be considered in preparing the Draft Local Plan.

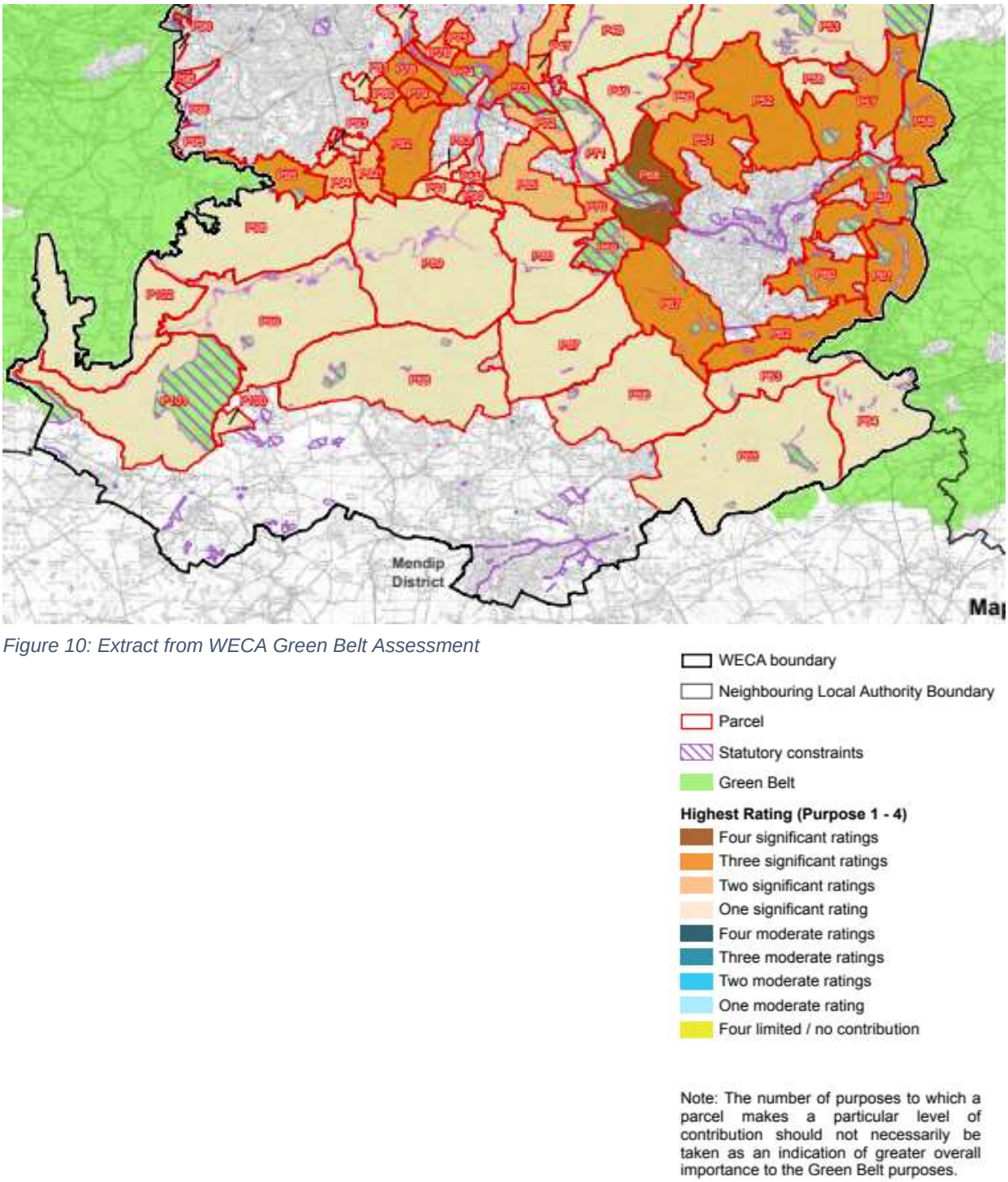


Figure 10: Extract from WECA Green Belt Assessment

Infrastructure provision – challenges and opportunities

4.15 It is crucial that new development is served by the timely provision of necessary supporting infrastructure e.g. schools, health and social care facilities, utilities, green infrastructure etc. The Council is a direct provider of some of this infrastructure and will identify requirements arising from any planned growth and seek to ensure timely provision to address such requirements. In addition, the council will continue to liaise with other external infrastructure providers e.g. utilities companies, in order to understand current deficiencies or surpluses in provision; what the infrastructure requirements are arising from new development; the most appropriate solutions and the barriers to delivering these solutions. Where barriers to infrastructure provision are insurmountable this would effectively prevent development taking place. Information from these discussions is referenced in the place-based chapters and in the Infrastructure Topic Paper

4.16 More detailed work on infrastructure requirements and delivery will be needed as the Local Plan progresses and the potential location options that are presented in this document are explored further. In addition to understanding the infrastructure requirements relating to individual development locations it will also be crucial to consider cumulative impact of development across a wider area e.g. in relation to education and school places; health facilities; and transport. Solutions will therefore need to address both location specific and cumulative impacts. This work will be undertaken in collaboration with key infrastructure providers and agencies.

4.17 The council's Green Infrastructure Strategy is being updated using the new Natural England GI Framework (2023). The revised Strategy will guide delivery of the councils GI Policy and prioritising areas requiring investment to deliver multifunctional GI.

Q. What do you think of the spatial strategy principles set out above and their relative importance?

Sub-areas within B&NES

4.18 The District comprises a range of settlements many of which are spatially and functionally related to each other. Considering these relationships is important in looking at potential locational options for development. In order to aid this process and for the purposes of the Local Plan Bath and North East Somerset has been divided into four main sub-areas, which are based around these connections and relationships. These sub-areas are illustrated on the map below. Some of the key spatial issues, opportunities and challenges in these sub-areas are briefly summarised below and are picked up in greater detail in the chapters which follow.

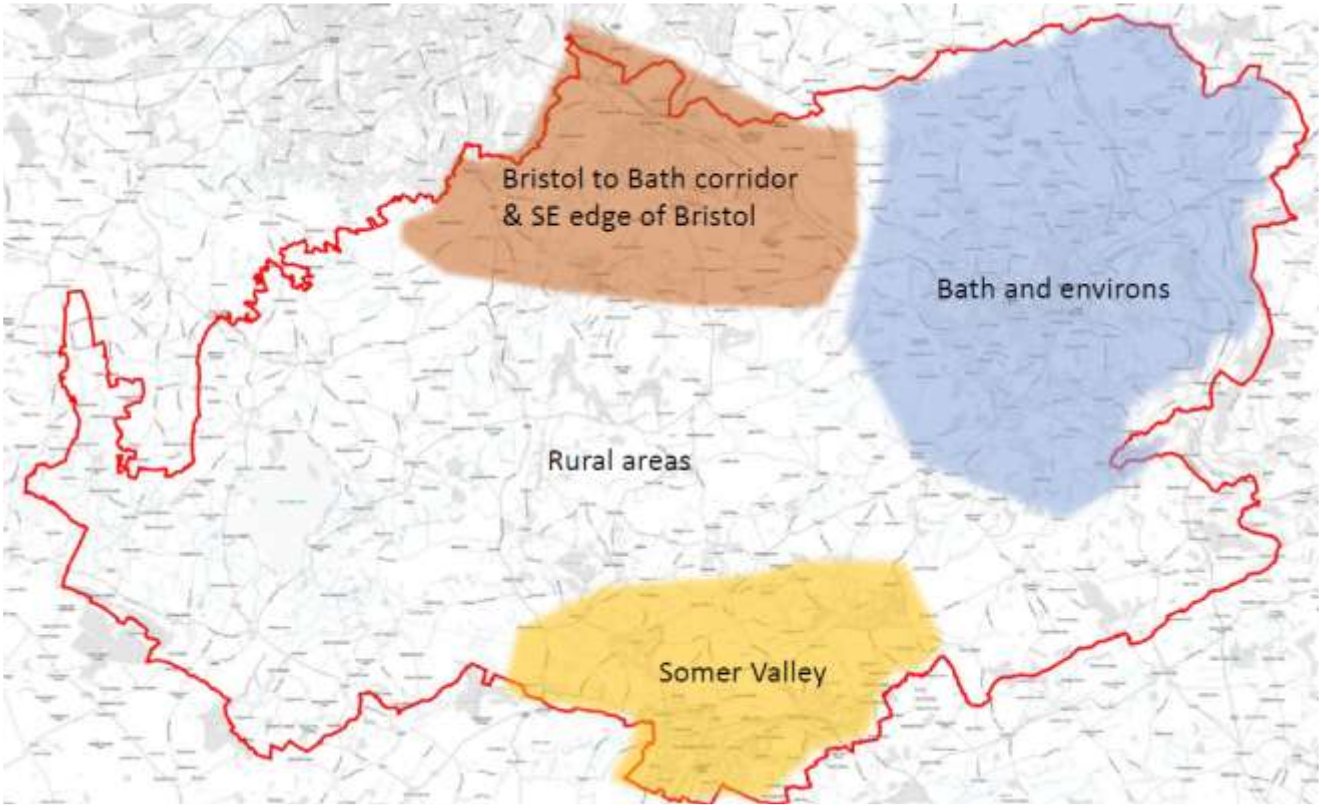


Figure 11: Map showing locations of sub-areas within B&NES

Bath and Environs

4.19 The city of Bath is the main economic centre and largest settlement within Bath and North East Somerset. As such it is the driver for much of the housing needed in Bath and North East Somerset and a focus for economic or employment space. The need for affordable housing is particularly acute in the city and as set out in chapter 2 this is the area of the District where housing is least affordable (with house price to earnings ratio in the city being higher than the rest of the district). The city also hosts two Universities, which also bring with them significant opportunities but also major impacts on the city's housing stock and communities. Bath is also a double-inscribed World Heritage Site, home to over 5,000 Listed Buildings and tightly surrounded by the Green Belt and two thirds of it is wrapped around by the Cotswolds National Landscape. Bath and its environs support key components of the Bath & Bradford on Avon Bat Special Area of Conservation and the city retains significant wildlife interest particularly linked to the river corridor, hillsides and green fingers that characterise the city.

4.20 There is substantial pressure for development arising from housing and economic needs within the city, where land supply is limited and at a premium. Brownfield sites need to be re-developed where possible and at optimum densities in order to ensure such land is used efficiently, but in a way that respects the city's sensitive context. Most of the significant brownfield sites have been redeveloped or are already committed for development and therefore, relatively few new brownfield sites available for development exist. Within this context the use of land within Bath needs to be carefully assessed and the needs which should be met must be prioritised. Opportunities for outward expansion of the city need to explored, but are also constrained by the quality of the environment and designations. The villages that lie within the hinterland of the city are also of special character and development opportunities are similarly limited. Options for development and which needs should be met and how are considered further in chapter 5.

Bath to Bristol Corridor and South East Edge of Bristol

4.21 Settlements within the transport and river corridor that connects Bath and Bristol, most notably Keynsham and Saltford, but also other villages closer to Bath are well to related to each other and accessible by public transport in terms of people's journeys for employment and services and facilities. Crucially these settlements are also well linked to Bristol and Bath by public transport, both bus and train from Keynsham. The south eastern edge of Bristol, in particular the Hicks Gate/Brislington area, also lies not far to the north west of Keynsham. In addition to this area the village of Whitchurch lies close to the south eastern edge of the city. However, whilst it is relatively well connected into Bristol it is important to remember that Whitchurch village is a separate and distinct settlement and community.

4.22 The comparatively good public transport links are an important characteristic of this part of the district. However, it should be noted the main highway routes also suffer from congestion, especially at peak times. Therefore, investment is needed to further improve public transport services and active travel links to help address it.

4.23 Land on the south east edge of Bristol and in the transport corridor linking Bath and Bristol lies within the Green Belt. Strategically this is an important part of the Green Belt in separating the two cities and the settlements that lie in between. The physical separation of not only Whitchurch village from Bristol, but also Keynsham from Bristol, and Keynsham and Saltford are also of great importance to the respective communities. In considering locations for development the need to retain, strengthen and enhance green infrastructure settlement gaps is crucial. As set out above land can only be released from the Green Belt for development through a Local Plan and only if justified by 'exceptional circumstances'.

4.24 The River Avon corridor and supporting sub catchments are an important ecological network for the region, connecting Bath to Bristol and the communities between. The River Avon corridor also provides an important recreational route and sustainable movement corridor that can be enhanced for active travel for existing and new communities, and for boat dwellers living on the river. The River Chew, which is particularly relevant in having helped to shape Keynsham, is an important tributary of the River Avon.

Somer Valley

4.25 The Somer Valley lies in the southern part of Bath and North East Somerset and adjoins the Somerset Council administrative area. For the purposes of the Local Plan the Somer Valley area focusses on the six closely connected settlements of Midsomer Norton, Radstock, Westfield, Peasedown, Paulton and Farrington Gurney. Other villages in the wider Somer Valley (such as High Littleton and Timsbury) are considered in the rural areas sub-area (see below). The Somer Valley has a rich mining and industrial heritage and a locally distinctive character, including a number of derelict coal batches of wildlife and cultural interest. It is important that the character of each settlement is respected in considering potential development locations.

4.26 There has been considerable recent housing growth in the area, delivered on a piecemeal basis, without the necessary supporting infrastructure keeping pace. In addition, out-commuting from the area to work is relatively high and has increased in recent decades due to economic restructuring within the area.

4.27 The Somer Valley is connected to Bath and Bristol by two major transport corridors (A367 and A37) and is relatively well served by public transport, although not as accessible to both cities as settlements in the Bath to Bristol corridor sub-area above.

4.28 Further significant investment is needed to improve public transport. Connectivity and safety improvements to the active travel network are also required. It is also important to deliver opportunities to improve local employment opportunities, including the Somer Valley Enterprise Zone, as well as delivering nature recovery and greater public access to greenspace.

Rural Areas

4.29 A significant proportion of Bath and North East Somerset is rural in nature. The rural areas are made up of several areas of attractive and distinct landscape and settlement character (e.g. the Chew Valley etc), as well as the Mendip Hills and Cotswolds National Landscapes. Areas of strategic importance for nature recovery are being identified through the Local Nature Recovery Strategy and through the work of the Bristol Avon Catchment Partnership, and West of England Nature Partnership. The high quality of the environment and opportunities to access the countryside, as well as the strong sense of community identity in villages, are important to local communities. The connectivity by public transport from villages to larger urban centres is variable and is poor in some of the smaller villages, which also lack services and facilities that can be accessed by walking, cycling or wheeling.

4.30 As is the case across the district as a whole there is a lack of affordable housing available in order to help meet local needs. Some housing development in villages can provide much needed affordable housing, as well as help to keep services and facilities viable and operating. However, it is important that any development in the rural areas meets the needs of those communities, respects locally distinctive character and is primarily focussed on those villages that are better connected through sustainable means of transport and have better access to key services and facilities.

Location Options

4.31 Through the selection of location or site options that can help to meet the overall need for housing, employment development and supporting infrastructure we must ensure that the Plan's spatial priorities are achieved. The key principles or factors outlined in the 'Spatial Strategy Principles' section above have shaped the choice of location options. Specifically, relative sustainable transport connectivity to employment opportunities and a range of key services and facilities was the starting point for identifying location options. Assessment of the performance or impacts of these locations against the other spatial strategy principles, as well as a broader range of sustainability criteria has been undertaken and has influenced the selection of location options. The assessment of options (or 'reasonable alternatives') is outlined in supporting documents, importantly including the Sustainability Appraisal and the Housing and Employment Land Availability Assessment (HELAA).

4.32 Through the HELAA a broad range of opportunities or sites across Bath and North East Somerset have been considered; in terms of their suitability, availability and achievability. The sites considered encompass those that have been submitted as potential development opportunities by landowners, developers and other stakeholders, supplemented by sites identified by the Council where land in sustainable locations (primarily adjoining the main settlements) has not been submitted. The map below illustrates the range of HELAA sites considered across the District.

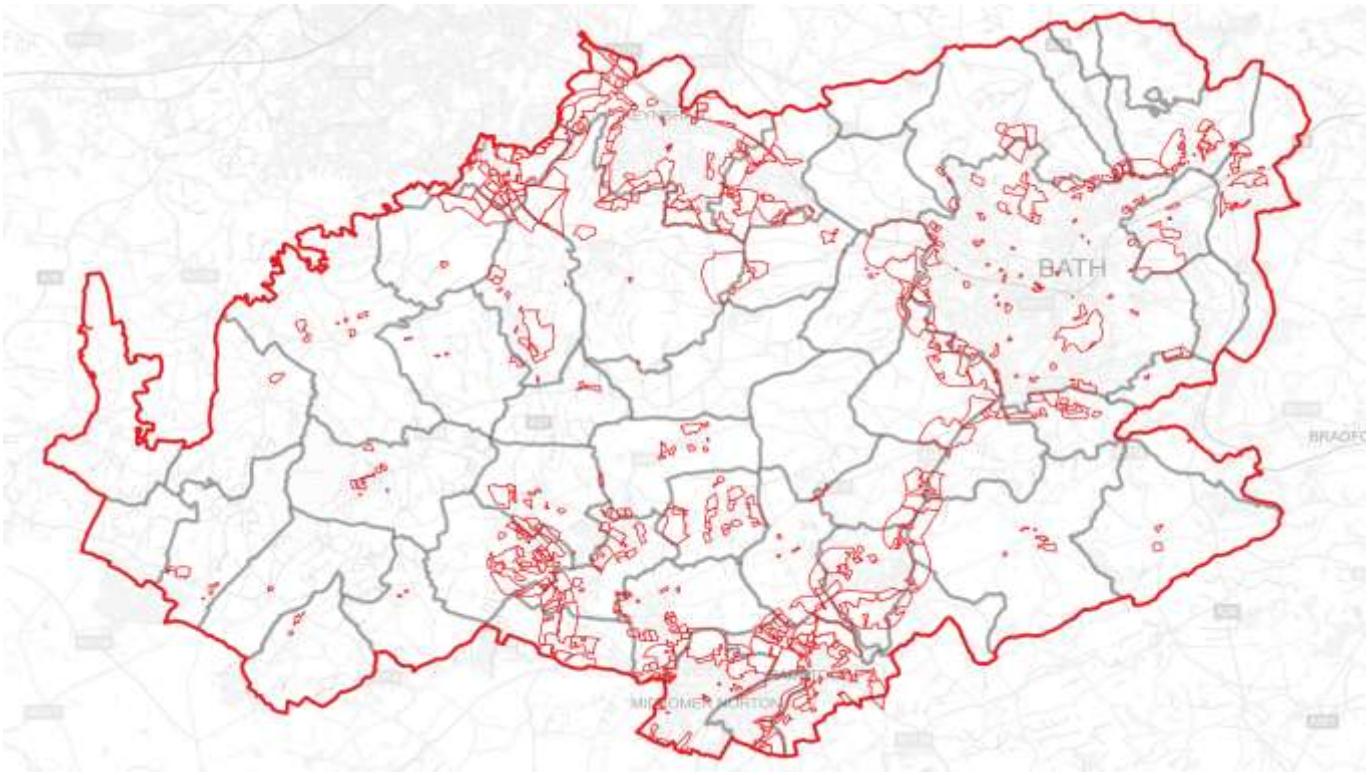


Figure 12: HELAA sites across B&NES

4.33 Those HELAA sites that are assessed as being suitable, available and achievable for development have been considered against the spatial strategy principles and sustainability criteria referenced above. This means that the broad range of HELAA sites has been narrowed down to the potential options for strategic development illustrated on the map below. Those HELAA sites that perform most poorly against the spatial strategy principles have not been identified as options. It should be noted that only locations or opportunities for strategic development (rather than smaller, more local sites) are shown on this map. In the villages, within the rural sub-area, site options are not identified at this stage. Rather the options document focusses on identifying villages within which potential site opportunities for Local Plan-led development will be considered through close working with local communities (this is further explained in chapter 8 below).

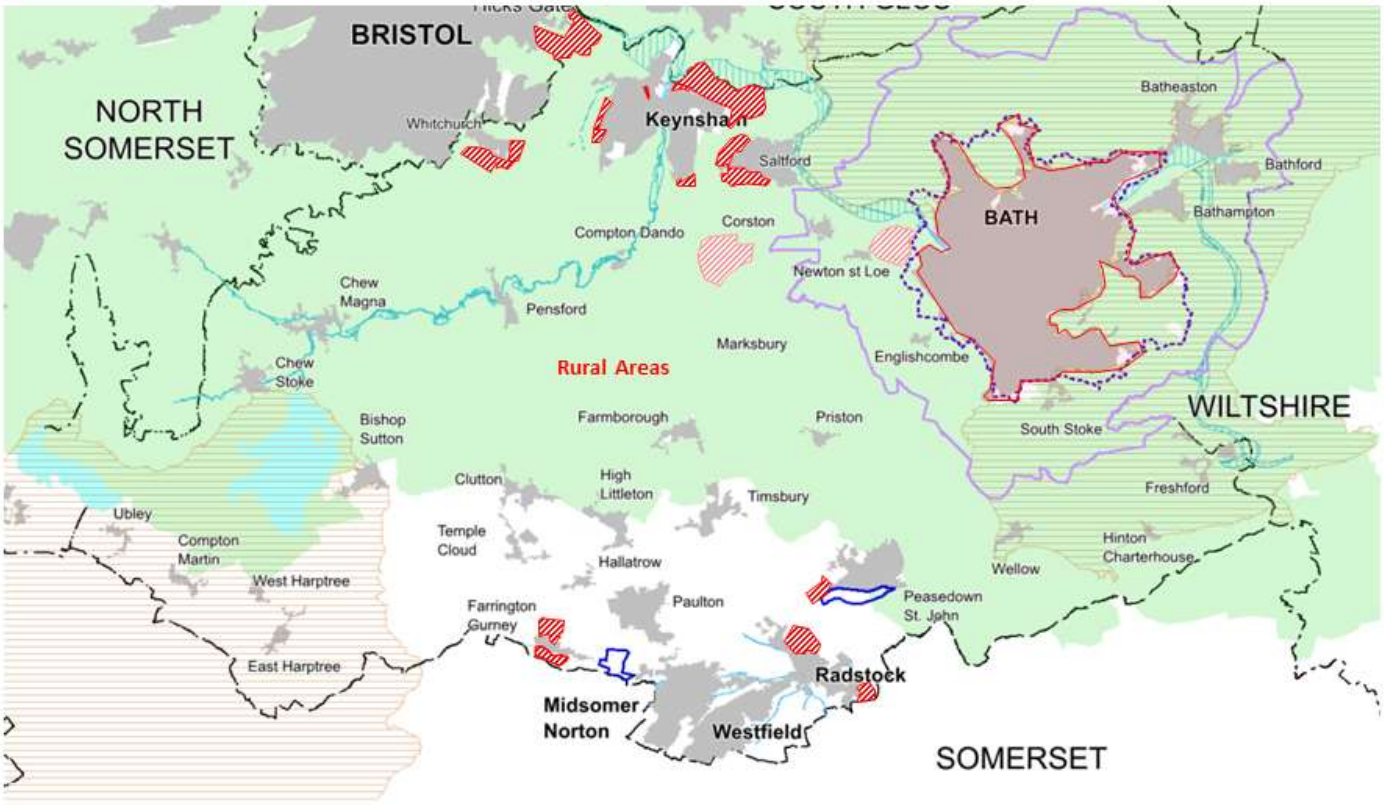


Figure 13: Map showing locations of strategic site options

4.34 The location options illustrated on the map are also listed in the table below. They are listed by sub-area and in order of their estimated development capacity, starting with the largest. The order in the table does not indicate a level of preference. Further information on the sustainability effects and carbon impact of each of these location options is set out in the Sustainability Appraisal and Climate Impact Assessment which are available separately on the Council's website. The performance of locations in terms of sustainability and climate impact also gives a strong indication as to how well they align with the Doughnut Economics Model. It should also be noted that the table below does not include brownfield sites within Bath, smaller 'non-strategic' sites that could be allocated in the Midsomer Norton area (see chapter 7) or sites that could be allocated at the most sustainable villages (see chapter 8). These sites, alongside the location options below, would also contribute to meeting the need for new homes.

Location Option	**Appx. housing capacity**
North Keynsham	1,500
Hicks Gate	1,000
South Saltford	800
East Radstock	500 – 1,000
North Radstock	400 – 1,000
East of Whitchurch village	500
West and East of A37, Whitchurch	500
West Saltford	500
Farrington Gurney (north)	500
Farrington Gurney (south)	500
West Keynsham	100 – 300
Peasedown St John	200
East of Whitchurch village	150
West of A37, Whitchurch	150
Central Keynsham	40 - 100

4.35 A further option for strategic development in an area to the West of Bath has also been considered. As set out in the Bath chapter (chapter 5) it is considered, at this stage that this option is unlikely to be included in the Draft Local Plan as assessment shows that development would be very likely to cause substantial harm to the World Heritage Site.

Location Option	**Housing capacity**
West of Bath	500 – 1,000

4.36 The location options summarised in the table above are explored in greater detail in the place-based chapters that follow. Each of the options could play a role in helping to meet the identified overall housing and employment development requirements. We are seeking your comments on each of these location options and whether you consider they represent a good opportunity to address our need for housing and/or employment opportunities.

4.37 The location options listed and assessed (alongside other sites referenced in paragraph 4.30 above) will together comprise a District-wide approach or strategy in meeting development needs. The District-wide strategy will be set out in the Draft Local Plan published later in the year.

4.38 In order to inform the selection and preparation of the most appropriate spatial strategy the sustainability of different combinations of locations or strategy approaches across the District is tested through the Sustainability Appraisal (INSERT LINK).

4.39 The testing of different strategy approaches through the Sustainability Appraisal enables the likely sustainability effects and advantages and disadvantages of different approaches to be identified.

4.40 Four strategy approaches are tested which include two based around accommodating the standard method derived housing need outlined in chapter 3 above, one with a higher reliance on Green Belt release (if justified by 'exceptional circumstances') to accommodate development and the other with a lower reliance on Green Belt release. In addition, an approach is tested that could potentially accommodate a higher level of growth (should this be necessary) requiring significant Green Belt release and one that excludes any Green Belt release and therefore, accommodates a lower level of growth. Comments are sought on both the individual location options (see questions in the place-based chapters below), as well as the B&NES wide spatial strategy which should be pursued in the Draft Local Plan and the related role of the different sub-areas.

Q. What role should different sub-areas play in accommodating new development and supporting infrastructure?

Q. What approach to distributing development across B&NES should be followed?

5 Bath and its Environs

Strategy Overview and Key Issues

5.1 The Local Plan is an important statutory document that sets out the key spatial issues, priorities and objectives for Bath and the planning framework for how this should be delivered. There are a number of complex and critical issues and challenges facing Bath, and a range of priorities that have emerged in discussions throughout the Council and through a period of stakeholder engagement.

5.2 This place based section of the Local Plan Options document sets out what the strategic issues and options are for Bath, and specifically, the spatial locations in which these can be addressed. It is a key role of the Local Plan to allocate new sites and protect existing sites for particular types of development and in this respect it is informed by robust evidence of objectively assessed needs. The Local Plan will also set out the specific requirements that each site needs to fulfil. This is complementary to content elsewhere in the Local Plan, particularly the Development Management sections that cover specific subject areas.

Place Profile

5.3 Bath is a relatively small city that has an international reputation. The city has a population of around 94,000 people and a larger catchment population who travel into the city for work and leisure. It is an expensive place to rent or buy property and many people live in surrounding towns and villages that better meet their housing needs. As well as high house prices Bath has a relatively low-wage economy (dominated by tourism/health/public sector jobs). There is limited land available in the city resulting in it being unable to meet all of its objectively assessed needs. Therefore, the Council has to prioritise which land uses it considers are the most important to deliver its objectives.

5.4 Economic growth in the last ten years has been sluggish and our lower-than-average wages cannot keep up with escalating costs of local housing. The council's Economic Strategy signals a new approach to local economic development which prioritises meeting the needs of all our residents and places whilst reducing impacts on our natural resources and environment.

5.5 The city has a vibrant cultural offer which supports its important role as an international visitor destination that attracts over 6 million visitors annually. It is a successful regional shopping destination, with below average vacancies.

5.6 Bath is a rare doubly inscribed World Heritage Site. This means that it is of international importance and of Outstanding Universal Value (OUV). It is within this context that the Local Plan manages how the city needs to evolve whilst avoiding harm to the OUV. Some examples would be protecting sensitive landscapes such as green hillsides from development or by guiding the height of new buildings. On the other hand, there are other attributes of the OUV that provide the inspiration for innovative and bold responses, and it is these that need to embraced if we are to address some of the key issues that the city faces.

5.7 There is a comprehensive network of liveable neighbourhoods that support the local needs of the resident population and provide day to day facilities within close proximity to where people live.

5.8 Bath has two universities that together represent approximately 25% of the residential population. The University of Bath is the second biggest employer in the city. Whilst the universities bring many benefits that include a thriving student population that support a vibrant city, the expansion of both the universities creates tensions in other areas of city life. Significant pressures include the effect of this expansion on the existing housing stock and on development sites that need to be prioritised for housing that is affordable, and for meeting the employment needs through new office and industrial development.

5.9 Traffic congestion in the city is a major challenge, that has affected air quality. There is significant in and out commuting. Bath benefits from a mainline railway station with a half hourly service to London and frequent connections to Bristol, Keynsham and towns in Wiltshire. It is a very walkable city and the city benefits from a number of strategic cycle routes: the Bristol to Bath Railway Path, the Kennet and Avon Canal to Bradford on Avon and the Two Tunnels Greenway.

5.10 In formulating the spatial strategy for the city, a sound starting point is to review the existing spatial strategy for Bath and to identify where there are policy gaps, where it needs to be re-written and other areas where it's robust but might need evolving.

5.11 As with other places across the district there is a broad range of evidence that informs policy choices including: Climate Emergency Strategy & Ecological Emergency Action Plan, Local Housing Needs Assessment (LHNA), Economic Needs Assessment, Journey to Net Zero Transport Strategy, Health & Wellbeing Strategy, Economic Strategy and Cultural Strategy. Some other strategies are in the process of being commissioned including the Sustainable Tourism and Visitor Accommodation Strategy.

Key Issues

- Bath is of global importance, recognised by its double inscription as a World Heritage Site, which transcends national boundaries. In addition, the city has over 5,000 listed buildings, and an extensive conservation area that covers two thirds of the city. It is surrounded by the Cotswold National Landscape around three sides, and the Green Belt. A consequence of this is that there are limited opportunities for outward expansion and there is not enough land available to meet all of the city's objectively assessed needs and so priorities need to be made. One of the key roles of the Local Plan is to prioritise and set out the spatial distribution of different uses within the city.

- House prices in the city are very expensive and many people who work in the city choose to live elsewhere to better meet their housing needs. The Local Housing Needs Assessment (LHNA) identifies that the total need for affordable housing, comprised of social rent and low cost ownership, is very significant and represents 77% of total housing need in Bath.

- The Economic Strategy sets out ambitious proposals to address Bath's specific economic challenges and create a fairer, more prosperous and sustainable economy focussing on innovation and creativity. There is an identified need for more high quality office space in central locations, and industrial/hybrid business floorspace at a broad range of scales for established, growing and emerging sectors, to meet the city's economic ambitions.

- The city suffers from significant traffic congestion. 75% of people driving to work in Bath do so from outside of the city resulting in heavy congestion on those key corridors into Bath such as Bathwick Street, London Road, Lower Bristol Road, and the Wellsway. A clean air zone was introduced in 2021 due to exceeding legal limits of Nitrogen Dioxide in some locations.

- Flood risk and surface water run off will need to be managed to respond to increasing frequency of extreme weather events, using nature-based solutions wherever possible.

- The role of green space and nature recovery in supporting, invigorating and enhancing the city is critical to address the ecological emergency and providing access for people.

- Parts of some Wards in Bath experience inequalities in health and wellbeing outcomes, including Twerton, Whiteway and Foxhill, and the built and natural environment can play an important role in addressing inequalities

- There are existing residents within and outside of Bath who feel disconnected with or do not utilise all that Bath has to offer. The role of the built and natural environment in promoting places that are inclusive to people of all ages and abilities, as well as being health promoting more generally, will be important.

Priorities and Objectives

5.12 The following list sets out the key priorities and objectives for Bath. Many of the priorities can be addressed by new development, and site or policy approach options have been selected in response to the key issues, priorities and objectives. However, there are some priorities that won't be addressed through new development but will be addressed through other policies in the Local Plan, or by strategies or initiatives undertaken by the Council or by other stakeholders.

- Provide the space to help create a fairer, more prosperous, innovative and sustainable economy within ecological and environmental limits. This will need to reflect our wide variety of needs from city centre offices and workspaces to larger industrial premises, advanced engineering, R&D and lab spaces.

- Deliver the right homes in the right places ensuring a greater diversity and choice of high quality, low carbon housing that is more affordable to meet the needs of residents and workers. As is the case across the district it is important that we build homes that are efficient to heat and that use clean energy, and which are fit for the whole life-course (young people, families, and into older age).

- Create opportunities to become carbon neutral and nature positive by 2030 and to become more climate resilient by enabling greater levels of building retrofit and integration of renewable energy solutions, low or zero carbon development, and the delivery of strategic Green Infrastructure and nature recovery projects such as Bath River Line and Bathscape.

- To set out a positive strategy for the conservation, enjoyment and understanding of the historic environment, and sustain and enhance the significance of the city's heritage assets including:

    - the OUV of the doubly inscribed World Heritage Site and its landscape setting, its listed buildings, the Bath Conservation Area and its setting, archaeology, scheduled ancient monuments and historic parks and gardens, and non-designated assets of local interest and value.

- Support the Bathscape vision with policies and supporting guidance to protect, promote and deliver the ambitions for a ‘Landscape City’. This requires a transformational approach which will deliver nature recovery and climate resilience. By increasing the extent of land and waterways managed positively for nature and by protecting natural assets through investment in nature based solutions and wildlife friendly interventions that improve ecological network connectivity, the city will address the need to increase the abundance and distribution of biodiversity.

- Provide an ecosystem framework for Bath that will inform the design of development and its integration with ecosystem functions, networks and nature based services.

- Provide policy that supports delivery of the GI Strategy and other projects and initiatives that help deliver the framework. This will require a prioritising of a revised GI policy, and investment in green infrastructure on a par with grey infrastructure.

- Ensure policy that supports the delivery of the Health and Wellbeing Strategy, and as a ‘Well-Being City’, ensure that Bath’s built and natural environments facilitate better health and well being for all, with beautifully designed and well-connected streets and spaces that reinforces its aspiration to be Europe’s most walkable city, with cycling and wheeling infrastructure for all users. It will provide a diverse range of high quality leisure, play and community spaces for all ages, cleaner air, and improved access to green spaces and the surrounding landscape.

- Increase provision and quality of green infrastructure, delivering improved access to green and blue spaces and placing nature at the heart of any development opportunities.

- Support the diversification and long term sustainability of the University of Bath and Bath Spa University in their transition towards the provision of enterprise and innovation space, and the Locksbrook Creative Quarter.

- Enhance the role of the city as a place of vibrant, diverse and world class culture, building on its global reputation as a place of leisure and resort and as a wonderful place to live, to work and to visit. Ensure it is welcoming, safe, engaging, inclusive and enriching for all ages and abilities.

- Provide for a network of local centres and neighbourhoods that support day to day living and foster a strong sense of community engagement and involvement in local projects, and ensure the provision of community infrastructure.

- Bath's Journey to Net Zero Transport Plan (JTNZ) was adopted in 2022 and a key priority of the Local Plan is to help, where possible, with its delivery. The JTNZ sets out a plan to tackle some of the biggest challenges our society faces: combating climate change, improving air quality, improving health and wellbeing and tackling congestion. The plan identifies the changes needed to our transport system to create places we want to live and work; with better connected, healthier and genuinely sustainable communities, and alongside the new transport strategies, helps to underpin and support the Local Plan.

- Making it easier to travel sustainably within Bath as well as from neighbouring cities, towns and villages, by walking, wheeling, cycling and by public transport, as well as improving air quality in the city and reducing congestion.

Question: Do you agree with the key issues, priorities and objectives for Bath?

The Capacity of the City

5.13 For good reasons, Bath is a constrained city. Its ability to expand outwards into the setting of the World Heritage Site is limited and building heights of new development in the city need to ensure that its character and important views are maintained and enhanced. A consequence of this is that the Council needs to carefully manage the land that is available and needs to prioritise those land uses that will deliver a city that better addresses the climate and ecological emergencies, is more sustainable in how people travel, more economically prosperous and meets our need for more housing that is affordable.

5.14 One of the key roles of the Local Plan is to seek to meet objectively assessed needs for housing, particularly affordable housing; economic space and other uses.

5.15 Given that Bath's lack of land was previously recognised in the formulation of the Core Strategy and the Placemaking Plan, a decision was taken then to prioritise housing and employment over other needs. The evidence available at the time informed the policy approach and sufficient land was safeguarded to demonstrably meet these priority needs. That meant that a more flexible approach could be taken for other land, notably in the Twerton Riverside area, to accommodate some of the other land use needs such as for Purpose Built Student Accommodation (PBSA).

5.16 Most of the PBSA that has been built since the adoption of the Core Strategy and Placemaking Plan has generally not been on land protected for the priority land uses, but on land where there was a more flexible policy approach to land uses i.e. Twerton Riverside, as well as on 'windfall' (or non-designated) sites such as the Cricket Club.

5.17 Given the scale of development that has been delivered over the past ten years or so, the amount of land left in the city is even more limited than previously. The Council has made it very clear that our key priorities are to optimise the delivery of housing that is affordable, and to safeguard existing and provide new employment space. These uses will therefore be the key priorities for the Local Plan.

5.18 Key pieces of evidence that support the Council's position are the Local Housing Needs Assessment (LHNA) which identifies what our specific housing needs are for the duration of the plan period, and the Economic Needs Assessment which has assessed the performance of different economic sectors and projected areas of growth. This report is clear that the city needs to protect existing and deliver a total of 68,000 sqm new office and research and development space (including existing commitments). It also needs to protect existing and enable the development of between 30,000 - 41,000 sqm of new industrial (including replacement) floorspace, including for advanced engineering purposes, clean tech, health and life sciences and transport and storage.

5.19 Given these land use priorities and their spatial needs, we then need to understand what capacity the city has to adsorb these needs: How much land do we have and how do we optimise its use, whilst also ensuring that we enable the delivery of exemplary developments that reinforce the city's important character and identity of the city? This spatial analysis is ongoing and will inform the Draft Local Plan.

5.20 A consequence of this approach is that there is highly likely to be less land available for other uses for which evidence might suggest that there is a need. A clear example of this is Purpose Built Student Accommodation (PBSA). As outlined above, a key role of the Local Plan is to mediate between different land uses and in doing so, particular land uses will not be permitted in specific locations (see also PBSA policy options in chapter 9: Development Management policies).

Site Options

5.21 Specific site allocations and development management policies that promote new development and protect existing land uses are effective planning tools for managing the use of land. Many site allocations already exist in the current Local Plan and they have generally proven to be robust in achieving their objectives.

5.22 It must be acknowledged though that some sites have not yet been delivered and this is normally related to the ability of the market to deliver. It is proposed to thoroughly review and modify the existing site allocations to ensure that they reflect renewed priorities of the Council, such as the climate and ecological emergencies and to demonstrate that needs are properly planned for.

5.23 The Council propose to allocate larger or significant development sites and that other opportunities for smaller scale or organic redevelopment and change (e.g. garage courts, change in local centres etc) will be supported by a facilitative and enabling policy framework.

5.24 To help diversify housing supply by encouraging smaller scale developers and self-builders, it is important for the Local Plan to embrace incremental change rather than expecting comprehensive development at a larger scale. This is often difficult to achieve and may never come forward due to complexities of land ownership. The policy framework will be supportive of incremental change and seek to simplify design and development requirements through design codes and guidance. Where appropriate, such as in the wider public interest, incremental changes will need to accord with wider spatial framework.

5.25 In addition, there could be opportunities to explore the potential for regeneration in the Foxhill and Twerton areas in Bath. Working with Curo, who manage much of the social housing stock in these areas, this regeneration would seek to improve existing housing, including making it more energy efficient (providing carbon emission benefits in line with the climate emergency), more affordable to run and providing more comfortable and improved living conditions. Regeneration also offers the opportunity to improve the quality of place and, where it involves redevelopment, the opportunity to increase the number of homes, thereby providing additional affordable housing (including social rented housing) which is needed. The overall number of homes also needs to be increased to be able to access Homes England funding.

5.26 Following consultation on these site options, a detailed assessment of the transport impact of each site will be undertaken, to inform selection of sites to be included in the Draft Plan. The cumulative impact of all sites included in the Draft Plan will also be assessed. Any site allocations in the Draft Plan will define the site specific interventions that are required.

5.27 There are a range of **potential** site allocations that are included in the Local Plan Options document, as follows:

- Existing site allocations refreshed and refined to reflect updated priorities and to address the climate and nature emergencies.

- Newbridge Riverside is proposed for a more fundamental review that will seek to protect its important employment role and optimise the potential development capacity of the area. This will entail protecting existing floorspace and enabling its evolution as an employment area to focus on industrial, advanced engineering, R&D businesses and the Locksbrook Creative Industry Hub. No residential, PBSA or University related activity (that is not in the above sectors) would be permitted.

- Other sites on the edge of or close to Bath:

    - During the preparation of the Core Strategy, the Council proposed a strategic allocation on three separate land parcels adjoining Weston and this was considered during the Examination stage by the Planning Inspector. All of the land was within the World Heritage Site, the Cotswolds National Landscape and the Green Belt. In addition, the land was identified as being part of the important green hillsides in the WHS Setting SPD, some of which was also part of the Bath Conservation Area. The Inspector concluded (para 184 of his report) that 'the benefits do not clearly outweigh the harm that would arise to the AONB, the WHS and the conservation area … and there are not the exceptional circumstances to justify removing land from the Green Belt or for major development in the AONB.' The Inspector recognised that parts of the land proposed would have less harm than the whole allocation, suggesting that these might be considered in isolation at a future date.
    - The Council has not undertaken the detailed further assessment that is required to ascertain the degree of harm of smaller non-strategic sites, such as some of the component land parcels of this previously proposed allocation. There will be other non-strategic sites in different parts of the city too. The suitability of these sites and any other sites put forward as part of this consultation will need to be assessed as part of the preparation of the Draft Local Plan.

- Some assessment has been undertaken of those sites submitted as part of the Housing and Employment Land Availability Assessment (HELAA).

- A potential development location south of Burnett on the A39 has been included in this section for further exploration and to establish whether this has potential as a longer term location for growth.

- Land to the West of Bath is also considered as a potential option for helping to meet the development needs of the city. However, assessment shows that development here would be very likely to cause substantial harm to the World Heritage Site. Therefore, it is considered to be unlikely that an allocation for development in this location will be capable of inclusion in the Draft Local Plan. That said, it is included within this Local Plan Options document to help ascertain whether substantial public benefits can be identified that might outweigh this substantial harm.

Question: Do you have any comments on this Site Options section?

Are there any other sites that haven't been identified, that need to be considered?

Site Allocations

5.28 A key purpose of this site allocations element of the Local Plan is to demonstrate how different land uses can be delivered, reflecting evidence and the priorities of the Council. Many of the sites/areas within the city set out below are already allocated in the adopted Core Strategy/Placemaking Plan. This Local Plan will review these allocations and set out our proposed approach.

5.29 The site allocations will also contain key development requirements and design principles to ensure that the development outputs contribute towards the creation of great places, that they seek to optimise the use of land, are properly integrated into and respond appropriately to their sensitive contexts, that they address the climate and ecological emergencies, and improve health and well being.

5.30 In accordance with National Planning Policy Framework (NPPF), there is a requirement to ensure that land is used efficiently whilst also creating beautiful and sustainable places. This contextual approach reflects the existing planning policy framework in Bath, where a set of 'Design Values' were established and which provide the context for considering the design of new buildings and as a means of creating authentic and locally distinctive and enduring places. These 'Design Values' continue to remain relevant in the consideration of new development proposals and in managing the potential tension between optimising the use of land and ensuring that development makes a positive contribution to local character and distinctiveness.

5.31 For all of the site allocations it is proposed, where relevant, to update the range of development requirements to include references to the need for a transformational approach to the protection and enhancement of biodiversity to deliver outcomes that genuinely contribute to nature recovery, whilst enabling new development, improving the relationship to the river, the integration of green infrastructure and the need for lighting in this location to safeguard the dark corridor for bats.

Milsom Quarter:

5.32 The Milsom Quarter Masterplan is a major regeneration project led by the Council that proposes that the area becomes the fashion destination for Bath and the South West. It has identified the Old Post Office as the site for the Fashion Museum, as a city centre cultural landmark, and the development of Broad Street Yards to support creative and entrepreneurial uses, complementing the fashion, interiors and homeware economies in the surrounding streets. It includes the Cattlemarket Site, which is an existing site allocation that was recently updated as part of the Local Plan Partial Update (LPPU). The Milsom Quarter Masterplan also has an aspiration to introduce approximately 180 new homes through new build or through the repurposing of upper floors that are currently vacant.

Options:

- No change proposed to the existing policy covering the Cattlemarket site.
- Introduce other policies or site allocations such as for Broad Street Yard.

Bath Central Riverside

5.33 During the formulation of the LPPU, the council committed to review this site allocation, particularly in relation to the development of a new stadium, through this Local Plan. In the adopted Core Strategy the development of a sports stadium in the city is identified as an important element of the spatial strategy for Bath. Preparation of this Local Plan provides an opportunity to review the role of a sports stadium in the strategy and if considered still to be important, whether it should be delivered on this site. As such there are considered to be the broad options outlined below for consultation, as follows:

Options

- Retain the site allocation policy (Policy SB2) as currently worded.
- Review and amend the current Policy SB2 wording to provide greater clarity on or to change the development requirements and design principles.

- Delete the Policy SB2 reference to this site being appropriate for a new stadium.

Manvers Street

5.34 This site is an existing site allocation that forms part of a wider and major regeneration project that is being taken forward by the Council. It is anticipated that delivery will broadly reflect the current site allocation policy.

Options

- Retain existing policy requirements
- Update policy requirements to provide more flexibility in terms of the office space requirements by enabling a wider range of hybrid business space to suit start-up business and research & development space to be delivered.

Bath Quays North

5.35 The redevelopment of this site is currently identified as one of the Council's flagship regeneration projects and an area that will be transformed into the city's main business location to help to redefine the city's economic profile. Outline consent was granted for a comprehensive mixed use development in April 2019, but the delivery of this complex site has not progressed. The site will continue to be the key location for office led development but one of the proposed options is to slightly broaden this scope to enable a wider range of hybrid business space to enable start up business and research & development space to be delivered.

5.36 The proximity of the site to the rail station, its riverside and city centre location, with the facilities and amenities that it provides are key assets that contribute towards its appeal. It is proposed to update the policy to ensure it reflects the Council's priorities, including clarifying that Purpose Built Student Accommodation (PBSA) or student accommodation continues to not be acceptable as this will impede the delivery of other Council objectives.

Options

5.37 Two options in respect of this site are presented below:

- Retain the existing land use mix (primarily office space, Class E(g)(i)) and review and amend the current policy wording to provide greater clarity on or to change the development requirements and design principles.

- Whilst ensuring this site continues to play a key role in the future economy of the city provide a greater degree of flexibility in terms of the land use mix required by policy. This could allow a change in the requirement to provide a 'minimum of 20,000 sqm of office floorspace' (Class E (g)(i)) and slightly broaden this scope to allow a wider range of hybrid business space to enable start up business and research & development space (E(g)(ii) to be delivered. Continue to allow a residential element and continue to exclude student accommodation/PBSA.

- Note: Evidence from the Future Economic Needs Assessment and Office and Industrial Market Review recommends around 47,500 sqm of additional office and research and development floorspace should be delivered in the city throughout the plan period (in addition to that committed). To allow a reduction in this important location would add pressure on other scarce sites to meet this need. The existing policy states that 'redevelopment of this site is the Council's flagship regeneration project; it will be an area that will be transformed into the city's main business location and will help to redefine the city's economic profile.' Changing the site allocation approach should not undermine this objective.

South Quays and Riverside Court

5.38 This is a flagship development site that was granted planning permission in 2017 and has now delivered approx. 7,900sqm of office and creative workspace. No1 Bath Quays is Bath's first new speculative development for decades. The building provides brand-new grade A and EPC 'A' office accommodation. The refurbishment of Newark Works provides Creative Workspace that is owned and managed by TCN, a company that own and manage creative workspace. There is outline planning permission for a residential development parcel of around 60 apartments, but this has not been delivered.

5.39 Riverside Court is currently used as offices and there have been a number of applications for changes of use. The most recent application (20/03608/FUL) was refused due to the strong economic reasons demonstrating that the loss of office floorspace would be inappropriate.

Options

- Review and amend the current policy wording to provide greater clarity on or to change the development requirements and design principles.

- Allow more flexibility in relation to the delivery of the residential element within the existing allocation, allowing the consented floorspace in the South Quays site to change to an employment use. Housing not provided on this site would then need to be delivered elsewhere.

- The current policy for Riverside Court states: 'The redevelopment of Riverside Court should retain as a minimum the existing levels of employment floorspace and be complemented by residential development that contributes towards the city's housing requirements.' Should this policy wording for Riverside Court:

    - remain as it is;
    - be amended to provide more flexibility in terms of land use mix; or
    - be strengthened to require more employment floorspace to be delivered?

South Bank

5.40 This area lies immediately to the west of the South Quays site and to the east of Sydenham Park. It is under two principal and separate land ownerships; the car showrooms and the Travis Perkins Builders Yard. These uses are important functions within the city, however other uses such as offices and residential that optimise the riverside location, the close proximity to the city centre and the high levels of public transport accessibility, may well come forward within the plan period.

Options

- Review and amend the current policy wording to provide greater clarity on or to change the development requirements and design principles.

- The current policy for South Bank requires the total development to deliver a minimum of 5,000 sq.m. (GIA) of office floorspace, and a minimum of 100 dwellings. If the two parts of the site are to be delivered at separate times, then each part is expected to deliver an approximately even mix of uses. Purpose built student accommodation in this area is not acceptable as this would impede the delivery of other Council objectives. Should this policy:

    - remain as it is;
    - be amended to provide more flexibility in terms of land use mix; or
    - be strengthened to require more employment or more residential floorspace to be delivered?

Green Park Station West & Sydenham Park

5.41 This is a complex area, with a variety of site ownerships and a diversity of uses. It comprises the following components:

- Green Park Station West (SB7A):
  - Green Park Station, and the units facing James Street West.
  - Sainsbury's.
- Sydenham Park (SB7B):
  - Bath Riverside East: the former Homebase site and its car park, and overflow Sainsbury car park.
  - Pinesway: Pinesgate offices and the associated road gyratory.
  - Pinesway Industrial Estate.

5.42 Due to this complexity and uncertainty, it is anticipated that delivery will be undertaken in a phased or piecemeal manner, with different landowners bringing forward development at different times, as and when their sites become available. However, to avoid the delivery of sub-optimal outcomes that do not deliver the wider opportunities in the area, it is crucial for the Local Plan to provide the urban design framework within which these individual developments can be delivered. This framework is acknowledged as needing to be flexible enough to respond to changing circumstances, yet it also needs to be robust enough to ensure that it can be delivered.

5.43 Developers and landowners are required to ensure that their individual development phases contribute positively to the delivery of this urban design framework and enable the vision for the wider area to be achieved. The affected landowners will need to work jointly to enable delivery, and to undertake a masterplan as appropriate. This should respond to the requirements set out here, and to the Bath Western Riverside SPD (2008) where relevant.

5.44 A planning application was allowed on appeal (September 2021) for the redevelopment of the Homebase site to provide a later living scheme of 288 units and 1,865 sqm of office floorspace. Due to the later living scheme being in the C2 use class it was not possible to secure affordable housing from the scheme. The consent enabled the subsequent demolition of the Homebase building, but apart from this, the scheme has not progressed.

Options

- Generally maintain current policy wording and update to better reflect the climate and ecological emergencies and review the alignment of the sustainable transport route through the site, if required.

- Review the proposed land uses on the site to reflect the evidence base and ensure that housing that is more affordable is delivered, that existing employment floorspace is protected and additional floorspace delivered.

- Create separate site allocations for each development parcel.

Bath Riverside

5.45 This large and important site has been delivering new homes for the city for the past fifteen years. It comprises of a number of different land parcels, and development on these parcels has largely either been completed, has the benefit of consent, or is subject to a current planning application. Changes were made to the existing policy wording to reflect the climate and ecological emergencies as part of the LPPU and there is considered to be little justification for any further changes at this stage.

5.46 It is proposed to devise a separate site allocation policy for the Westmark Site (see below).

5.47 No change proposed to the existing policy.

Question: Do you have any comments on this?

Bath Press

5.48 Planning permission was granted in 2015 for the demolition and redevelopment of the site to provide a residential-led mixed use development comprising 244 dwellings and approximately 1,500 sqm of flexible employment space. Since this time and apart from demolition, delivery has stalled. There has been a change in ownership of the site and a new planning application for a similar mix of uses has been submitted.

5.49 No change proposed to the existing policy.

Question: Do you have any comments on this?

Roseberry Place

5.50 Consent granted for mixed use scheme of Build to Rent residential and office floorspace. The former has been completed, whereas the office element has not progressed despite long periods of marketing.

Options

- No change proposed to the existing policy.

- Amend policy to allow a wider range of hybrid business space to enable start up business and research & development space to be delivered.

- Amend policy as above, but allow for mixed use development to potentially allow other forms of housing that meet identified need i.e. homes that are suitable for workers in the local economy, and not PBSA.

Westmark Site, Windsor Bridge Road

5.51 Currently this site is part of the Bath Riverside Site Allocation Policy SB8. Given that no progress has been made on the delivery of this site and that planning applications are at an advanced stage on the remaining Bath Riverside sites, it is proposed to generate a separate site allocation for the Westmark Site.

5.52 Based on the 'Future Economic Needs Assessment and Office and Industrial Market Review' evidence base, the Victoria Park Business Centre, which forms part of this site, is to be protected from development. For the remainder of the site it is proposed to require a residential led development that includes the provision of specific housing products that better meet local needs. Purpose Built Student Accommodation (PBSA) is to continue to be excluded.

Question: Do you have any comments on this proposed approach?

Stable Yard Industrial Estate

5.53 This is an industrial location, which is well occupied and contributes towards meeting an identified need in the city. Based on the Employment Needs Assessment evidence base, the Stable Yard site is to be protected from development.

Question: Do you have any comments on this proposed approach?

Newbridge Riverside

5.54 This location comprises the Locksbrook Road and Brassmill Lane industrial areas and accommodates a wide range of businesses that perform a crucial role in the diverse economy of the city. Part of this area also includes the Locksbrook Creative Industry Hub (current Policy SB22), a collaboration with Bath Spa University, and the Fashion Collection Archive and which relates primarily to the creative arts sector.

5.55 There is considered to be scope to reimagine the role of this area and to intensify development opportunities benefitting the city's economy. Informed by the 'Future Economic Needs Assessment and Office and Industrial Market Review', the Council will commission a study to thoroughly understand the landscape, natural environment and heritage context of this location and generate an ambitious, deliverable, future scenario for how this current employment location could be reimagined. It is anticipating an imaginative and creative response to the untapped development potential of the area, that optimises the existing and planned transport infrastructure, set within an ecologically rich landscape that capitalises on its integral relationship with the river environment.

5.56 It is considered that this area has the potential to play an important, even iconic, employment role for the city, reflecting its global recognition, reputation, and history of innovation. Such an approach could complement the city's central office and workspace core and provide a more diverse employment space offer for the creative industries sectors, advanced engineering sector (such as many of the existing anchor businesses), research and development, biosciences, and other sectors that have specific spatial or operational requirements.

5.57 The future scenario will need to set out a range of different options in which this role could be achieved.

Options

- Intensify the development potential of this area, in terms of capacity, and clearly define the range of industrial related uses that are appropriate for this location including industrial, advanced engineering sector (such as many of the existing anchor businesses), clean tech, health and life sciences, transport and storage, and creative industries. This option would ensure this area continues to serve as the main location for industrial space within the city. Identify those uses that would not be permitted, i.e. residential and PBSA.

- Within a clearly defined landscape and ecological framework and infrastructure plan should the site allocation have a consistent approach across the whole of the 'Newbridge Riverside' or should it be more granulated and have different approaches in different parts? This could allow a more nuanced approach tailored to the specific characteristics and potential of the different areas. For example:

    - Locksbrook Road: comprising Horstmann, Bath Spa University, the Locksbrook Creative Industry Hub including the Fashion Collection Archive, various operations including trade counters.
    - Brassmill Lane: Mix of industrial type uses and trade counters including the Maltings trading estate, larger employers and manufacturers such as Rotork and Roper Rhodes.
    - This could include Weston Island or this could be maintained as a separate allocation (see below)

Weston Island

5.58 The existing policy was prepared to enable the relocation of businesses from central area sites to allow these to be redeveloped for mixed use regeneration. For various reasons, it is now looking more unlikely that these uses will relocate to this site and so it is necessary, subject to whether First Bus decide to remain on the site or to relocate, to consider alternative options for Weston Island.

5.59 This is an existing employment site with very good access directly to the Lower Bristol Road. With evidence from the Future Economic Needs Assessment and Office and Industrial Market Review, there are very sound planning reasons to retain an industrial focus for this site. It is also in Flood Zone 3 which precludes residential and other uses.

5.60 Notwithstanding the evidence to retain the site for industrial purposes, there is an aspiration from Bath Art Depot (BAD) to reuse the existing buildings and remainder of the site. They would provide much needed studio space for artists, maker spaces with access to facilities, exhibition venues, space for community-led events and a location where local businesses can offer food, drink, retail and entertainment. This would also involve a diverse programme of creative learning and training, working with Bath's schools, universities and other community organisations and institutions. Under this scenario Weston Island would host exhibitions and events of national and international relevance.

5.61 Whilst this concept is supported in principle, there is currently no evidence of how this could be delivered and therefore it is not reasonable, at this stage, for the Local Plan to seek to allocate land for this purpose. The Local Plan will however continue to be supportive of the concept, with the potential allocation being related to whether further evidence regarding its deliverability can be demonstrated during the production of the Local Plan. It should also be borne in mind that the use of the site for these purposes might impede the Council's delivery of its other economic priorities, such as reusing the site for industrial purposes.

5.62 Bath Spa University has an aspiration to deliver and evolve the Locksbrook Creative Industry Hub and there could be potential to utilise Weston Island as part of this. If this concept provides employment floorspace it has the potential to contribute towards the vitality and vibrancy of the wider area. Purpose Built Student Accommodation (PBSA) and teaching space would not be supported.

5.63 One of the specific requirements in the current site allocation policy is to 'Provide a welcoming, spacious and safe public sustainable transport link across Weston Island and its respective bridges and provide high quality public realm.' It then goes on to state that 'there may also be opportunities for more public facing uses such as creative, arts based activities. Such uses could help to animate and overlook this new link'. Therefore, proposals from Bath Spa University as part of the Locksbrook Creativity Hub concept and/or from Bath Art Depot, could be appropriate uses to 'animate and overlook this new link'.

Options

- This site could be protected for industrial uses in line with the Newbridge Riverside area as outlined above. This would effectively mean this site is a sub-area of a wider Newbridge Riverside allocation.

- Alternatively and subject to the space requirements of particular uses, there may be potential to combine the industrial land use requirements with some or all of the, Locksbrook Creative Industry Hub and Bath Art Depot elements

Question: Which Option do you prefer? Please explain why.

Twerton Park

5.64 This policy was updated in the Local Plan Partial Update.

5.65 No change is proposed to the existing policy.

Question: Do you have any comments on this?

Royal United Hospital (RUH), Weston

5.66 The RUH have commissioned a new Estates Strategy for this site. Once this has had final sign off within the RUH Bath NHS Foundation Trust it is the intention, subject to review, to include reference to it and support its delivery, as appropriate, through the Local Plan.

5.67 There is strong evidence that the lack of availability and affordability of housing is making it difficult for some employers to attract and retain staff. Where these employers control or own land, such as the RUH, there could be opportunities to facilitate the delivery of employer linked housing that is 100% affordable.

5.68 Provided that land will not be required for healthcare or car parking during the Plan period, the council supports the provision of 100% affordable residential accommodation (Class C3) of a range of sizes and types, for use by key workers associated with the RUH.

5.69 Changes to the existing policy will be considered in the context of the new estates masterplan.

Do you have any comments on this?

Hartwells Garage

5.70 Outline planning permission for a mixed use development comprising up to 104 residential units and the provision of up to 186 student bedrooms site was granted on appeal in March 2021. Progress on delivery has been delayed but is understood to still be progressing.

5.71 No change proposed to the existing policy.

Do you have any comments on this?

Sion Hill

5.72 Owned by Bath Spa University (BPU) and currently allocated for housing. This site was allocated in the LPPU and the policy is considered to remain fit for purpose.

5.73 No change proposed to the existing policy.

Do you have any comments on this?

St Martins

5.74 Recently introduced and allocated in the LPPU and the policy is considered to remain fit for purpose.

5.75 No change proposed to the existing policy.

Do you have any comments on this?

Sulis Down

5.76 The site was removed from the Green Belt and allocated for development in the Core Strategy. The extent of the site allocation and policy requirements responded to key elements of the evidence base relating to the harm to the World Heritage Site and its setting, as well as important heritage assets such as the Wansdyke. Phase 1 of the allocation is nearing completion and there is a current planning application for the comprehensive masterplan and for phases 3 and 4. It is a very sensitive development site and given that the evidence relating to harm has not changed, it is not proposed to amend this site allocation.

5.77 No change proposed and continue to protect the field to the south of the Wansdyke and the field to the east, adjacent to Southstoke Lane.

Do you have any comments on this?

Englishcombe Lane

5.78 This is an existing site allocation for residential development. There have been significant concerns from local residents about a number of issues including ecology, drainage and land slip issues. Despite this, it is considered that this site is capable of being developed for residential uses.

5.79 No change proposed to the existing policy.

Do you have any comments on this?

Burlington Street

5.80 This is an existing site allocation that is considered fit for purpose.

5.81 No change proposed to the existing policy.

Do you have any comments on this?

Sulis Club

5.82 This is a sports ground owned by the University of Bath. It is on a gently sloping site on the edge of the plateau in a highly sensitive skyline location on the edge of the World Heritage site, and visible from the surrounding countryside.

5.83 The current policy SB19 states: Sulis Club Outdoor Sports area – Proposals for development will be judged against national planning policy within the NPPF, including that relating to AONBs and Green Belt, as well as the World Heritage Site and its setting and Outstanding Universal Values. For the Sulis Club this enables the appropriate redevelopment of previously developed land, within the parameters set by the NPPF.

Options

- No change to current policy SB19.
- Consider and gather evidence relating to potential development on this site which is compatible with the requirement to protect the OUV of the WHSs and which will strengthen the important well-treed skyline.
- Do you have any comments on this?

West of Bath

5.84 One of the locational options that has been considered to help address the development needs of Bath is land to the west of the city (see plan below). This area could have potential to provide housing that is more affordable, new office or industrial buildings, or potentially to relocate the existing Newbridge Park and Ride, thereby freeing up the existing site for other forms of development.

Map to be inserted showing West of Bath location.

5.85 The provision of development as outlined above could deliver public benefits and help to address objectively assessed needs, but this has to be weighed against the likely harm that development could cause to the World Heritage Site (WHS), particularly to the attribute of 'the green setting of the city in the hollow in the hills' and impacts on the setting of the Cotswolds National Landscape. To evaluate this, the Council commissioned Land Use Consultants (LUC) to undertake a technical evidence assessment of the potential impacts of a range of development typologies in land to the west and south of Bath.

5.86 Whilst development to the West of Bath could have public benefits, the assessment by LUC shows that it is very likely to cause substantial harm to the World Heritage Site (WHS) and its setting and that this harm cannot be satisfactorily mitigated. It would also cause harm to the setting of the Cotswolds National Landscape.

Note: Map to be updated

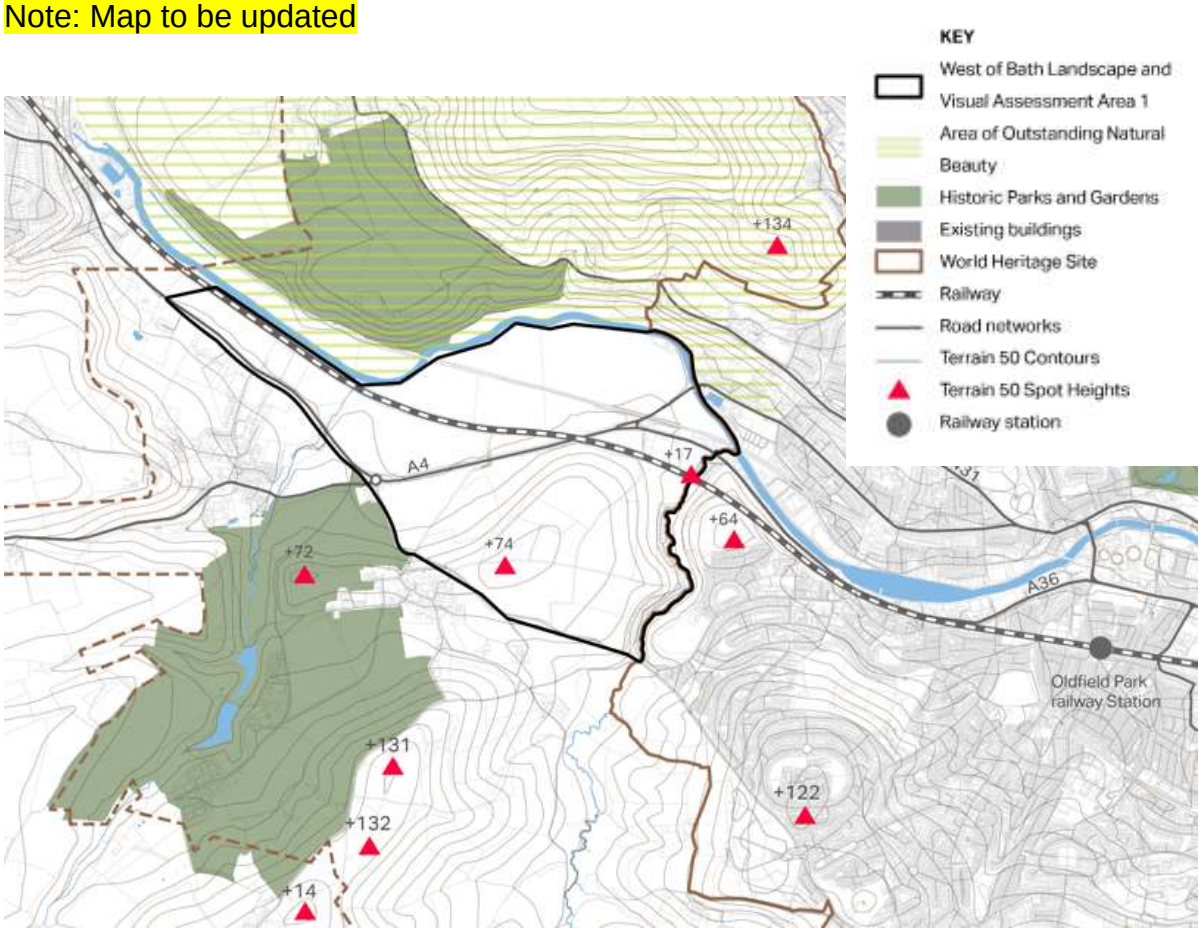


Figure 14: Map showing West of Bath area for the LUC assessment into potential impacts of development

5.87 The NPPF makes it clear that substantial harm to the WHS should be 'wholly exceptional'. In addition, the NPPF makes it clear that protection and enhancement of a heritage asset should be given great weight and that as a WHS is the most significant asset, it should be given the greatest weight.

5.88 Growth of the city west of Bath and causing substantial harm is also likely to be of significant concern to UNESCO (particularly given the double inscription of the city) and this would also affect the other Spa Towns that are part of the Great Spa Towns WHS inscription which includes Bath.

5.89 The LUC assessment identified that harm caused to the Outstanding Universal Value of the WHS by the types of development tested is intrinsic and unavoidable because it will fundamentally alter the character and appearance of the areas as undeveloped agricultural land that provides the green setting for the city. This is considered to be an 'in-principle' issue that could not be overcome by design. No heritage benefits have been identified for any of the areas assessed.

5.90 Given the LUC assessment and the national policy context outlined above, it is considered at this stage that an allocation of land for development West of Bath is unlikely to be included in the Draft Local Plan. That said, it is included within this Local Plan Options document to test and ascertain whether substantial public benefits can be identified that would outweigh the substantial harm.

Green Belt

5.91 In addition to identifying substantial public benefit and whether this outweighs harm to the WHS and its setting, this location also lies within one of the most important areas of the Green Belt and the impact of development on the Green Belt would need to be carefully considered.

5.92 Exceptional circumstances would need to be demonstrated in order to justify removing the land from the Green Belt. Whilst such ‘exceptional circumstances’ are site specific this broadly means demonstrating that reasonable alternatives outside the Green Belt have been considered and rejected and that harm to the Green Belt is outweighed by the benefits of development.

Questions:

Do you consider that development in this area could provide substantial public benefits that might outweigh the substantial harm to the World Heritage Site? If so, what are these public benefits?

Do you consider that these public benefits also demonstrate ‘exceptional circumstances’ that justify removal from the Green Belt? Please explain why and what ‘reasonable alternatives’ should be considered.

Are there specific sites or areas in the west of Bath location that you think should be considered?

South of Burnett, adjacent to the A39

5.93 This location has been identified as a potential long-term opportunity for a standalone development or new community that could help to address objectively assessed needs either towards the end of the Local Plan period or beyond the plan period as part of a longer-term spatial strategy. The council is seeking views on whether stakeholders consider it should be explored.

5.94 It is included in the Options document to assess the potential issues that would need to be considered and whether this area has any merit for further discussion and exploration. The map below indicates a broad area of search. The area is identified as causing less harm to the landscape than other locations close to Bath, although woodland planting would be required in the area to the west as screening to the Chew Valley.

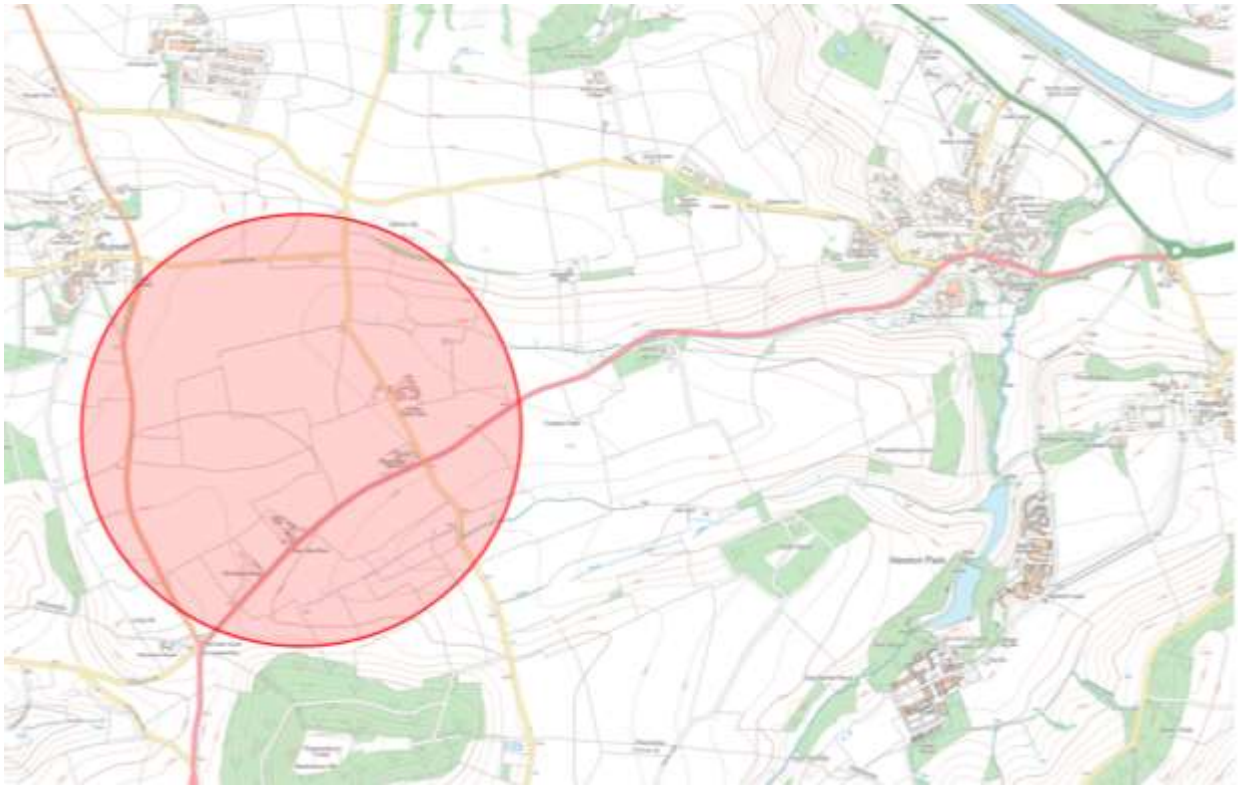


Figure 15 Broad area of search south of Burnett

5.95 As it is some distance away from any reasonably sized communities, it would need to be of sufficient scale to provide day-to-day services such as a primary school and local shops. It would also be reliant on improvements to public transport and active travel routes, which if delivered, would also benefit other existing communities along this route and in the wider area. Considerable further work is required to identify whether these issues are achievable.

5.96 One of the potential benefits of this location is that a significant portion of this area is owned by the Duchy, who have a proven track record of delivering high quality, sustainable and mixed use development. An additional benefit of this location is that given its proximity to the Bath Spa University campus, there could be opportunities to deliver some of their future needs in this location. This has not been discussed with Bath Spa University.

5.97 Views of stakeholders are sought as to whether this location should be explored as a potential, longer term development opportunity.

Q: Do you consider the potential for longer term development in this location should be explored further?

South of Burnett	
Opportunities	The area provides a potential opportunity for a small new settlement/community and employment. It lies relatively close to Bath on the A39 bus corridor that could potentially be improved. It could contribute to the longer term growth strategy for B&NES.
Constraints	Currently poor connectivity to the A4/Bristol-Bath strategic corridor as the main public transport corridor which is the current focus for investment. Stantonbury Hill and its setting - scheduled ancient monument. The area lies within the Green Belt. There are some existing hedgerows and plantations within the area which should be protected. A high-pressure gas pipeline cuts across the area. A 33kV overhead powerline cuts across part of the area. The area is separated from existing towns and facilities
Mitigation required	Woodland screening to the west to mitigate impacts on the Chew Valley. An appropriate response to the setting of Stantonbury Hill.
Further evidence required	Heritage assessment of the potential impacts on Stantonbury Hill and its setting. This location may raise issues under HRA and SAC bat surveys may be required

6 Bath to Bristol corridor and south east edge of Bristol

Strategy Overview and Key Issues

6.1 The area described in this Options Document as the Bath to Bristol corridor and the south east edge of Bristol comprises areas located along or close to the Bath to Bristol A4 corridor, and areas adjoining the south east edge of Bristol including:

- Keynsham and Saltford
- Hicks Gate
- Whitchurch Village

6.2 These areas have been selected for review in terms of potential growth due to their relative sustainability in relation to access to sustainable transport modes and access to services and facilities, when compared to other areas of the district.

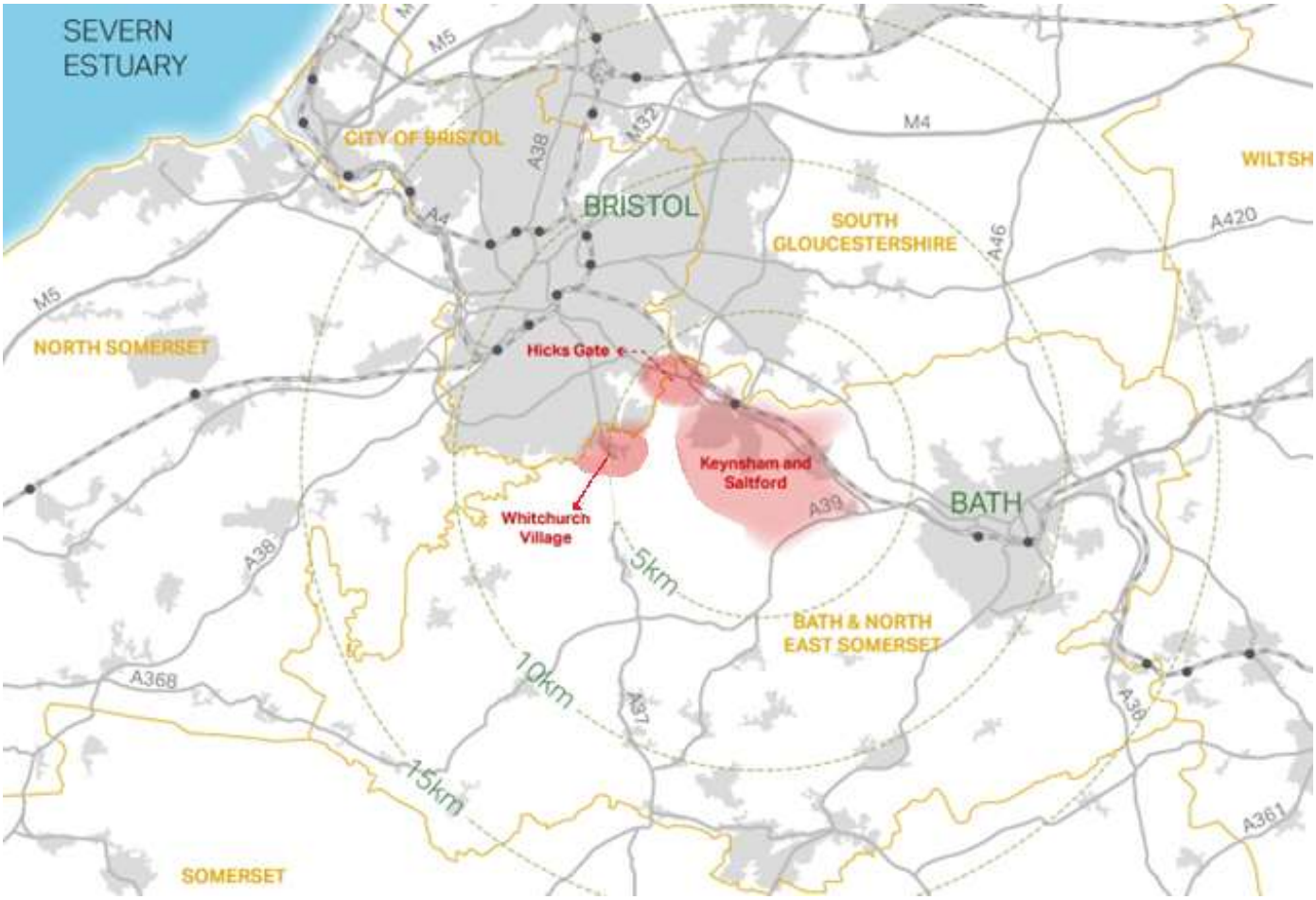


Figure 16: Map showing location of area described as Bath to Bristol corridor and south east edge of Bristol

Duty to co-operate

6.3 Bristol City Council and South Gloucestershire Council administrative areas are located directly to the north and east of the Bath to Bristol corridor. Therefore, meetings with both of these authorities have been undertaken and will continue to take place to discuss strategic cross-boundary matters such as transport, flood risk, green belt, and housing provision.

Transport

6.4 The Bath to Bristol A4 corridor provides a strategic transport link with frequent bus services between the two cities. The West of England Combined Authority (WECA) have recently consulted on initial options for upgrades to the A4 Bath to Bristol corridor, which set out a range of proposed improvements for active travel modes and bus services. Amongst others, the proposed improvements would provide continuous and designated walking and cycling routes along the A4, shared between the two active travel modes in locations where space is limited, continuous designated bus lanes on both sides of the bypass for much of the corridor, and mobility hubs located along the corridor providing facilities to easily transfer between different modes of transport. A new cycling and walking route is also proposed along Station Road in Keynsham, providing good connectivity between the A4, Keynsham Railway Station and Keynsham Town Centre.

6.5 Regular train services exist between Bath Spa and Bristol Temple Meads railway stations, with regular services also stopping at Keynsham Railway Station.

6.6 The Bristol and Bath Cycle Path (Route 4) links east Bristol with Bath, passing closely to the north of Keynsham and east Saltford. Although some local cycle routes connect into Route 4, there are opportunities to better utilise the proximity of these settlements to the route through provision of additional and dedicated cycle paths.

6.7 Whitchurch Village is located along the A37 corridor to the south-east of Bristol. The A37 facilitates radial movements into Bristol from more rural areas to the south of the city. With regards to public transport, there is no railway station in Whitchurch Village, nor at any point along the A37 corridor. However, bus services operate along the A37 corridor, providing relatively good connection with Bristol City Centre to the north, and destinations in the Somer Valley to the south.

6.8 Sustrans National Cycle Network (NCN) Route 3 links central and south Bristol to the Chew Valley and Wells, passing through Whitchurch Village, along Staunton Lane and Sleep Lane.

Green Belt

6.9 The majority of the district located along the Bath to Bristol A4 corridor, and at the south east edge of Bristol is located within the Bristol and Bath Green Belt.

6.10 Delivering future growth along the A4 corridor and to the south east of Bristol would require significant areas of land to be removed from the Green Belt. The impact of removing these parcels of land will need to be carefully considered on an individual basis, but also cumulatively across the whole area.

6.11 WECA have published the Strategic Green Belt Assessment undertaken to inform the now halted SDS, and this document has been used as a starting point to understand the contribution that parcels across the area make to the five purposes of the green belt set out in the NPPF. Following this Options consultation, further assessment will be carried out in relation to the impact of removing preferred site allocations from the Green Belt, and will also consider opportunities for enhancing land retained in the Green Belt.

Green Infrastructure

6.12 Green infrastructure is a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, and communities. Opportunities to enhance and extend the Green Infrastructure network should be central to the design of new developments, and development proposals should demonstrate strong links to the wider green infrastructure network.

6.13 Some of the site options set out in this chapter include reference to ‘Strategic Green Infrastructure Opportunities’, which are located outside of the area shown for potential development. These indicate areas where the Council consider that green infrastructure could be provided or improved to meet Natural England Green Infrastructure standards, and may also offer nature based solutions to address issues such as flooding and nature recovery. New and enhanced green infrastructure will either be funded by development in the area, or through other mechanisms to be explored as we prepare the Draft Local Plan.

Flood Risk

6.14 The River Avon flows between Bristol and Bath, in parallel with the A4 corridor. Areas of flood risk exist along parts of the River Avon, and Bristol City Council are currently preparing a Bristol Avon Flood Strategy, to consider potential areas of mitigation required along the river.

6.15 B&NES Council and Bristol City Council are in regular correspondence to discuss any impact that flood defence works in the Bristol area might have cross-boundary in B&NES, particularly in the north Keynsham area.

6.16 There may also be scope across the whole river catchment for areas of flood risk to be considered for nature-based solutions, and to explore key areas where retrofitting of SUDs could be beneficial.

Keynsham and Saltford

Place Profile

6.17 Keynsham and Saltford are settlements which occupy strategic locations on the A4 between Bath and Bristol. Both settlements are linked to the two cities by the A4, and Keynsham is also linked by railway. Sustrans National Cycle Network (NCN) Route 4 links east Bristol with Bath, passing closely to the north of Keynsham and east of Saltford.

6.18 Keynsham is a thriving market town, with a population of around 20,000 people. It plays an important role in supporting sustainable economic growth across B&NES, with its absolute employment numbers having increased over the period 2011 – 2021. Its town centre is characterised by variety of local independent retailers, many of which have evolved and set up on the High Street in more recent years, as well as a strong food and beverage offer.

6.19 Keynsham's settlement origins are demonstrated by the location of its historic core and Conservation Area fronting onto and within the River Chew Valley. Heritage assets are clustered throughout the Conservation Area in the town centre. During the latter part of the 20th century, Keynsham expanded rapidly to cater for development associated with the growth of Bristol. Expansion eastwards along Wellsway saw settlement growth on either side of the Chew Valley, presenting limitations in settlement connectivity between the east and west sides of the town.

6.20 The River Chew provides an important landscape, wildlife and recreational corridor running through the heart of the town, providing potential to connect residents with the wider countryside, particularly through the valley, down to Chew Valley Lake, and beyond. Keynsham sits within the Chew Valley Reconnected Green Infrastructure Project Area, which is made up of important networks of natural and semi-natural habitats, providing crucial habitats and wildlife corridors for priority species.

6.21 In Keynsham there is an imbalance of transport modes in the town centre with greater priority given to vehicles over active modes, as is typical of similar size towns. There are a series of walking and cycle routes within Keynsham, however, there are missing links within Keynsham and between Whitchurch Village to the west and Saltford to the east. Keynsham has its own rail station and there is a good frequency of bus services operating from Keynsham town centre offering services to destinations including the centres of Bath and Bristol. Services to other destinations not on the main bus routes to Bristol and Bath can be less frequent.

6.22 The principal roads that serve Keynsham and Saltford are the A4, A4175, B3116 and Charlton Road. The private car mode share for journeys to work are higher than the national and South West average. During the traditional weekday highway peak hours , there is congestion typically along the A4 and within Keynsham town centre on roads such as Bath Hill, Station Road and Mill Lane.

6.23 Saltford is a large village located to the east of Keynsham, with a population of around 4,000 people. Its historic core and Conservation Area front the River Avon to the north of the village, with numerous heritage assets located within this area. Over time, the village has grown to the south and west, with development predominantly residential in use, but with a small quantity of retail and commercial businesses located along the A4. Other village facilities such as the village hall and recreation ground are located to the north of the village, and Saltford Primary School is located off Claverton Road towards the south of the village.

6.24 Keynsham and Saltford are surrounded by the Bristol and Bath Green Belt, which separates the two settlements.

6.25 The Cotswold National Landscape is located directly to the east of Saltford, with impressive sweeping views across the two settlements visible from across the designated area.

6.26 A local designation in the adopted Local Plan relating to the Landscape Setting of Settlements wraps around much of Keynsham and to the north, east, and south of Saltford. The designation as shown on the Policies Map and associated policy requires that development should only take place if it conserves and enhances this landscape setting. We are seeking comments on the extent of the existing designation. At page **X** there is an opportunity to identify whether the boundaries of any existing landscape settings of settlements identified on the Policies Map should be amended. A link to the policies map showing the existing boundaries can be viewed **here.**

Key Issues and Opportunities

- Evidence from the Employment Needs Assessment and Office and Industrial Market Review suggests net employment land requirements over the Plan period in the Keynsham area comprise around:
    - 11,000 sqm office space (1 ha land requirement)
    - 7,000 – 9,000 sqm industrial floorspace (2 ha land requirement)
    - 19,000 sqm warehousing / logistics floorspace (4 ha land requirement
- Land surrounding Keynsham and Saltford is designated as Green Belt. Any new development adjoining the settlements would require the removal of land from the Green Belt, and removal would require exceptional circumstances to be fully evidenced and justified.
- Flood risk from the River Avon to the north of Keynsham and to the east of Saltford restricts potential development in these areas.
- The Bath to Bristol Strategic A4 corridor experiences significant congestion in both directions during peak times, including through the centre of Saltford. Congestion on the A4 also causes delays in Keynsham town centre.
- Insufficient public transport provision and easy and cheap parking within Keynsham results in an over-dependence on travelling by car within Keynsham and Saltford. Currently no public transport options exist between the two settlements, though WECA has recently consulted on works to the A4, which includes bus stops and mobility hubs along the A4 providing links between the two settlements.
- Keynsham's car parks are reasonably well utilised with a peak occupancy of 75%. However, this is over a relatively short time period with a 7-day mean occupancy of 55%, indicating a surplus of car parking in the town.
- Public space is more balanced towards vehicles over people, causing issues with congestion and severance.
- Keynsham and Saltford both have Air Quality Management Areas (AQMAs) where air pollution levels exceed the governments' objective limit.
- Poor connectivity to the Bristol to Bath cycle route from both Keynsham and Saltford, and cycle routes within the settlements are also poorly connected

- Poor access to Keynsham Railway Station on foot, bicycle, and bus, particularly from the A4 corridor.

- Both settlements are located in areas of landscape sensitivity. The Cotswolds National Landscape is located directly east of Saltford, with views across both of the settlements, and a local designation relating to the Landscape Setting of Settlements wraps around much of Keynsham and to the north, east, and south of Saltford.

- Keynsham is bisected by the River Chew, which provides an important landscape, wildlife and recreational corridor through the town, but also creates movement severance for people due to limited crossings over the river. Weirs along the river currently provide barriers to fish passage for migratory fish.

- Keynsham and Saltford contain numerous important heritage assets which require protection.

- Keynsham lacks a cultural space/venue such as a hall with theatre for use by community.

- Keynsham and Saltford have health and wellbeing needs that the built and natural environment can play a role in addressing, including food insecurity, cardiovascular, respiratory and healthy weight needs.

Priorities and Objectives

6.27 The following list sets out the key priorities and objectives for Keynsham and Saltford. Many of the priorities can be addressed by new development, and site options have been selected in response to the key issues, priorities and objectives. However, there are some priorities that won't be addressed through new development but will be addressed through other policies in the Local Plan or initiatives undertaken by the Council or by other stakeholders.

- Create opportunities to enable Keynsham to attract new employers, including in established and emerging sectors, and generate a range of jobs that will mean local residents have access to and can thrive in good work, by providing land to meet employment requirements of the area.

- Provide homes to meet the needs of the district, including provision of homes that are affordable, and a mix of homes to meet the need of a variety of demographics, including homes for older people.

- Retain significant green gap between Keynsham and Saltford, and seek to improve the quality of the gap, making it more accessible and useable to all.

- Create opportunities to become carbon neutral and nature positive by 2030, and work towards a climate resilient district.
- Ensure provision of community and social infrastructure and sustainable transport initiatives that serve existing residents as well as new, and across the lifecourse.
- Improve accessibility and connectivity by sustainable modes within Keynsham and Saltford, and also between the two settlements.
- Explore options to alleviate congestion within Keynsham Town Centre, and along the A4 corridor at peak times.
- Protect the key aspects of the landscape setting of the two settlements, and views to and from the Cotswold National Landscape.
- Provision of good quality green and blue infrastructure that is accessible and usable to all, placing nature at the heart of any development opportunities.
- Maximise ecological mitigation and biodiversity net gain.
- Restore the natural connectivity and functioning of the river and flood plain for key species.
- Enhance access to the river for leisure, and explore potential to provide more space for boat dwellings.
- Explore the green infrastructure opportunities provided by the River Chew Valley through Keynsham, the River Avon corridor, and Stockwood Vale, for nature recovery, human health and well-being, and climate adaptation and mitigation.
- Seek opportunities to encourage community food growing and edible landscapes, and provide space for allotments.
- Ensure policy supports the delivery of built and natural environments that promote health and wellbeing for all.

Question: Do you agree with the key issues, priorities and objectives for Keynsham and Saltford?

Transport Opportunities

6.28 Some of the key issues in Keynsham and Saltford relate to transport and highways, as listed above. A number of transport opportunities and potential interventions have been identified for Keynsham and Saltford. These interventions will need more detailed consideration whilst preparing the Draft Local Plan, including mechanisms for funding them.

- Active Travel Mode Routes - New segregated cycle lanes, as well as changes to country lanes where appropriate, providing a clear network of attractive primary and secondary routes connecting key amenities and facilities. This could include improvements for active travel between Keynsham and Saltford; and improved routes between Whitchurch and Keynsham, including to Broadlands Academy.

- Modal filters - Targeted filters as part of Liveable Neighbourhoods style interventions to link residential areas with local centres and town centre.

- E-Bikes and E-scooters - Support the expansion of the e-scooter and e-bike rental schemes into Keynsham and Saltford to improve local mobility, including provision of E-bike hire stations within both settlements.

- Public Realm - Measures to keep traffic on appropriate routes, away from less appropriate and more sensitive areas, providing opportunities to deliver sustainable transport and public realm benefits.

- Public Realm - Re-allocate private vehicle space to people over cars. E.g. widened footways, improved crossings, footway crossovers, public space.

- Public Realm - Enhance public realm in the town centre, creating a more attractive local environment.

- Mobility Hubs – Provision of new mobility hubs on the A4, within Keynsham town centre and in proximity to Keynsham rail station. Provision of additional mobility facilities at existing car parks.

- Bus Priority – Interventions to provide bus journey time benefits, by prioritising buses over private vehicles.

- Demand Responsive Transport (DRT) - DRT could be used to connect to proposed mobility hubs within Keynsham town centre, where passengers can gain access to a connecting bus or rail service to complete their journey.

Do you agree with the transport opportunities suggested for Keynsham and Saltford?

Site Options

6.29 A variety of site options for development are set out below, which have been prepared in response to the key issues, priorities and objectives set out above. Explanation as to how each of the site options responds to the key issues, priorities and objectives is set out within the opportunities and constraints tables for each site option. Where mitigation or additional evidence work is required to achieve priorities and objectives, this is referenced within the table. Conflicts with priorities and objectives are also referenced.

6.30 Following consultation on these site options, a detailed assessment of the transport impact of each site will be undertaken, to inform selection of sites to be included in the Draft Plan. The cumulative impact of all sites included in the Draft Plan will also be assessed. Any site allocations in the Draft Plan will define site specific interventions required.

Are there any other sites that haven't been identified, that need to be considered?

North Keynsham

Context

6.31 North Keynsham is located to the east of Keynsham town centre, and south of the River Avon, separated from the town by the railway line running between Bristol and Bath. Narrow access points via various bridges and tunnels connect the site to Keynsham.

6.32 The site is located in close proximity to the A4, the Bristol and Bath Cycle Path and Keynsham Train Station, all of which provide direct access to Bath and Bristol by bus, train and bicycle.

6.33 Some constraints exist across the site due to its location, existing land uses, and poor connections to its surroundings (see constraints in table below). However, through careful masterplanning and provision of mitigation where required, the site is considered to be a good option for development due to its highly sustainable location.

6.34 Due to its highly sustainable location, if this area is allocated for development in the Local Plan, its deliverable capacity should be optimised. With this in mind, further evidence base work is being undertaken to determine whether a higher quantum of development than set out below could be provided through mitigation of on-site constraints imposed by the water recycling plant and gas pipeline.

6.35 Additional landscape evidence work is also being undertaken to assess the impact of development on the Cotswold National Landscape and its setting.

6.36 The option for potential development at West Saltford (see page X), will need to be considered in conjunction with this North Keynsham option, with regards to maintaining a significant green gap between Keynsham and Salford, which is a key priority for both settlements.

6.37 A road will be required to access the development site and it is envisaged that it will also play a more strategic role as a relief route , pulling traffic out of Keynsham town centre, to the wider benefit of the town and enabling a greater focus on sustainable modes of transport on the town centre area network.

6.38 The site requires provision of significant infrastructure, not only from a transport perspective, but also to provide services and facilities for future residents. Optimising residential development at the site is considered to be important to both financially support provision of this infrastructure, and secure its long term use.

6.39 The site is located in the Green Belt. The Strategic Green Belt Assessment carried out by WECA to inform the now halted Spatial Development Strategy assesses this land parcel (P72) as having the following contribution to each of the NPPF Green Belt purposes:

- Purpose 1 - checking the unrestricted sprawl of large built-up areas: Limited / no contribution
- Purpose 2 - preventing the merger of neighbouring towns: Significant contribution
- Purpose 3 – safeguarding the countryside from encroachment: Significant contribution
- Purpose 4 - preserving the setting and special character of historic towns: Moderate contribution



Figure 17: Context Plan - North Keynsham

Site Option

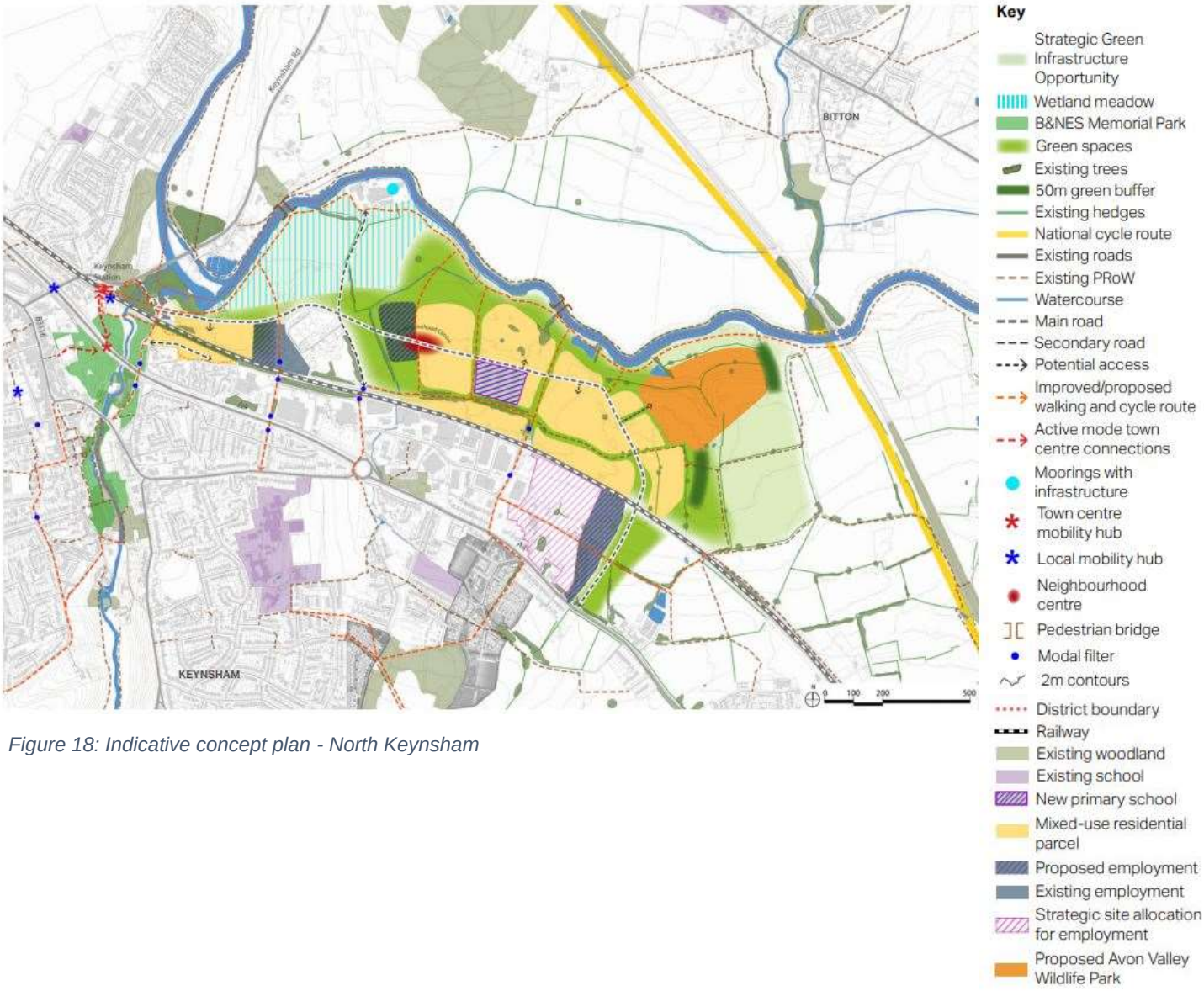


Figure 18: Indicative concept plan - North Keynsham

North Keynsham	
Opportunities	Provision of a sustainably located mixed-use development, comprising: • Around 1,500 new homes, with potential to include an element of Purpose Built Student Accommodation within the wider mix of housing • Around 6.5 ha of employment uses A range of community and leisure facilities at the centre of the development, including a primary school, retail provision, community facilities, and the opportunity to provide a cultural facility, such as a hall with theatre, for use by local communities. Located in close proximity to the A4, the Bristol and Bath Cycle Path and Keynsham Train Station, providing direct access to Bath and Bristol by public transport and active travel modes. Potential to provide high quality active travel routes into town centre and also to Bristol to Bath cycle route. Opportunity to provide car free development due to sustainable location. Potential to provide a strategic link on the highway network using the access road required by the site to remove traffic from Keynsham town centre, to the wider benefit of the town. Potential to explore the use of the river front for moorings and other water-related uses. Significant opportunities for nature recovery and wetland habitat within areas located in flood zone 3. Potential to explore the creation of woodland habitats linking Keynsham community woodland to the River Avon.

Constraints	Located in the Green Belt. Potential for loss of green gap between Keynsham and Saltford, particularly when considered in addition to option at West Saltford. Significant landscape sensitivity considerations relating to the impact of development on the Cotswold National Landscape. The relocation of Avon Valley Wildlife Park to the east will also need to be considered in relation to potential landscape impact on the Cotswolds National Landscape and its setting. Stidham Farm SSSI and SNCI located to the east of the site. Broadmead Field SNCI and River Avon SNCI located within the site boundary. Access is currently restricted due to the site's location between the railway line and the River Avon. Narrow access points exist via bridges and tunnels connecting the site to Keynsham. Poor access to the site exists from Keynsham Train Station. The north-western side of the site is located in flood zone 3. Part of the site is also located in Flood Zone 2. Relocation of Avon Valley Wildlife Park required. Odour zone from water recycling centre restricts some land uses in its immediate surroundings. High-pressure gas main running along the eastern side of the site restricts most land uses within HSE explosive standoff areas.
Mitigation required	Requires significant improvement to walking and cycling routes between the site, Keynsham Train Station and the wider town. Significant green infrastructure buffer likely to be required to the east of any development, to reduce impact on the Cotswold National Landscape, as well as interspersing significant tree planting and green space within development to help soften and break up any perceived mass of built forms, strengthen green infrastructure, and enhance the integration of built form within the landscape. Ecological mitigation required to ensure safeguarding of SSSI and SNCI, and to deliver fish recovery

Further evidence required	Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district. Landscape assessment required to assess impact of development on Cotswold National Landscape. Evidence to consider whether mitigation at water recycling centre could allow for development closer to the works. Evidence to consider whether mitigation along gas pipeline could allow for development within HSE explosive standoff areas.

Question: Do you support development at North Keynsham? Please provide reasoning.

East of Avon Mill Lane

Context

6.40 East of Avon Mill Lane is a narrow parcel of land located to the south of the railway line, accessed via Avon Mill Lane and Vandyck Avenue. It currently accommodates a number of medium sized industrial employment units.

6.41 The site is bordered directly to the south by residential homes. The close proximity of the existing industrial units to the residential dwellings currently causes localised issues relating to noise and pollution. This option therefore explores the potential to redevelop the industrial uses for residential, in order to improve the well-being of residents living to the south.

6.42 It should be noted that no discussion has taken place with the landowner or existing business occupying the site.

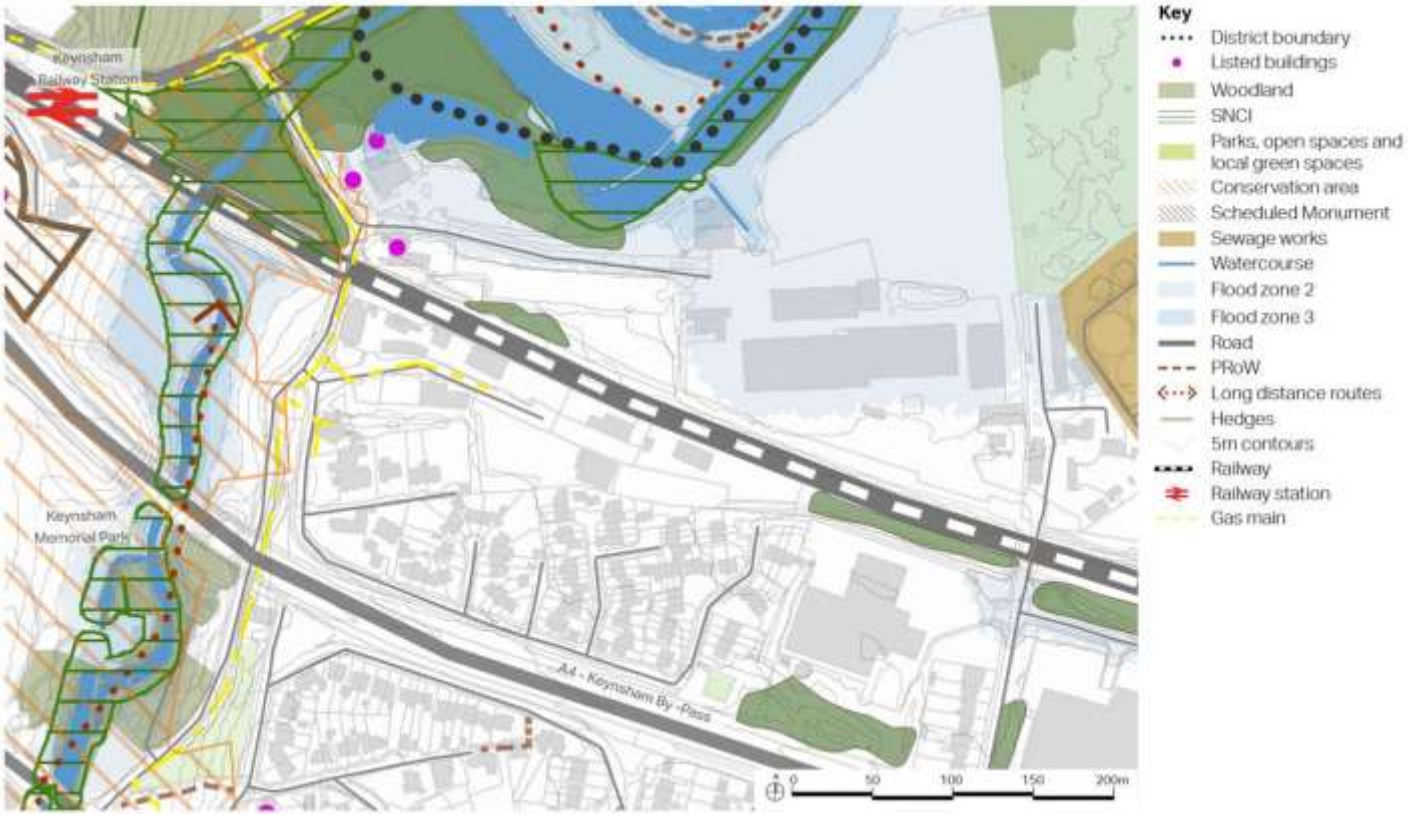


Figure 19: Context plan - East of Avon Mill Lane

Site Option



Figure 20: Indicative concept plan - East of Avon Mill Lane

East of Avon Mill Lane	
Opportunities	Provision of around 160 homes, plus a playground for use by existing and new residents, on brownfield site. Opportunity to improve the well-being of existing residents living directly south of the existing industrial units, through replacement with more compatible neighbouring residential use. Potential to explore local food growing opportunities, such as provision of a small orchard. Opportunity to provide car free development in a sustainable location close to Keynsham railway station.
Constraints	Loss of existing industrial employment land.

	Site located directly adjacent to the railway line. Active travel routes into town centre require improvement.
Mitigation required	Significant planting to the north of the site required to provide a visual and noise buffer to the existing rail lines. Consideration of active travel routes into town centre required.
Further evidence required	Holistic review of employment space across the District required, including the impact of the loss of this industrial site. Contamination assessment required due to current industrial land use.

Question: Do you support development at East of Avon Mill Lane? Please provide reasoning.

Central Keynsham

Context

6.43 The Sustainable Transport Plan for Keynsham town centre includes the provision of improved public transport, walking and cycling infrastructure, with the aim to encourage people to use sustainable modes of transport to get to Keynsham town centre. This aims to lead to a reduction in the need for car parking spaces in the centre of the town, over the 20-year Plan period.

6.44 As such, and depending on further analysis of car parking provision within the town centre, the options below explore the potential to redevelop some of the existing car parks close to Keynsham High Street to provide mixed-use, residential-led development.

6.45 The sites are located in highly sustainable locations, within easy walking distance of the facilities and amenities of Keynsham's main commercial and retail centre, and with excellent access to key public transport links.

6.46 Ashton Way Car Park and Labbott North and South car parks are located just behind Keynsham High Street and Temple Street. Both car parks serve town centre visitors and those working in the town. Option 1 explores the opportunity to redevelop half of Ashton Way car park (retaining the other half as car parking), and both of the Labbott car parks, to provide residential apartments.

6.47 Tesco supermarket is located on Danes Lane. The shop sits to the rear of the plot, with a large car park to the front of the building.

6.48 Both option 1 and 2 explore the potential to redevelop the site, moving Tesco to the front of the plot to provide an improved supermarket and create an active frontage to Danes Lane, and optimising the use of the site through provision of residential uses above the retail unit. Option 2 also considers a potential reduction in the size of the car park (or consideration of multi-storey elements), with provision of a block of apartments on part of the site. The likely embodied carbon impact of such redevelopment needs further assessment (see also embodied carbon policy options in Chapter 9: Development Management Policies). Further, it should be noted that no discussion has taken place with Tesco regarding these options.

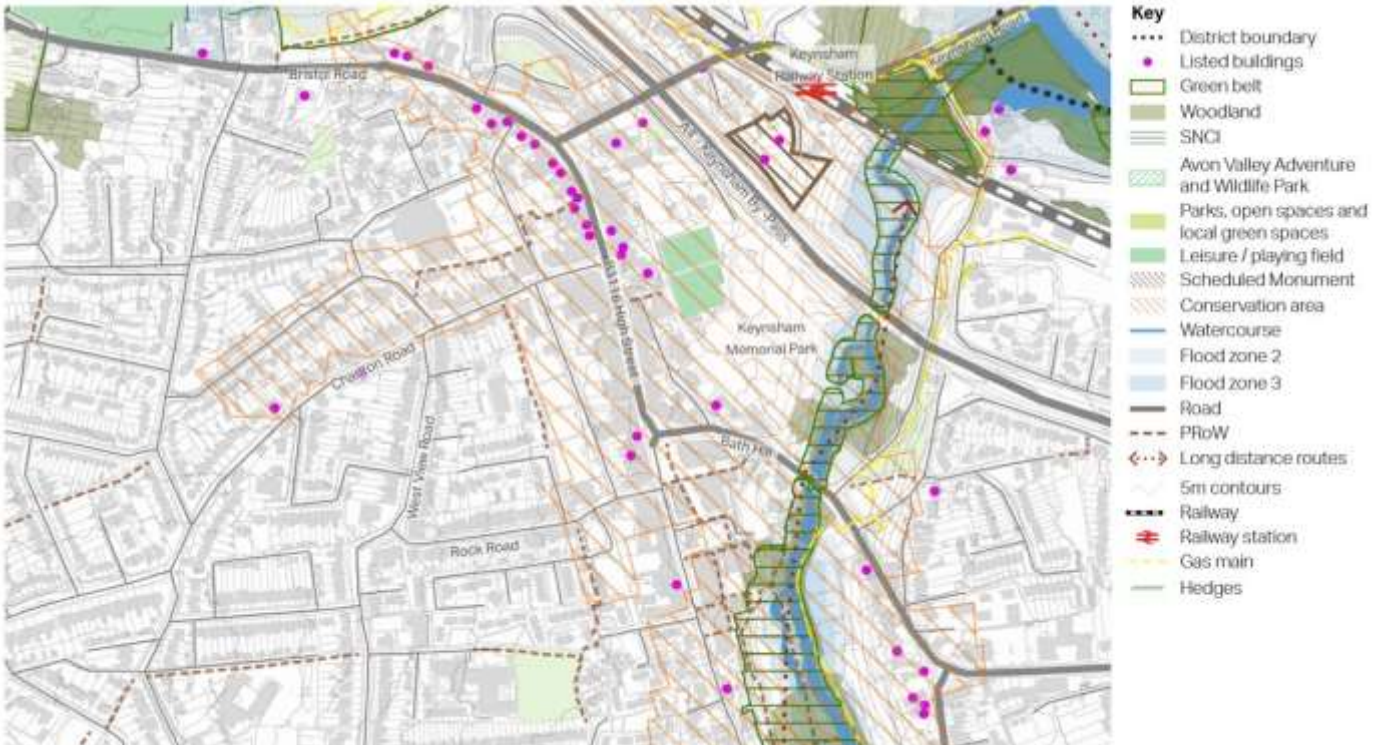


Figure 21: Context plan - Central Keynsham

Site Options

Central Keynsham Option 1

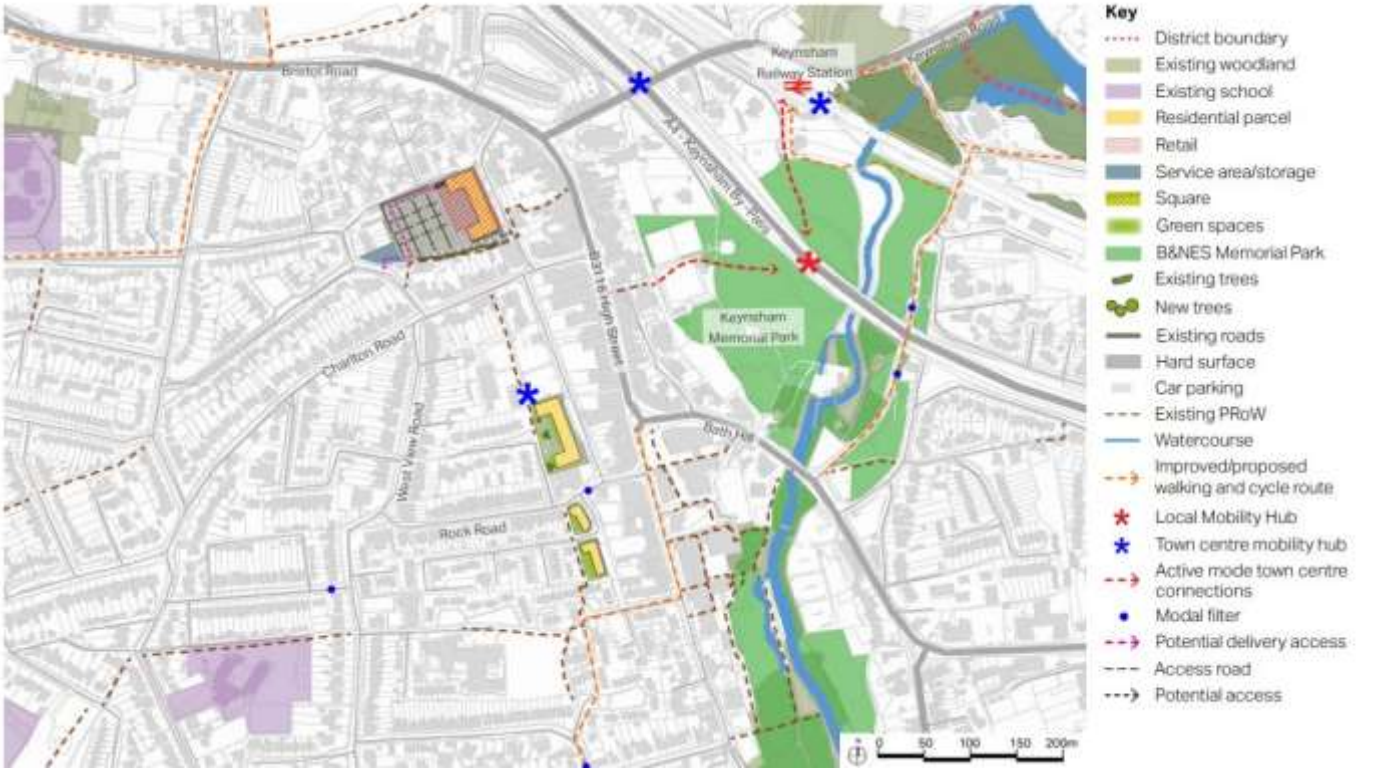


Figure 22: Indicative concept plan - Central Keynsham Option 1

Central Keynsham Option 1	
Opportunities	Provision of around 100 homes. Optimise development on brownfield land, located in highly sustainable town centre location. Creates active frontage on Danes Lane. Opportunity to explore urban greening through planting of street trees and provision of green infrastructure.
Constraints	Requires redevelopment of car parking spaces in town centre location - dependant on further analysis of car parking provision within the town centre over 20 year Plan period. Requires relocation of Tesco to eastern side of plot. Embodied carbon considerations relating to redevelopment of existing building. Located adjacent to Keynsham Conservation Area, and multiple listed buildings. Constrained brownfield sites with little opportunity for green space provision.
Mitigation required	Linked to sustainable transport plan for the town, which seeks to improve infrastructure to encourage active and sustainable modes of travel, therefore reducing the need for car parking spaces in the town centre.
Further evidence required	Further analysis of car parking use in Keynsham Town Centre. Embodied carbon analysis relating to redevelopment of existing building.

Central Keynsham Option 2



Figure 23: Indicative concept plan - Central Keynsham Option 2

Central Keynsham Option 2	
Opportunities	Provision of around 40 homes. Optimises development on brownfield land, located in highly sustainable town centre location Create an active frontage onto Danes Lane, including public square to provide amenity green space to residents. Opportunity to explore urban greening through planting of street trees and provision of green infrastructure.
Constraints	Requires relocation of Tesco to eastern side of plot. Embodied carbon considerations relating to redevelopment of existing building.

	Requires small reduction in car parking at Tesco site (though multi-storey elements could be explored). Located adjacent to Keynsham Conservation Area, and multiple listed buildings. Constrained brownfield site with little opportunity for green space provision.
Mitigation required	None identified.
Further evidence required	Analysis of Tesco car parking requirements. Embodied carbon analysis relating to redevelopment of existing building.

Question: Do you support development at Central Keynsham? Please provide reasoning.

West Keynsham

Context

6.49 West Keynsham is located to the west of Charlton Road. The southern end of the site directly fronts Charlton Road, whereas the northern side neighbours the back gardens of the houses on Lays Drive.

6.50 The land is mainly used as arable fields with Lays Farm Trading Estate located in the centre. The site is fragmented by well-maintained hedgerows and mature trees creating enclosed areas. To the west of the site, the land slopes steeply towards Stockwood Vale.

6.51 Two options for West Keynsham are set out below. The first optimises housing development in this area, but would require the relocation of businesses at Lays Farm Trading Estate. The second reduces the number of homes proposed significantly, retaining Lays Farm Trading Estate in situ.

6.52 The site is located in the Green Belt. The Strategic Green Belt Assessment carried out by WECA to inform the now halted Spatial Development Strategy assesses this land parcel (P82) as having the following contribution to each of the NPPF Green Belt purposes:

- Purpose 1 - checking the unrestricted sprawl of large built-up areas: Significant contribution
- Purpose 2 - preventing the merger of neighbouring towns: Significant contribution
- Purpose 3 – safeguarding the countryside from encroachment: Significant contribution
- Purpose 4 - preserving the setting and special character of historic towns: Moderate contribution

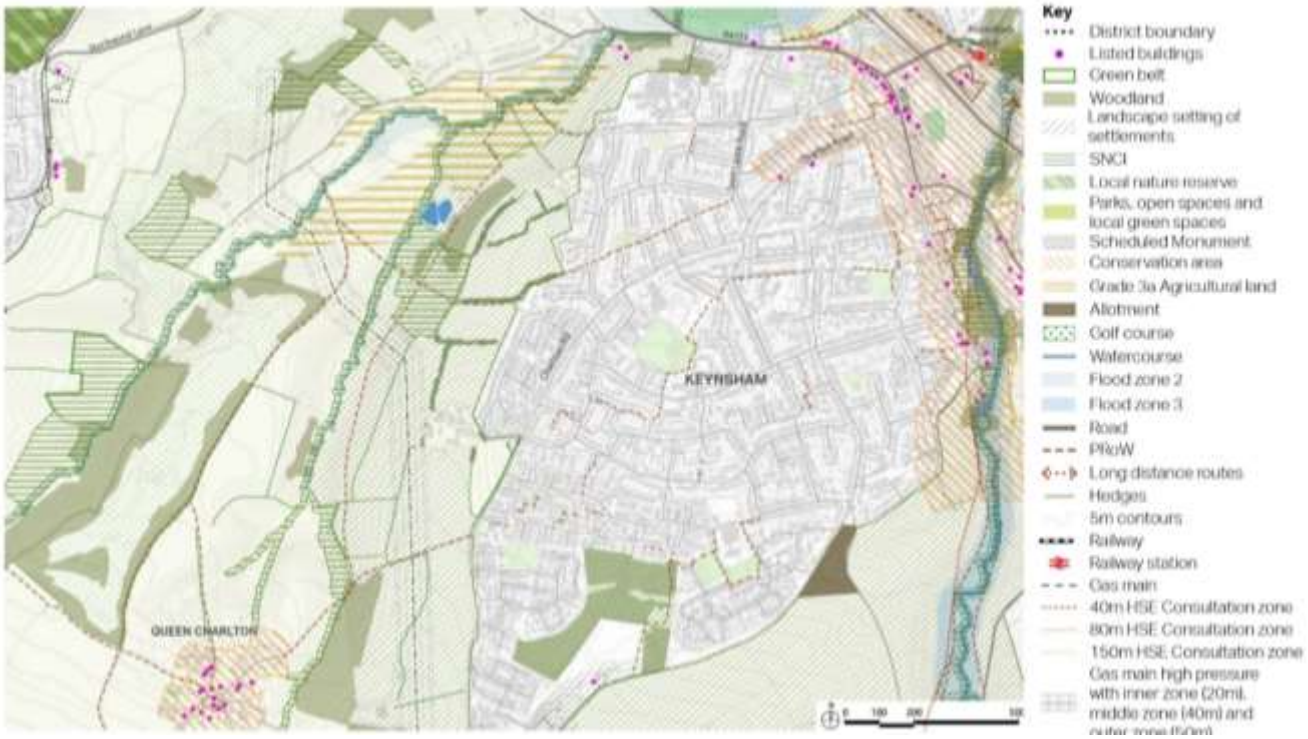


Figure 24: Context plan - West Keynsham

Site Options

West Keynsham Option 1

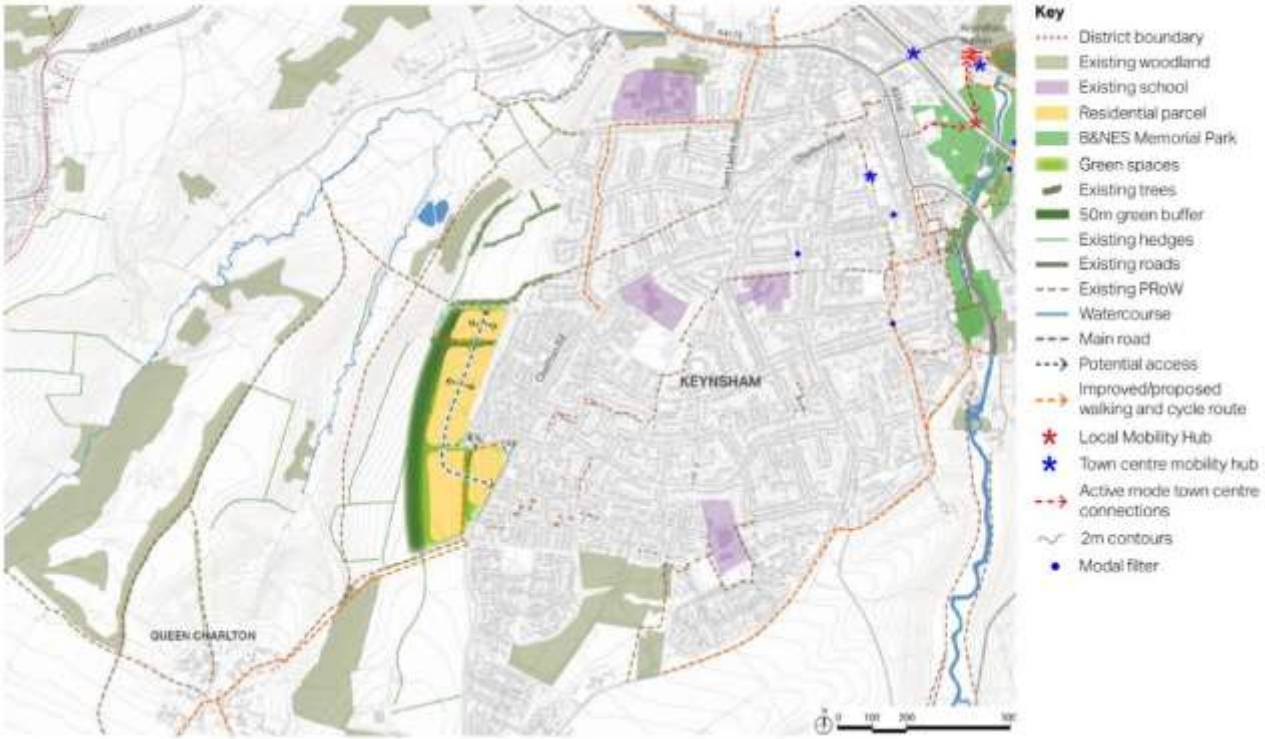


Figure 25: Indicative concept plan - West Keynsham Option 1

West Keynsham Option 1	
Opportunities	Provision of 300 homes
Constraints	Located in the Green Belt Loss of employment land at Lays Farm Industrial Estate Loss of agricultural land Single vehicular access only from Charlton Road Pedestrian access to the north of the site linking to town centre currently very narrow – improved assess required Site lies within area designated as part of the Landscape Setting of Settlement, therefore development must consider conservation and enhancement of landscape character and landscape setting of Keynsham. Much of site covered by SNCI buffer.
Mitigation required	50m minimum GI buffer along western edge of site to mitigate harm to views from west. Tree-lined streets, and tree-line avenue to run north to south at highest point to enhance screening. SNCI to be retained and protected.
Further evidence required	Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district, and considering opportunities for enhancements to retained Green Belt land Landscape assessment required to consider impact of development on Landscape Setting of Settlement. Consideration of potential risk to watercourse due to elevated position of site.

West Keynsham Option 2

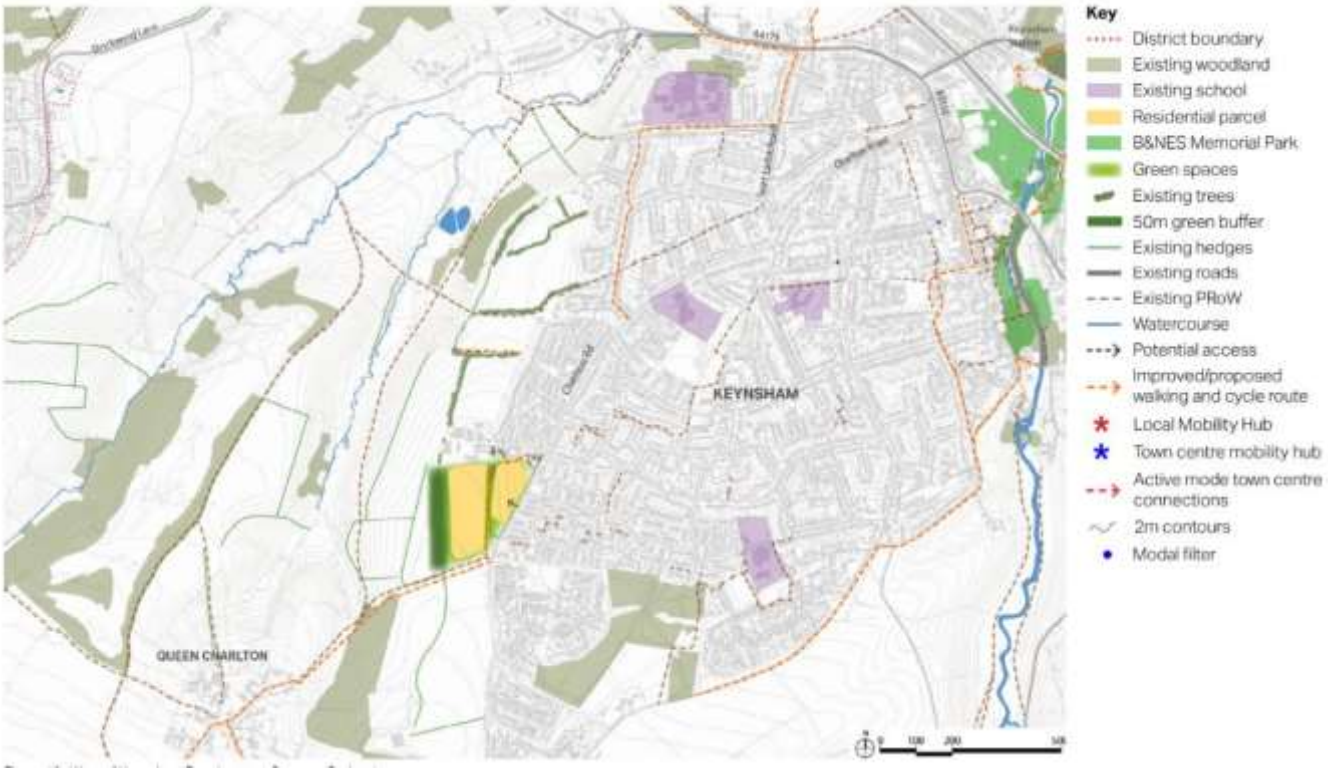


Figure 26: Indicative concept plan - Option 2

West Keynsham Option 2	
Opportunities	Provision of 100 homes.
Constraints	Located in the Green Belt Site lies within area designated as Landscape Setting of Settlement, therefore development must consider conservation and enhancement of landscape character and landscape setting of Keynsham. Limited access to green space and local food growing provision. Green space would need to be accommodated on site.
Mitigation required	50m GI buffer along western edge of site to mitigate harm to views from west

Further evidence required	Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district and considering opportunities for enhancements to retained Green Belt land. Landscape assessment required to consider impact of development on Landscape Setting of Settlement. Consideration of potential risk to watercourse due to elevated position of site.

Question: Do you support development at West Keynsham? Please provide reasoning.

Question: Do you prefer West Keynsham Option 1 or Option 2?

South East Keynsham

Context

6.53 South East Keynsham is located to the south of the east side of Keynsham, comprising two parcels of land located to the east and west of Wellsway (the B3116). Wellsway connects the town to the A39 to the south.

6.54 The parcel located to the west of Wellsway is used as arable land and is bounded by residential homes to the south and north, and woodland to the west.

6.55 The parcel located to the east of Wellsway is also used as arable land, and extends up to Courtenay Road to the north, to provide a walking and cycling route up into Keynsham, as no permeability exists between the land parcel and the residential development adjoining it to the north.

6.56 A bus stop providing a twice hourly bus service into Bristol to the north, and the Somer Valley to the south, is located on Wellsway close to the site. However, improvements to walking infrastructure to reach the bus stops from the site would be required as limited pavement currently exist.

6.57 The nearest existing convenience shop is located on Chandag Road, approximately 1 mile away from the site.

6.58 The site is located in the Green Belt. The Strategic Green Belt Assessment carried out by WECA to inform the now halted Spatial Development Strategy assesses these land parcels (P84 west of Wellsway, and P85 east of Wellsway) as having the following contributions to each of the NPPF Green Belt purposes:

- Purpose 1 - checking the unrestricted sprawl of large built-up areas: P84 and P85 Limited / no contribution
- Purpose 2 - preventing the merger of neighbouring towns: P84 limited / no contribution, P85 significant contribution
- Purpose 3 – safeguarding the countryside from encroachment: P84 and P85 significant contribution
- Purpose 4 - preserving the setting and special character of historic towns: P84 moderate contribution, P85 limited / no contribution



Figure 27: Context plan - South East Keynsham

Site Option



South East Keynsham	
Opportunities	Provision of around 350 homes. Potential to provide a convenience shop on Wellsway, to serve existing and new residents. Opportunities to link development into Manor Road Community Woodland Improvement Project work, including potential for expansion of the existing woodland to the east of the development parcel (noting potential constraint of gas pipeline in this location). Opportunity for provision of local food growing.
Constraints	Located in the Green Belt. Poor active travel route availability into Keynsham town centre. Significant walking times to nearest convenience shop on Chandag Road, and to Wellsway Primary School. No permeability between the site and the existing housing to the north, with potential impact being the creation of an isolated development, severed from the existing town. Gas pipeline between Keynsham and Saltford may restrict the types of Green Infrastructure that could be provided between the two settlements.
Mitigation required	Significant improvements to walking and cycling infrastructure required, both into Keynsham and across to Saltford. Significant tree buffer required along eastern boundary of the site, to reduce impact of built development in views from the Cotswold National Landscape. Significant street tree planting required throughout development parcels, to reduce impact of development in views from the Cotswold National Landscape.

Further evidence required	Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district and considering opportunities for enhancements to retained Green Belt land. Exploration of extent of possible green infrastructure enhancements between Keynsham and Saltford required (noting constraint of gas pipeline in this location).

Question: Do you support development at South East Keynsham? Please provide reasoning.

West Saltford

Context

6.59 West Saltford is located on the western edge of the village of Salford. The area is mostly flat arable fields with some hedgerows containing hedgerow trees.

6.60 The site connects directly onto the A4 corridor, providing good access to frequent bus stops providing services into Bath and Bristol.

6.61 A key priority for the Keynsham and Saltford area of the district is to retain a significant green gap between the two settlements. As such, any development located to the west of Saltford will need to be carefully assessed in conjunction with the options at North Keynsham (see page X) and South East Keynsham (see page X), as well as in relation to land already allocated to the east of Keynsham. Development will need to include requirements to strengthen and enhance the remaining green infrastructure between Keynsham and Saltford, seeking to make it more accessible and useable.

6.62 The land parcels are located to the west of Grange Road in Saltford. However, no permeability currently exists between Grange Road and the parcels, due to the continuous configuration of dwelling plots along the road. As such, walking and cycling routes into the village would need to be provided from the south side of the site, connecting to Manor Road, and to the north along the A4, though there may be scope, through discussions with local landowners, to provide a walking route through an existing residential plot, to provide a link into the village.

6.63 The site is located in the Green Belt. The Strategic Green Belt Assessment carried out by WECA to inform the now halted Spatial Development Strategy assesses these land parcels (P85) as making the following contribution to each of the NPPF Green Belt purposes:

- Purpose 1 - checking the unrestricted sprawl of large built-up areas: Limited / no contribution
- Purpose 2 - preventing the merger of neighbouring towns: significant contribution
- Purpose 3 – safeguarding the countryside from encroachment: Significant contribution
- Purpose 4 - preserving the setting and special character of historic towns: Limited / no contribution

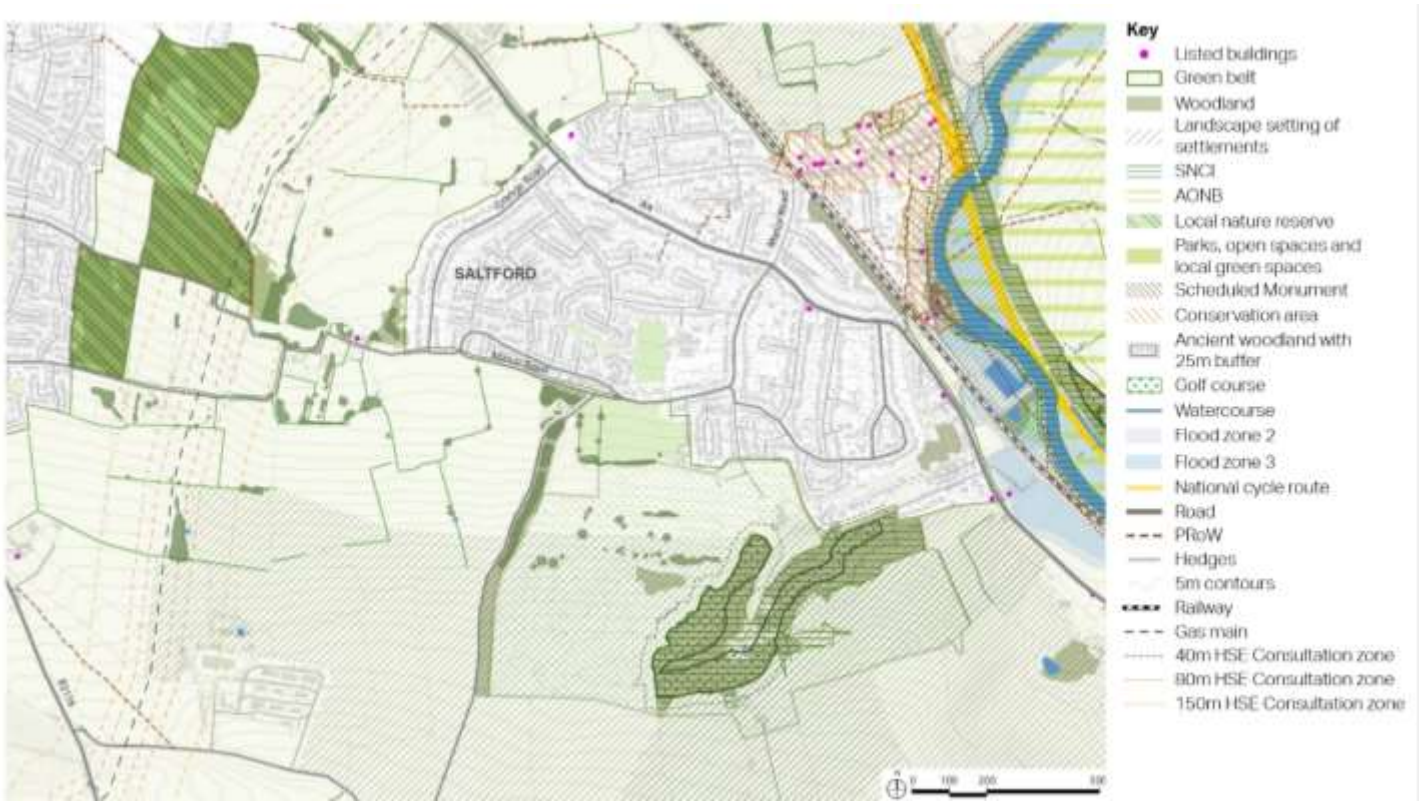


Figure 29: Context plan - West Saltford

Site Option



Figure 30: Indicative concept plan - West Saltford

West Saltford	
Opportunities	Provision of around 500 homes, a new primary school, and a public green space. Opportunity for provision of local food growing. Direct access to A4, providing easy access to sustainable travel options. Opportunity to strengthen and enhance the remaining green infrastructure gap between Keynsham and Saltford, seeking to make it more accessible and useable. Further evidence is required to understand the extent of possible enhancements. Opportunity to explore and fund Manor Road becoming a “Quiet Lane” between Keynsham and Saltford, through introduction of a modal filter, or other traffic restrictions, to ensure traffic flows and speeds are low enough to enable active travel between the two settlements.
Constraints	Located in the Green Belt. Reduces green gap between Saltford and Keynsham, particularly when considered in addition to option at North Keynsham. Gas pipeline between Keynsham and Saltford may restrict the types of Green Infrastructure that could be provided between the two settlements. Grade II listed Keynsham Manor house located on Manor Road. Impact on setting to be considered, particularly impact of new primary school building. No permeability between site and existing housing to the east on Grange Road. Walking and cycling links would be from the north and south only.
Mitigation required	Strengthening and enhancement of the remaining green infrastructure gap between Keynsham and Saltford required.
Further evidence required	Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district, and

	considering opportunities for enhancements to retained Green Belt land. Consideration in conjunction with extent of options at North Keynsham and South East Keynsham, to ensure significant green gap between Keynsham and Saltford remains. Exploration of extent of possible green infrastructure enhancements between Keynsham and Saltford required (noting constraint of gas pipeline in this location). Discussion with landowners on Grange Road to understand if walking route between plot and village could be created.

Question: Do you support development at West Saltford? Please provide reasoning.

South Saltford

Context

6.64 South Saltford is located to the south of the village, accessed from Manor Road. The western part of the site is characterised by agricultural fields enclosed by hedgerows with relatively few trees. The eastern part of the site is currently occupied by a golf course with small woodland areas and tree belts between the different parts of the course.

6.65 Land parcels at South Saltford would be accessed from Manor Road via two junctions.

6.66 The site is located in the Green Belt. The Strategic Green Belt Assessment carried out by WECA to inform the now halted Spatial Development Strategy assesses these land parcels (P85) as making the following contribution to each of the NPPF Green Belt purposes:

- Purpose 1 - checking the unrestricted sprawl of large built-up areas: Limited / no contribution
- Purpose 2 - preventing the merger of neighbouring towns: significant contribution
- Purpose 3 – safeguarding the countryside from encroachment: Significant contribution
- Purpose 4 - preserving the setting and special character of historic towns: Limited / no contribution

6.67 A locally defined landscape setting of settlement designation is located directly to the south of the South Saltford site option. At page **X** there is an opportunity to comment whether the boundaries of any existing landscape settings identified on the policies map should be amended.

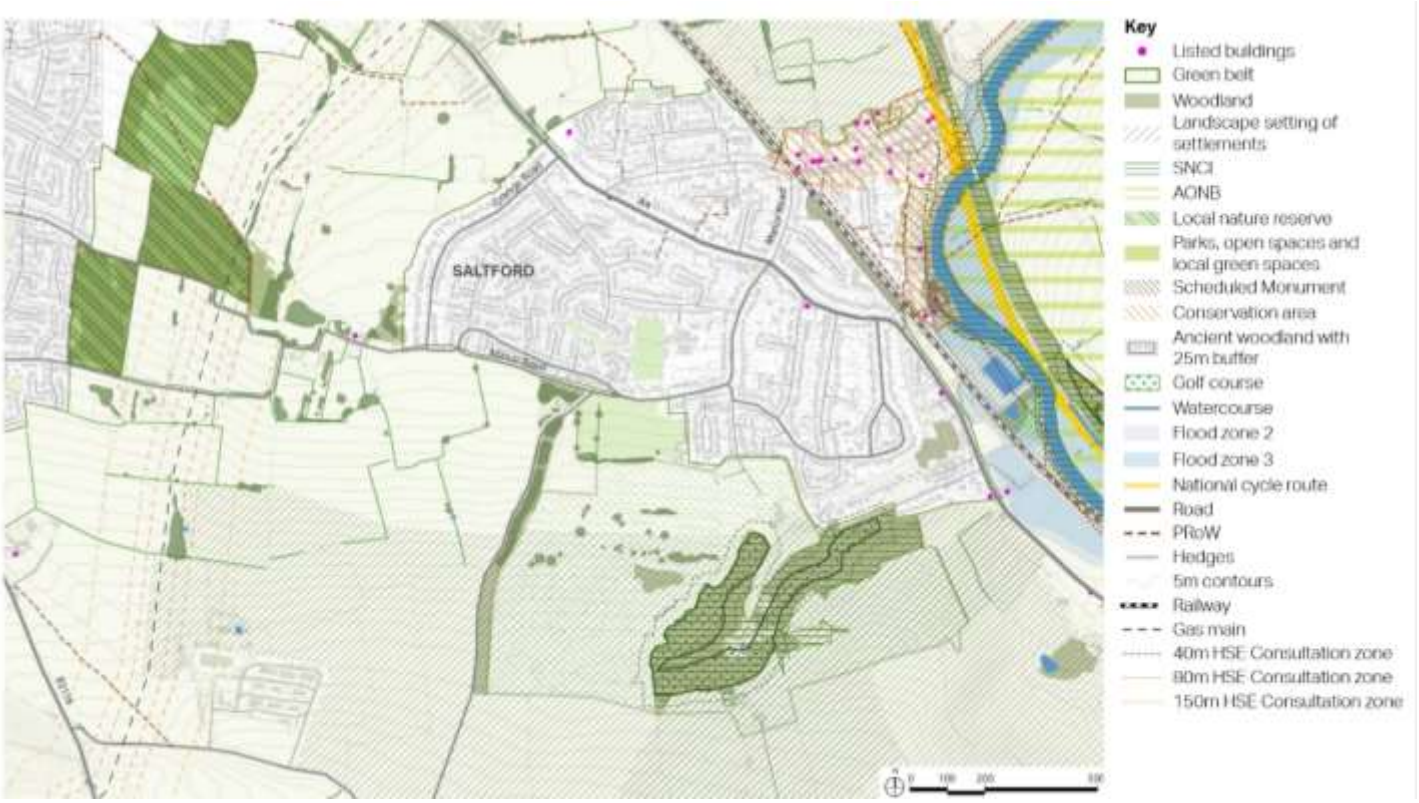


Figure 31: Context plan - South Saltford

Site Option



South Saltford	
Opportunities	Provision of around 800 homes, a new primary school, a village green, and a small local centre, with facilities such as a village shop to serve residents to the south of the village. Opportunity to explore and fund 'Quiet Road' along Manor Road between Keynsham and Saltford, through introduction of a modal filter, or other traffic restrictions, to ensure traffic flows and speeds are low enough to enable active travel between the two settlements. Opportunity to explore Modal filter along Manor Road to the north of the development, to prioritise active modes along the route closest to the new community facilities and primary school.
Constraints	Located in the Green Belt. Requires redevelopment of some areas of golf course. Grade II listed Keynsham Manor house located on Manor Road. Impact on setting to be considered, particularly impact of new primary school building. Currently defined landscape setting of settlement designation located directly to the south of the development parcels. In order to ensure no impact on setting, building heights must not exceed 2-storeys in height, other than along the A4 corridor.
Mitigation required	Requirement for a woodland belt at least 50m wide along the southern edge of the development area to provide a soft backdrop to the housing on shallow slopes.
Further evidence required	Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district. Exploration of extent of possible green infrastructure enhancements between Keynsham and Saltford required (noting constraint of gas pipeline in this location).

Question: Do you support development at South Saltford? Please provide reasoning.

Hicks Gate

Place Profile

6.68 The Hicks Gate area is in the Green Belt and stretches west from the Hicks Gate roundabout to the local authority boundary with Bristol, including land to the north and the south of the A4. The wider area, which includes land within Bath and North East Somerset as well as Bristol City Council, largely comprises of agricultural fields typically used for grazing, with a network of public rights of way. This wider area includes to a range of sports pitches, Brislington House, St Brendan's Sixth Form College, allotments and the Brislington Park and Ride Site.

6.69 The centre of Bristol is within 4km and Keynsham town centre is within 2km.

6.70 The A4 is a strategic transport corridor between Bath and Bristol. It experiences significant congestion in both directions during peak times.



Figure 33: Context plan - Hicks Gate

6.71 Bristol City Council has now published the new Bristol Local Plan Publication Version (November 2023) and 'Policy DS12: New neighbourhood – Bath Road, Brislington' proposes removing land from the Green Belt to the south of the A4 as identified on the aerial photograph below, for the development of 500-750 dwellings. The published Bristol Local Plan also states that if appropriate proposals adjacent to this location come forward, the city council will work with Bath and North East Somerset Council to consider the impacts and opportunities, to assess infrastructure requirements and to ensure integrated and well-planned communities are created.



Figure 34:Extract from Bristol City Council Draft Local Plan showing area proposed to be removed from the Green Belt

Key Issues and Opportunities

- The wider area lies within Bristol City Council and B&NES Council. The local authorities would collaborate to enable the preparation of a comprehensive masterplan to deliver a high quality place to live and work.

- The Hicks Gate area is located within the Green Belt, which in this locality contributes to maintaining a separation between Bristol and Keynsham, and preventing the merger of the city and town. The Strategic Green Belt Assessment (WECA) assesses the wider area as two land parcels (P78 and P79) as having the following contribution to each of the NPPF Green Belt purposes:

    - Purpose 1 - checking the unrestricted sprawl of large built-up areas: P78 and P79 significant contribution
    - Purpose 2 - preventing the merger of neighbouring towns: P78, and P79 significant contribution
    - Purpose 3 – safeguarding the countryside from encroachment: P78, and P79 significant contribution
    - Purpose 4 - Preserving the setting and special character of historic towns: P78 limited / no contribution, P79 moderate contribution

- In order for development to be progressed in the wider area exceptional circumstances would need to be demonstrated in order to justify removing land from the Green Belt. In the Bristol Local Plan Publication Version (November 2023) Bristol City Council is proposing to remove land from the Green Belt within the Bristol administrative area.

- This area has primarily been considered for its potential as a residential led development, coupled with the opportunity for employment led regeneration within the existing and adjacent areas of Bristol. One of the options to be considered as part of this consultation is whether there should be a section of the development area within Bath and North East Somerset that is more focused on the provision of employment floorspace.

- The A4 is a strategic route for vehicles and for freight. The introduction of segregated facilities for walking, cycling, public transport, plus green infrastructure and crossing points would be expected to ensure mobility for residents and mitigate the severance effect of the strategic road.

- As part of comprehensive development there is potential for the Brislington Park and Ride facility in Bristol to be relocated to land within Bath and North East Somerset closer to the Hicks Gate roundabout and in so doing becoming a transport interchange. This would mean that in-bound traffic using the Park and Ride would not pass through the proposed development area.

- The delivery of a transport interchange at Hicks Gate offers the potential to provide a broader range of sustainable connections with surrounding communities, including Keynsham and Bristol's East Fringe. This could include additional bus services, active travel connections, and shared mobility facilities such as E-car clubs, hire bikes and e-scooters. It also would provide access to bus services on the Bristol Bath Strategic Corridor (BBSC), which will benefit from journey time improvements provided by the BBSC project.

- There are few footpaths in Hicks Gate, reducing connectivity within and through the area. The A4 severs movement across the area and cycling is restricted along this busy route. Cycle routes could be relocated away from the A4 to provide active travel links and improve the air quality.

- In terms of access to natural spaces, there is no connection to the River Avon and Stockwood Vale Golf Course restricts access to the wider countryside to the south.

- The landscape setting within the Hicks Gate area is sensitive, particularly in relation to the land immediately to the south of the A4 before the land slopes upwards. This area has a coherent landscape with small to medium late or post medieval permanent pasture (mostly) fields and excellent original, tall hedgerows.

- Existing hedgerows within the area are an important resource for associated wildlife. They need to be integrated in the new development and any hedgerow loss must be compensated at some other areas in line with the BNG and nature recovery requirements and strategies.

- The issue of the potential adverse impact on the water quality of the stream within the site should taken into account and mitigations should be applied.

- There are very few residents currently in the Hicks Gate area. One of the challenges will be to create a community with appropriate infrastructure and mix of uses.

Priorities and Objectives

6.72 The priorities and objectives for the Hicks Gate Area are set out below. Many of the priorities can be addressed by new development, and site options have been selected in response to the key issues, priorities and objectives. However, there are some priorities that won't be addressed through new development but will be addressed through other policies in the Local Plan or initiatives undertaken by the Council or by other stakeholders.

6.73 The options proposed have been informed by a suite of evidence base material covering transport, landscape character, ecology and many other subjects. Following a comprehensive analysis of the constraints and opportunities, partly formulated through a series of design workshops, the following emerging priorities and objectives are proposed to help shape the placemaking aspirations and provide substance to the opportunity for strategic development at Hicks Gate. These are:

- Maximise the delivery of housing that is affordable in response to social and economic needs, and local demographics.
- Deliver zero-carbon homes and a built environment that seeks to meet the challenge of climate change by delivering a development that is both resilient and enduring.
- Consider the opportunities to deliver a greater proportion of employment led development within the Bath and North East Somerset area.
- The development will be compact, with an efficient use of the available land predicated on a well-balanced housing density, and a mix of house sizes, typologies and tenures.
- Development at Hicks Gate will seek to complement existing provision of services and amenities providing for the needs of both new and existing communities.
- The land use mixes across the site should be flexible, balanced and complementary with residential, community and leisure facilities, local services, retail, employment, offices and studios, all woven together to create a place that is truly designed for a healthy work-life balance.
- Reduce the need to travel, particularly by retaining and providing jobs, services and community facilities at suitable locations close to residential areas.
- Safeguard existing habitats and seek opportunities to deliver at least 20% biodiversity net gain with a strong network of hedgerows and flower rich verges throughout.

- Promote strategic green infrastructure and compensatory improvements in the remaining Green Belt gap between Bristol and Keynsham.

- Provide a range of sports, recreational facilities, parks and open spaces incorporating existing landscape assets to enable new residents to have an easy access to nature and promote active modes of travel.

- Provide tree-lined streets and public spaces to promote a sense of well-being as well as providing shading and cooling in the summer months and contributing towards the development's climate change resilience capabilities.

- Integrate natural water management solutions to achieve resilient places to respond to the challenge of water stress by integrating sustainable urban drainage systems (SuDS), rain gardens, permeable pavers and rooftop gardens.

6.74 The diagram below, represents these conceptual themes:

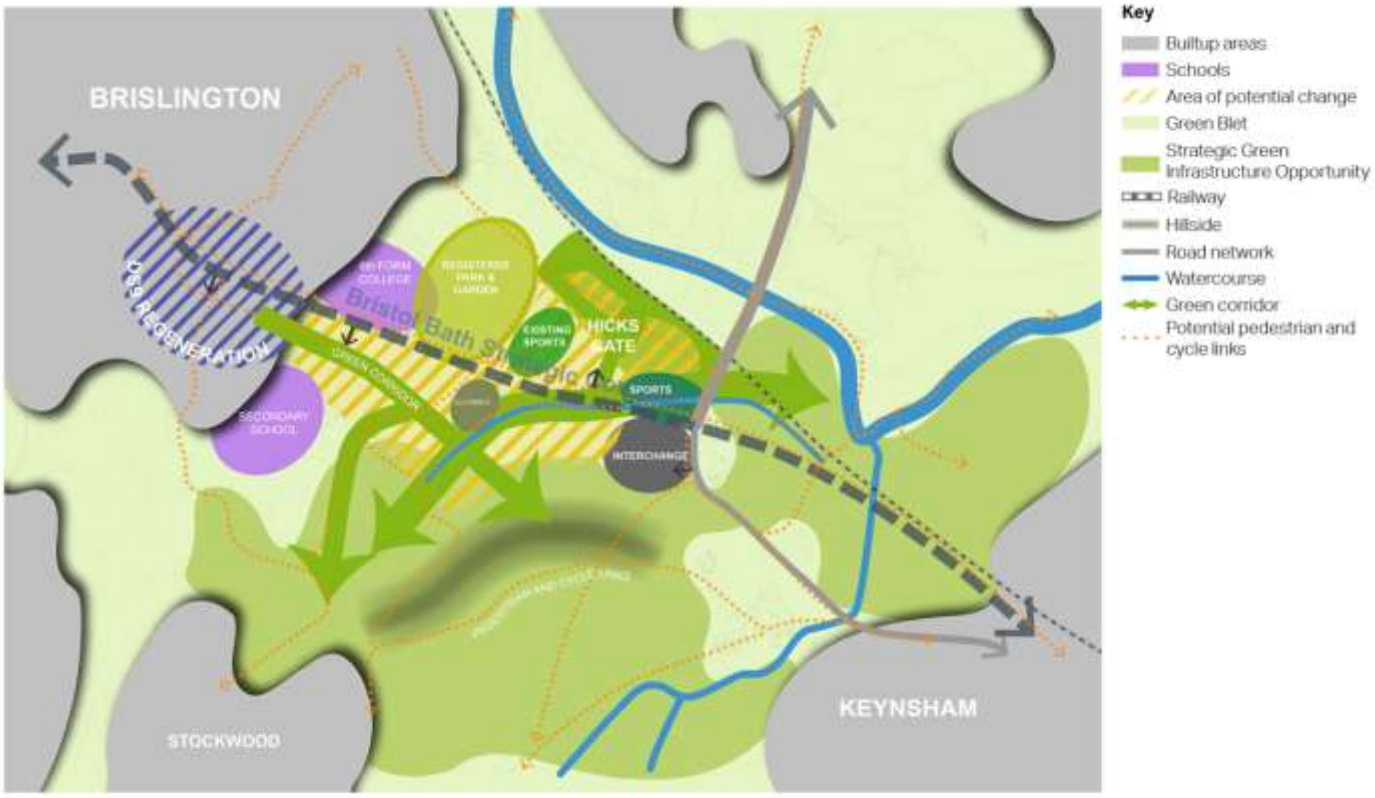


Figure 35: Indicative concept plan - Hicks Gate

Transport Opportunities

6.75 Some of the key issues in the Hicks Gate area relate to transport and highways and a number of opportunities and potential interventions have been identified. These interventions will need more detailed consideration whilst working up the Draft Local Plan, including mechanisms for funding them:

- As part of the City Regional Sustainable Transport Settlement, the Bristol to Bath Corridor project is being led by WECA and delivered in partnership with B&NES Council and Bristol City Council. It aims to improve travel between Bath and Bristol through better bus services and enabling more cycling and walking, through the delivery of a Mass Transit corridor which will pass along the A4 through Hicks Gate. The current scope of the project includes bus priority measures, road space reallocation, enhancement to bus stops, improved walking and cycling facilities and improvements to the public realm. The project intends to improve sustainable movement along the corridor.

- The Park and Ride site at Brislington is proposed to be relocated, expanded, and increased in functionality to provide interchange between a variety of transport modes to provide a network of connections across the local area. The south west corner of the Hicks Gate Roundabout has been identified as the preferred location.

- The new community will integrate with existing communities via a network of sustainable, accessible and green movement corridors, allowing people to access amenities and services in the Hicks Gate area and across the wider Keynsham and south-east Bristol area. Hicks Gate will be a low-car settlement, promoting limited through routes within the development and focusing on walking and cycling, and accessible and competitive public transport opportunities.

- Improving public spaces and routes, including crossing facilities on the A4 to encourage people to use public transport and active modes of travel.

- Existing pedestrian and cycle connections can be enhanced and integrated with new proposals across the area to ensure wider commuter routes north-south and east-west. It can connect the Hicks Gate area to Bristol, Stockwood, and Keynsham.

- Extension of short-term E-scooter and E-Bike rental within the Hicks Gate area.

- Additional bus routes to link with a greater range of places such as Keynsham, Whitchurch Village and Bristol's East Fringe.

- WEST Link Demand Responsive Travel (DRT) zones in Bath and North East Somerset and Bristol shows zones are currently located immediately to the east and west of the Hicks Gate study area. DRT could be used to connect an Interchange Hub at Hicks Gate, where passengers can gain access to a connecting bus or rail service to complete their journey.

- Work with bus operators and other key stakeholders to decarbonise the bus fleet in the Hicks Gate area.

- Introduce more Electric Vehicle charging points in the Hicks Gate area.

Site Options

6.76 Two broad options for development have emerged and these are described in more detail below.

6.77 It should be noted this area has primarily been considered as a residential led development, with the opportunity for employment led regeneration within the existing and adjacent areas of Bristol. As set out in chapter 3 above there is a need to plan for additional employment space within Bath and North East Somerset in order to help facilitate a more prosperous, sustainable and fairer economy and this location may have the potential to accommodate employment uses. Therefore, an issue to be considered for both options set out below is whether there should be a section of the development area within Bath and North East Somerset that is focused on the provision of employment floorspace. This would rebalance some of these development parcels and provide a greater proportion of employment and less housing development. A logical location for an employment element could be adjacent to the proposed Transport Interchange.

6.78 The principle difference between the two options is that the first option sought to respond more appropriately to the landscape sensitivity evidence by maintaining and enhancing a larger gap between the Hicks Gate area and Keynsham, and avoiding development up to the proposed transport interchange. There is a lesser quantum of development for this option.

6.79 The second option is proposing to increase the quantum of development. It would need to ensure that a sufficient Green Belt gap between the Hicks Gate area and Keynsham is retained

Hicks Gate Option 1

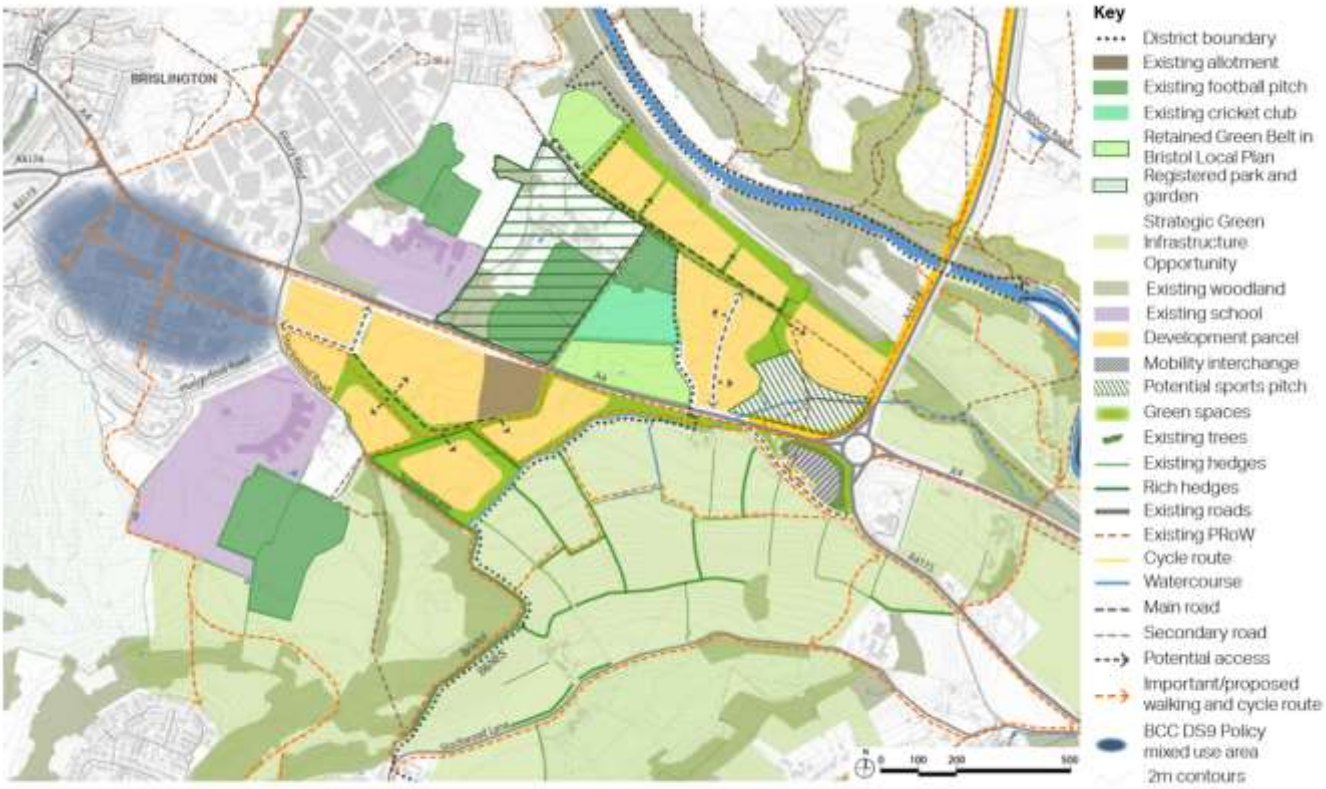


Figure 36: Indicative concept plan - Hicks Gate Option 1

Hicks Gate Option 1	
Opportunities	The delivery of a vibrant, well connected, low carbon community, within a high-quality, nature positive, urban environment that is in harmony with its attractive landscape setting. It will be an exemplar for sustainable living and working, providing new approaches to sustainable transport, with high levels of public transport and active travel use. It will have integrated green and blue infrastructure, rich in biodiversity, and unlock improvements to the quality and accessibility of the surrounding countryside and the strategic green infrastructure opportunity.
Constraints	Located in the Green Belt. The A4 corridor is an important strategic transport corridor into Bristol and currently gets congested. Parts of the site are located in areas of landscape sensitivity – further assessment and consideration of appropriate mitigation required. Secondary school pupils within Bath and North East Somerset would need safe access to Broadlands in Keynsham. Delivery requires close co-ordination between B&NES Council and Bristol City Council. It will be crucial for the local authorities to collaborate to enable the preparation of a comprehensive masterplan to deliver a high quality place to live and work.
Mitigation required	Measures to optimise the attractiveness and use of public transport and active travel, including delivery of the Bristol to Bath Strategic Corridor project including consideration of the location and accessibility of bus stops on the A4. Pedestrian and cycle crossings will be required over the A4 to alleviate severance issues Significant green infrastructure and planting required throughout and along the edge of the development sites. Seek to make improvements, including enhanced access to the remaining Green Belt land, providing opportunities for outdoor sport and recreation, retaining and enhancing landscapes, visual amenity and biodiversity.

Further evidence required	Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district. Landscape sensitivity assessment and mitigation.

Hicks Gate Option 2

6.80 Hicks Gate Option 2 follows a very similar development proposition to the first option but is looking at a more extensive development area to the south of the A4. This is acknowledged to have more substantial impacts on landscape character. It would need to ensure that a sufficient Green Belt gap between the Hicks Gate area and Keynsham is retained.

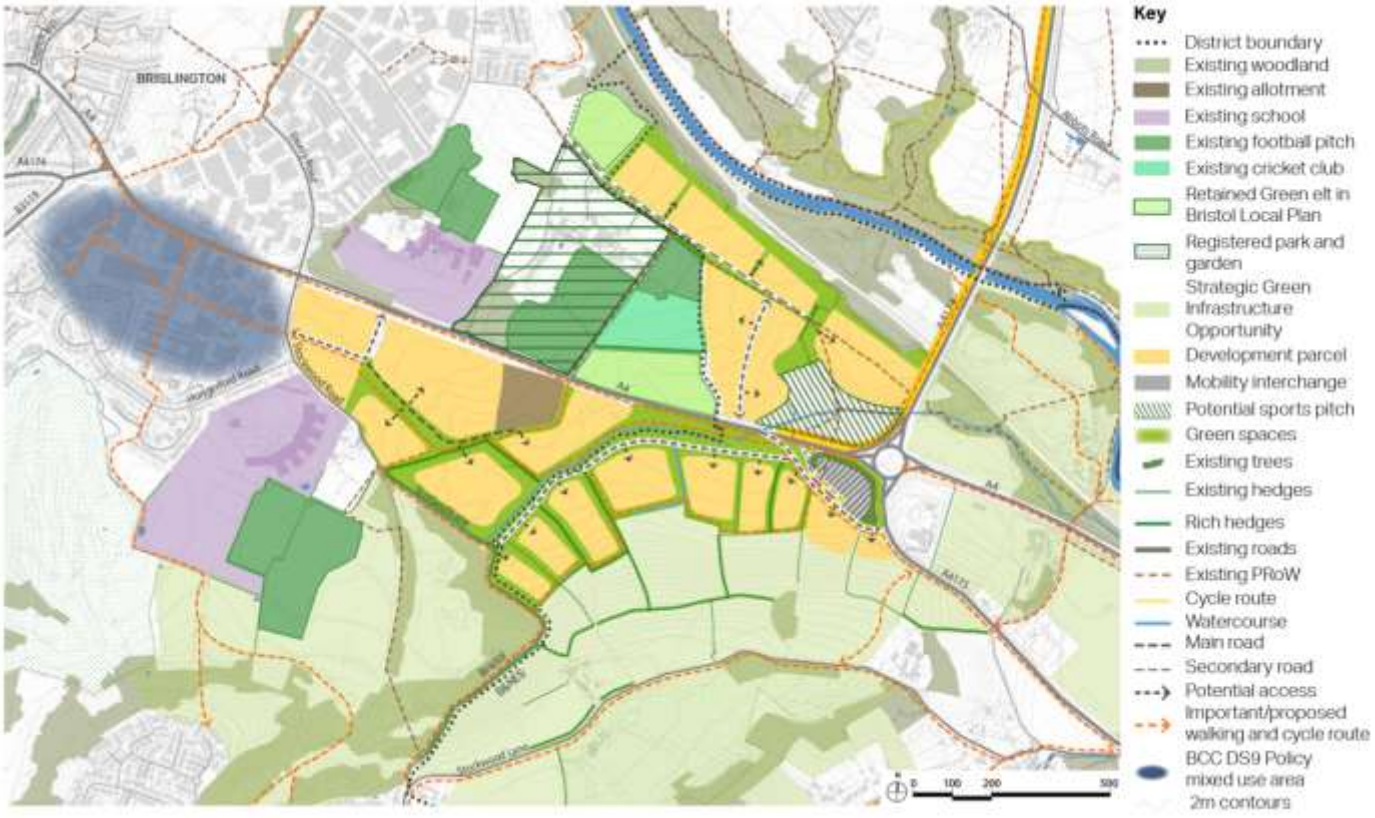


Figure 37: Indicative concept plan - Hicks Gate Option 2

Hicks Gate Option 2	
Opportunities	The delivery of a vibrant, well connected, low carbon community, within a high-quality, nature positive, urban environment that is in harmony with its attractive landscape setting. It will be an exemplar for sustainable living and working, providing new approaches to sustainable transport, with high levels of public transport and active travel use. It will have integrated green and blue infrastructure, rich in biodiversity, and unlock improvements to the quality and accessibility of the surrounding countryside.
Constraints	Located in the Green Belt. The A4 corridor is an important strategic transport corridor into Bristol and can get congested. This option proposes more development than Option 1 in areas of landscape sensitivity – further assessment and consideration of appropriate mitigation required. Secondary school pupils within B&NES would need safe access to Broadlands in Keynsham. Delivery requires co-ordination between B&NES and Bristol City Council. It will be crucial for the local authorities to collaborate to enable the preparation of a comprehensive masterplan to deliver a high quality place to live and work.
Mitigation required	Careful consideration of the location and accessibility of bus stops on the A4 to optimise public transport use by residents. Pedestrian and cycle crossings will be required over the A4 to alleviate severance issues. Significant green infrastructure and planting required throughout and along the edge of the development sites. Seek to make improvements, including enhanced access, to the remaining Green Belt land, providing opportunities for outdoor sport and recreation, retaining and enhancing landscapes, visual amenity and biodiversity.

Further evidence required	Green Belt assessment required to further assess the impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district. Landscape sensitivity assessment and mitigation.

Questions:

0. **Do you support development at Hicks Gate? If so, which option is preferable? Please provide reasoning.**

1. **What land uses should be prioritised?**
   - **(i) Residential led with associated infrastructure**
   - **(ii) A shift in the balance between residential and employment providing a greater amount of employment space**

Whitchurch Village

Place Profile

6.81 Whitchurch Village is located within the northern part of B&NES, with a population of around 2,000 people. It sits directly south of Stockwood and east of Hartcliffe in Bristol. The administrative area of Bristol City Council lies immediately to the north and east of the Village. The village of Queen Charlton lies to the east, and the town of Keynsham to the north east. More recent development has increased the number of houses in the village by around 250 homes, but did not bring with it any supporting facilities. The existing village lacks certain amenities such as a village shop, although the existing music shop sells some convenience goods.

6.82 Whitchurch Village is surrounded nearly entirely by Green Belt, separating it from Bristol to the north and west, and Keynsham to the east. Any new development adjoining the village would require the removal of land from the Green Belt, and removal would require exceptional circumstances to be fully evidenced and justified.



Figure 38: Context plan - Whitchurch Village

6.83 The local transport network for Whitchurch Village is characterised by the dominance of private car journeys. This contributes to the high traffic volumes on the A37 which bisects the village. The lack of sustainable alternatives, notably a railway station, results in a high proportion of out-commuting, particularly to Bristol. For local journeys, walking, cycling and wheeling are not popular choices because of the lack of safe and convenient routes. There are a limited range of destinations served by direct bus services, although Whitchurch Village is well-served by frequent bus services to Bristol City Centre.

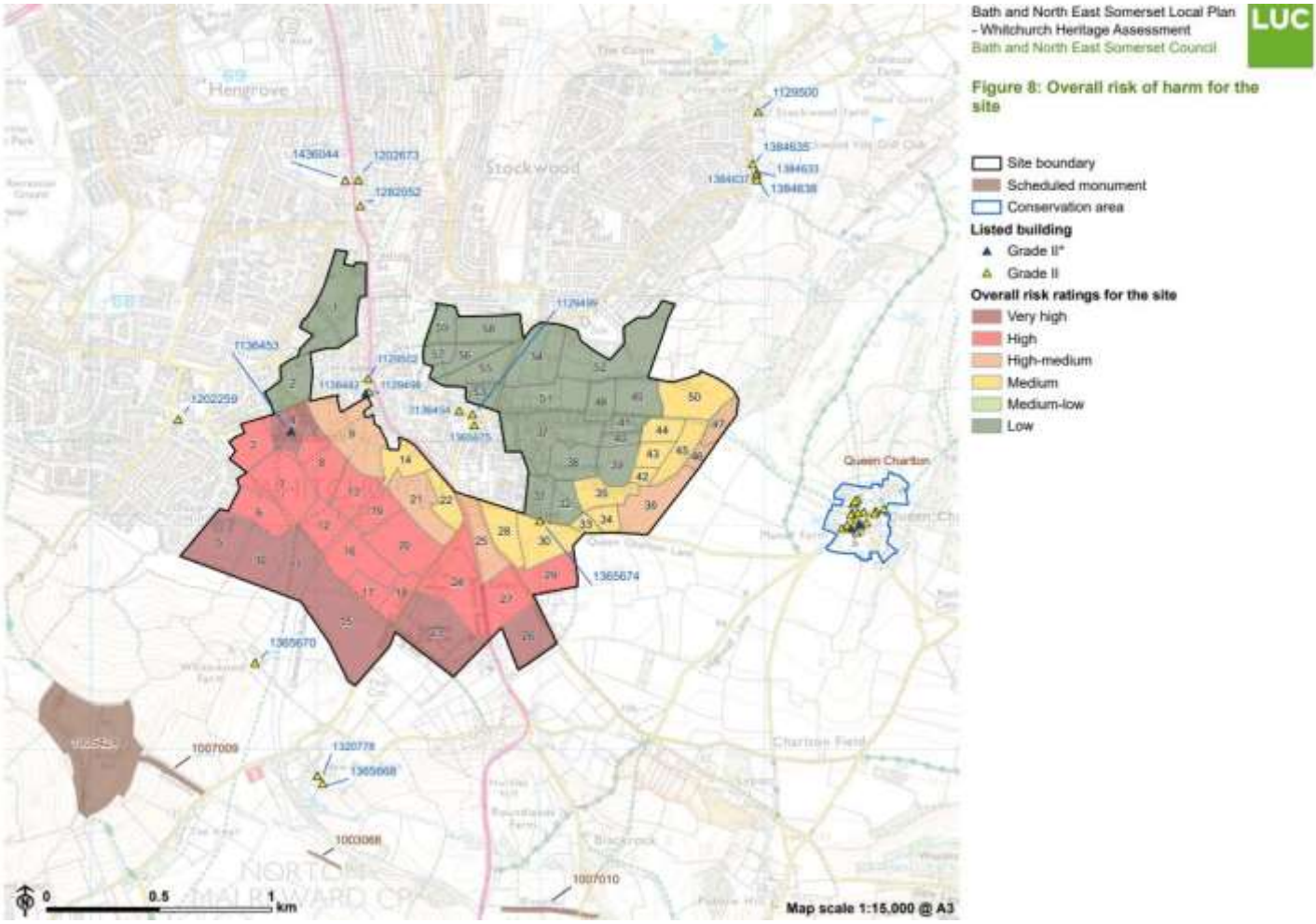
6.84 The WECA Joint Local Transport Plan 4 (JLTP4) identified the South East Bristol Orbital Low Carbon Corridor project as an opportunity to provide a multimodal orbital corridor close to Whitchurch Village to facilitate north/south connectivity. However, this project is now under review through the preparation of WECA Joint Local Transport Plan 5 (JLTP5), which is being prepared in the context of the climate emergency declared by each of the local authorities.

6.85 Various important heritage assets are located within and surrounding the village. Of particular note is Maes Knoll Scheduled Ancient Monument, which is located around 2km to the south west of Whitchurch Village (see figure 36). Maes Knoll is a substantial, univallate fort enclosing the eastern end and highest point of a plateau of high ground running approximately west to east for around 3km from East Dundry. Maes Knoll is a visually prominent local landmark, with its distinctive flat-topped profile visible across large areas of Bristol and north-east Somerset. In turn, views from the site are very extensive, reaching as far as both Severn crossings and a swathe of historic Somerset. The setting of Maes Knoll is defined by its hilltop location. Its elevated location affords panoramic views of the immediate fields on the hillslopes and the green buffer surrounding suburban Bristol.

6.86 A Statement of Heritage Significance and Appraisal of Risk of Harm for all heritage assets in and around Whitchurch Village, including Maes Knoll Scheduled Ancient Monument, has been carried out to inform the preparation of the options set out in this chapter. The diagram below provides a summary of this assessment, indicating, using a RAG rating, the parcels of land on which development would likely cause the most harm to the significance of one or more heritage assets.

6.87 The options shown below for Whitchurch Village have been directed to locations where harm to heritage assets would likely fall within the NPPF definition of ‘less than substantial harm’ or could be reduced by appropriate mitigation such as landscape design solutions. Any future development on land parcels assessed to cause less than substantial harm to a heritage asset will need to weigh this harm against any public benefits that are provided by developing the parcel.

6.88 The full heritage assessment can be viewed at the **following link: INSERT**



Rating	Level of risk of harm to asset
Very high	An area of high importance and sensitivity, where development would have the greatest impact. The development of the site is likely to be of such a scale that the significance of the heritage asset would experience significant harm, up to and potentially including 'substantial harm' for the purposes of the NPPF, with no potential for meaningful mitigation.
High	An area of high importance and sensitivity, where development would have a significant impact. Development of the site is likely to result in a significant harmful impact on the significance of the heritage asset, but this could be reduced (but not removed) via appropriate mitigation.
High-medium	Area of medium-high importance and sensitivity where development would have a harmful impact if no mitigation occurred. Development of the site could result in a harmful impact on the significance of the heritage asset but this impact is likely to fall within the definition of 'less than substantial harm', and/or could be reduced via appropriate mitigation (such as via landscape design solutions).
Medium	Area of medium importance and sensitivity. The development of the site may result in a harmful impact to the significance of a heritage asset but it is likely that these impacts could be avoided via appropriate mitigation (such as via landscape design solutions).
Medium-low	Area of medium to low sensitivity. Potential impact will be of such a minimal scale that the significance of the heritage asset will not be harmed.
Low	Area of low sensitivity, development of the site is likely to result in minimal impact on the significance of the asset. It is likely that no mitigation would be required.

Figure 39: Extract from LUC Heritage Impact Assessment

6.89 The area is also highly sensitive in terms of landscape impact. A Landscape and Visual Impact Assessment was carried out in 2017, which assessed the significance of effects of development on landscape and views for land parcels surrounding Whitchurch Village. The summary results of the assessment are shown on the diagram below. All of the site options for Whitchurch Village include development of parcels rated as having a high or medium-high negative significance of effects. These are noted in the constraints for each site, and if any allocations are proposed in Whitchurch Village at Draft Plan stage, these will need to be informed by additional landscape sensitivity work, and consideration of potential mitigation.

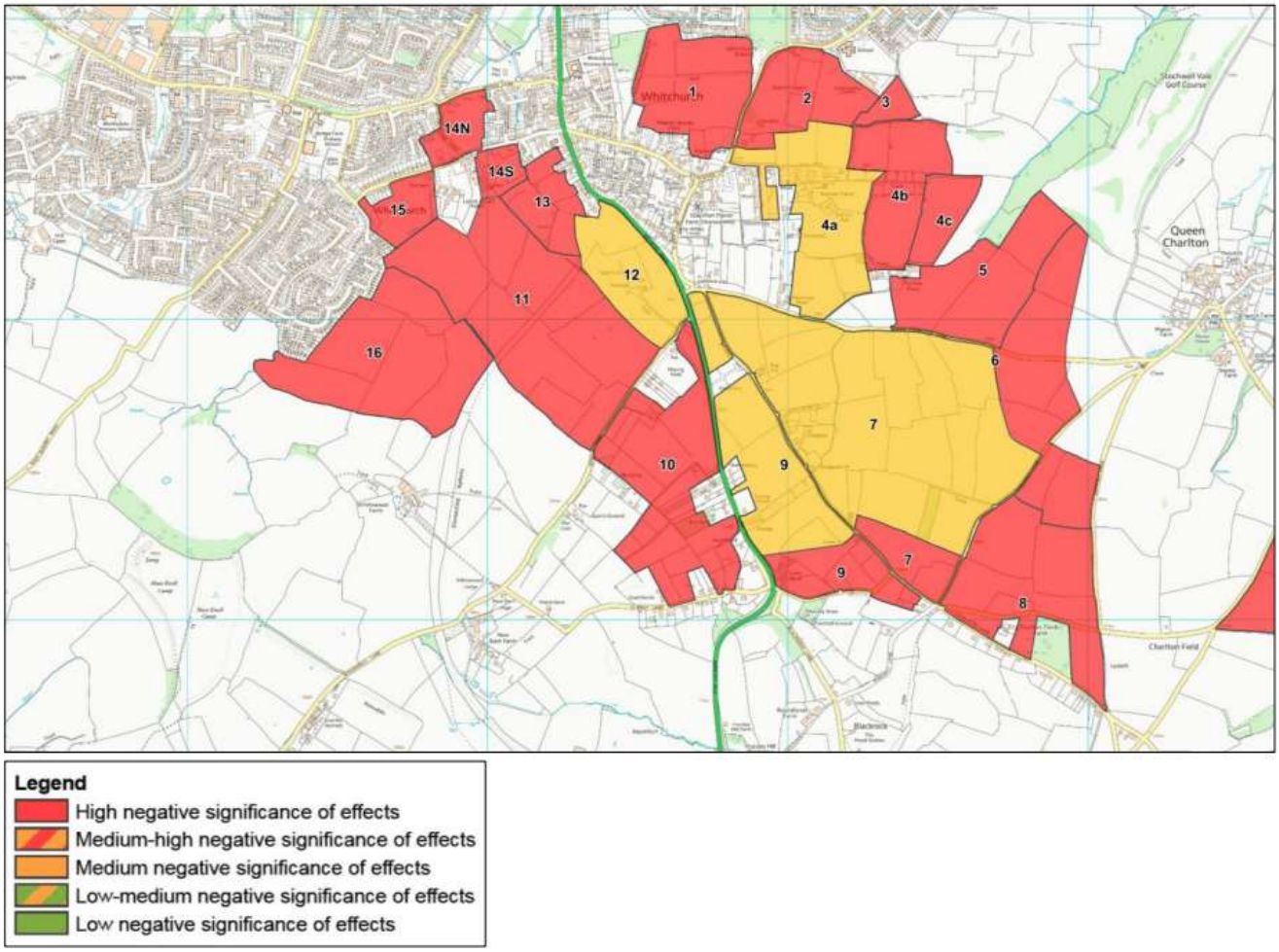


Figure 40: Extract from 2017 Landscape and Visual Impact Assessment

Key Issues and Opportunities

- Lack of employment in the local area results in out-commuting, mostly by car.
- Whitchurch Village is surrounded nearly entirely by Green Belt, separating it from Bristol to the north and west, and Keynsham to the east.

- A number of important heritage assets are located in and around the village, including Maes Knoll and Wansdyke Scheduled Ancient Monuments located to the south west.

- Landscape sensitivity assessments carried out in the area surrounding Whitchurch Village indicate that land located to the south of the village, between the village and Maes Knoll, is of particularly high landscape sensitivity, apart from a small parcel of land directly adjoining the A37 to the west, which is assessed to have a medium landscape sensitivity. Parcels of land directly adjoining the village to the east are also assessed as having a medium landscape sensitivity, becoming more highly sensitive moving further east.

- There is currently no dedicated shop in the village to buy convenience goods, though the existing music shop sells some convenience items. There are a limited number of commercial units, a pub / restaurant, a primary school and sports facilities. Growth of the village in recent years did not include provision of any supporting facilities.

- The village primary school is currently close to capacity, with no space for on-site expansion. The existing school could accommodate pupils from around 150 new homes, but any larger scale of development would need to be supported by a new primary school.

- Secondary age pupils from any new development at Whitchurch Village will need to be transported to Broadlands School in Keynsham, at cost to the Council. These pupils will not be able to travel to school sustainably by active modes.

- High traffic volumes cause congestion issues along the A37 corridor, particularly at peak times.

- Footway widths are narrow at points along the A37, and the carriageway width is frequently constrained by on-street parking.

- The village play park is well-used, but is located along the A37 at the southern end of the village, accessed via a very narrow footpath along A37. A new signalised crossing to be installed as part of the Whitchurch Village Low Traffic Neighbourhood Scheme will improve access to the play park from the east.

- The A37 severs the east and west parts of the village, and there are limited pedestrian crossings across the busy road.

- There are inadequate walking and cycle facilities on the A37 corridor, owing to the constrained carriageway and footway widths along parts of its length.

- There are limited orbital routes available for journeys to the northeast and northwest of the Whitchurch Village for both the private car and sustainable modes.

Priorities and Objectives

6.90 The following list sets out the key priorities and objectives for Whitchurch Village. Many of the priorities can be addressed by new development, and site options have been selected in response to the key issues, priorities and objectives. However, there are some priorities that won't be addressed through new development but will be addressed through other policies in the Local Plan or initiatives undertaken by the Council or by other stakeholders.

- Maximise the delivery of affordable housing responding to local social and economic needs, and local demographics, including provision of homes fit for downsizing and single people.
- Provision of small-scale local employment space in order to provide the opportunity for local residents to be able to access and thrive in good work.
- Retain green buffer between Bristol and Whitchurch Village, in order to ensure that the two do not merge
- Preserve and enhance the settlement's village identity
- Provision of new local facilities such as a village shop, community facilities and spaces to increase social interaction and encourage local living.
- Protect heritage assets and their settings.
- Protect areas of landscape sensitivity.
- Maximise ecological mitigation and Biodiversity Net Gain.
- Create a safe and attractive walking route between the village centre and the existing playground located to the south of the village.
- Enhance connectivity and access to the surrounding countryside including to Maes Knoll through better provision of active travel routes.
- Encourage the use of sustainable travel choices and reduce reliance on car use.

Question: Do you agree with the key issues, opportunities, priorities and objectives for Whitchurch Village?

Transport Opportunities

6.91 Some of the key issues in Whitchurch Village relate to transport and highways, as listed above. A number of transport opportunities and potential interventions have been identified for Whitchurch Village. These interventions will need more detailed consideration whilst working up the Draft Local Plan, including mechanisms for funding them.

- Improving the connectivity for active travel, reducing the severance of the A37 corridor.
- Improving access routes for pedestrians to facilities including the South Bristol hospital and Leisure Centre, to reduce the need to travel further afield.
- Improving public spaces and routes, including crossing facilities, to encourage people to use active modes of travel, including:
    - Building on the success of the existing Liveable Neighbourhood scheme at Queen Charlton Lane to create greener, safer spaces for people, and;
    - New signalised pedestrian and cycle crossings on the busiest routes to improve safety of those using active travel modes.
- Identifying minor rural roads to be designated as Quiet Lanes to provide safer routes for active travel, away from speeding traffic.
- Extension of short-term E-scooter and E-Bike rental within Whitchurch Village.
- Provision of a mobility hub in Whitchurch Village on the A37, providing a host of transport options in one place, allowing people to change modes easily between shared transport such as car clubs and e-scooters, public transport and active travel modes.
- Bus priority measures could be considered and provided along the A37 corridor.
- There is a need for Whitchurch Village to have good access to the facilities and services in Keynsham, such as Broadlands Academy. A new bus service between Keynsham and Whitchurch Village would fill a gap in the existing provision.

- Demand Responsive transport (DRT) can complement fixed route public transport on the main corridors by providing connections into these existing services. WESTLink South zone currently runs through the middle of Whitchurch Village. DRT could be used to connect to the proposed mobility hub within Whitchurch Village, where passengers can gain access to a connecting bus or rail service to complete their journey.

What do you think of the transport opportunities and potential interventions for Whitchurch Village?

Site Options

6.92 A variety of site options for development are set out below, which have been prepared in response to the key issues, priorities and objectives set out above. Explanation as to how each of the site options responds to the key issues, priorities and objectives is set out within the opportunities and constraints tables for each site option. Where mitigation or additional evidence work is required to achieve priorities and objectives, this is referenced within the table.

6.93 Following consultation on these site options, a detailed assessment of the transport impact of each site will be undertaken, to inform selection of sites to be included in the Draft Plan. The cumulative impact of all sites included in the Draft Plan will also be assessed. Any site allocations in the Draft Plan will define site specific interventions required.

6.94 Options 1 and 2 provide around 500-600 new homes. This is the minimum number of homes considered to be required to support a new primary school in the village. This quantum of development is also more likely to be able to support the provision of other facilities such as a new village shop.

6.95 Options 3 and 4 provide 150 new homes. This is the maximum number of homes considered able to be supported by the existing village primary school. This quantum of development would be unlikely to support provision of other facilities for the village.

Are there any other sites that haven't been identified, that need to be considered?

Whitchurch Village Option 1: Land to the west and east of the A37

6.96 Option 1 includes:

- Land located to the west of the A37, between Norton Lane to the south, and Blackacre to the north, and

- A triangle of land to the east of the A37, between the A37 and Queen Charlton Lane.

6.97 The land is primarily used as arable fields. However, the Bristol Barbarians RFC club is located in the south-eastern part of the area, which would need to be relocated to the south if this option was to be taken forward.

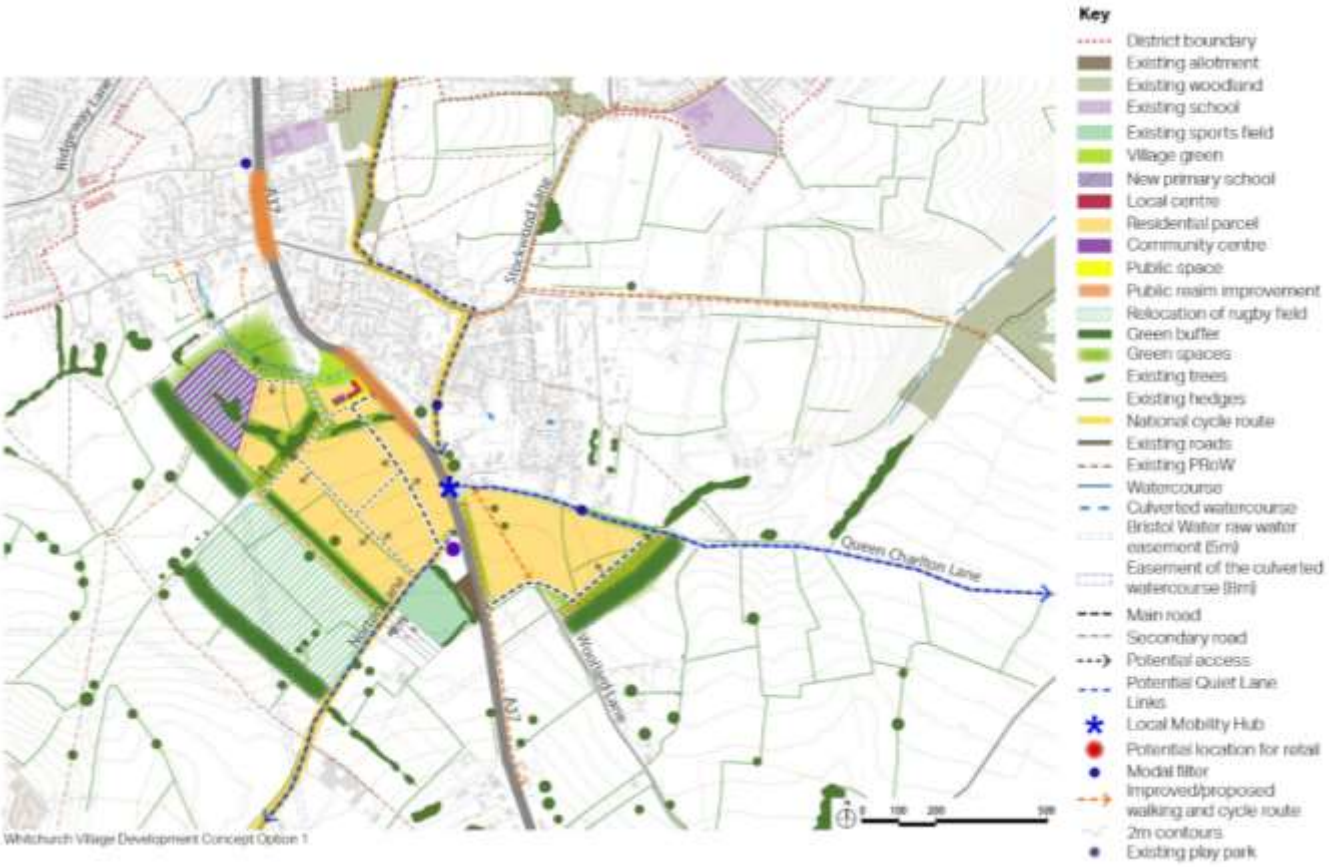
6.98 The site is located in the Green Belt. The Strategic Green Belt Assessment carried out by WECA to inform the now halted Spatial Development Strategy assesses these land parcels (P92, P93 and P94) as making the following contribution to each of the NPPF Green Belt purposes:

- Purpose 1 - checking the unrestricted sprawl of large built-up areas: P92, P93 and P94 significant contribution

- Purpose 2 - preventing the merger of neighbouring towns: P92 moderate contribution, P93 and P94 limited / no contribution

- Purpose 3 – safeguarding the countryside from encroachment: P92 and P94 significant contribution, P93 moderate contribution

- Purpose 4 - Preserving the setting and special character of historic towns: P92, P93, P94 limited / no contribution



Whitchurch Village Option 1	
Opportunities	Provision of around 500-600 homes, plus extension of existing village centre along A37, with provision of a primary school, village green, village shop, and other community facilities. Located close to the existing village centre, and with good access by active travel modes to facilities located in Whitchurch Bristol. Safe and attractive walking route from north west end of village to existing village playground. Public realm improvements along the A37 to improve pedestrian and cycle connectivity, with local mobility hub connecting to national cycle route.

Constraints	Located in the Green Belt. Requires relocation of rugby club further south. Further exploration required relating to whether relocated rugby club could be adequately accommodated within the existing hedgerow network, with buffers. The majority of this option is located within areas assessed to have either a high-medium, or medium risk of harm to heritage assets in the area. In these areas it is considered that development could result in a harmful impact on the significance of heritage assets but this impact is likely to fall within the definition of 'less than substantial harm', and/or could be reduced via appropriate mitigation (such as via landscape design solutions). Some of the land parcels located to the south west of the option are located in areas assessed to have a high risk of harm to heritage assets, where it is considered that development would likely result in a significant harmful impact on the significance of heritage assets, but that this could be reduced (but not removed) via appropriate mitigation. Any harm will need to be weighed against public benefits that are provided by developing the parcel. Development would impact historic field pattern to the west of A37. Located in area of high landscape sensitivity – further assessment and consideration of appropriate mitigation required. Secondary school pupils would need to be transported to Broadlands in Keynsham at cost to the Council, and would not be able to reach school using actives modes. Although located close to the existing village centre and facilities within Whitchurch Bristol, without improved public realm and crossings along A37, severance with the existing village could occur.
Mitigation required	Careful consideration of pedestrian and cycle crossings required within public realm improvements to alleviate severance issues. Significant green infrastructure and planting required throughout and along the edge of the development parcels, to provide softening to edges of development, and mitigate impact on landscape and heritage assets located to the south.

Further evidence required	Landscape sensitivity assessment and mitigation. Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district. Further heritage assessment required relating to levels of harm to heritage assets, and consideration of weight of harm against public benefit. Impact of development on historic field patterns to be considered.

Whitchurch Village Option 2: Eastern extension of the village

6.99 Option 2 comprises:

- A triangle of land located directly east of the A37 between the A37 and Queen Charlton Road, and
- Land adjoining the village to the east, currently occupied by Horseworld.

6.100 The site is located in the Green Belt. The Strategic Green Belt Assessment carried out by WECA to inform the now halted Spatial Development Strategy assesses these land parcels (P92) as making the following contribution to each of the NPPF Green Belt purposes:

- Purpose 1 - checking the unrestricted sprawl of large built-up areas: significant contribution
- Purpose 2 - preventing the merger of neighbouring towns: moderate contribution
- Purpose 3 – safeguarding the countryside from encroachment: significant contribution
- Purpose 4 - Preserving the setting and special character of historic towns: limited / no contribution

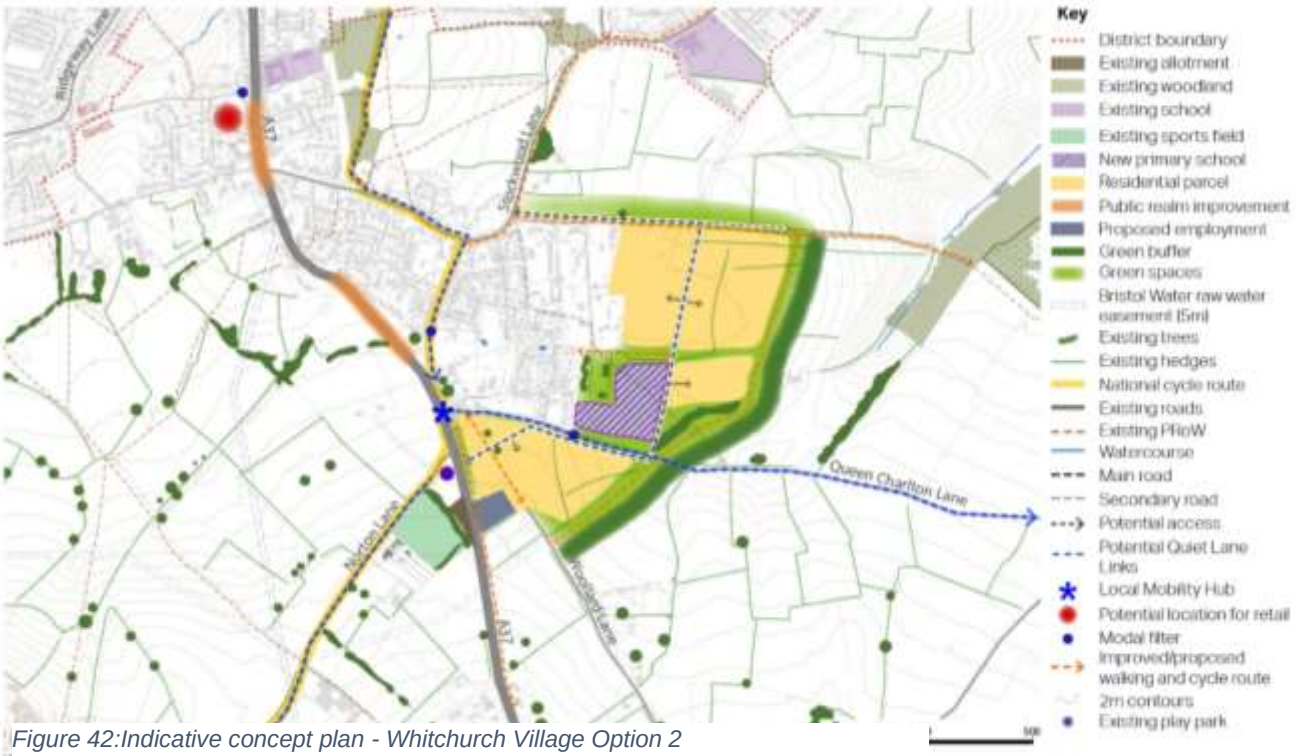


Figure 42:Indicative concept plan - Whitchurch Village Option 2

Whitchurch Village Option 2	
Opportunities	Provision of around 500-600 homes. Residential-led mixed-use development, including provision of a primary school and small-scale employment space. Public realm improvements along the A37 to improve pedestrian and cycle connectivity, with local mobility hub connecting to national cycle route. Development in location less sensitive in heritage and landscape terms. Opportunity to improve access for residents into Stockwood Vale Valleys, and walking routes across to Keynsham.
Constraints	Located in the Green Belt. Not considered to be a particularly good location to provide a village shop, due to distance from existing village centre and the A37. Significant walking distances from eastern edge of development parcels to existing village centre, and facilities located in Whitchurch Bristol. Land parcels making up this option are located within areas assessed to have either a low risk of harm to heritage assets, or in areas of high-medium, or medium risk of harm to heritage assets. In the latter two areas it is considered that development could result in a harmful impact on the significance of heritage assets, but this impact is likely to fall within the definition of 'less than substantial harm', and/or could be reduced via appropriate mitigation (such as via landscape design solutions). Any harm will need to be weighed against public benefits that are provided by developing the parcel. Secondary school pupils would need to be transported to Broadlands in Keynsham at cost to the Council, and would not be able to reach school using actives modes.

Mitigation required	Significant green buffer required to eastern edge, to protect views from Queen Charlton Conservation Area. Green infrastructure required along A37 to soften edge of development parcel when viewed from heritage assets located to the south west.
Further evidence required	Landscape sensitivity assessment and mitigation. Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district. Further heritage assessment required relating to levels of harm to heritage assets, and consideration of weight of harm against public benefit.

Whitchurch Village Option 3: Land to the west of the A37 (150 homes)

6.101 Option 3 comprises a small parcel of land located to the west of the A37, accessed directly from this road. The land is currently used as arable fields, and sits to the rear of a single row of residential units located along the A37.

6.102 This option is capped at 150 new homes, which is the quantum considered to generate the number of primary school aged children that could be accommodated by the existing primary school.

6.103 The site is located in the Green Belt. The Strategic Green Belt Assessment carried out by WECA to inform the now halted Spatial Development Strategy assesses these land parcels (P93) as making the following contribution to each of the NPPF Green Belt purposes:

- Purpose 1 - checking the unrestricted sprawl of large built-up areas: significant contribution
- Purpose 2 - preventing the merger of neighbouring towns: limited / no contribution
- Purpose 3 – safeguarding the countryside from encroachment: P93 moderate contribution
- Purpose 4 - Preserving the setting and special character of historic towns: limited / no contribution



Figure 43: Indicative concept plan - Whitchurch Village Option 3

Whitchurch Village Option 3	
Opportunities	Provision of 150 homes Quantum of housing able to be accommodated at existing primary school. Located close to the existing village centre, and with good access by active travel modes to facilities located in Whitchurch Bristol. Public realm improvements along the A37 to improve pedestrian and cycle connectivity, with local mobility hub connecting to national cycle route.
Constraints	Located in the Green Belt. Potential to cause a medium level of harm to the significance of St Nicholas Church and Lyons Court Farmhouse. This harm is likely to fall within the NPPF definition of 'less than substantial harm', and/or could be reduced via appropriate mitigation (such as via landscape design solutions). Development would impact on historic field pattern to the west of A37. Located in area of high landscape sensitivity – further assessment and consideration of appropriate mitigation required. Secondary school pupils would need to be transported to Broadlands in Keynsham at cost to the Council, and would not be able to reach school using actives modes. Although located close to the existing village centre and facilities within Whitchurch Bristol, without improved public realm and crossings along A37, severance with the existing village could occur.

Mitigation required	Careful consideration of pedestrian and cycle crossings required within public realm improvements to alleviate severance issues. Significant green infrastructure and planting required throughout and along the edge of the development parcels , to provide softening to edges of development, and mitigate impact on landscape and heritage assets. 50m green buffer required along south and west edges of development parcels, to mitigate harm to heritage and landscape assets, including Lyon's Court Farm and Maes Knoll.
Further evidence required	Landscape sensitivity assessment and mitigation. Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district. Impact of development on historic field patterns to be considered. Further heritage assessment required relating to levels of harm to heritage assets, and consideration of weight of harm against public benefit.

Whitchurch Village Option 4: Eastern extension of the Village (150 homes)

6.104 Option 4 comprises a parcel of land located to the east of the village, currently occupied by Horseworld.

6.105 This option is capped at 150 new homes, which is the quantum considered to generate the number of primary school aged children that could be accommodated by the existing primary school.

6.106 The site is located in the Green Belt. The Strategic Green Belt Assessment carried out by WECA to inform the now halted Spatial Development Strategy assesses these land parcels (P92) as making the following contribution to each of the NPPF Green Belt purposes:

- Purpose 1 - checking the unrestricted sprawl of large built-up areas: significant contribution
- Purpose 2 - preventing the merger of neighbouring towns: moderate contribution
- Purpose 3 – safeguarding the countryside from encroachment: significant contribution
- Purpose 4 - Preserving the setting and special character of historic towns: limited / no contribution



Figure 44:Indicative concept plan - Whitchurch Village Option 4

Whitchurch Village Option 4	
Opportunities	Provision of around 150 homes. Development in location less sensitive in heritage and landscape terms. Opportunity to improve access for residents into Stockwood Vale Valleys. Quantum of housing able to be accommodated at existing primary school.
Constraints	Located in the Green Belt. Significant walking distance to existing village centre, and from facilities located in Whitchurch Bristol. Secondary school pupils would need to be transported to Broadlands in Keynsham at cost to the Council, and would not be able to reach school using actives modes.
Mitigation required	50m green buffer required to eastern edge, to protect views from Queen Charlton Conservation Area.
Further evidence required	Landscape sensitivity assessment and mitigation. Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district.

Question: Do you support development at Whitchurch Village?

Question: If you support development, which option do you prefer?

Please provide reasoning.

7 Somer Valley: Vision, Strategy and Options

Strategy Overview and Key Issues

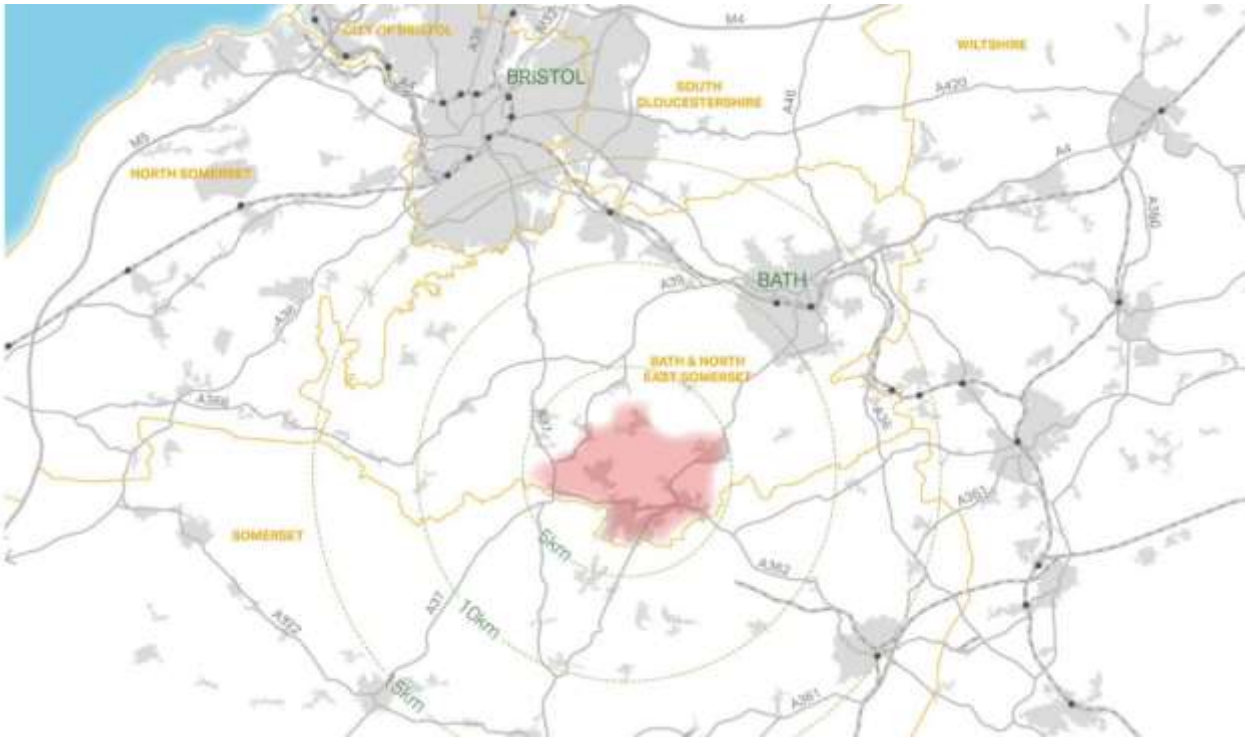


Figure 45: Map showing location of the Somer Valley

7.1 The section below relates to the Somer Valley area illustrated on the map above and primarily outlines context, key issues, priorities and opportunities. It is followed by sections on specific places within the Somer Valley.

7.2 The Somer Valley area covers a large area including many larger and smaller settlements surrounded by hilly countryside and attractive green spaces. The larger settlements are Midsomer Norton, Radstock, Westfield, Paulton and Peasedown St John and these settlements all have their own character and different amenities.

7.3 The area has a rich industrial and mining history, and this heritage is visible in both the settlements and landscape. Some of the paths to the old mines are still in use and old railway lines and the canal have found a more recreational use. The batches from former mining work characterise the surrounding landscape and can have high ecological value and nature recovery potential.

7.4 There has been significant population growth in the Somer Valley between the 2011 and 2021 censuses with 36,546 people recorded in the 2011 Census, which increased to 52,264 residents in 2021. In terms of household size, the largest percentage of households in the Somer Valley are made up of two people. There is a high level of out commuting and a high level of car use.

7.5 Manufacturing, Construction, and Transport & Storage are the most concentrated sectors for employment in the Somer Valley relative to Bath and North East Somerset as a whole. The Somer Valley's absolute employment numbers in Construction, Professional, Scientific & Technical, Administrative & Support Services, and Human Health and Social Work have increased, and there has been growth in other sectors as well. There have been significant employment losses in Manufacturing in the Somer Valley in recent decades.

Transport

7.6 The Somer Valley has a dispersed settlement pattern, an undulating topography and is physically distant to other key settlements such as Bristol and Bath. Somer Valley has relatively limited dedicated cycle infrastructure and no railway provision and therefore, to access rail services residents need to travel to Bath, Bristol or Frome. There is a lack of bus connections between the east and west of the Somer Valley, poor services in more rural areas and lack of connections between villages. The principal roads within the Somer Valley are the A367, A37, A362 and A39.There is typically congestion during peak hours on the A367, A362 and A39. Congestion and the associated impact of traffic is also experienced within the Somer Valley, notably in the centres of Radstock and Midsomer Norton.

Duty to co-operate

7.7 Somerset Council administrative area is located directly to the south of the Somer Valley. Therefore, we are engaging with Somerset Council to discuss strategic cross-boundary matters such as housing provision, transport and other infrastructure.

Key Issues

- The Somer Valley area has had significant housing development over the adopted Local Plan period from 2011. However, that has been delivered on a piecemeal basis with little infrastructure provision resulting from and needed to serve development.

- Restructuring of the local economy has resulted in some businesses closing and an increase in out-commuting.

- Midsomer Norton and Radstock town centres have limited footfall due to the lack of diversity in retail offers, as well as a lack of an attractive food and beverage offer.

- There is a lack of sustainable and active travel links in the area, and steep topography creates a constraint to active travelAccess to public transport is patchy, and within some areas access is very limited. Bus provision has been reduced in recent years.

- The A37 is a major road that runs through several towns and villages and creates a severance barrier in these communities.

- The Somer Valley has a rich mining heritage, but it could be better promoted and curated.

- There is a lack of wayfinding which impacts residents and visitors ability to access the countryside.

Priorities and Objectives

- Facilitate opportunities to enable existing businesses to be retained and new employers attracted to the Somer Valley, in both established and emerging sectors, and generate a range of jobs that will mean local residents have access to and can thrive in good work

- Provide homes to help meet need, including the provision of homes that are affordable, and a mix of homes to meet the varying accommodation needs of the population, including homes for older people.

- New development should complement the Radstock Town Centre Regeneration Action Plan and the Midsomer Norton Heritage Action Zone aiming to increase footfall to these town centres.

- The Local Plan Partial Update removed the allocation at South Road car park for a supermarket. Opportunities for the use of the site will be reviewed alongside the wider regeneration of Midsomer Norton Town Centre.

- New development should complement the Somer Valley Rediscovered Project to provide greater opportunities for people to engage with and enable nature recovery.

- The Somer Valley has health and wellbeing needs that the built and natural environment can play a role in addressing. The Somer Valley has high levels of childhood obesity, people living in poverty, and levels of physical inactivity, and poor adult mental health. It is also an area with lower levels of active travel.

- New development should complement the Somer Valley Links project to provide a greater choice of transport via sustainable and active travel (walking, cycling, wheeling and public transport).

- WECA have allocated funding to explore the feasibility of mine water heat recovery form district heating.

Question: Do you agree with the key issues, priorities and objectives for the Somer Valley?

Opportunities

Transport Opportunities

7.8 Some of the key issues in the Somer Valley relate to transport and highways. A number of transport opportunities and potential interventions have been identified for the Somer Valley. These interventions will need more detailed consideration whilst preparing the Draft Local Plan, including mechanisms for funding them.

7.9 The area can be improved in terms of active travel, currently there is a high level of out community and limited active travel links. Dedicated cycle links can be improved and a network of quiet lanes identified. The extension of e-bike and scooter rental could be provided within the Somer Valley. Development should be located in areas with access to shops and services allowing people to live locally.

7.10 The public transport system is being enhanced through the Somer Valley Links project. Through this project bus infrastructure is being improved including the provision of mobility hubs and bus priority lanes. Zero emission buses will help to achieve net zero targets and cleaner air.

Green Infrastructure Opportunities

7.11 Green infrastructure is a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, and communities. To enhance and extend the network green infrastructure should be central to the design of new developments, and development proposals should demonstrate strong links to the wider green infrastructure network.

7.12 Some of the site options set out in this chapter include reference to ‘Strategic Green Infrastructure Opportunities’, which are located outside of the area shown for potential development. These indicate areas where the Council consider that green infrastructure could be provided or improved to meet Natural England green infrastructure standards, and may also offer nature based solutions to address issues such as flooding and nature recovery. New and enhanced green infrastructure will either be funded by development in the area, or through other mechanisms to be explored as we prepare the Draft Local Plan.

Site Options

7.13 A variety of site options for development are set out for each place below, which have been prepared in response to the key issues, priorities and opportunities. Explanation as to how each of the site options responds to the key issues, priorities and objectives is outlined within the opportunities and constraints tables for each site option. Where mitigation or additional evidence work is required to achieve priorities and objectives, this is referenced within the table, as well as any conflicts with priorities and objectives. Each site has sub options relating to the quantum of development that can be achieved.

7.14 Following consultation on these site options, a detailed assessment of the transport impact of each site will be undertaken, to inform selection of sites to be included in the Draft Plan. The cumulative impact of all sites included in the Draft Plan will also be assessed. Any site allocations in the Draft Plan will define site specific interventions required.

7.15 On their own each site would not require extensions to existing secondary schools. However, secondary schools in the Somer Valley cover a wide catchment area and therefore if a number of sites were to come forward for development then the cumulative impact on the secondary schools will need to be considered at the site allocation stage in the Draft Local Plan.

Are there any other sites that haven't been identified, that need to be considered?

Peasedown

Place Profile

7.16 Peasedown St John is located to the south west of Bath. The village sits on top of a plateau above the Cam Brook and Wellow Brook Valleys. Both brooks whilst designated as SNCIs, have potential for nature recovery and habitat enhancement. The village has a population of approximately 6,500.

7.17 The small hamlet of Carlingcott existed before the large 19th century expansion when the Somerset coalfield was expanded as the Industrial Revolution increased demand for coal. By the second half of the 20th century there were at least six collieries within 3km of Peasedown St John. Evidence of the areas mining heritage can be seen within the landscape, most notably Braysdown Colliery batch which sits to the south of the village.

7.18 The south east side of the village was greatly extended in the 1990s which included the provision of a bypass on the A367. The southern boundary of the village is now formed by the Peasedown by-pass. Bath Business Park is located to the south east and is now nearing full occupation.

7.19 The village is served by a number of existing amenities such as a primary school, local shops and sports facilities. There are bus connections along the A367 to both Bath and Radstock.



Figure 46: Context plan - Peasedown St John

Key Issues and Opportunities

- The bypass is a hard boundary to the settlement and residential development on the southern side of the bypass would result in severance issues.
- There is an increased requirement and opportunities for employment in the area in order that local residents can access good jobs.
- Development on the northern side of the A367 would enable easy access to the village centre without the need to cross the bypass.
- The village sits on a busy commuter route between Radstock and Bath
- The primary school should be able to accommodate additional children generated by new development. Secondary age pupils from any new development at Peasedown St John will need to be transported to Writhlington School in Radstock, at cost to the Council. These pupils will not be able to travel to school sustainably by active modes.

Priorities and Objectives

7.20 The following list sets out the key priorities and objectives for Peasedown. Many of the priorities can be addressed by new development, and site options have been selected in response to the key issues, priorities and objectives. However, there are some priorities that won't be addressed through new development but will be addressed through other policies in the Local Plan or initiatives undertaken by the Council or by other stakeholders.

- Expansion of the Bath Business Park would allow for job growth providing local employment opportunities within the Somer Valley, whilst not impacting on the delivery of employment space at the Somer Valley Enterprise Zone.
- New housing development in Peasedown St John should be well connected for pedestrians to the existing village centre to allow for pavement access.
- Provision of renewable energy

Site Options

7.21 The area to the south west of Peasedown St John comprises three fields aligned along the northern side of the A367. While this parcel projects beyond the current boundary of the settlement, it is well connected to the existing urban area and there are clear opportunities to create better connections, particularly in terms of active travel. The land is nestled adjacent to an ancient woodland as well as having a well treed road frontage with hedgerows that reduce intervisibility with other parts of the wider landscape. All of these features and especially the ancient woodland are vulnerable to damage or loss from new development.

7.22 The area has the potential to be developed for residential uses, together with landscape and habitat enhancement/creation. There is also scope for the creation of new public transport and active travel connections back into the village and towards key destinations such as the village centre, the church and primary school.

7.23 The area south of Peasedown St John is open arable fields which were historically part of a local estate and includes parkland trees. There are several Public Rights of Way leading out into the countryside, originating in the village centre of Peasedown St John and extending out through the area to the south of the A367, which forms a hard, southern edge to the village. The existing buildings on the southern side turn their backs to the A367, as does the residential development on the north side of the road. The parcels on the southern side of the A367 are on a skyline which slopes gently towards the south and is clearly visible in medium- and long-distance views across the valley. The visibility of these parcels in some views means this land is not suitable for residential development. The severance of this land from the main village by the A367 limits development opportunities as there are limited opportunities for pedestrian connection back into the village.

7.24 The area to the south of the A367 provides an opportunity for a mobility hub, supporting and connecting with a network of transport interchange hubs to provide seamless, convenient, end-to-end mobility for longer journeys through the district by improving public transport accessibility.

7.25 The remaining land within the HELAA site is not considered appropriate for residential or employment development. However, the site is shown as being ‘unconstrained’ land within the RERAS. Therefore, there is scope to explore the possibility of using the land as a large scale solar PV installation subject to further assessment of landscape impact and mitigation.

7.26 Further to the east, adjacent to the hospital and existing employment site (and, therefore, taking advantage of the existing junction) there is an opportunity for suitably scaled industrial/commercial development. The current development is highly visible within the landscape and therefore any development here would need mitigation to screen the buildings from the surrounding landscape.



Figure 47: Indicative concept plan - Peasedown St John

Peasedown St John	
Opportunities	Addition of up to 200 homes, of which an element would be affordable housing Expansion of Bath Business Park Renewable Energy from solar PV to the south of the village and improved grassland. A new Mobility Hub on the A367 to allow for on going public transport travel into Bath. Highway improvements to existing junctions. Quiet lanes and new roundabouts proposed by the Somer Valley Links project.
Constraints	Landscape character, Conservation Area, highways, Ancient Woodland, green space provision Secondary school pupils would need to be transported to Writhlington School in Radstock at cost to the Council, and would not be able to reach school using actives modes.
Mitigation required	Landscape buffers, highway improvements, biodiversity net gain, planting, provision of on site green space and access to local food growing.
Further evidence required	Archaeological assessment, heritage assessment, confirmation of highways improvements, Landscape Visual Impact Assessment.

Question: Do you support development at Peasedown St John? Please provide reasoning.

Radstock

Place Profile

7.27 Radstock lies within the sunken valley of the Wellow Brook and is surrounded by hillsides, once used by operating collieries. Radstock Conservation Area is extensive, stretching from Lower Writhlington to incorporate elements of Westfield, described as one of England's best preserved coal mining towns and the reason for the Conservation Area designation. The Somerset Coal Canal first opened to support the coal industry which was superseded by the tramway in 1814, it was the role Radstock played as a railway logistics hub to the Somerset Coalfield which spurred expansion. By 1874, the town had two stations on separate lines, the first was the Great Western Railway (from Bristol to Frome via Radstock) and the second was the Somerset and Dorset Railway (from Bath to Poole via Radstock). This had implications for Radstock's morphology, which saw pockets of expansion focused on hillsides close to collieries and away from the heritage core. The town incorporates smaller settlements such as Clandown, Haydon and Writhlington which historically were separate villages.

7.28 The residential areas in the town are served by the town centre which provides a range of retail and other facilities and is proposed to be improved through the Radstock Town Centre Regeneration Action Plan. Other commercial areas are located to the east of the town centre in lowland areas beside Wellow Brook, and the town's sewerage facility is located further east. Coombe End which runs parallel to the A367 in the west, is an area which lacks formal structure comprising small commercial enterprises and residential housing, a former industrial rail line once passed nearby. The Radstock and Somerset Coalfield Museum is located centrally, and Radstock Town Football Club and Dragonfly Leisure are located towards the southern extent of the town, south of Frome Road. Surrounding Radstock Town Football Club there is a playing field and skate play area, and there are further small scale play areas in other areas of the town and allotments north of Springfield Crescent and south of Manor Road. Radstock has two primary schools and two secondary schools.

7.29 Radstock is served by bus services including on the A367 towards Peasedown St John and Bath. But to the south of Radstock areas such as Haydon and Writhlington public transport options are more limited.

Key Issues and Opportunities

- The pedestrian and cycle movement within Radstock town centre is severed due to the busy A367 which cuts through the centre and the highways layout is overly complex.

- Access to the waterfronts is limited within Radstock town centre.

- Radstock town centre has limited footfall due to the lack of diversity in retail offers, as well as a lack of an attractive food and beverage offer.
- There is a strong network of public rights of way and connections to the cycle path. Local residents would like to see access to the countryside improved.
- Public transport has been reduced in the Somer Valley with some areas having very limited access to bus services.
- The Conservation Area covers a large proportion of the town and the boundaries are being reviewed to possibly extend them.
- The town is surrounded by green hillsides which are integral to its landscape character.
- The town's mining heritage has shaped its landscape character.

Priorities and objectives

7.30 The following list sets out the key priorities and objectives for Radstock. Many of the priorities can be addressed by new development, and site options have been selected in response to the key issues, priorities and objectives. However, there are some priorities that won't be addressed through new development but will be addressed through other policies in the Local Plan or initiatives undertaken by the Council or by other stakeholders

- New development should work with the Radstock Town Centre Regeneration Action Plan and help to increase footfall to the town centre.
- New development should complement relevant elements of the Somer Valley Rediscovered Project to provide greater opportunities for people to engage with and enable nature recovery.
- New development should provide a greater choice of transport via sustainable and active travel (walking, cycling, wheeling and public transport). New development can link into the existing public transport network allowing for buses to become more viable.
- Provide homes to meet the needs of the local area, including provision of homes that are affordable.
- Ensure built and natural environments promote health and wellbeing for all.

- Any additional population must be accommodated within existing schools. Writhlington School has limited capacity and additional development could have a negative impact. As such the cumulative impact of potential development sites on the secondary schools will need to be considered.

North Radstock

Context

7.31 Land immediately to the north of Radstock currently consists of agricultural fields, mostly on the plateau above the town. Bath Old Road, a historic route, runs through the area of search and has a few homes dotted along it. Trinity Church School sits at the southern edge with access to Woodborough Lane. The area is close to Radstock town centre in the south and is bordered by countryside to the north and east. The A367 runs along the western edge of the area of search with the small settlement of Clandown immediately beyond.

7.32 Landscape character is an important attribute in this area given that it sits above the rest of the town and forms part of the green setting of Radstock and the Conservation Area. The landscape and visual impacts of any new development would therefore need to be minimised and mitigated by integrating new development within a robust landscape planting framework and ensuring it blends in with the existing hillside that continue to provide a green setting for Radstock..

7.33 A single Scheduled Ancient Monument lies to the north-west of the area, comprising Camerton Romano-British town and associated prehistoric and early medieval monuments. As a consequence of the close proximity to the Scheduled Monument there is some potential for previously unrecorded remains to be present within the area of search, although the part of the area closest to the Scheduled Ancient Monument was subject to landfill and any former archaeological remains would have been removed. There is no record of any remains having been reported during those works.

7.34 Bath Old Road appears to be used as a ‘rat run’ and speed is only limited in the built up areas to the south. There is currently no pavement access to and through parts of the area.. Existing walking, cycling and wheeling connections into the town centre and to Trinity Primary School are poor. Any new development would require and could deliver significant improvements to these connections..

7.35 Works to Bath Old Road to provide a Quiet Lane could help to facilitate active travel. The speed limit would need to be reduced and a new pavement provided giving better pedestrian access into the town centre. Trinity School has room to expand and vehicular access to the school could be improved, for example by providing an additional access from the north. New vehicular access onto the A367 would be needed so that any development is not accessed solely from Bath Old Road and to ensure there is direct access to nearby bus stops.



Figure 48: Context Plan - North Radstock

Site Options

7.36 Site options are presented below that could provide up to 1,000 new homes in total, as well as supporting facilities and green infrastructure. The site options have the potential to create a new neighbourhood with a connection to the A367 and direct access to Radstock town centre via the Bath Old Road. It is a residential and landscape led development with green screening to the north and south and a tree-lined street running through the middle of the development creating a sense of place when arriving at the new neighbourhood and contributing to the landscape setting.

7.37 Other green links to the countryside will run north-south through the development to create biodiversity links, support habitat improvement, provide views to the countryside and improve the connectivity within the neighbourhood.

7.38 The proximity of the development to Radstock town centre will benefit the regeneration strategy for the town centre and should help to increase footfall. Creating a critical mass of residents with easy access to current and new facilities would help the town centre to thrive. The town centre's regeneration will benefit from future public realm improvements focussing on pedestrian safety and accessibility.

7.39 The existing school is close to the proposed local centre, and with good pedestrian links between these facilities. The school will have a direct link to Clandown providing better access on foot for residents, and the school site can be extended to allow for potential future growth in the school age population in Radstock.

Option 1

7.40 The development will extend to the west of the Bath Old Road, with a direct link to Radstock town centre along both the existing Public Rights of Way and routes through the new development. Development is stepped away from the Bath Old Road to preserve its characteristic far-reaching views towards Radstock to the south and open countryside to the north.

7.41 Vehicle access to the development areas can be provided to connect onto the A367 via the Option 1 development area. Bath Old Road could become emergency access only, and will be a key active travel link between the development and Radstock Town Centre, and north to Peasedown St John and the mobility hub.



Figure 49: Indicative concept plan - North Radstock Option 1

North Radstock Option 1	
Opportunities	Approximately 400 homes, of which an element would be affordable housing. The speed of traffic on Bath Old Road could be reduced and new pavement provided. There is potential for a quiet lane. Improved access to Trinity School. Improved access to the countryside and surrounding public rights of way. Green Space Provision and Allotments Connections to the 174 bus along the A367
Constraints	Hillside location with landscape value and close to the Conservation Area. Bath Old Road is used as a rat run and does not have pavement access. Nearby is Camerton Romano settlement which is a Scheduled Ancient Monument. Safeguarded existing sport and recreational facilities (Roundhill Recreational Ground)
Mitigation required	Landscaping and green infrastructure. Additional access to Trinity School. Provision of on-site green space (including provision for local food growing) Mitigation if Roundhill Recreation Ground is lost.
Further evidence required	Archaeological assessment. Detailed Landscape Assessment Heritage Assessment

Option 2

7.42 In addition to option 1, in this option would extend development to the east of Bath Old Road with open space along the north of the residential parcels wrapping around to the east to connect to a new central green space. Located close to the new local centre, the new green space is positioned to maximise accessibility.

7.43 A greater quantum of development allows for additional facilities such as a local centre.



Figure 50: Indicative concept plan - North Radstock Option 2

North Radstock – Option 2	
Opportunities	Approximately 600 homes, of which an element would be affordable housing. The speed of traffic on Bath Old Road could be reduced and new pavement provided. There is potential for a quiet lane. A larger quantum of development can provide new community facilities. Improved access to Trinity School. Improved access to the countryside Green Space Provision and Allotments New local centre Connections to the 174 bus along the A367
Constraints	Hillside location with landscape value and close to the Conservation Area. Bath Old Road is used as a rat run and does not have pavement access. Nearby is Camerton Romano settlement which is a Scheduled Ancient Monument. Proximity to the Conservation Area
Mitigation required	Landscaping and green infrastructure. Additional access to Trinity School. Provision of on-site green space (including provision for local food growing) Mitigation if Roundhill Recreation Ground is lost.
Further evidence required	Archaeological assessment Detailed landscape assessment Heritage Assessment

Option 3

7.44 In addition to option 1 and 2 development proposed is maximised under this option to provide a total of around 1,000 homes. A tree belt within the open space to the east, will help absorb the development in long distance views from the east.

7.45 There is a strategic green infrastructure opportunity on the slopes to the east of the site.



Figure 51: Indicative concept plan - North Radstock Option 3

North Radstock – Option 3	
Opportunities	Approximately 1,000 houses of which an element would be affordable housing. The speed of traffic on Bath Old Road could be reduced and new pavement provided. There is potential for a quiet lane. A larger quantum of development can provide new community facilities. Improved access to Trinity School. Improved access to the countryside and. strategic green infrastructure opportunities. Green Space Provision and Allotments New local centre Connections to the 174 bus along the A367
Constraints	Hillside location with landscape value and close to the Conservation Area. Bath Old Road is used as a rat run and does not have pavement access. Nearby is Camerton Romano settlement which is a Scheduled Ancient Monument. Proximity to the Conservation Area
Mitigation required	Landscaping and green infrastructure. Additional access to Trinity School. Provision of on-site green space (including provision for local food growing). Retention of Roundhill Recreation Ground.
Further evidence required	Archaeological assessment. Detailed landscape assessment Heritage Assessment

Question: Do you support development at North Radstock? Please provide reasoning.

Question: Do you prefer North Radstock option 1, option 2 or option 3?

East Radstock

Context

7.46 The area sits within the existing landscape comprising agricultural fields, enclosed by the valley to the northeast, which forms part of the Wellow Brook valley to the north. To the south of the valley, the landform rises to form a shallow plateau, centred along Green Parlour Road.

7.47 The A362 runs through the area providing vehicular access to both the northern and southern parts of the locality. Development of this area would be an expansion of Writhlington.

7.48 New development would generate the need for new and improved links to the town centre and to the surrounding countryside. The existing five-way junction at Frome Road, Old Road and Manor Road is heavily congested at peak times. In particular, there are schools and associated traffic either side of the junction. Development would require and could help facilitate improvements to the existing junction, which would provide better access to and within the area also better supporting a local centre. In order to enable development and in addition to improving the existing five-way junction, a new junction would need to be created to relieve pressure on the existing five-way junction. Manor Road is currently used as a ‘rat run’ to access Peasedown St John. Braysdown Lane which connects to Manor Road is proposed to be designated as a quiet lane which may help reduce use of Manor Road by cars.

7.49 There are limited public transport connections into the town centre therefore, currently people without a car struggle to access services. The potential to improve public transport connections associated with any development would also need to be explored.

7.50 The area is surrounded by gently rolling, open countryside, easily accessible by existing lanes and new and improved connections. Nearby ancient woodlands would be a natural edge to the development and these areas of planting could be expanded by the creation of a buffer zone, which would provide protection for the ancient woodland and improve biodiversity.

7.51 The area is located at the edge of a rolling and indented plateau with the steep sided valley of the Wellow Brook immediately to the north. It occupies an elevated position on the skyline. It is therefore important that any development retains a green landscape setting of the wider Writhlington area. The existing network of hedgerows, along field boundaries and roads, would also need to be strengthened and new open spaces created to form a landscape setting for any new development. New landscape planting would be needed to soften the visual impact of development. There are also walking connections of paths and lanes into the countryside and scope for more and improved connections.

7.52 Any future development would need to be on land within both B&NES and Somerset Council administrative areas in order to provide a quantum of development necessary to facilitate provision of shops, services and improvements to the road network. This requires ongoing dialogue between the two Councils regarding the potential for future development If development were to be progressed the two councils would also then need to co-operate on their respective Local Plans and work together on preparing a placemaking strategy to facilitate creation of a high quality, sustainable and healthy development well connected to the rest of Radstock and the surrounding area. In addition, the councils would need to liaise on identifying infrastructure requirements and funding arrangements including developer contributions.

7.53 The area of search east of Radstock has the potential to support a reasonably large scale residential-led development, which would also deliver open space, social infrastructure, nature recovery and improved local facilities over the Plan period. Development of this scale and in this location would also support regeneration efforts in the local town centres.



Figure 52: Context plan - East Radstock

Site Options

7.54 Development in this location could provide up to 1,000 homes (although an option for a lesser amount of development is also set out below). If the site is to be developed then the quantum of the development must be viable to allow for and help deliver junction improvements along the A362.

7.55 The vehicular access will be directly off the A362 and the Old Road will be transformed to active travel modes and local vehicular access only.

7.56 The new development would be located partially on the shallow plateau, with existing hedgerows strengthened and new planting established along key access roads and the new footpath and cycleway network, to help integrate the development into the landscape and in views from the east.

7.57 The nearest bus services are located in Radstock town centre, although there may be potential to extend services if critical mass can be achieved, where a Mobility Hub is proposed to facilitate interchange between modes.

7.58 Vehicle access would be provided from routes which provide connections to the A362 and Old Road. To the north, the A362 connects to Radstock town centre and surrounding residential areas. Old Road provides an additional route to Radstock town centre. Access points for active modes can also be provided to both of these routes. Providing a vehicular access onto the A362 offers the potential to reduce the number of traffic movements at the nearby five-ways junction, which could reduce safety and congestion issues.

7.59 A larger development might provide the opportunity to deliver better supporting facilities. Providing supporting facilities offers the potential to improve access to amenities for the local population, reducing distances that people need to travel.

Option 1

7.60 Option 1 would provide 550 homes, along with junction improvements.

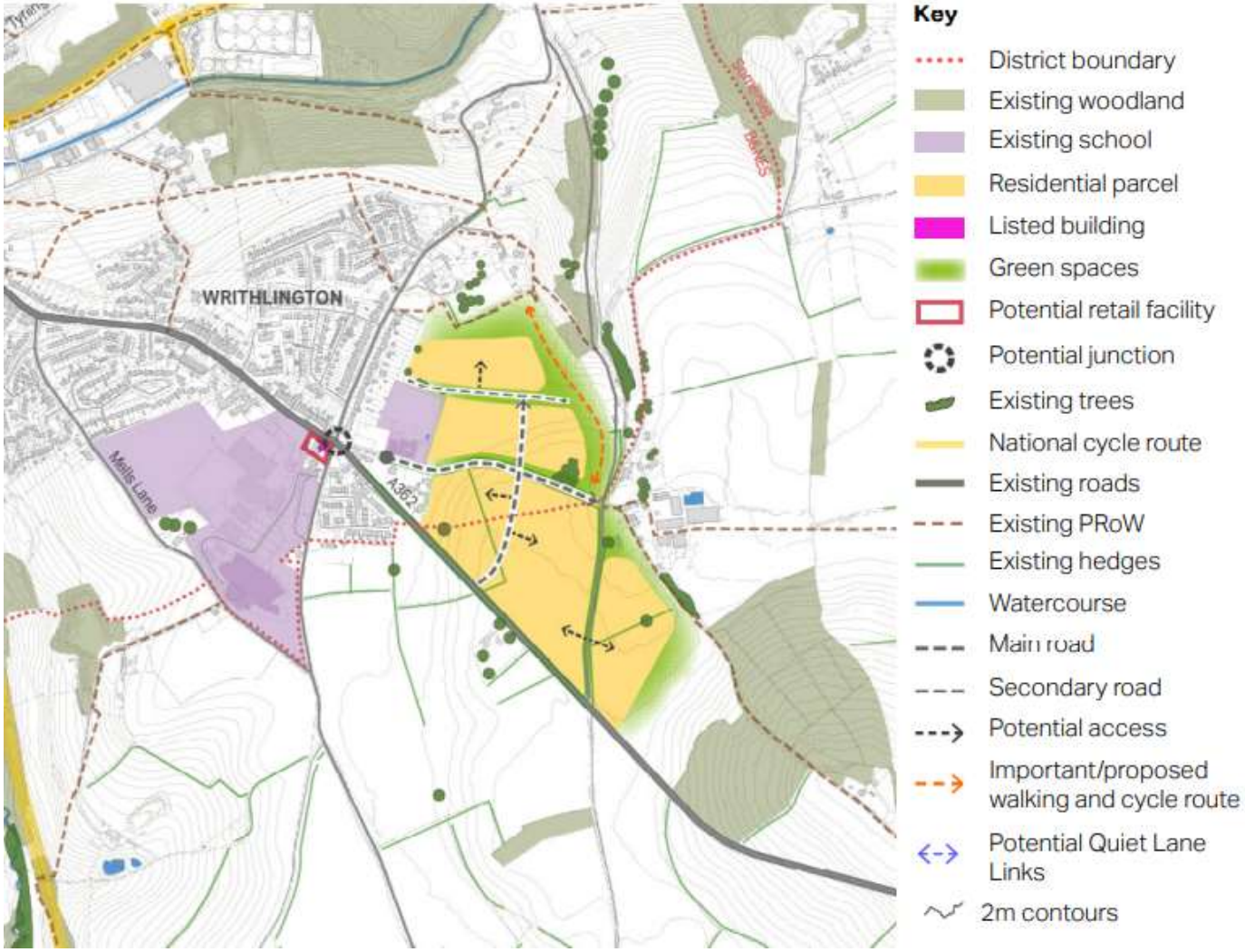


Figure 53: Indicative concept plan - East Radstock Option 1

East Radstock – Option 1	
Opportunities	Addition of up to 550 homes, encompassing an element of affordable housing. New community and recreation facilities. Improvements to existing road junctions. Improve access to the countryside
Constraints	The landscape setting of the existing site. Existing traffic congestion. Cumulative impact on school places
Mitigation required	Additional traffic junction to ease congestion Landscaping Community facilities
Further evidence required	Landscape plan, ecological assessment, highways and traffic assessment

Option 2

7.61 Option 2 would almost double the development potential from option 1. Development is extended to the south with the option to provide new recreation facilities. There would be a further road connection onto Knobsbury Lane.

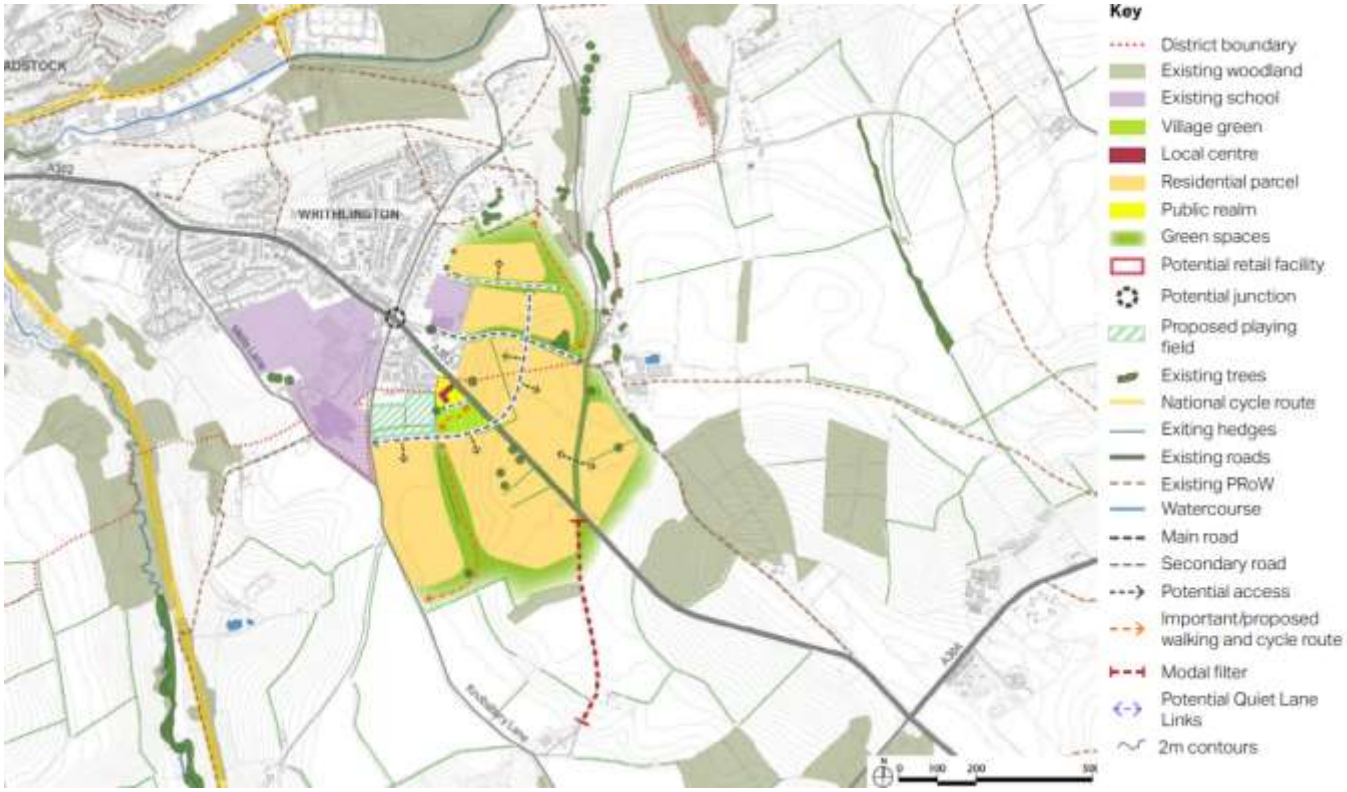


Figure 54: Indicative concept plan - East Radstock Option 2

East Radstock – Option 2	
Opportunities	Provide up to 1,000 homes, encompassing an element of affordable housing. New community and recreation facilities. Improvements to existing road junctions. Improve access to the countryside
Constraints	The landscape setting of the existing site. Existing traffic congestion. Cumulative impact on school places Knobsbury Lane is an important skyline view and would require significant landscape buffering
Mitigation required	Additional traffic junction to ease congestion Landscaping Community facilities
Further evidence required	Landscape plan, ecological assessment, highways and traffic assessment

Question: Do you support development at East Radstock? Please provide reasoning.

Question: Do you prefer option 1 or option 2?

West of the Enterprise Zone

Place Profile

7.62 The area west of the land allocated for the Somer Valley Enterprise Zone is currently an agricultural field with overhead power lines running across it. While the power lines prohibit other forms of development, the openness and size of the parcel provides an opportunity for developing solar PV at a scale supported by habitat improvement. The adjacent enterprise zone allocation will be a good neighbour to an energy generation facility. The site is classed as being unconstrained land within the RERAS.

7.63 Wellow Brook is a natural edge to any potential development to the south and can be part of an enhanced green infrastructure network. There is an opportunity to create a recreational route along Wellow Brook providing access to the wider area.

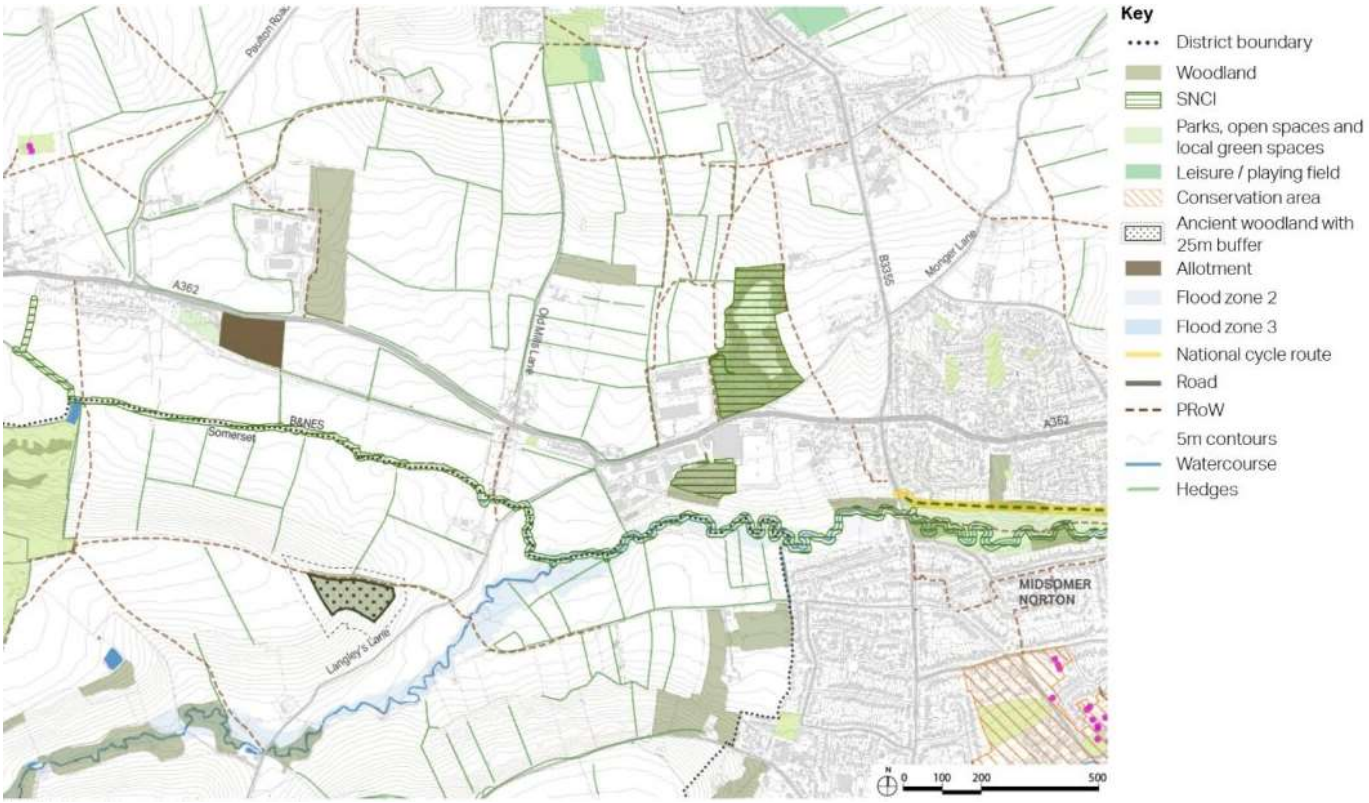


Figure 55: Context plan - West of the Enterprise Zone

Key Issues

- Impact of renewable energy on the surrounding landscape. The proposed PV panels will need to be designed and sited so as to best integrate with the surrounding landscape.

- Transport connections between Midsomer Norton and Farrington Gurney
- Within the context of the climate emergency and spatial priorities of the Local Plan there is a requirement within B&NES to provide renewable energy as the current target is not being met.
- Comprehensive landscaping and nature recovery plan
- Connections to walking and cycling routes

Site Option

7.64 The proposal for this area is to develop the land on both sides of the A362 for renewable energy generation (solar PV). Development of this sort is in keeping with the priority to facilitate opportunities for renewable energy generation to help B&NES become carbon neutral and nature positive by 2030, and work towards becoming a climate resilient district. The solar PV would need to integrate with the existing landscape character and improve biodiversity and habitats.

7.65 The solar PV would be located within the existing network of hedgerows and tree belts along the disused railway line and the Wellow Brook. These should be strengthened to fill gaps in hedgerows and help integrate the solar panels into the landscape, making them less obvious in views from existing roads and Public Rights of Way.



Figure 56: Indicative concept plan - West of the Enterprise Zone

West of the Somer Valley Enterprise Zone	
Opportunities	Walking and Cycling connections between Midsomer Norton and Farrington Gurney. Provision of renewable energy to help meet the council's renewable energy targets.
Constraints	Landscape sensitivity. Adjacent to Wellow Brook Access to the A362.
Mitigation required	Landscaping plan Buffer to nearby SNCI at Wellow Brook
Further evidence required	Information on Grid Capacity Landscape Visual Impact Assessment

Question: Do you support renewable energy development to the West of the Somer Valley Enterprise Zone? Please provide reasoning.

Farrington Gurney

Place Profile

7.66 Farrington Gurney sits on the junction of the A37 and A362 and has good access to the surrounding towns and cities. The village already supports a variety of facilities including a school, pub, restaurant and a community facility.

7.67 The Somer Valley links project and Somer Valley Enterprise Zone will provide an off road cycle path into Midsomer Norton. The Somer Valley links project proposes a new mobility hub at Farrington Gurney.

7.68 Historically, the development of the village has moved away from St John's Church, which is a listed building and now stands on its own in fields to the east of the village. The setting of the church will be an important consideration for any development proposals.

7.69 Farrington Gurney is surrounded by rolling, relatively flat countryside. The gentle escarpment to the south creates a boundary for any proposed development. The Nature Reserve at Hollow Marsh and countryside are accessible via local Public Rights of Way.

7.70 The main constraint is that almost all of the land within the area of search is classified as Grade 1 in the Agricultural Land Classification, and land adjacent, to the south, is classified as Grade 3a. Grade 1 and 3a, are referred to as 'best and most versatile' land, where development should be avoided.

7.71 There are opportunities for a good size residential and landscape-led development. The new mobility hub along the A37 would help to achieve a net zero carbon development, and active travel is promoted throughout the development.

7.72 To improve walking, cycling and wheeling permeability throughout the village, the existing main roads need to be downgraded and vehicle speeds need to be reduced to provide improved pedestrian safety. Where possible, the existing pedestrian and cycle routes need to be improved and widened. A thorough archaeological investigation would be needed as part of the planning and development process.

7.73 There is an Air Quality Management Area within Farrington Gurney at the junction of the A37 and A362. The area is expected to become compliant at the end of 2023 and the latest monitoring data on air quality is awaited. However, an increase in development to the village may impact on air quality and any new development may need to contribute financial contributions to manage air quality.

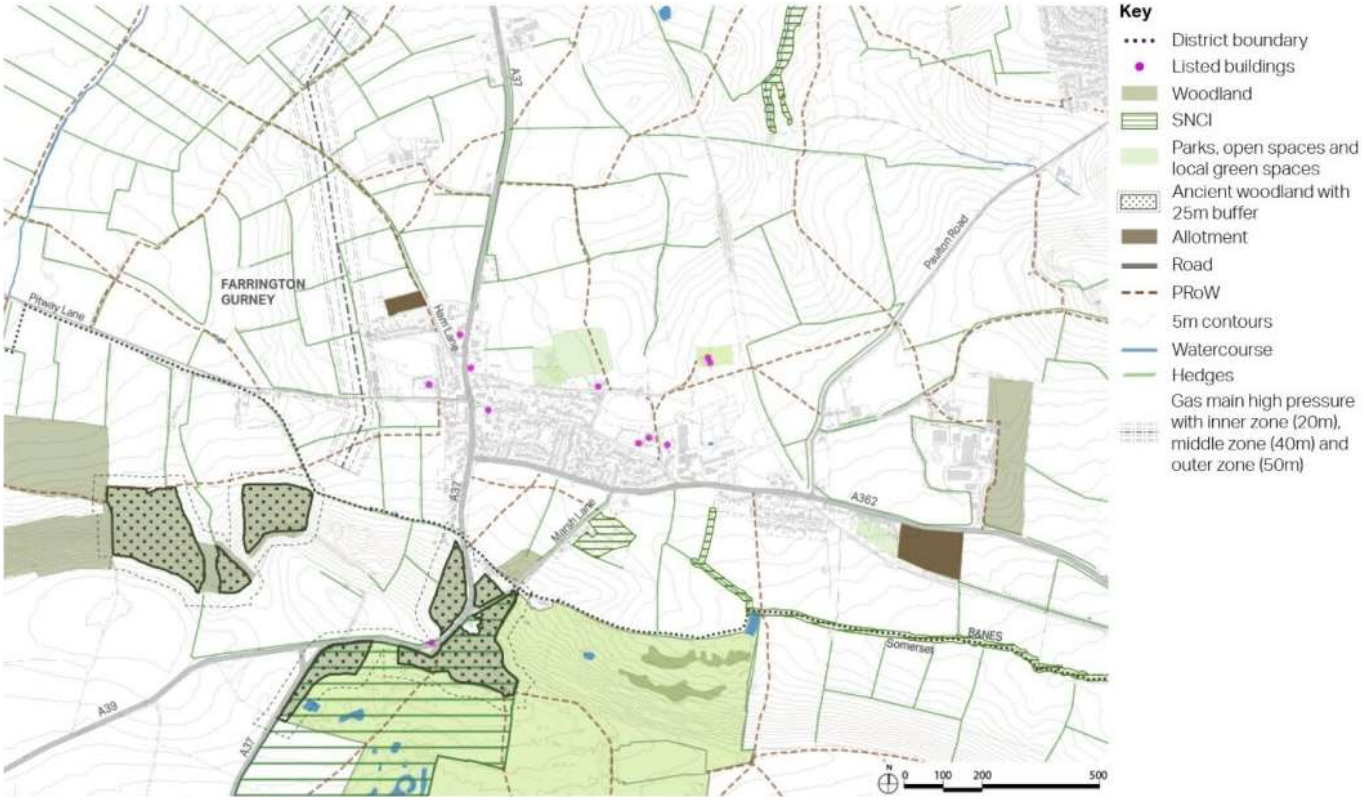


Figure 57: Context Plan - Farrington Gurney

Key Issues

- Setting of the existing Grade II listed church.
- Setting of the surrounding landscape.
- Impact of development on the existing highway network and access to public transport
- Impact on the Farrington Gurney Air Quality Management Area (AQMA)
- Lack of housing that is affordable.
- Secondary age pupils from any new development at Farrington Gurney will need to be transported to Norton Hill School in Midsomer Norton, at cost to the Council. These pupils will not be able to travel to school sustainably by active modes.

Priorities and Objectives

7.74 The following list sets out the key priorities and objectives for Farrington Gurney. Many of the priorities can be addressed by new development, and site options have been selected in response to the key issues, priorities and objectives. However, there are some priorities that won't be addressed through new development but will be addressed through other policies in the Local Plan or initiatives undertaken by the Council or by other stakeholders.

- Around 500 homes could be provided, including housing that is affordable and meets local needs
- The existing primary school is full, with no room to expand. Therefore, a new school would need to be provided which influences the scale or quantum of development required.
- Opportunities to improve local services and facilities.
- There is an opportunity to connect to the Somer Valley links project which along with the Somer Valley Enterprise Zone will provide an off-road cycle link to Midsomer Norton. This will provide cycle connection to the network in Midsomer Norton.
- Landscape mitigation would be required to soften the impact of the development.
- Ensure any new development provides mitigation measures so as not to cause harm to the Air Quality Management Area.

Site Options

7.75 The development options would have vehicular access off the A37, which needs to be downgraded (e.g. speeds reduced) as it passes through the village, in order that safe pedestrian and cycle routes and crossings can be provided.

7.76 Green links throughout the residential areas would enhance local biodiversity and provide a high-quality public realm and direct access to the countryside.

7.77 The new development needs to be respectful of the historic character of the village when it comes to connecting to the existing settlement. Historic routes could be used for active travel, and it is important to retain and enhance the local character of the settlement. The setting of the Grade II listed church is an important consideration and would require a sensitive solution.

Option 1

7.78 The development provides a series of green corridors along existing roads and Public Rights of Way, with the enclosing green buffer to the north and east forming a network of open spaces accessible by a system of footpaths and cycleways.

7.79 A new bus route along the A362 would connect with the existing bus services on the A37 corridor, via a new Mobility Hub located at the junction of the A362 / A37. Bus priority at the A37 / A362 junction will enhance bus journey times.

7.80 Pedestrian space improvements are proposed along the A37 corridor through Farrington Gurney, comprised of wider footways, a review of pedestrian crossings and signals and a reduction in the speed limit.

7.81 Church Lane could be closed to traffic to improve the north-south pedestrian and cycle links to the existing Farrington Gurney Church of England Primary School.

7.82 Two Quiet Lane Links have been identified running in an east-west alignment on unnamed rural roads to the north of Farrington Gurney.

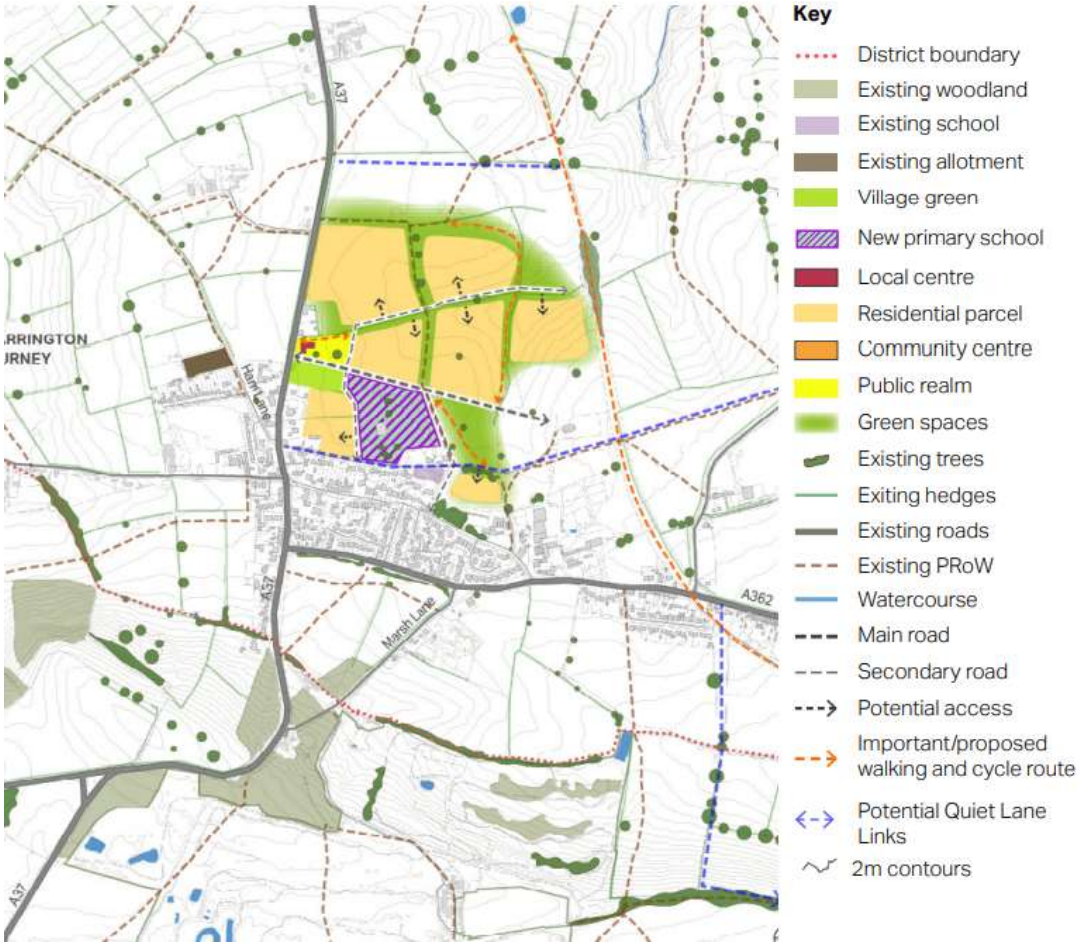


Figure 58: Indicative concept plan - Farrington Gurney Option 1

Farrington Gurney (north) - Option 1	
Opportunities	Provision of approximately 500 homes, an element of which would be affordable housing.
Constraints	Setting of the listed church requires sensitive treatment Air Quality Management Area Primary school capacity Agricultural land classification Recreation ground – safeguarded existing sport and recreational facilities. The Recreation Ground is also designated as a Local Green Space. Secondary school pupils would need to be transported to Norton Hill School in Midsomer Norton at cost to the Council, and would not be able to reach school using actives modes.
Mitigation required	New primary school Landscaping Highway works Provision of on-site green space (including park and recreation ground)
Further evidence required	Heritage assessment Archaeology investigation Landscape Assessment

Option 2

7.83 Option 2 is a residential development to the south of the A362, with vehicular access off this main road.

7.84 The existing road running through the site (Marsh Lane) would become an important connecting route, providing access to the main body of development. There will be additional green links and active travel routes connecting to the existing village and, in particular to the various amenities and services, such as the school and the Co-op.

7.85 Residential parcels would be located within a series of green corridors and buffers to protect the Site of Nature Conservation Interest in the centre of the area and Rush Hill Wood, an Ancient Woodland to the south. Marsh Lane which connects the two areas of woodland is identified as a Nature Recovery Network opportunity for woodland connectivity. The buffer along the southern boundary also helps protect the setting of the Grade II registered park and garden of Ston Easton Park to the south.

7.86 Planting along the A362, which runs between the existing settlement and the new development would help to integrate it into the settlement, framing views towards the ridge to the south and to key buildings within the existing settlement.

7.87 There would be a need for pedestrian improvements along the A362, which provides access for vehicles and active travel modes to the development. The Somer Valley Links proposes an active travel route along the road to connect with active travel links in Midsomer Norton.



Figure 59: Indicative concept plan - Farrington Gurney Option 2

Farrington Gurney (south) - Option 2	
Opportunities	Approximately 500 homes of which an element would be Affordable Housing
Constraints	Site of Nature Conservation Importance Ancient Woodland Mendip Hills Agricultural Land Classification Air Quality Management Area
Mitigation required	New primary School Highway improvement on the A362 Landscape buffer to ancient woodland and SNCI Secondary school pupils would need to be transported to Norton Hill School in Midsomer Norton at cost to the Council, and would not be able to reach school using actives modes.
Further evidence required	Archaeological assessment Landscape Assessment

Question: Do you support development at Farrington Gurney? Please provide reasoning.

Question: Do you prefer option 1 or option 2? Please provide reasoning.

Non-strategic Sites

7.88 Through the call for sites and HELAA process a number of smaller, non-strategic or more local sites have been promoted. These sites will not individually provide a strategic quantum of development, but could still contribute a useful role in meeting the overall housing requirement.

Option to allocate smaller sites for housing within the Somer Valley			
	Option	**Opportunities**	**Constraints**
1	Only allocate strategic sites where the quantum of development can support and deliver site specific infrastructure and services.	All new strategic development sites will provide new infrastructure and services.	May miss opportunities for smaller sites to contribute to the housing requirement.
2	In addition to the allocation of strategic sites, allocate smaller local sites for housing.	Cumulatively smaller sites will contribute to the meeting the housing requirement. It will be possible to secure contributions to infrastructure improvements.	The sites will not be of a size to trigger the provision of site specific infrastructure and services. Piecemeal development does not look at the area as a whole and makes it more difficult to secure co-ordinated infrastructure provision/improvements.

Potential smaller site allocations

7.89 The map below shows sites that have been promoted through the HELAA process that are assessed as being suitable, available and achievable and therefore, could potentially be allocated for development. Site boundaries have not been indicated as they would be defined as part of site allocation in the Draft Local Plan, along with setting the site requirements. This is a set of options and a decision regarding allocation will be made at the Draft Local Plan stage. Likewise, during the options consultation further sites may be promoted for housing development that will be considered. Sites below are referenced using their HELAA number and set out in the table below is a summary of the main opportunities and constraints related to each site.

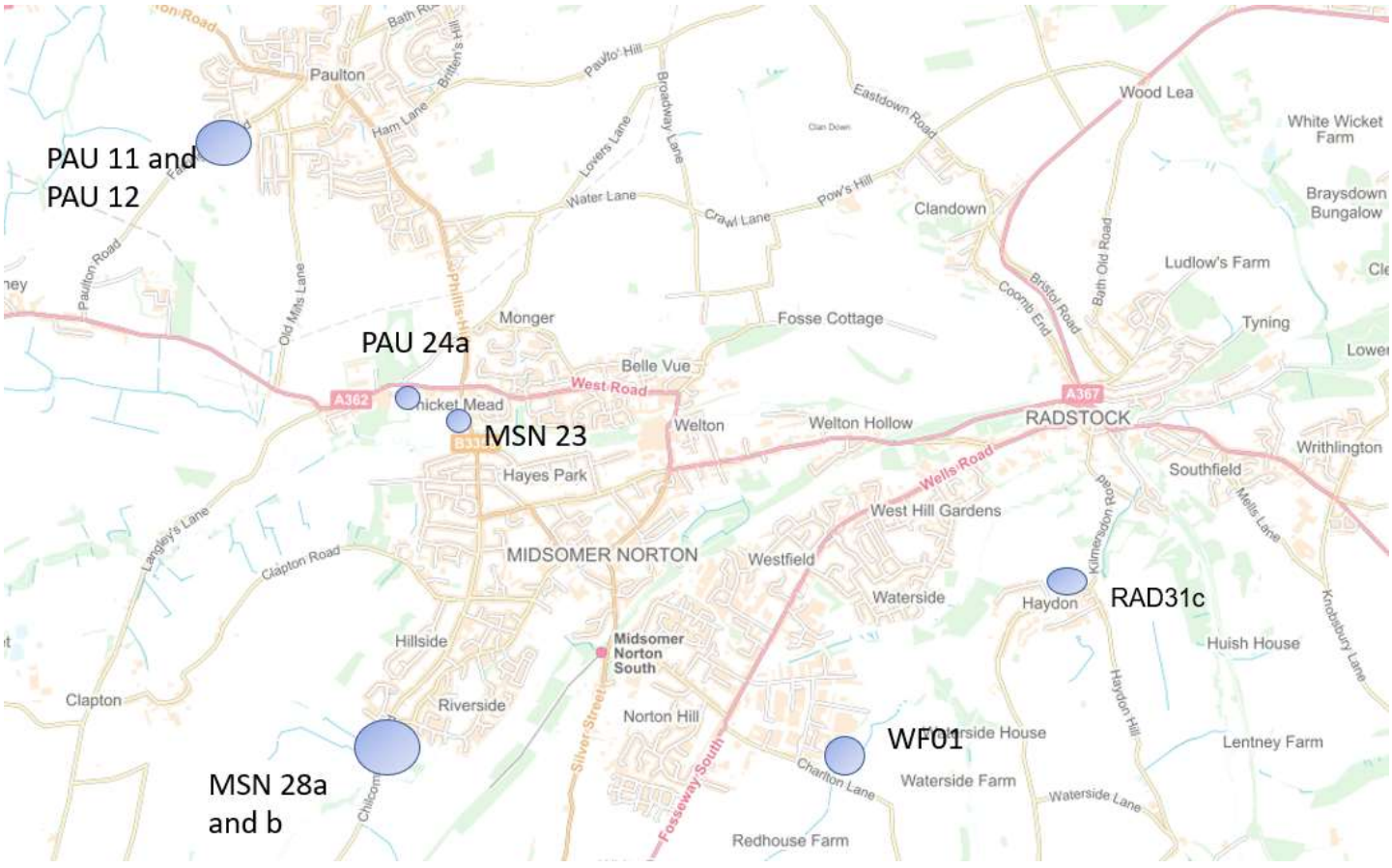


Figure 60: Map showing location of potential smaller site allocations

RAD 31c

7.90 The site is located to the north east of Haydon village, sitting on a plateau above Radstock Town Centre. To the north of the site is a Regionally Important Geological Site and Site of Special Scientific Interest.

Option	Opportunities	Constraints
RAD 31C	Infill development following the contours of the existing settlement. Opportunity for nature recovery. Existing infrastructure can be used.	No public transport. Environmentally sensitive location.

Question: Do you support development at Haydon village? Please provide reasoning.

WF01

7.91 The site is located on the southern edge of Westfield. It sits adjacent to the existing Westfield industrial estate. There is currently no pavement access to the main road and the site accommodates an existing stream that flows into waterside valley.

Option	Opportunities	Constraints
WF01C	Development could facilitate new pavements and lower traffic speed limits.	The presence of the stream will make it difficult to develop. There is no pavement access to the main road. The site is cut off from shops and services. Access would need to go through a busy industrial site. Development of this land might be more suitable for industrial/employment purposes. Visual impact of the development on the wider landscape.

Question: Do you support development at south Westfield? Please provide reasoning.

MSN28a and b

7.92 The sites are located on the southern edge of Midsomer Norton adjacent to existing housing estates. The current pavement access ends adjacent to the site.

Option	Opportunities	Constraints
MSN28 a and b	Extension to existing residential development. Development could facilitate new pavements and lower traffic speed limits.	The site is not close to local shops and services. Unsustainable location.

Question: Do you support development to the south of Midsomer Norton? Please provide reasoning.

MSN23 and PAU 24a

7.93 The sites are located on the western edge of Midsomer Norton close to the Tesco store at Old Mills. MSN23 is a sloping site that sits close to the valley floor. PAU 24a is a plateau site adjacent to Tesco that slopes down toward the valley.

Option	Opportunities	Constraints
MSN 23 and PAU 24a	Infill gaps within existing development. Opportunity for better pedestrian connections between Tesco and Midsomer Norton.	Due to land ownership this will result in piecemeal development and there is limited opportunity for cohesive design.

Question: Do you support development to the west of Midsomer Norton? Please provide reasoning.

PAU 11 and 12

7.94 The sites sit close to Farrington Road. PAU 12 sits to the north of Farrington Road adjacent to Westview and Downsway. It is a relatively flat site. PAU 11 is accessed from Abbots Farm Close and slopes upwards to the south.

Option	Opportunities	Constraints
PAU 11 and 12	Opportunity for small scale additional housing.	Due to the location of the site development would likely be characterised by cul-de-sacs with little connectivity to the surrounding settlement. Impact on the existing landscape.

Question: Do you support development at south west Paulton? Please provide reasoning.

8 Rural Areas: Vision, Strategy and Options

Strategy Overview and Key Issues

8.1 Home to over 37,000 residents, rural B&NES is a diverse group of towns, villages, and hamlets with distinct characteristics and landscapes which accounts for over 90% of the district's land area. Each settlement has their own strengths and challenges. Traditionally the rural economy has been based on farming, self-employment and small businesses, which without the right support limits growth potential. Poor public transport and digital connectivity also act as barriers to business and home working, contributing to social isolation and unequal access to essential goods and services. 78% of rural residents commute to work by car, and alongside high transport emissions, highlights the need for more local employment and sustainable travel options for our rural communities.

8.2 In 2022, house prices in B&NES were more than 10 times annual median average earnings, creating challenges across the district. The lack of affordable housing in our rural communities threatens the vitality of local businesses and the social sustainability of our towns and villages.

Place Profile

8.3 Set amongst high quality natural environments, the villages and hamlets of the rural areas of the district provide an attractive and often peaceful environment in which to live and work. The economy of the rural areas is grounded in agriculture, which now works alongside other small rural businesses. The high-quality landscape, of varying characters, contributes to the quality of life of the district's residents, as well as attracting visitors and as a place for leisure and relaxation.

8.4 Large parts of the rural areas are designated as Green Belt, and much are within the Cotswolds or Mendip Hills National Landscapes. The rural areas complement the more urban parts of the district, and many rural residents look to these urban areas for a wider range of facilities and employment.

8.5 The current approach to rural development, as delineated in the Placemaking Plan and Core Strategy, categorises our villages as follows:

- **RA1 Villages:** Non-Green Belt villages boasting primary schools and, crucially, at least two of the following essential amenities within the village - a post office, community meeting space, and convenience store. Furthermore, they benefit from at least a daily Monday-Saturday public transport service to major centres. Policy RA1 required allocation of sites to deliver around 50 dwellings in each village.

- **RA2 Villages:** Non-Green Belt villages that fall outside the RA1 scope, characterised by site allocations to deliver around 10-15 dwellings in each village.

- **GB2 Villages:** Villages washed over by the Green Belt, where development is restricted to infill only.

Key Issues

8.6 It is becoming increasingly evident that the current strategy is leading to the relative dispersal of development across a wide range of settlements. This is an unintended consequence of the approach outlined above and has led to a number of issues this Local Plan needs to address.

8.7 Many of these issues have been picked up from feedback received to the Launch Consultation and Phase 1 Workshops:

- Lack of affordable housing to meet local needs that may impact on the social sustainability of the rural areas and exacerbate difficulties for an ageing population.

- For much of the rural area poor access to public transport affects the functionality of the rural economy and leads to isolation for those without access to private transport.

- Access to community and social facilities, services and shops.

- Reliance of the rural economy based on farming, the self-employed and small businesses that require support to flourish.

- Potential opportunities to diversify the rural economy e.g. centred around local food production, sustainable rural and eco-tourism, renewable energy, or the natural resources sector.

Priorities and Objectives

8.8 The following list sets out the key priorities and objectives for the rural areas. Many of the priorities can be addressed by new development. However, there are some priorities that won't be addressed through new development but will be addressed through other policies in the Local Plan or initiatives undertaken by the Council or by other stakeholders.

8.9 The Government has also announced its commitment to Unleashing rural opportunity, these include ways in which the planning system can enable the rural economy to grow. Through this the Government has consulted on possible changes to permitted development rights which support agricultural development and rural diversification. This will look at changes to the current rules to make agricultural development more flexible for farmers so they can improve their existing agricultural buildings to make them more productive. The paper also outlines the ways in which the Government is seeking to support the building of more homes for local people to buy where local communities want them.

8.10 The council's Economic Strategy is also seeking to support the diversification of the rural economy and realising opportunities to facilitate moves towards a greener economy, including growth in environmental services and natural resources sectors, as well as sustainable rural and eco-tourism. Improvements in digital infrastructure and changing work practices also creates opportunities to diversify and enhance the rural economy. A stronger rural economy, providing opportunities for local residents to access good jobs, is a vital component of more sustainable rural communities, alongside efforts to retain and improve local services and facilities.

Proportionate Growth:

8.11 Central to these issues is the need for proportionality to growth, ensuring that development aligns with the unique characteristics and needs of individual communities. Without a deliberate focus on proportionality, development can risk overburdening smaller villages or inadequately serving larger ones.

8.12 These challenges underline the necessity for a more adaptable and nuanced approach to rural development, which not only empowers local communities but also ensures that development is commensurate with the distinct needs and characteristics of our rural villages and settlements. It is with these considerations in mind that the Rural Strategy introduces the two complementary pathways to address these issues while fostering sustainable growth and development.

Pathway 1: Community-Led Growth

8.13 Under this pathway, local communities take the lead in shaping and advancing their growth initiatives. Emphasising community involvement, this approach offers a flexible framework, enabling residents to propose growth projects that align with their local aspirations. Using a range of tools, including rural exception schemes, community land trusts, and Neighbourhood Planning, empowering communities to initiate growth projects.

Pathway 2: Local Plan-Led Growth

8.14 As communities contemplate the pursuit of their growth proposals, it is essential to maintain efforts in preparing the new Local Plan to ensure the certainty of delivering new developments, especially housing and employment opportunities.

8.15 Taking these steps is vital to:

- Positively plan and reduce the possibility of speculative developments.
- Facilitate the development of new affordable, market, and specialised housing to meet the needs of rural communities.
- Support existing services and facilities.

8.16 In opting for a Local Plan-led/site allocation approach to rural growth and development, there are several inherent benefits that prioritise the holistic well-being of our villages. Unlike speculative large site development, which can introduce unforeseen challenges for essential functions like schools, transport, and community facilities, a Local Plan provides a structured and comprehensive framework.

8.17 Pathway 2 focuses on a Local Plan-led approach that provides a clear direction for growth and change, adhering to the NPPF's principles of sustainable development. This approach is essential in helping to meet our overall housing, job, and infrastructure requirements and provides certainty for both communities and developers. The principle of "proportionality" is central to this approach, ensuring that growth aligns with the unique needs and character of each community.

8.18 Pathway 2 focuses on guiding new development in rural areas by identifying relatively sustainable villages. Instead of adhering to the rigid distinctions of RA1 and RA2 villages, a more flexible and proportionate approach will be taken.

8.19 The strategy for rural growth is based on an assessment of a village's sustainability, considering factors such as connectivity through sustainable modes of transportation (public transport, walking, cycling and wheeling) and the availability of essential services and facilities.

8.20 In conjunction with this approach, place profiles have been prepared for our villages and parishes. These profiles incorporate an analysis of past growth since the start of the Core Strategy plan period, demographics, connectivity, facilities audit, and other key issues. The outputs of this work are outlined in a Topic Paper (published alongside the Options document) and the associated identification of relatively sustainable villages for consideration are set out in the Options document.

8.21 Options are set out below showing the relatively sustainable villages and what proportionate growth nominally of 5% over the plan period could mean in terms of additional housing numbers, based on the number of dwellings existing in the village. There are also options relating to growth either being focused at the most sustainable of these villages (highlighted in bold) or across all of the identified villages.

8.22 The villages identified as relatively sustainable compared to others are proposed to become the focus of attention for some rural growth. Our commitment is to engage with the community and parish council in these villages to explore the potential for modest growth, its location and the associated benefits that such development could bring e.g. meeting local housing needs or providing employment opportunities, helping to keep villages viable and sustainable. This modest development would be on large sites that would then be allocated for development in the Draft Local Plan and would be additional to any small windfall sites (often sites for one or two dwellings) that might come forward within the Housing Development Boundary for each village. Opportunities outlined in the Housing and Economic Land Availability Assessment (HELAA) will be considered as a starting point for potential locations while also working closely with community representatives as the plan progresses to ensure that any development aligns with their aspirations while preserving the distinct character and vitality of each rural area.

8.23 It should be noted that Options relating to the villages of Saltford, Whitchurch, Farrington Gurney, Paulton and Peasedown St John are being addressed in the Place Based sections of this document.

8.24 Should other villages wish to be considered for further growth then there is the opportunity for them to respond through this consultation.

Village Options

8.25 Village options are set out in the table below:

Village	5% Growth	Opportunities	Constraints
Bathampton	40 **dwellings over the Plan Period**	High connectivity **score** Broad range of services & facilities	Village excluded from but surrounded by the Green Belt and within the Cotswolds **National Landscape. Allocation of greenfield site(s) for development adjoining the village would require exceptional circumstances to be demonstrated to remove the land from the Green Belt.** Within **indicative extent of the setting of the World Heritage Site** Limited **Primary School capacity**
Batheaston	63 **dwellings over the Plan Period**	High connectivity score Broad range of services & fa**cilities**	Village excluded from but surrounded by the Green Belt and within the Cotswolds **National Landscape. Allocation of greenfield site(s) for development adjoining the village would require exceptional circumstances to be demonstrated to remove the land from the Green Belt.** Within **indicative extent of the setting of the World Heritage Site** Limited Primary School capacity

Bathford	40 **dwellings over the Plan Period**	High connectivity score Moderate range of services & facilities Some Primary School **capacity identified**	Village **inset from the Green Belt and lies within the Cotswolds National Landscape. Allocation of greenfield site(s) for development adjoining the village would require exceptional circumstances to be demonstrated to remove the land from the Green Belt.** Within indicative extent of the setting of the World Heritage Site
Chew Magna	28 dwellings over the Plan Period	Broad range of services & facilities	Low connectivity score Village washed over by the Green Belt – development limited to infilling, limited affordable housing for local community needs, and redevelopment of previously developed land. Allocation of greenfield site(s) for development adjoining the village would require reviewing the status of the village as washed over by the Green Belt. Limited Primary School capacity
Chew Stoke	21 dwellings over the Plan Period	Moderate range of services & facilities	Low connectivity score Village washed over by the Green Belt – development limited to infilling, limited affordable housing for local community needs, and redevelopment of previously developed land. Allocation of greenfield site(s) for development adjoining the village would require reviewing the status of the village as washed over by the Green Belt. Limited Primary School capacity

Clutton	35 dwellings over the Plan Period	Moderate connectivity score Some Primary School capacity identified	Limited range of services & facilities The northern edge of the village is in the Green Belt
Corston	11 dwellings over the Plan Period	Moderate connectivity score	Limited range of services & facilities Within indicative extent of the setting of the World Heritage Site No Primary School Village washed over by the Green Belt – development limited to infilling, limited affordable housing for local community needs, and redevelopment of previously developed land. Allocation of greenfield site for development adjoining the village would require reviewing the status of the village as washed over by the Green Belt.
Farmborough	28 dwellings over the Plan Period	Moderate connectivity score Moderate range of services & facilities	Village inset from the Green Belt. Allocation of greenfield site(s) for development adjoining the village would require exceptional circumstances to be demonstrated to remove the land from the Green Belt. Limited Primary School capacity

Freshford	15 **dwellings over the Plan Period**	High connectivity score Moderate range of services & facilities	Limited Primary School capacity Village **washed over by the Green Belt – development limited to infilling, limited affordable housing for local community needs, and redevelopment of previously developed land. Allocation of greenfield site for development adjoining the village would require reviewing the status of the village as washed over by the Green Belt**. Village **within the Cotswolds National Landscape**
High Littleton	45 dwellings over the Plan Period	Moderate connectivity score Moderate range of services & facilities	The North West, North and North East edges of High Littleton village are surrounded by the Green Belt. Limited Primary School capacity
Pensford	25 dwellings over the Plan Period	Moderate range of services & facilities	Low connectivity score Village washed over by the Green Belt – development limited to infilling, limited affordable housing for local community needs, and redevelopment of previously developed land. Allocation of greenfield site(s) for development adjoining the village would require reviewing the status of the village as washed over by the Green Belt. Limited Primary School capacity

Bishop Sutton	33 dwellings over the Plan Period	Moderate range of services & facilities Some Primary School capacity identified	Low connectivity score Village within the Mendip Hills National Landscape
Temple Cloud	30 dwellings over the Plan Period	Moderate connectivity score Broad range of services & facilities	Limited Primary School capacity Air Quality Management Area
Timsbury	59 **dwellings over the Plan Period**	Moderate connectivity score Broad range of services & facilities Some Primary School capacity identified	The northern edge of the village is in the Green Belt

Question: Do you agree with this approach and why?

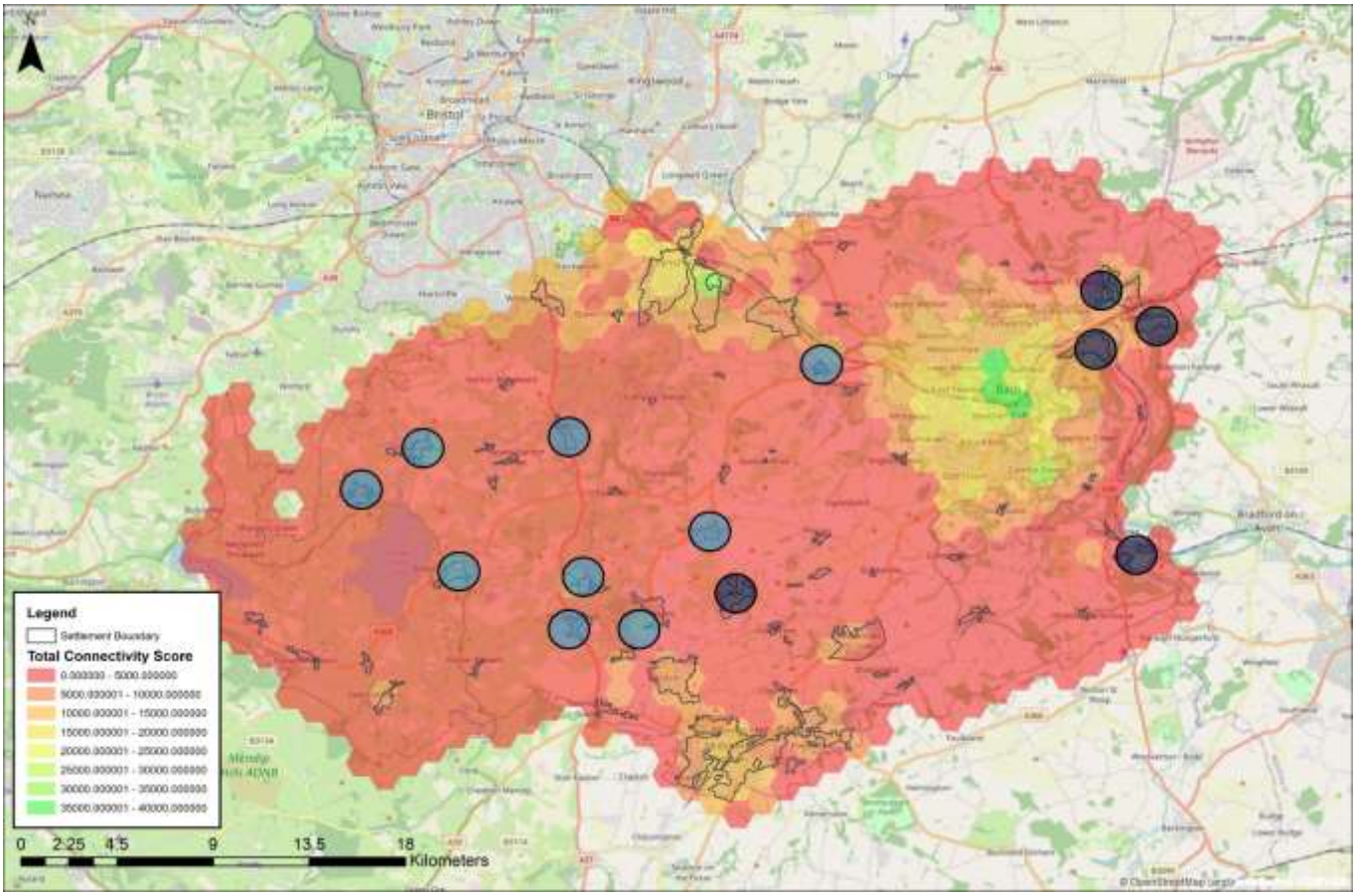


Figure 61:Rural areas relative connectivity map

9 Development Management Policy Options

9.1 Development Management policies set out local standards and criteria against which planning applications for the development and use of land and buildings are assessed.

9.2 We recently updated a significant number of Development Management policies through the adoption of our Local Plan Partial Update. A number of these policies are therefore considered up to date, and are not proposed to be amended through preparation of the new Local Plan. A table listing the policies that are considered to not require amendment is set out at **appendix 1.**

9.3 Development Management policies must conform with national planning policy contained in the NPPF and the technical planning practice guidance which supports it. The government have recently published an intention to prepare National Development Management Policies (NDMP), which would be given statutory status in determining planning applications and sit alongside policies set out in Local Plans. This should mean that Local Plans will be quicker to prepare, and focus only on locally relevant policies. However, uncertainty exists around the scope and preparation timescales for these NDMPs and the scope for local planning authorities to define local standards that differ to those in some NDMPs. Therefore, the council has prepared options relating to Development Management policies in the Local Plan for the purposes of public consultation. Development Management policies must also reflect any future changes to permitted development rights i.e. those forms of development that the government defines as not requiring planning permission. This will be kept under review in preparing the Draft Local Plan.

Housing

Policy H/AH: Affordable Housing

9.4 Background and evidence can be found in the Housing Topic Paper and the Local Housing Need Assessment (LHNA).

Large Sites

9.5 Paragraph 63 of the National Planning Policy Framework (NPPF December 2023) requires local authorities to assess the size, type and tenure of housing needed for different groups in the community, including those who require affordable housing, and reflect the results of this assessment in their planning policies.

9.6 The LHNA sets out an affordable housing requirement of 77% of overall housing need within Bath City and 31% within the rest of Bath and North East Somerset. On large sites (or major applications) providing at least 10 dwellings a proportion of the homes delivered will be required to be affordable housing of various tenures, including social rent and low cost home ownership.

9.7 Whilst the evidence in the LHNA sets out the affordable housing need within the district and the split between social rent and low cost home ownership, this evidence will need to be viability tested (alongside other Local Plan policy requirements) to inform the proportion of affordable housing to be required on qualifying sites. The Local Plan viability assessment will be undertaken to inform the Regulation 19 Draft Local Plan and is likely to strongly influence the proportion of affordable housing that will be sought on qualifying sites particularly in Bath. Therefore, at this Options stage the proportion of affordable housing to be required is not established, nor the tenure split. Both will be set out in the Regulation 19 Draft Local Plan.

9.8 It is proposed to take forward the requirement for affordable housing on large sites as follows:

H/AH: Affordable Housing (Large Sites)	
	Proposed Approach
1	Affordable Housing will be required as on-site provision in developments of 10 dwellings* and above (0.5ha and above) in line with percentages set out in the LHNA and as tested through the Local Plan viability (whole plan) assessment. It is also proposed this will be on a grant free basis. *Note: that dwellings is not confined to C3 use class but comprises all residential accommodation that provides a dwelling for a household. Some forms of dwellings are subject to separate Affordable Housing policy options e.g.co-living and Build to Rent schemes.

9.9 The proposed Affordable Housing policy approach will also take forward current policy as relates to sub-division and phasing and other design elements, affordability in perpetuity and that any sales or staircasing affecting affordable housing delivered through Affordable Housing policy will be made to recycle the receipts/subsidy for the provision of new alternative affordable housing located elsewhere within Bath and North East Somerset. Property size and mix will be guided by the LHNA and other local housing requirements. The policy will also include delivery mechanisms and include our current approach to vacant building credit.

Question: Do you agree with this approach?

First Homes

9.10 National policy also requires that at least 25% of the affordable housing secured on large sites should be delivered as First Homes. These are dwellings that are available to purchase for first time buyers at a discounted price, set nationally at a minimum of a 30% discount. National policy also stipulates that the maximum price to be paid for a First Home (after the discount has been applied) must be no higher than £250,000. Evidence previously produced by the council showed that, given the relationship between incomes and house prices, First Homes will still be relatively unaffordable in Bath and North East Somerset and would not meet the needs of those households requiring affordable housing. As such evidence showed that shared ownership provides a more affordable low-cost home ownership product within the district. The council set out its approach to First Homes in the Bath and North East Somerset First Homes Interim Position Statement, which in summary is that First Homes will not be mandatorily required on qualifying large sites.

9.11 However, through the preparation of the Local Plan 2022-2042 this approach needs to be reviewed in light of up to date evidence. The LHNA shows that there is a significant need for more affordable forms of housing for those households that can afford market rents, but aspire to home ownership. This need is particularly significant in Bath. First Homes are a product that could play a useful role in meeting this need, alongside shared ownership homes. Therefore, as an option it is proposed to require that 25% of all affordable housing secured on a large site should be delivered as First Homes. It is also proposed that, despite house prices being very high in the district, especially in Bath, the discount should be set at 30% because a greater discount would reduce the amount of developer subsidy available to fund provision of shared ownership homes which are crucial in helping to meet affordable housing need more widely. Given the 30% discount evidence shows that it is likely that First Homes in Bath will typically be smaller (1 and possibly 2 bed) dwellings given the £250,000 price cap.

H/AH: First Homes (Large Sites)	
	Option
1	It is proposed that on qualifying large sites 25% of all affordable housing secured will be required to be delivered as First Homes. The First Homes will be provided at a 30% discounted price and sold at a price, after the discount has been applied, of no more than £250,000.

Question: Do you agree with this approach?

9.12 Evidence of need for more affordable forms of housing for those that aspire to home ownership is corroborated by the Economic Strategy, which notes there is a need for housing that can be afforded by essential local workers and other workers in the local economy. Essential local workers are defined in the NPPF as 'Public sector employees who provide frontline services in areas including health, education and community safety – such as NHS staff, teachers, police, firefighters and military personnel, social care and childcare workers'.

9.13 The lack of availability and affordability of housing is making it difficult for some employers, including those in the public sector, to attract and retain staff. First Homes may play a role in helping to meet this need. In addition, there may be an opportunity for employers to provide affordable housing for their essential local worker staff on specific sites or land that they own. The Council is considering whether to introduce a policy approach that would seek to facilitate delivery of such employer linked affordable housing for essential workers on specific sites e.g. enabling100% affordable housing schemes to be developed by potentially being more flexible in terms of tenure mix. Subject to evidence of need, there may be a case to allow such essential worker housing as an exception to other policies in the Local Plan (these would be defined in the Draft Local Plan).

Question:

Small Sites

9.14 Paragraph 65 of the NPPF sets out that provision of affordable housing should not be sought for residential proposals that are not major development applications, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).

9.15 The Cotswolds National Landscape and Mendip Hills National Landscape are designated rural areas within Bath and North East Somerset and cover almost a third of the local authority area. Both the Cotswold National Landscape and Mendip Hills Management Plans highlight affordable housing requirements to meet the needs of local rural communities within the National Landscapes.

9.16 It is proposed to take forward the requirement for affordable housing on small sites within designated rural landscapes, given nationally protected landscape national policy as relates to major development and limited opportunities to bring forward affordable housing within these sensitive landscapes.

9.17 Options as relates to small sites are as follows:

H/AH: Affordable Housing (Small Sites)			
	Option	**Advantages**	**Disadvantages**
1	Residential developments on small sites from 5 to 9 dwellings within the Cotswold National Landscape and Mendip Hills National Landscape should provide either on site provision or an appropriate financial contribution towards the provision of affordable housing with commuted sum calculations. The target level of affordable housing for these small sites will be viability tested through the Local Plan viability assessment to support the Draft Local Plan.	Delivery of affordable housing to meet the needs of local rural communities within the National Landscapes.	Would need to consider tenure mix and management of small numbers of affordable housing units.
2	Residential developments on small sites from 2 to 9 dwellings within the Cotswold National Landscape and Mendip Hills National Landscape should provide either on site provision or an appropriate financial contribution towards the provision of affordable housing with commuted sum calculations. The target level of affordable housing for these small sites will be viability tested through the Local Plan viability assessment to support the Draft Local Plan.	Delivery of affordable housing to meet the needs of local rural communities within the National Landscapes.	Would need to consider tenure mix and management of small numbers of affordable housing units.

Viability

9.18 The NPPF December 2023 paragraph 58 states that 'Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable.'

9.19 Planning Practice Guidance: Viability sets out that 'Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage' and 'Under no circumstances will the price paid for land be a relevant justification for failing to accord with relevant policies in the plan.' However, PPG also includes a caveat on this that 'It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage' and sets out how viability should be reviewed during the lifetime of a project, principles for carrying out viability assessments and standardised inputs to viability assessments.

9.20 Given the aims of this Local Plan in maximising the delivery of affordable housing to respond to the district's demographic, social and economic needs and the significant requirement for affordable housing within the local authority area as set out in the LHNA, it will be imperative that new development deliver affordable housing to meet the need. We require policy that is clear that viability of affordable housing has been tested at plan-making stage. We will maximise opportunities to deliver affordable housing wherever possible through planning obligations and other delivery mechanisms.

9.21 Options as relates to affordable housing viability are as follows:

H/AH: Affordable Housing (Viability)			
	Option	**Advantages**	**Disadvantages**
1	Take forward existing policy as relates to affordable housing viability with the addition that where an application fails to provide the full affordable housing policy requirement, to include effective review mechanisms aimed at achieving a greater level of policy compliance over the lifetime of the development where viability improves or the availability of grant.	Maximising the delivery of affordable housing over the lifetime of development given the significant requirement for affordable housing within B&NES.	Resource to implement review mechanisms aimed at achieving a greater level of policy compliance over the lifetime of the development.

2	Update existing affordable housing viability policy highlighting the presumption that there should be no need for further viability assessment at the decision-making stage. It is for the applicant to demonstrate whether particular circumstances (e.g. relating to abnormally high development costs, such as remediating substantial site contamination) justify the need for a viability assessment at the application stage and under no circumstances will the price paid for land be a relevant justification for failing to accord with relevant policies in the plan. In considering affordable housing viability within the proposed development, the following considerations will be taken into account: • Whether grant or other public subsidy is available. • The tenure and size mix of the affordable housing to be provided. • Whether there are exceptional build or other development costs. • The achievement of other planning obligations. Where an application fails to provide the full affordable housing policy requirement, to include effective review mechanisms aimed at achieving a greater level of policy compliance over the lifetime of the development where viability improves or the availability of grant.	Providing clarity and Development Plan status on viability aspect of policy and maximising the delivery of affordable housing given the significant requirement for affordable housing within Bath and North East Somerset.	Resource to implement review mechanisms aimed at achieving a greater level of policy compliance over the lifetime of the development.

Policy H/RS: Affordable Housing Regeneration Schemes

9.22 In promoting healthy and safe communities, the NPPF (December 2023) under paragraph 98 sets out that 'Planning policies and decisions should consider the social, economic and environmental benefits of estate regeneration. Local planning authorities should use their planning powers to help deliver estate regeneration to a high standard.'

9.23 The case for regeneration of areas of social housing is often based on a concentration of poor-quality and energy inefficient housing stock, in both larger estates and smaller developments, where a comprehensive programme of repair or refurbishment is not a cost effective or deliverable solution. The other significant driver for regeneration of social housing estates is the correlation between the large concentrations of social housing stock and socio-economic deprivation. In these cases, even large-scale investment in existing housing stock may not address the socio-economic challenges or lessen the strain on wider support services across the area.

9.24 In some instances, redevelopment-led regeneration of social housing may be the most effective means of delivering improvement. Policy H8 in the Placemaking Plan seeks to facilitate such redevelopment in order to deliver enhancement to the social housing stock.

9.25 In seeking to facilitate redevelopment or regeneration of social housing the current policy seeks, as the starting point, to ensure that there is no net loss in affordable housing. However, the current policy caveats this position by stating that it is subject to viability considerations and other social balance considerations. Therefore, it allows the applicant to demonstrate viability or social balance/community mix reasons as to why retaining the existing number of affordable units cannot or should not be delivered.

9.26 As outlined above, the need for affordable housing within Bath and North East Somerset and particularly in Bath is significant and therefore, any potential loss of affordable housing through the operation of the current policy is of concern.

9.27 It is proposed that options relating to the explicit inclusion of viability considerations within the policy should be considered. The alternative means of improving social housing stock through refurbishing or repairing individual properties also has a financial cost. In operating the policy and considering viability, the cost of property repair/refurbishment should be taken into account.

9.28 Options as relates to Affordable Housing Regeneration Schemes are as follows:

H/RS: Affordable Housing Regeneration Schemes			
	Option	**Advantages**	**Disadvantages**
1	Where the redevelopment/regeneration of areas of social housing is supported it is required that there will be no net loss of affordable housing subject to social balance considerations.	Maximise affordable housing delivery.	Viability considerations.
2	Where the redevelopment/regeneration of areas of social housing is supported it is required that there is no net loss of affordable housing subject to social balance **and viability** considerations.	Ensures and potentially maximises affordable housing delivery.	Could reduce affordable housing delivery.

Policy H/RES: Rural Exception Sites, First Homes Exception Sites and Community Led Development Exceptions Sites

Rural Exception Sites

9.29 The National Planning Policy Framework (NPPF December 2023) supports the delivery of rural exception sites to bring forward affordable housing to address identified local needs. Market housing can be included in rural exception schemes where this will facilitate the delivery of affordable housing. Schemes are typically on the edge of a rural community/village on a site that would not normally be granted planning permission for residential use.

9.30 Core Strategy Policy RA4 sets out the current policy in respect of rural exceptions sites that broadly reflects the NPPF. The supporting text to the policy currently emphasises that it is imperative that the majority of the scheme must be affordable and that a small proportion of market housing will only be permitted where it is robustly demonstrated it is needed to subsidise the provision of affordable housing.

9.31 Rural exceptions policy has not delivered any affordable housing to date during the Core Strategy period (2011 - 2029). This is largely due to changes in the affordable housing sector funding and delivery models, but also to the restrictive and overly complex nature of exception site delivery, as well as a relatively imprecise planning policy.

9.32 The current policy does not provide any guidance on the scale or size of exceptions sites that will be permitted and provides limited clarity on the level of market housing appropriate in cross-subsidising delivery of affordable housing. This lack of clarity is acting as an obstacle to the delivery of affordable housing on exceptions sites.

9.33 It is proposed that many key elements of the existing policy should be retained, including ensuring provision meets a demonstrable need for affordable housing, support of local communities, that homes remain as affordable housing in perpetuity and local connections tests are met. The need for affordable housing within a rural settlement will be determined through a Rural Housing Needs Survey based on robust methodology and housing need within the settlement as evidenced through the Housing (Homesearch) Register.

9.34 Given that 'exceptions site' development would be outside controlled/defined areas (i.e. the Housing Development Boundaries), sites should be identified through a sequential approach which includes assessment of the economic, social and environmental impacts. It is considered necessary to emphasise the importance of development being on sites well related to settlements and appropriate to their context in terms of character, scale and form and that have no adverse impact on internationally or nationally protected species and/or their habitats.

9.35 In relation to the Green Belt locations, rural exception sites will be allowed in the Green Belt only when it can be demonstrated that non-Green Belt alternative sites are not available. The policy would also seek to ensure that 'rural exceptions sites' are selected in order to minimise harm to the openness and purposes of the Green Belt.

9.36 Options as relates to Rural Exceptions Sites are as follows:

H/RES: Rural Exception Sites (Location)			
	Option	**Advantages**	**Disadvantages**
1	In terms of the location of rural exception sites set no prescriptive approach in the policy and simply rely on the NPPF definition of Rural exception sites as 'Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.'	Reflects national policy.	Unclear where 'rural' exception sites policy applies.
2	Set out in the policy within Bath and North East Somerset where and to which settlements rural exception sites will apply in line with the emerging rural areas strategy to support rural communities.	Provides clarity on policy.	Would not be applicable to all settlements (i.e. to those not listed).

H/RES: Rural Exception Sites (Scale)			
	Options	**Advantages**	**Disadvantages**
1	Continue to refer to Rural Exceptions Sites as applying to small sites. Generally small sites are defined as less than 10 dwellings.	Reflects national policy.	Current policy does not provide any guidance on the size of exception sites that will be permitted. Generally small sites are defined as less than 10 dwellings. This restricting the delivery of affordable housing on rural exceptions sites.
2	Set out that sites could have a capacity of up to 20 dwellings in total subject to the levels of local housing need, cross-subsidy requirements, and size of the settlement. Further guidance might be needed as to village size proportionality in order to determine where a maximum site capacity would be less than 20 dwellings.	Provides clarity on policy. The need for affordable housing within a rural settlement will be determined through a Rural Housing Needs Survey based on robust methodology and housing need within the settlement as evidenced through the Housing Register.	Developments could look to maximise site capacity.

H/RES: Rural Exception Sites (Cross Subsidy)			
	Options	**Advantages**	**Disadvantages**
1	Continue to refer to a small proportion of market housing will be appropriate only where it can be demonstrated that the market housing is essential to cross-subsidise the affordable housing and that the site would be unviable without this cross-subsidy.	Reflects national policy and is flexible.	Current policy provides limited clarity on the level of market housing appropriate in cross-subsidising delivery of affordable housing.
2	Maximum of 40% market housing to meet local needs (including downsizing) will be appropriate where it can be demonstrated that the proportion of market housing proposed is essential to cross-subsidise the affordable housing and that the site would be unviable or undeliverable without this cross-subsidy, taking into account the availability of public subsidy.	Providing clarity on policy. Market housing will only be permitted where it is robustly demonstrated it is needed to subsidise the provision of affordable housing.	Developments could look to maximise market housing on site.

First Homes Exceptions Sites

9.37 The government introduced First Homes exception sites to deliver affordable housing for first time buyers. First Homes exception sites have replaced entry-level exception sites and changes were made to national planning guidance to facilitate this. First Homes exception sites can address housing needs across the local authority area rather than be focussed on the needs of a specific community, although the local authority does have discretion to introduce local eligibility criteria where evidenced based. The Written Ministerial Statement (WMS) on Affordable Homes Update (24 May 2021) sets out national policy on First Homes.

9.38 First Homes exception sites cannot come forward in areas designated as Green Belt or AONBs and thus are limited in terms of which areas they can come forward in Bath and North East Somerset as can be seen on the map below. First Homes exception sites should be on land which is not already allocated for housing.



Figure 62: Map showing Green Belt and National Landscape designations across B&NES

9.39 The WMS (24 May 2021) sets out that First Homes exception sites should be adjacent to existing settlements, proportionate in size to them, not compromise the protection given to areas or assets of particular importance in the NPPF and comply with any local design policies and standards. Further Planning Policy Guidance on First Homes can be found at: https://www.gov.uk/guidance/first-homes

9.40 Given that there are limited areas in Bath and North East Somerset in which First Homes Exceptions Sites can come forward, Options are as set out in the table below. Please also see policy approach options relating to First Homes as an element of a qualifying large site.

H/RES: First Homes Exceptions Sites			
	Options	**Advantages**	**Disadvantages**
1	It is not proposed to take forward specific policy on First Homes Exception Sites within Bath and North East Somerset as there are limited areas in which these Exception Sites could come forward in Bath and North East Somerset and planning applications would be determined in line with National Policy (Written Ministerial Statement) and Guidance and the Development Plan.	Reflects national policy.	Does not consider Bath and North East Somerset specific requirements.
2	Take forward a criteria-based policy on First Homes Exception Sites within Bath and North East Somerset.	Provides a criteria-based policy on First Homes Exception Sites within Bath and North East Somerset.	Reiterates national policy.

Question: Which option do you prefer and why?

Question: If you consider a criteria-based policy should be included in the Draft Local Plan what factors should be covered by the criteria?

Community Led Housing

9.41 Community Led Housing is a way of delivering housing developments to meet local community needs. Paragraph 73 of the NPPF (December 2023) sets out that 'Local Planning authorities should support the development of exception sites for community-led development (as defined in Annex 2 of the NPPF) on sites that would not otherwise be suitable as rural exception sites.'

9.42 The NPPF further sets out that these sites should be on land which is not already allocated for housing and should: comprise one or more types of affordable housing as defined in Annex 2 of the NPPF, a proportion of market homes may be allowed on the site at the local planning authority's discretion, be adjacent to existing settlements, proportionate in size to them (not larger than one hectare in size or exceed 5% of the size of the existing settlement), not compromise the protection given to areas or assets of particular importance in the NPPF and comply with any local design policies and standards.

9.43 Proposed options as relates to exception sites for community led development are as follows:

H/RES: Community Led Development Exceptions Sites			
	Options	**Advantages**	**Disadvantages**
1	Do not take forward specific policy on exception sites for community-led development with planning applications being determined in line with National Policy and Guidance and the Development Plan.	Reflects national policy.	Does not consider Bath and North East Somerset specific requirements.
2	Take forward a criteria-based policy on exception sites for community-led development within B&NES.	Provides a criteria-based policy on exception sites for community-led housing within Bath and North East Somerset.	Reiterates national policy.

Question: Which option do you prefer and why?

Question: If you consider a criteria-based policy should be included in the Draft Local Plan what factors should be covered by the criteria?

Policy H/SH: Specialist Housing and Homes for Older People Design

9.44 Paragraph 135 of the NPPF highlights that planning policies should ensure that developments 'create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users…'

9.45 Planning Practice Guidance (PPG) Housing for older and disabled people (published June 2019) sets out that it is critical to provide housing for older people as people are living longer and the proportion of older people in the population is increasing, and therefore offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities, and help reduce costs to the social care and health systems. It also sets out that provision of appropriate housing for people with disabilities, including specialist and supported housing, is crucial in helping them to live safe and independent lives.

9.46 The National Design Guide sets out that 'Well-designed places include a variety of homes to meet the needs of older people, including retirement villages, care homes, extra-care housing, sheltered housing, independent living and age-restricted general market housing. They are integrated into new settlements with good access to public transport and local facilities.'

9.47 In considering national and local planning policy and guidance together with B&NES Council strategies, Options for policy within the new Local Plan are as follows:

H/SH: Specialist Housing and Homes for Older People Design			
	Option	**Advantages**	**Disadvantages**
1	Take forward current Development Plan Policy (H1 and relevant policy within CP10).	Provides policy on specialist housing and homes for older people design requirements.	Current policy focusses on HAPPI standards and different design standards would be appropriate to different types of specialist housing and homes. Current policy falls under two different policies within the Development Plan.
2	Take forward design requirements for specialist housing and older person housing and facilities in line with best practice design principles (and that meet with CQC standards where required).	Provides policy on specialist housing and homes for older people design requirements. Proposes to include policy as relates to best practice design principles and that meets CQC standards where required.	Whilst proposed policy sets out specialist housing and homes for older people design requirements, it does not include locational requirements.

3	Take forward design requirements for specialist housing and older person housing and facilities in line with best practice design principles (and that meet with CQC standards where required) and provide policy to ensure that specialist housing and homes for older people are designed to support integrated and cohesive communities in accessible locations.	Provides policy on specialist housing and homes for older people design requirements. Proposes to include policy as relates to best practice design principles and that meet with CQC standards where required. In addition, it provides locational requirements i.e. supports integrated and cohesive communities in accessible locations.	None identified.

Policy H/EC: Affordable Housing Requirements within Older Person and Specialist Housing (including Extra Care)

9.48 Paragraph 63 of the (NPPF December 2023 requires local authorities to assess the size, type and tenure of housing needed for different groups in the community and reflect the results of this assessment in their planning policies. The NPPF also sets out that as part of achieving sustainable development a sufficient range of homes should be provided to meet the needs of present and future generations.

9.49 This range of homes includes housing for older people (including those who require retirement housing, housing-with-care and care homes). PPG Housing for older and disabled people highlights that 'The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing.' It further sets out that 'Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems.'

9.50 There are different forms of older person specialist housing including age restricted housing, sheltered housing, extra care hosing or housing with care and residential care homes and nursing homes. Some forms of specialist housing will be considered to be use class C3 (dwellings) and some will be considered to be use class C2 (residential institutions / communal accommodation) even though they constitute a dwelling.

9.51 National planning guidance sets out that it is for the local planning authority to determine which use class a particular development falls into but suggests that when making the decision consideration could be given to the level of care provided and the scale of communal facilities provided.

9.52 Within the High Court Judgment - Rectory Homes Ltd v Secretary of State for Housing Communities and Local Government [2020] EWHC 2098 (Admin) (31 July 2020) Justice Holgate set out that 'There is no reason why a C2 development cannot provide accommodation in the form of dwellings provided its use did not fall within Use Class C3.'

9.53 In considering the need for specialist older person housing, including age restricted general housing, sheltered housing, extra care housing or housing with care as set out in PPG and which constitute a self-contained dwelling or unit, it is key that local authorities assess the size, type and tenure of housing needed for older people.

9.54 The Bath and North East Somerset Local Housing Needs Assessment Report of Findings (December 2023) sets out that 'there would be a need to provide an additional 557 specialist older person housing units in Bath City (of which 43% would need to be provided as affordable housing) and 1,121 specialist units in the Rest of B&NES (including 50% affordable housing).

9.55 Given the primary objectives of the Local Plan which include 'Maximising the delivery of affordable housing to respond to the district's demographic, social and economic needs', we will be looking to take forward the requirement for affordable housing within older person housing where it meets the definition of age restricted general housing, sheltered housing, extra care housing or housing with care where it is a dwelling or self-contained unit.

9.56 The proposed policy approach relating to the requirement for affordable housing within older person housing is as follows:

H/EC: Affordable Housing Requirements within Older Person and Specialist Housing (including Extra Care)	
	Proposed Approach
1	Take forward Affordable Housing requirements within specialist older person housing where it constitutes a self-contained dwelling or unit in line with percentages set out in the LHNA and as tested through the Local Plan viability (whole plan) assessment.

Question: Do you agree with this approach?

Policy H/AS: Accessible Homes and Residential Space Standards

9.57 Paragraph 135 of the NPPF (December 2023) states that planning policies should ensure that developments create places with a high standard of amenity for existing and future users. The accompanying footnote (Footnote 52) states that planning policies for housing should make use of the optional technical standards for accessible and adaptable housing and also the nationally described space standard, where these would address a need and can be justified.

Accessible Homes

9.58 Planning Practice Guidance (PPG) Housing: optional technical standards sets out that local authorities can require accessibility, adaptability and wheelchair standards in new dwellings provided that they have evidence that demonstrates a clear need for these types of housing and their resulting policies plan to meet this need. They should clearly state in their Local Plan what proportion of new dwellings should comply with the requirement.

9.59 PPG states that planning policies should only set out the requirements for enhanced accessibility or adaptability of dwellings through reference to the optional requirements within Part M of Building Regulations – M4(2) 'accessible and adaptable dwellings' and M4(3) 'wheelchair user dwellings'. Any planning policies requiring either Building Regulations M4(2) and / or M4(3) should take into account site specific factors and that for developments where step free access is not viable, neither of the requirements should be applied.

9.60 Government consulted on raising accessibility standards for new homes and responded to consultation setting out that ‘Government proposes that the most appropriate way forward is to mandate the current M4(2) (Category 2: Accessible and adaptable dwellings) requirement in Building Regulations as a minimum standard for all new homes – option 2 in consultation. M4(1) will apply by exception only, where M4(2) is impractical and unachievable (as detailed below). Subject to a further consultation on the draft technical details, we will implement this change in due course with a change to building regulations.’

9.61 The Local Plan Partial Update included an update to Policy H7: Housing Accessibility to provide suitable housing that meets the needs of different groups in the community, including disabled people, older people and families with young children. These accessibility standards were taken forward in line with the relevant evidence base and subject to viability testing.

9.62 Providing accessible housing is important in ensuring that the needs of older and disabled people are met, as well as creating the flexibility for homes to meet the changing needs of individuals and families at different stages of life. We are proposing housing accessibility standard Options as follows:

H/AS: Accessible Homes			
	Option	**Advantages**	**Disadvantages**
1	Take forward optional technical standards M4(2) and M4(3) in line with up- to-date evidence base (LHNA) and subject to viability testing and with reference to relevant caveats in exceptional circumstances where M4(2) and M4(3) standards cannot be delivered.	Provides accessible and adaptable housing that meets the needs of all.	None identified.
2	Take forward M4(2) and M4(3) standards in all housing. M4(3) requirements to be required in line with LHNA evidence base and subject to viability testing. Set out relevant caveats in exceptional circumstances where M4(2) and M4(3) standards cannot be delivered.	Provides accessible and adaptable housing that meets the needs of all.	Viability considerations.
3	Take forward M4(3) standards in line with up-to-date evidence base and subject to viability testing. Set out relevant caveats in exceptional circumstances where M4(3) standards cannot be delivered. (This option would be reliant on the requirement of M4(2) accessibility standards to come forward through Building Regulations updates.)	Provides wheelchair housing to meet the needs of disabled people (both for wheelchair accessible and wheelchair adaptable housing).	Reliant on the requirement of M4(2) accessibility standards being brought forward through Building Regulations update.

9.63 Where M4(2) and M4(3) cannot be delivered, the requirement would be to deliver M4(1) compliant dwellings.

Residential Space Standards

9.64 Planning Practice Guidance (PPG) provides that where a local planning authority wishes to require an internal residential space standard that this can only be done by reference to the nationally described residential space standard (NDSS) within their Local Plan. The nationally described residential space standard sets out internal space requirements relating to bedrooms, storage and internal areas for new dwellings, with the requirements determined by the number of storeys, bedrooms and bedspaces.

9.65 The National Design Guide 2021 highlights that good design promotes quality of life for occupants and users of buildings including function and should provide comfort, safety, security, amenity, privacy, accessibility, and adaptability. It further sets out that 'Well-designed homes and communal areas within buildings provide a good standard and quality of internal space. This includes room sizes, floor-to-ceiling heights, internal and external storage, sunlight, daylight and ventilation.'

9.66 NDSS are required within Affordable Housing within B&NES and were taken forward within the B&NES Planning Obligations SPD subsequent to the Housing Standards Review in 2015. Options as relates to Nationally Described Space Standards (NDSS) in Affordable Housing are as follows:

H/AS: Residential Space Standards			
	Option	**Advantages**	**Disadvantages**
1	Take forward the requirement for NDSS within Affordable Housing in the Local Plan as currently set out in the B&NES Planning Obligations SPD in line with evidence base (note – this is subject to the Local Plan viability assessment that will inform the Draft Local Plan).	Where a local planning authority requires an internal space standard, they should only do so by reference in the Local Plan to the NDSS.	None identified.
2	Leave current NDSS requirements for Affordable Housing in the B&NES Planning Obligations SPD.	Current policy.	Where a local planning authority requires an internal space standard, they should only do so by reference in the Local Plan to the NDSS.

9.67 We do not currently have a requirement for NDSS within market housing in our adopted Local Plan, although within B&NES anecdotal evidence suggests that generally developments are brought forward using these space standards.

9.68 Given the health and wellbeing benefits for residents of NDSS and viable delivery, we are proposing to test options around the requirement for NDSS within market housing, including Build to Rent schemes

9.69 We also need to consider our approach to space standards in terms of delivering high quality innovative approaches to alternative forms of housing such as micro-housing and co-living to meet the needs of some of our communities, considering how we would ensure how high amenity levels can be reached without NDSS (see separate section on co-living below).

9.70 Options as relates to NDSS in market housing are as follows:

H/AS: Residential Space Standards in Market Housing			
	Option	**Advantages**	**Disadvantages**
1	Do not take forward NDSS requirements within policy as relates to market housing.	Developments are not required to take forward NDSS within market housing.	Developments may not provide minimum dimensions and design criteria which would be detrimental to residential amenity/quality of life.
2	Take forward the requirement for NDSS within market housing within the Local Plan in line with the evidence base. Note: NDSS requirement would not apply to specific types of residential accommodation e.g. co-living, as set out later in this chapter.	NDSS include minimum dimensions and design criteria to make homes comfortable, safe and adaptable to allow people to carry on everyday activities at ease.	Viability considerations.

Policy H/HM: Housing Mix

9.71 Paragraph 63 of the NPPF (December 2023) requires local authorities to assess the size, type and tenure of housing needed for different groups in the community and reflect the results of this assessment in their planning policies. The NPPF also sets out that as part of achieving sustainable development a sufficient range of homes should be provided to meet the needs of present and future generations.

9.72 Consultation on the B&NES Local Plan 2022-2042 Launch Document (October 2022) provided feedback from a range of stakeholders who highlighted the need to ensure that housing mix meets the needs of their local communities, including young people, young families, single residents, keyworkers, families and an ageing population.

9.73 Policy CP9: Affordable Housing and Policy CP10: Housing Mix of the B&NES Local Plan provides policy requirements as relates to housing mix within affordable housing and market housing. Whilst the mix of affordable housing units is delivered to reflect current evidence base (housing needs assessment and housing needs register) and in consultation with the council to ensure that the housing delivered meets needs, there are issues that within market housing, particularly on smaller sites, some housing mixes are driven more by commercial considerations than local need.

9.74 It will be important that housing mix within developments reflect the needs of local communities. Rural Exception site policy highlights that the need for affordable housing within a rural settlement will be determined through a Rural Housing Needs Survey based on robust methodology and housing need within the settlement as evidenced through the Housing (Homesearch) Register. The Survey will also consider the proposed housing mix required within the community.

9.75 Options as relates to proposed housing mix policy are as follows:

H/HM: Housing Mix			
	Option	**Advantages**	**Disadvantages**
1	Take forward policy in line with that currently set out in Policies CP9 and CP10 of the Development Plan.	Current policy.	Policy lacks clarity particularly as relates to housing mix requirements within market housing.
2	Take forward policy in line with that currently set out in Policies CP9 and CP10 of the Development Plan. Further to highlight that housing mix on the application site should meet the needs of different household types and sizes within local communities as demonstrated by evidence either through a Local Housing Needs Survey or the LHNA.	Provides clarity on housing mix required in affordable and market housing in line with an up-to-date evidence base.	Viability considerations.

Policy H/BtR: Build to Rent Developments

Background

9.76 Build to rent (BtR) is purpose-built housing, typically 100% rented out. It can form part of a wider multi-tenure development but should be on the same site and/or contiguous with the main development. The detailed background and evidence relating to the following options is set out in the Housing Topic Paper.

Location of Build to Rent Schemes

9.77 National Guidance states that where a Local Housing Need Assessment identifies a need for BtR developments, authorities should include a Local Plan policy setting out their approach to promoting and accommodating BtR, recognising the circumstances and locations where it will be encouraged. As such, the following options are proposed:

H/BtR: Build to Rent Developments – Location of BtR Schemes			
	Option	**Advantages**	**Disadvantages**
1	Policy to set out preferred situations in which BtR will be encouraged, i.e. located in city / town centre locations	Encourages BtR in sustainable locations	Restricts smaller BtR schemes outside town centres – could be considered too restrictive
2	Policy to restrict BtR developments, apart from within site allocations where levels of provision are specified, based on local need	Ensures provision as an appropriate balance of tenures within a scheme, based on need	Restricts BtR other than site allocations – could be considered too restrictive
3	Policy to stay silent on the preferred location of BtR developments, therefore allowing the market to lead location of future development	Provides flexibility	PPG requires approach to promoting and accommodating BtR to be set out in LP

Question: Which option do you prefer and why?

Affordable Private Rent Discount Level

9.78 National policy states that affordable private rent should be set at a level that is at least 20% less than the private market rent (inclusive of service charges) for the same or equivalent property.

9.79 Evidence set out in the Housing Topic Paper shows that the 20% discount set out in the NPPF does not provide an affordable level of rent in B&NES. To address this, the following options are proposed:

H/BtR: Build to Rent Developments – Affordable Private Rent Discount Level			
	Option	**Advantages**	**Disadvantages**
1	Affordable Private Rent provided at a level that is equivalent to or below Local Housing Allowance for the relevant sized property (inclusive of service charges).	APR will be at level of LHA and therefore genuinely affordable in Bath and North East Somerset	Potential for reduced numbers of affordable units provided due to requirement for lower APR levels
2	Affordable Private Rent provided at a level that is at least 20% less than the private market rent (inclusive of service charges) for the same or equivalent property.	Potential for increased number of APR homes provided compared to option 1, due to higher APR levels	Reliant on planning application determination process to seek higher than 20% discount to meet affordability required in Bath and North East Somerset Unlikely to meet LHA levels

Question: Which option do you prefer?

Affordable Private Rent homes required in each development

9.80 Planning Practice Guidance advises that 20% is generally a suitable benchmark for the level of affordable private rent homes to be in any build to rent scheme. However, if local authorities wish to set a different proportion, they should justify this using the evidence emerging from their local housing need assessment, and set the policy out in their Local Plan.

9.81 Data in the LHNA evidences a significant need for affordable housing in Bath and North East Somerset. In Bath, the level of affordable housing required is around 77% of total housing provision, and outside of Bath, the level is around 31%.

9.82 As such, the following options test the delivery of a higher percentage of affordable housing from Build to Rent schemes, consistent with standard affordable housing percentages required across other housing types. The options will be subject to viability testing.

H/BtR: Build to Rent Developments – Affordable Private Rent homes required in each development			
	Option	**Advantages**	**Disadvantages**
1	At least 20% affordable private rent homes to be provided (and maintained in perpetuity)	In line with NPPF recommendation	Lower levels of AH provided than shown to be required in the LHNA
2	Percentage of affordable private rent homes to be provided (and maintained in perpetuity) in line with standard affordable housing percentages required across other housing types.	Levels in line with affordable housing percentages required across other housing types	Viability implications (to be tested)

Question: Do you agree with the percentage levels to be tested?

Policy H/CL: Co-living Schemes

Background

9.83 Co-living Schemes are not defined in national policy or guidance. They are purpose-built residential schemes, that often comprise studio bedspaces with access to shared communal facilities. Schemes may be new build, or conversions of existing buildings. They fall under a sui generis planning use class, and are not restricted to any particular user group, i.e. students.

9.84 Co-living is a relatively new housing model which allows occupiers to live together communally with accommodation containing individual bedrooms and communal areas such as kitchens, living areas, and areas to work.

9.85 Co-living schemes are being promoted by developers as a more affordable and transitional form of purpose built rented accommodation for various groups of people such as young professionals or recent graduates who are on their way to transitioning to rented self-contained flats or houses, or home ownership.

9.86 Some co-living schemes are aimed at other groups, such as older people, who have chosen to move out of individual homes, and live communally. There are also examples of co-living schemes in the UK where intergenerational living is promoted.

9.87 Co-living is considered to provide an alternative to traditional shared housing, and often includes the provision of additional services and facilities, such as on-site gyms and concierge services.

9.88 The adopted B&NES Local Plan does not currently comprise a policy relating to co-living developments, against which to assess planning applications. As such, policy options are set out below relating to location and provision, affordable housing, and amenity standards.

Location and Provision

9.89 As co-living schemes are mainly aimed at young professionals and recent graduates, or older people who have chosen to move out of individual homes and live communally, it is considered important that the accommodation is located in highly sustainable locations, very well connected by public transport, and are close to employment opportunities and amenities. Regarding this, the following options are proposed:

H/CL: Co-living Schemes – Location and Provision			
	Option	**Advantages**	**Disadvantages**
1	Policy to set out preferred location in which co-living will be encouraged, i.e. located in city / town centre locations	Encourages co-living in sustainable locations	Restricts smaller co-living schemes outside town centres – could be considered too restrictive?
2	Policy to stay silent on the preferred location of co-living developments, therefore allowing the market to lead location of future development	Provides flexibility	No control over future provision / location

Question: Which option do you prefer?

Affordable Housing Provision

9.90 Co-living is considered to fall under a sui generis planning use class.

9.91 Adopted policy CP9 in the B&NES Core Strategy requires developments of 10 or more dwellings to provide on-site provision of affordable dwellings, unless evidence is submitted to show that such provision would be unviable.

9.92 It is established in planning legislation that a dwelling refers to a unit of residential accommodation which provides the facilities needed for day-to-day private domestic existence.

9.93 Co-living schemes generally provide studio accommodation which comprise the facilities required for single person occupancy, comprising a bed, seating, bathroom facilities, and a small kitchen or kitchenette. It is therefore appropriate that co-living accommodation contributes to affordable housing provision within the District.

9.94 However, because it does not meet minimum housing space standards co-living accommodation is not considered to provide a suitable form of affordable housing in itself.

9.95 As such, a financial contribution is required in lieu of on-site provision.

H/CL: Co-living Schemes – Affordable Housing Provision			
	Option	**Advantages**	**Disadvantages**
1	Requirement for all co-living schemes to provide a financial contribution in lieu of on-site affordable housing provision.	Provision of affordable housing on co-living development sites	Viability implications (to be tested)

Question: Do you agree with this approach?

Amenity Standards

9.96 Housing design standards (including NDSS) and policies do not apply to co-living accommodation as it falls under a sui generis use class. Therefore policies and guidance are considered to be required to provide consistent standards to ensure good quality, well-managed living spaces are provided, that positively integrate with the surroundings.

9.97 Reference is made within the options to exploring the adoption of NDSS for market housing. Whilst the layouts of co-living developments are not usually appropriate to meet the requirements of NDSS, reference is proposed to a need to provide high quality amenity spaces which meet the needs of occupants.

H/CL: Co-living Schemes – Amenity Standards			
	Option	**Advantages**	**Disadvantages**
1	Policy setting out requirement to ensure good quality, well-managed living spaces.	Flexibility for developers	No consistent set of standards to assess planning applications
2	Policy setting out specific requirements to ensure good quality, well-managed living spaces, including minimum room sizes for bedrooms and communal areas, lighting standards, and management requirements.	Provides consistent set of standards to assess planning applications	Less flexible in terms of building layout, accommodation size and management

Question: Do you think policy should set out specific requirements such as minimum room sizes for co-living schemes?

Policy H/PBSA: Purpose built student accommodation

Provision and Location

9.98 Policy H2A in the LPPU directs PBSA to on-campus locations, or elsewhere in the District where a nomination agreement with an educational establishment is provided, or where the PBSA would be provided for 2nd and 3rd year students.

9.99 The University of Bath and Bath Spa University have provided the Council with projected student growth figures, which are set out in the Student Growth Topic Paper. The Topic Paper also sets out the calculation used to predict the number of additional PBSA bedspaces that would be required across the Plan period in order to support this growth, taking into account the existing PBSA within the City, as well as any already in the pipeline.

9.100 If an assumption is taken that both universities were to grow in line with their projections up to 2030, with an assumed 1% annual growth from 2030 – 2042, approximately 4,800 (or 240 per year) additional PBSA bedspaces would be required across the Plan period, in addition to those already in the pipeline.

9.101 If there was no growth assumed between 2030 – 2042, there would be a requirement of approximately 2,000 (or 100 per year) additional PBSA bedspaces across the Plan period, in addition to those already in the pipeline.

9.102 If an assumption is taken that both universities will grow at the same rate between 2030 – 2042 as predicted between 2022 – 2030, there would be a requirement of approximately 10,300 (or 515 per year) additional PBSA bedspaces across the Plan period, in addition to those already in the pipeline. The LHNA calculates predicted growth in student population based on average growth trends for the 20-year period between 2001-2021. This is consistent with the approach taken for other forms of housing. The LHNA calculates that the number of the students requiring accommodation in Bath and North East Somerset to be 7,300 (or 370 per year). Challenges exist in accommodating continued levels of student growth within Bath, and across the District, particularly given the higher priority for accommodating non-student housing and especially affordable housing to meet local need and employment space. Additionally other Local Plan priorities e.g. relating green infrastructure provision and protection of the World Heritage Site, its setting, and other heritage assets also limit the ability to accommodate further PBSA. The following options test three ways in which provision of PBSA could be accommodated and controlled within the District.

H/PBSA: Purpose Built Student Accommodation - Provision and Location			
	Option	**Advantages**	**Disadvantages**
1	Restrict PBSA across the district other than on-campus	Protection of sites in B&NES for general housing and employment uses Encourages exploration of campus provision outside B&NES	If provision of PBSA is not in line with educational establishment growth, potential to limit growth, or increase HMO numbers across the district
2	Allow PBSA to only be developed on sites specifically allocated for that purpose, including a review of potential locations outside Bath, i.e. Keynsham and Hicks Gate	Better management of location and quantum of PBSA Protection of sites for general housing and employment uses, or a mix including some PBSA Encourage exploration of sustainable locations outside the city to provide PBSA	If provision of PBSA is not in line with educational establishment growth, potential to limit growth, or increase HMO numbers across the district Sites outside Bath potentially not as sustainable for students travelling to universities Green Belt release for PBSA would require exceptional circumstances justification
3	Retain LPPU policy H2A as worded, giving educational establishments flexibility to use nomination agreements to bring forward PBSA	Flexibility for educational establishments to meet growth needs off-campus	Off-campus PBSA likely to lead to loss of land for employment and general housing Off-campus PBSA is market-led, so likely to provide higher proportion of studios, rather than more affordable cluster flats

Question: Which option do you prefer?

PBSA Affordable Housing or Rent

9.103 LPPU policy H2A does not currently require the delivery of affordable housing or affordable rent in relation to provision of PBSA.

9.104 Both universities in the city of Bath have raised significant concerns relating to the high cost of student accommodation, and the negative impact that these high costs have on the well-being of their students.

9.105 The B&NES Local Housing Needs Assessment sets out a significant need for affordable homes across the District, particularly within the city of Bath.

9.106 In order to meet the priorities of the Local Plan relating to providing homes that are affordable, the options below seek to introduce a requirement for all PBSA developments to contribute towards housing that is affordable within the District, either through a contribution to conventional C3 affordable housing, or provision of on-site affordable student accommodation.

9.107 The first option seeks to meet the needs of students who struggle to afford the high costs of accommodation in the city, by requiring all PBSA developments to deliver a certain percentage of bedspaces as 'affordable student accommodation', which is likely to be defined as being set at a rent level that is no more than 55% of the maximum maintenance grant available for that academic year.

9.108 The second option seeks to meet the general need for affordable dwellings in the city by requiring all PBSA developments to deliver a cash in lieu contribution towards conventional C3 affordable housing. This option is justified by the consideration that sites allocated for PBSA could otherwise have been allocated for use as C3 dwellings, which would be required to provide 30% or 40% on-site affordable housing. As PBSA does not meet minimum housing space standards it is not considered suitable as a form of affordable housing itself. Therefore, a cash in lieu contribution is required towards conventional C3 affordable housing.

9.109 The third option seeks to meet both needs, by requiring provision of affordable student accommodation for PBSA developments located on-campus, or sites owned by either of the universities, and a cash in lieu contribution towards conventional C3 affordable housing.

H/PBSA: Purpose Built Student Accommodation - Affordable Housing or Rent			
	Option	**Advantages**	**Disadvantages**
1	Requirement for all PBSA developments to deliver at least 30% of bedspaces as 'affordable student accommodation'	Meets need of students unable to afford accommodation	Loss of affordable housing on sites that could otherwise be allocated for C3 dwellings
2	Requirement for all PBSA developments to deliver a cash in lieu contribution towards conventional C3 affordable housing	Provides a contribution to conventional affordable housing, on sites that could otherwise have been allocated for C3 dwellings	Does not meet the needs of students unable to afford accommodation
3	Requirement for PBSA developments located on-campus or on sites owned by an educational establishment to deliver at least 30% of bedspaces as affordable student accommodation, and PBSA developments located elsewhere to deliver a cash in lieu contribution towards conventional C3 affordable housing	Partly meets the need of students unable to afford accommodation (on-campus), and also facilitates delivery of contributions towards conventional affordable housing on sites that could otherwise have been allocated for C3 dwellings	Fewer affordable student rent properties than option 1. Fewer contributions to conventional affordable housing than option 2. Potentially more complicated to implement.

Question: Which option do you think would best meet the Local Plan priority of providing homes that are affordable?

Policy H/SBCHB: Self and Custom Housebuilding

9.110 The NPPF states that Councils should plan for a mix of housing including for people wishing to build their own homes. The Self-build and Custom Housebuilding Act 2015 introduced a duty on local authorities to keep a register of people who want to build their own homes and to grant permissions for enough serviced plots of land to meet the demand on the register. Self-build permissions are identified using claims for exemption from Community Infrastructure Levy (CIL) payments (self-build dwellings are exempt from CIL).

9.111 Policy H4 in the Placemaking Plan encourages self-build, but it does not create a policy environment that directly facilitates the delivery of self and custom build housing. Therefore, in order to facilitate the approval of the number of plots required to meet demand, it is considered that further policy intervention is necessary, as sufficient plots are unlikely to come forward without it. Promotion of self-build is also in accordance with the Government's stated ambition of diversifying the housing market (i.e. moving away from a market dominated by large-volume housebuilders).

9.112 The existing policy framework already allows for single plot self-build schemes to come forward within urban areas and villages (within Housing Development Boundaries), and small numbers are currently being delivered.

9.113 Other Councils have also introduced requirements for a minimum proportion of large sites to be self-build – for example, Teignbridge and South Gloucestershire have policies requiring a 10% self-build plots on sites over 20 and 100 respectively. Others have gone further still, for example, Cherwell District Council has purchased and allocated land for around 2,000 self-build dwellings and expects to make a financial return.

9.114 There are a number of different policy approaches that could be explored which might help boost the delivery of self-build plots in Bath and North East Somerset. The policy approaches are presented for purposes stimulating discussion to address facilitating the delivery of self-build plots:

H/SBCHB: Self and Custom Housebuilding			
	Option	**Advantages**	**Disadvantages**
1	Support/housing mix policy seeking to secure appropriate mix of homes on all sites, taking account of existing imbalances in housing stock, site characteristics, viability and market considerations and opportunity to facilitate Custom and Self Build schemes.	Diverse Housing Stock: Encouraging a mix of homes can lead to a more diverse housing stock, addressing the needs of different demographics and lifestyles within the community. Market Responsiveness: Considering market conditions and site characteristics ensures that the housing supply is more responsive to the actual demands of the local population, potentially improving overall market dynamics.	Viability Challenges: Balancing housing mix with site viability and market considerations can be challenging. There might be situations where the desired housing mix is not economically viable for developers or self-builders. Complex Implementation: Implementing and enforcing a nuanced policy that considers various factors may be difficult to administer effectively.

2	Percentage policy on large sites or strategic allocations – e.g. Mid Devon (Policy S3) – sites of 20 or more homes to provide at least 5% serviced plots for sale to self-builders	Encourages Diversity: This policy promotes diversity within large developments, ensuring that not all housing is homogenous and encouraging a mix of styles and designs. Local Economic Benefits: Self-build projects can contribute to the local economy by supporting local businesses and contractors, leading to increased economic activity.	Viability Challenges: Balancing housing mix with site viability and market considerations can be challenging. There might be situations where the desired housing mix is not economically viable for developers or self-builders. Choice: Self-builders may not wish to be part of a larger development site or want more choice regarding the type of development that could take place on a plot.
3	Allocation of suitable sites promoted for Self/Custom Build that are in line with the spatial strategy outlined above.	Strategic Spatial Planning: Allocating specific sites for self-build in line with spatial strategies ensures that self-build developments align with broader planning goals. Community Engagement: Identifying suitable sites through a strategic approach involves community input, fostering a sense of engagement and collaboration in the planning process.	Limited Flexibility: Strict allocation might limit flexibility in responding to changing market conditions or unforeseen developments. Land Availability Challenges: Identifying and securing suitable sites for self-build may be challenging, particularly in areas with limited available land.

Question: Which option do you think would best meet the Local Plan priority of providing homes that are affordable?

Policy H/GT: Gypsies, Roma, Travellers and Travelling Show People

9.115 The NPPF (December 2023) states that the needs of groups with specific housing requirements must be addressed and this includes the needs of travellers. National policy guidance is provided in the government's Planning policy for traveller sites (PPTS). This guidance recently updated Annex 1 (December 2023)and clarifies that Gypsies and Travellers mean any 'persons of nomadic habit of life whatever their race or origin, including such persons who on ground only of their own or their family's or dependant's educational or health needs of old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.' As well as delivering the right number of homes, the Local Plan needs to guide the size and type of homes delivered, so that they reflect the needs of different groups in the community.

9.116 Policy CP11: Gypsies, Travellers and Travelling Showpeople sets out a criteria-based policy for the identification and allocation of suitable, available and deliverable or developable sites in a Development Plan Document and when considering planning applications.

9.117 The Bath and North East Somerset Council Gypsy and Traveller Accommodation Assessment (Final Report) September 2021 (GTAA) undertaken by Opinion Research Services (ORS) on behalf of B&NES Council, set out the pitch requirement for the period 2020-2034. Although the approach and methodology to the GTAA was underpinned by the planning definition for a Gypsy, Traveller or Travelling Showperson as set out in PPTS (2015), it also included an assessment of need for households that did not meet the planning definition.

9.118 The 2021 GTAA set out the requirement of 12 pitches (2020-2034) to meet the need for households that meet the planning definition of gypsies and travellers. Planning application 21/04206/FUL Carrswood View permitted the change of use of three transit Gypsy and Traveller pitches to use as permanent residential pitches for Gypsy and Traveller households. This leaves a residual requirement to 2034 of nine pitches.

9.119 ORS in an update note to this work on pitch requirements to 2042 set out a requirement of an additional 2 pitches required to meet the PPTS planning definition. ORS highlighted that given the local nature of the need consideration should be given to meeting it through intensifying existing private pitches.

9.120 An updated GTAA (comprising new household interviews) will be undertaken in early 2024 to inform the Draft (Regulation 19) Local Plan and consider the implications of the recent update to the definition of Gypsies and Travellers as set out in Annex 1 of the PPTS.

9.121 Based on current evidence given the limited and locally specific pitch requirements, it is proposed to take forward a criteria-based policy approach within the Local Plan in addition to National Planning Policy requirements. The criteria-based policy would include consideration of intensification of private traveller sites given local requirements. Infrastructure requirements, and specifically the need for school places, will need to be considered in relation to any sites or intensification of existing sites proposed.

9.122 In terms of transit pitches, the GTAA concluded that 'Due to low numbers of unauthorised encampments and the presence of designated transit pitches, it is recommended that there is no need for any additional transit provision in Bath and North East Somerset at this time.'

We are proposing to take forward a criteria-based policy approach as outlined above and we do not consider that there would be a requirement to allocate additional sites for permanent residential or transit pitches within the Local Plan.

Question: Do you agree with this approach?

Policy H/M: Moorings

Background

9.123 The NPPF encourages local planning authorities to deliver a wide choice of high-quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. It is recognised that houseboats contribute to increasing diversity of homes within the District.

The NPPF further sets out that in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment conducted using the standard method in national planning guidance. The housing needs of all groups should be assessed.

9.124 Provisions set out in the Housing and Planning Act now include a duty (under Section 8 of the 1985 Housing Act that covers the requirement for a periodical review of housing needs) for local authorities to consider the needs of people residing in, or resorting to, their district with respect to the provision of sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored.

9.125 Placemaking Plan Policy H6 covers development proposals seeking new moorings. The policy seeks to guide proposals to the most sustainable locations where there is easy access to necessary services and facilities. These include education facilities and as such the need for additional school places must be considered when assessing proposed sites for moorings.

9.126 There is an evidence-based current need for 6 permanent/ licenced moorings and a Modelled maximum need for 17 moorings based on an estimated 100 live aboard boats across the district. This need is in addition to existing moorings.

9.127 9.122 The detailed background and evidence relating to the policy is set out in the Housing Topic Paper. INSERT LINK

Policy Approach

9.128 The waterways that are used for moorings primarily lie within the Green Belt (other than within the city of Bath). Appeal decisions and Court judgements have confirmed that marinas and moorings related development is inappropriate development in the Green Belt, unless it preserves the openness of the Green Belt. Given the limited scale of need for moorings and that most of the waterway lie within the Green Belt it is proposed to take forward a criteria-based policy approach within the Local Plan in addition to National Planning Policy requirements, as well as to consider the potential for additional moorings as part of the development location option at North Keynsham (see also chapter 6). The criteria-based policy would include consideration of intensification of private traveller sites given local requirements.

9.129 The criteria-based policy would be based on adopted Policy H6. The existing policy sets out that development involving new and additional moorings will be permitted provided they are located outside the Green Belt. As noted above most waterways situated within Bath and North East Somerset are located within the Green Belt. The adopted policy presents limitations for delivering moorings especially considering there are exceptions to development within the Green Belt set out within the NPPF.

9.130 It is therefore proposed to make amendments to the supporting text/policy relating to moorings development in the Green Belt. In line with national policy, it will be made clear that some limited moorings development might fall within one of the exceptions to inappropriate development within the Green Belt i.e. a material change of use of land that preserves the openness of the Green Belt.

Question: Do you agree with this approach and why?

9.131 We are proposing to take forward a criteria-based policy approach with amended references to the Green Belt, as well as considering the potential for additional residential moorings as part of the development options at North Keynsham as outlined above.

Question: Do you agree with this approach and why?

H/M: Moorings			
	Option	**Advantages**	**Disadvantages**
1	Retain policy H6 with amendments.	Adopted policy presents no issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required.	None identified.

Climate Change

Policy C/RD: Sustainable Construction for New Residential Development

9.132 Adopted policy SCR6 currently sets limits on space heating and energy consumption in new build residential dwellings. The policy also requires energy needs to be met through on-site renewable energy to match total energy use.

9.133 The policy applies to all residential development including PBSA and care homes, but does not apply to extensions, conversions and other changes of use.

9.134 The Local Plan provides an opportunity to review how the policies are being implemented and to consider the option of setting stricter standards for space heating and energy use.

National Policy changes

9.135 On the 13th December 2023 the DLUHC released a Written Ministerial Statement that discourages local authorities from setting their own standards with regards to energy efficiency in homes and setting out the desired approach for sustainable construction policies. The statement specifies the metric to be used for any locally set policies should be as follows;

9.136 *The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).*

9.137 In addition, DLUHC are currently consulting on the Future Homes Standards which looks at changing building regulations and introducing new requirements for residential development. The aim is for new residential buildings to be 'zero carbon ready', meaning that no further work will be needed for them to have zero carbon emissions once the electricity grid has decarbonised. The standards will require heating and hot water demand to be met through low-carbon sources and fossil fuel methods will not be permitted.

9.138 The consultation proposes minimal changes in fabric standards from Building Regulations Part L 2021, with only option number one proposing a slight improvement in air tightness. The proposed option one includes the installation of wastewater heat recovery systems, decentralised mechanical extract ventilation and solar PV panels to cover the equivalent of 40% of ground floor area. Option two proposes none of these changes. The consultation does not state a preferred option.

9.139 The proposed changes rely on the electricity grid becoming decarbonised for new buildings to achieve zero carbon emissions and therefore, it is still considered that a policy on sustainable construction is required.

Options

9.140 The first option listed below will seek to retain the current policy and not adjust the existing standards.

9.141 The second option looks at setting stricter standards for space heating and energy use, whilst continuing to require energy needs to be met on site through renewables.

9.142 The third option would alter the metric used from space heating and energy use intensity to a % carbon reduction from the target emission rate of the building as assessed by the standard assessment procedure (SAP) and as referenced in the recent Written Ministerial Statement. This option will also explore the addition of requiring no use of on-site fossil fuels.

C/RD: Sustainable Construction for New Residential Development			
	Option	**Advantages**	**Disadvantages**
1	Retain the existing standards as set out in policy SCR6.	The current policy requires a good energy efficiency standard on operational emissions.	Other LPAs are now seeking to set stricter standards and not changing the standards will mean that new homes will not be as efficient as they could be.
2	Revise the standards to state the following; • Space heating demand less than 15kWh/m2/annum; • Total energy use less than 35kWh/m2/annum; and • On site renewable energy generation to match the total energy use, with a preference for roof mounted solar PV • Connection to a low- or zero-carbon district heating network where available Retain the options for offsetting where energy needs cannot be met on site.	The policy will result in warmer more efficient homes and will contribute to addressing the climate emergency. The proposal is in line with other West of England authorities.	The introduction of stricter standards may increase the cost of the development to the detriment of other requirements such as affordable housing. Viability will need to be tested. May not align with the Witten Ministerial Statement.
3	Require a 100% reduction in carbon emissions from the target emission rate as outlined in the Standard Assessment Procedure No use of on-site fossil fuels	Closely aligns with the requirements of the Written Ministerial Statement.	Percentage carbon metric is not as accurate as space hearting and EUI targets.

Question: Do you prefer option 1, option 2 or option 3? Please provide reasoning.

Policy C/NRB: Sustainable Construction for Non-Residential Buildings

9.143 Adopted policy SCR7 set a new policy requiring a 100% reduction in operational carbon emissions from the buildings regulation standard in part L. The policy requires that energy efficiency should be maximised through efficient fabric and services with energy use being met through on site renewables.

9.144 A carbon reduction policy is not as accurate a metric as space heating and energy standards. However, it is difficult to set heating and energy use standards for non-residential buildings due to their varied typologies.

9.145 Option 1 looks at retaining the existing standards but broadening this policy to all new build non-residential buildings.

9.146 Option 2 looks at setting a space heating standard for non-residential buildings and the possibility of an energy use intensity standard.

9.147 Option 3 considers the use of BREEAM standards to assess the efficiency of the buildings in line with some other local authorities.

C/NRB: Sustainable Construction for New Non-Residential Development			
	Option	**Advantages**	**Disadvantages**
1	Retain the existing policy but apply the policy to all non-residential development.	The policy has been working well so far and to include all non-residential buildings will improve the standards of new building stock.	The policy uses building regulations to calculate the carbon reduction, which is less accurate than space heating and energy standards. Carbon reduction does not take account of a buildings form factor.
2	Set a space heating requirement of; 15kWh/m2/annum Explore the possibility of setting an energy use intensity standard for different non-residential typologies. Continue to require energy needs to be met through on-site renewable energy generation	The use of space heating and EUI standards will result in a more accurate assessment of the buildings operation energy. Form factor can be taken into account. Changes to building regulations will not impact on the implementation of the policy.	Due to the variation in performance in non-residential buildings it may be difficult to set EUI standards. Any new standards may affect the viability of development.

3	Retain the existing policy but require all major and minor applications to meet as a minimum BREEAM excellent standards	BREEAM is a widely used third party accreditation scheme. BREEAM 'Excellent' is the most common level of performance referred to, both in planning policy and corporate strategies.	The setting of BREEAM standards duplicates requirements of the existing operational energy, embodied carbon and environmental policies. BREEAM excellent does not meet a 100% carbon reduction

Question: Do you prefer option 1, option 2 or option 3? Please provide reasoning.

Policy C/EC: Embodied Carbon

9.148 Adopted policy SCR8 introduced the concept of embodied carbon assessments. Embodied carbon emissions are those associated with raw material extraction, manufacture and transport of building materials, construction, maintenance, repair replacements, dismantling, demolition and eventual material disposal.

9.149 Policy SCR8 required an embodied carbon assessment on sub-structures, super-structures and finishes. A target of 900kgCO2e/m2 was set to be required on large scale new build development.

9.150 The standard in the LPPU was is relatively to reach and was seen as a cost neutral approach in order to introduce the concept of embodied carbon assessments. There is now an opportunity through the Local Plan to set a stricter standard and broaden the reach of the policy.

C/EC: Embodied Carbon			
	Option	**Advantages**	**Disadvantages**
1	Retain the existing standards of the policy but broaden the scope of the policy to include all new major and minor applications.	The current target is easy to reach and does not impact on the viability of development.	As the standard is easy to reach the policy will not encourage developments to use more sustainable materials.
2	Alter the standards to require an embodied carbon assessment on major and minor development and require development to achieve the following standards on the sub-structures, superstructures and finishes. • Residential (4 storeys or fewer) - <625 kgCO2e/m² • Residential (5 storeys or greater) - <800 kgCO2e/m² • Non-residential schemes - <900 kgCO2e/m²	The proposed standards will require that more sustainable materials are used in construction.	Setting stricter standards may impact on the viability of development and impact on other measures such as affordable housing.
3	Where an application is seeking to demolish a building the applicant is required to demonstrate why it is not suitable for re- use. If the building is not suitable for re use the applicant must demonstrate how they will reuse and recycle materials created through the demolition.	Buildings will only be demolished and materials disposed of as a last resort.	Setting stricter standards may impact on the viability of development and impact on other measures such as affordable housing.

Question: Do you prefer option 1, option 2 or option 3? Please provide reasoning.

Policy C/RE: Renewable Energy

9.151 The Council's current approach to renewable energy is set out in Policy CP3. Policy SCR4 sets out the Council's approach to and support for Community Led Projects.

9.152 The policy approach was reviewed through the LPPU to set out a positive approach for determining applications and guiding development to the most suitable locations.

9.153 The revised Policy CP3 sets out the criteria for all stand-alone renewable energy projects, as well as specific criteria for wind energy and ground mounted solar.

9.154 Through the LPPU, the Council has set out a landscape led approach for wind energy and ground-mounted solar PV to guide development to the best locations which is based on the Landscape Sensitivity Assessment (LSA) for Renewable Energy Development (LUC, 2021).

9.155 It was not possible to review the Core Strategy target for renewable energy generation through the LPPU. This Options Document presents options for how both the target and approach to CP3 could be revised to plan positively for renewable energy while ensuring that adverse impacts are addressed satisfactorily.

National Context

9.156 Paragraph 160 of the NPPF states that the planning system should support renewable and low carbon energy and associated infrastructure. To help increase the use and supply of renewable and low carbon energy and heat, plans should:

- Provide a positive strategy for energy from these sources that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily.
- Consider identifying areas suitable for renewable and low carbon energy sources and supporting infrastructure.
- Identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.

9.157 Community-led initiatives for renewable and low carbon energy should also be supported, giving consideration to the role of neighbourhood planning as well as local plans.

9.158 Further detailed guidance on developing policies on renewables and low carbon energy and the planning considerations involved in such schemes is provided in the Planning Practice Guidance (PPG).

Changes since adoption of the LPPU

9.159 Since the adoption of the LPPU there have been changes to national policy issued by the Government in relation to Wind Energy, through the release of 5th September 2023 Written Material Statement (WMS) and subsequent revision to the NPPF.

9.160 Through the WMS the Government is seeking to restart development of onshore wind in England. The NPPF has been revised to allow alternative ways of identifying potential locations for new wind farm developments, rather than solely local development plans. This now includes local and neighbourhood development orders, or community right to build orders.

9.161 There have also been changes to the wording around the test applied in relation to community backing of onshore wind, on which further guidance is expected from the Government on how public support for wind farms will be assessed, and how communities that host wind farms could benefit from lower energy bills.

Proposed Target

9.162 It was not possible to review the Core Strategy target for renewable energy generation through the LPPU. Consequently, a misalignment exists between the Core Strategy target and the Council's Climate Emergency goal.

9.163 Stretch Pathway modelling outlined in the Council's Climate Emergency Strategy 2019-2030 indicates the magnitude and urgency of our ambition in Bath and North East Somerset to achieve our 2030 goal. According to the Anthesis 2019 report, it is suggested that we need a minimum additional 300MW if renewable energy to contribute to the decarbonisation of electricity, heat, and transport. Rapid and large-scale development of local renewable energy installations is essential, such as equipping 50% of existing homes with roof mounted solar PV by 2030, installing solar PV on commercial roof space equivalent to around 116 football pitches, and incorporating approximately 28 large (2.5 MW) wind turbines..

9.164 Through National Policy there is no prescribed way of determining how much energy should be generated from installations located within Bath and North East Somerset. However, in order to explore the implications of our Climate Emergency 2030 target on renewable energy development and to provide an indication of the scale of the challenge, refer to our evidence base, specifically the Renewable Energy Resource Assessment Study (RERAS).

9.165 The RERAS was commissioned, working with our partners (South Gloucestershire, North Somerset and the West of England Combined Authority (WECA)) to ensure a consistent approach across those areas. As part of this, we have projected local energy demand in Bath and North East Somerset in 2030 based on the assumption that we are living in a carbon neutral scenario.

9.166 The RERAS presents a ‘snapshot’ theoretical projection of local energy demand in 2030 in terms of Gigawatt hours (approximately 1,260 GWh), and it is based on a number of assumptions. The RERAS outlines three scenarios regarding the number and mix of additional solar and wind renewable energy installations in Bath and North East Somerset to meet the projected 2030 local electricity demand.

9.167 However, the Council's ambition for a minimum 300MW surpasses the first two scenarios in the RERAS, and as the RERAS recommends these are presented as scenarios rather than targets, we have not included these as options within this document.

9.168 Given this misalignment, we believe that linking back to the Council's Climate Emergency declaration and emphasizing the 300MW minimum target is the most appropriate way forward. This approach ensures a clear connection between planning applications for renewable energy and the overarching climate targets, allowing for flexibility over the plan period in case of changes to targets or evolution in the evidence base. Notably, evidence base documents, such as the RERAS, act as snapshots in time and are based on assumptions. This strategic approach helps avoid scenarios like the LPPU policy review, where the target was set in the Core Strategy many years before the declaration of the Climate Emergency by the Council.

C/RE: Renewable Energy Target			
	Option	**Advantages**	**Disadvantages**
1	Flexible Target – Linking the determination of planning applications for renewable energy back to the Council's and National climate targets.	Adaptability to Changing Targets: This approach allows for flexibility, adapting to changes in national climate targets. As targets evolve, the planning applications can be adjusted accordingly, ensuring alignment with the most current goals. Resilience to Policy Changes: Considering the evolution of evidence over time, this approach acknowledges that policies set in the past might need adjustment. It prevents the potential pitfalls of rigid plans that don't account for changing circumstances, such as the example of the LPPU policy review.	Potential for Delayed Action: The adaptive nature of the approach could potentially lead to delays in implementation as planning applications may need to be revised and updated based on changing targets Lack of Long-Term Certainty: The flexibility introduced might create uncertainty for stakeholders, including developers and investors, who may prefer more stable, long-term targets for planning and investment decisions.

Question: Do you agree with this approach and why?

Proposed Approach

9.169 Given that Policy CP3 has recently been reviewed, the policy approach could be regarded as appropriate to take forward into this Local Plan. Increased interest in Solar PV operators looking at sites within the District, such as the permitted 15MW solar farm on Marksbury Plain is noted.

9.170 The RERAS evidence base also includes a review of the technical potential of renewable energy technologies in the district. In particular, the study provides evidence on the potential areas for wind energy and solar PV, based on a variety of criteria and looking at factors, such as different wind turbine sizes, as required by national policy.

9.171 The RERAS shows that the potential opportunities and areas where large scale wind installations can effectively operate on a commercial basis are limited within Bath and North East Somerset (Appendix 1). Through this option these areas could be safeguarded so that other development which could prejudice wind energy development is not permitted.

9.172 It is important to stress that both the safeguarded areas and the broad areas of search (set out in the approach above) are only 'potentially suitable' for wind turbines: being within these locations does not mean that an application for a wind turbine or turbines would be approved. All applications for wind turbines would be assessed against the detailed policy criteria and all other relevant policies in this Local Plan, as well as National Policy or relevant Neighbourhood Plans.

9.173 Given the potential sensitivity of the areas identified (National Landscapes) through the technical assessment, it is not proposed to constrain these sites for large wind turbines only and provide a degree a flexibility on turbine size, consistent with our overall desire to increase renewable energy generation and to bring forward wind development, balanced against the need to protect environmental assets.

9.174 In stark contrast the RERAs shows that the solar resource is widespread across the district (Appendix 2). We consider that there would be no benefit in safeguarding these areas.

9.175 Options have also been presented for policy approach that could be applied to build upon the landscape led approach adopted currently in Policy CP3.

C/RE: Renewable Energy Approach			
	Option	**Advantages**	**Disadvantages**
1	Keep the broad areas of search approach established through the LPPU, with scope to review or add new elements (e.g., mine-water storage).	Approach recently adopted and seems to be appropriate	Broad areas of search may lack the certainty for developers or communities when looking for opportunities
2	Safeguarding of our best potential sites for wind energy	Safeguarding the best sites for wind energy ensures optimal utilisation of resources. These sites are selected based on favourable wind conditions, maximizing the efficiency and output of wind turbines.	Safeguarding specific sites for wind energy may limit alternative land uses, such as agriculture or recreation. This can lead to conflicts with other interests. The development of wind energy projects, even in optimal sites, can have environmental or landscape impacts.

Question: Do you agree with this approach and why?

Nature and Ecosystem Services

Policy N/SHS: Sites, Habitats and Species

Background

9.176 The NPPF expects local planning authorities to include criteria-based policies in their Local Plan against which the impact of development proposals on or affecting protected biodiversity and geodiversity can be considered. It also requires distinctions to be made between the hierarchy of international, national and locally designated sites.

9.177 Placemaking Plan policy NE3 Sites Habitats and Species seeks to conserve and increase the abundance and diversity of Bath and North East Somerset's wildlife habitats and species and to minimise adverse effects where conflicts of interest are unavoidable.

9.178 The detailed background and evidence relating to the policy is set out in the Natural Environment Topic Paper. INSERT LINK

Policy Approach

9.179 The B&NES Ecological Emergency Action Plan (EEAP) sets out the Vision to be Nature Positive by 2030. The EEAP sets out three guiding priorities consisting of:

- Increase the extent of land and waterways managed positively for nature across B&NES;
- Increase the abundance and distribution of key species across B&NES; and
- Enable more people to access and engage with nature.

9.180 The policy remains fit for purpose. The current policy accords with national and local strategies, however, amendments could be incorporated to ensure the policy is clearer particularly regarding the planning balance and judgement, including measures to help increase the abundance and distribution of key species, and in general meeting the three guiding priorities of the EEAP.

N/SHS: Sites, Habitats and Species			
	Option	**Advantages**	**Disadvantages**
1	Retain policy NE3 with amendments as outlined above.	Adopted policy tested recently at LPPU examination. No evidence to suggest major changes are required.	None identified.

Question: Do you agree with this approach and why?

Question: Are there any approaches which can be taken to ensure the policy can better reflect the Council's corporate priorities?

Policy N/BNG: Biodiversity Net Gain

Background

9.181 Biodiversity Net Gain (BNG) is a process designed for the planning system to make sure new development delivers a net positive impact on the natural environment.

9.182 The Construction Industry Research & Information Association provide a useful description of the BNG process:

9.183 “Enhancing biodiversity is integral to sustainable development, and BNG is an approach to embed and demonstrate biodiversity enhancement within development. It involves first avoiding and then minimising biodiversity loss as far as possible, and, achieving measurable net gains that contribute towards local and strategic biodiversity priorities” (CIRIA, C776a).

9.184 This clarifies a key aspect of the BNG approach which is to first avoid and then minimise biodiversity loss before considering and then calculating BNG values pre and post development. The approach therefore requires continued use of the mitigation hierarchy and existing and updated Natural Environment Policies.

9.185 Local Plan Partial Update (LPPU) Policy NE3a sets out development will only be permitted for major developments where a BNG of a minimum of 10% is demonstrated and secured in perpetuity (at least 30 years) subject to meeting the criteria listed within the policy.

9.186 The LPPU sets out the intention for research to be undertaken to explore introducing a higher requirement of BNG through preparation of the new full Local Plan. This is also set out in the council’s Ecological Emergency Action Plan.

9.187 The detailed background and evidence relating to the following options is set out in the Natural Environment Topic Paper.

Policy approach options

9.188 National Guidance sets out that plans should: “promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.” As such, the following options are proposed:

N/BNG: Biodiversity Net Gain			
	Option	**Advantages**	**Disadvantages**
1	Rely on the existing policy approach and emerging national legislation.	Approach is already in place and has recently been tested as part of the LPPU examination. The approach responds to the Council's declared Ecological Emergency in July 2020.	Existing approach is limited concerning a distinction between the requirements on greenfield sites and brownfield sites. Further issues raised revolve around how development schemes requiring BNG will be implemented, monitored and enforced. Relying on a 10% minimum BNG requirement may not deliver sufficient habitat gains. Existing policy approach will be out of kilter with mandatory requirements for small sites after March 2024 and so will need updating to require at least 10% net gain for minor applications.

2	Require a minimum 20% biodiversity net gain on: • Previously developed land (Major Applications) • Strategic housing sites (can then be a development requirement for allocated sites) • All major development within protected landscapes • Ground array solar farms • For all council developments.	The LPPU sets out the intention for research to be undertaken to explore introducing a higher requirement of BNG through preparation of the new full Local Plan. The approach will increase a development's contribution to nature recovery, and as a result help to better address the ecological emergency.	Potential viability concerns may require weighing up or balancing benefits against other spatial priorities. Further work needed on sufficient evidence to justify the approach.
3	A staggered/ graded approach to BNG requirements for different schemes i.e. require a minimum 20% biodiversity net gain on all major developments, down to 10% on minor applications.	The LPPU sets out the intention for research to be undertaken to explore introducing a higher requirement of BNG through preparation of the new full Local Plan.	Potential viability concerns may require weighing up or balancing benefits against other spatial priorities i.e., amount / type of housing provided on site. Further work needed on sufficient evidence to justify the approach.

Question: Which option do you prefer and why?

Question: Would an additional policy approach be needed for influencing location of off-site gains and their proximity to point of habitat loss?

Question: Should we be seeking a minimum of no net loss and appropriate net gain for schemes exempt from mandatory BNG?

9.189 Government guidance refers to habitats of significance but as of now this is not defined.

Question: Do we need to define when long term management of on-site gains is required?

Policy N/GI: Green Infrastructure

Background

9.190 The National Planning Policy Framework (NPPF) defines Green Infrastructure (GI) as a network of multi-functional green and blue spaces and other natural features, urban and rural, which can deliver a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.

9.191 In January 2023 Natural England published The Green Infrastructure Framework – Principles and Standards for England (GI Framework). This was a commitment in the Government's 25 Year Environment Plan. It supports the greening of towns and cities and connections with the surrounding landscape as part of the Nature Recovery Network. The GI Framework will help local planning authorities and developers meet requirements in the NPPF to consider GI in local plans and in new development.

9.192 As part of the GI Framework Natural England has developed a set of GI Principles:

9.193 'The GI Principles underpin the Framework. They provide a baseline for different organisations to develop stronger GI policy and delivery. The principles cover the why, what and how to do good GI.'

9.194 In addition to principles GI Standards are outlined, which are a key component of the GI Framework. The Headline GI Standards are for use by local planning authorities and other stakeholders informed by local knowledge and evidence to:

- Develop a vision for local green infrastructure and understanding of current green infrastructure provision, needs and priorities;
- Set key local green infrastructure targets; and
- Monitor and evaluate green infrastructure provision.

9.195 The five Headline standards are as follows

- S1: GI Strategies;
- S2: Accessible Green Space;
- S3: Urban Nature recovery;
- S4: Urban Tree canopy; and
- S5: Urban Greening Factor.

9.196 The Urban Greening Factor (UGF) is a planning tool designed to improve the provision of GI and increase the level of greening in urban environments. It is designed to be applied to major developments and sets a target score for the proportion of GI within a development site for specific land uses.

9.197 B&NES local policy addresses GI through policy CP7 (adopted as part of the Core Strategy and policy NE1 (adopted as part of the Placemaking Plan).

9.198 Policy CP7 as existing requires work in partnership with key public and private bodies, local communities and the voluntary sector to protect and enhance the GI network and ensure a strategic approach is taken.

9.199 Policy NE1 requires amongst other things for major development proposals to provide a plan of the existing green infrastructure assets within and around the development site.

9.200 The detailed background and evidence relating to the following options is set out in the Natural Environment Topic Paper.

Policy approach options

9.201 NPPF paragraph 181 sets out that plans should, amongst other things:

9.202 'take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.'

9.203 Regarding the NE GI Framework Principles and Standards, the UGF is not covered under the existing policy framework for B&NES, whilst other parts of the GI Framework are covered to some extent. The B&NES GI Strategy (2013) is being reviewed and will be guided by the GI Framework. Targets and requirements will need to be supported by a robust evidence base. As such, the following options are proposed:

N/GI: Green Infrastructure			
	Option	**Advantages**	**Disadvantages**
1	Leave the policy as existing.	Limited issues from a development management perspective. The policy as it is written provides flexibility and scope for Development Management Officers to negotiate.	There would be limited requirement for the management and monitoring of implementation of GI. Would be out of date with respect to government guidance NE GI Framework. Not well integrated with other policies i.e. BNG, landscaping, open spaces and sustainable drainage. Does not reference the GI Strategy – which is being updated alongside the Local Plan in line with the NE GI Framework. This document will set targets and identify the strategic GI network and priorities for GI enhancement. Does not reference accessible greenspace standard, urban nature recovery standard, urban greening factor and urban tree canopy cover standard (as per NE GI Framework). Will not meet the spatial priorities set out within the local plan.

2	New GI policy consolidating NE1 and CP7 and to include Natural England GI Framework standards. Key requirements will be to seek a GI plan, with 30-year management and monitoring for major applications. Detail to be guided by the forthcoming revised B&NES GI Strategy.	The approach will allow for the management and monitoring of GI, which can align with BNG, and will enable GI to contribute and support other policy objectives. This could/ should provide scope to simplify the Local Plan. Provides support for the delivery of the B&NES GI Strategy ambitions and targets. Will provide a more concise and stronger policy and presents benefits for a more concise plan. The option will assist in delivering greater benefits to residents, communities, and to wider society.	The policy approach to be taken forward will be subject to viability testing as the Draft Local Plan is prepared. There is a risk this policy option may not be viable and won't be included in the Draft Plan. This option may require weighing up or balancing benefits against other spatial priorities i.e., amount / type of housing provided on site. Work required to ensure sufficient evidence to justify the approach. Question as to whether there are resources in place for monitoring GI – whether there is overlap with BNG i.e. will this approach be covered in the BNG Plan.

3	New GI policy consolidating NE1 and CP7 which presents Natural England GI Framework. With a separate policy for the GI Framework Urban Greening Factor (UGF) i.e., all major commercial/ residential development to provide a locally agreed UGF Score.	Will help to address the council's Corporate priorities. The approach will require the management and monitoring of GI. Allows for consistency between the local plan and revised GI Strategy. Having an UGF will assist in securing no loss of green infrastructure. A separate UGF policy will give more focus to this Standard than the other 4 headline standards. An UGF policy can be used alongside BNG to help set the quantity and functionality of Green Infrastructure that should be delivered on-site. The option will assist in delivering greater benefits to residents, communities, and to wider society.	The policy approach to be taken forward will be subject to viability testing as the Draft Local Plan is prepared as noted for option 2. Having sufficient evidence to justify the approach. Requiring submission of UGF assessment may be considered an additional administrative burden. A GI policy and a separate UGF Policy will present similar issues as existing i.e., two GI related policies. Will not meet the aim of having a more concise plan. Would bring into question why Standard One of the GI Framework does not have a separate policy - for developers to provide a GI Plan that sets out management and monitoring of GI. Resourcing concerns and overlap with BNG as noted above for option 2.

Question: Which option do you prefer and why?

Question: Are there any approaches which can be taken to ensure the policy can better reflect the Council's cooperate priorities?

Policy N/OS: Open Spaces

Background

9.204 The NPPF highlights the importance of having access to high quality open spaces and opportunities for sport and recreation.

9.205 Placemaking Plan Policy LCR6 indicates that where new development generates a need for additional recreational open space ("green space") and facilities including allotments, parks and recreation grounds and play space (youth and children) which cannot be met on-site or by existing provision, the developer will be required to either provide for, or to contribute to the provision of accessible sport and recreational open space and/or facilities to meet the need arising from the new development in accordance with the standards set out in the Green Space Strategy, and Planning Obligations SPD or successor documents.

9.206 The detailed background and evidence relating to the following options is set out in the Natural Environment Topic Paper. INSERT LINK

Policy approach options

9.207 NPPF paragraph 102 sets out the following in relation to open spaces:

9.208 'Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.'

9.209 As such, the following options are proposed:

N/OS: Open Spaces			
	Option	**Advantages**	**Disadvantages**
1	Continue with the existing approach, that being open space requirements are achieved through the implementation of policy LCR6. This will require consultation with the B&NES parks team on applications, with open space requirements set within the Green Space Strategy and Planning Obligations SPD.	The existing approach allows for flexibility, as standards are not set within policy.	As standards and requirements are set within separate documents the current approach can result in inconsistency in terms of open space provided through the planning application process.
2	Incorporate Natural England Space standards within planning policy.	Will take account of most current and up to date guidance. Setting standards within policy will allow for stronger weighting in determining applications.	Will limit flexibility should standards change.
3	Remove policy (accessible green space to be covered under consolidated GI policy).	Allows for a more concise plan overall, ensuring GI and provision of green space are covered together. The revised GI Strategy will include accessible green space standard as part of NE GI Framework approach.	May reduce scope of flexibility for achieving certain forms of open space or GI should they be considered collectively.

Question: Which option do you prefer and why?

Question: Are there any approaches which can be taken to ensure the policy can better reflect the Council's cooperate priorities?

Policy N/TWC: Trees and Woodland Conservation

Background

9.210 The NPPF highlights trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Paragraph 136 of the NPPF notes the following regarding trees:

9.211 ‘Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.’

9.212 Placemaking Plan Policy NE6 seeks to protect the District's trees and woodland from the adverse impact of development by setting out criteria against which proposals will be assessed. The policy also seeks the appropriate retention and new planting of trees and woodlands. The policy had been updated as part of the Local Plan Partial Update to cover when development proposals may directly or indirectly affect veteran trees.

9.213 Placemaking Plan policy D4 requires, amongst other things, for development to be well connected and when proposed, street trees and green spaces should contribute to a network of GI and should be adequately sited to promote connectivity for people and wildlife. Further details on this policy are covered under the Heritage and Design section.

9.214 The detailed background and evidence relating to the following options is set out in the Natural Environment Topic Paper. INSERT LINK

Policy approach options

9.215 Trees are an important part of our natural life support system: they have a vital role to play not just in the sustainability of our urban and rural areas, but as an important component of green infrastructure networks. The NPPF requires authorities to make new streets tree-lined. Natural England (NE) have released a tool to help towns and cities turn greener. A standard within the tool promotes an increase in tree canopy cover in urban environments. In addition to these requirements emphasise should also be placed on the need to apply the ‘right tree, right place’ principle as set out within the ‘Urban Tree Manual’ developed by the Forest Research Policy & Advice Team. The following options are proposed in relation to policy NE6:

N/TWC: Trees and Woodland Conservation			
	Option	**Advantages**	**Disadvantages**
1	Rely on the existing policy approach supplemented by national planning policy.	As identified changes to the NPPF are not currently addressed by existing policy there would be limited benefit to keeping local policy in its current form.	Will not take account of most current up to date local requirements.
2	Amend the existing policy to avoid crossover with other policy, to include a requirement for new street lined trees, a locally agreed tree canopy cover target, and incorporate the 'right tree, right place' principle.	Will take account of most current and up to date guidance set out within the NPPF and NE GI Framework. A target for the GI Framework Standard 5: Urban tree canopy cover will be identified in the revised GI Strategy. The option will assist in developments becoming climate-resilient, improve residents' wellbeing, and benefit nature.	The approach taken forward will be subject to viability testing as the Draft Local Plan is prepared. A risk this policy option may not be viable and won't be included in the Draft Plan. This option may require weighing up or balancing benefits against other spatial priorities i.e., amount / type of housing provided on site. The NE Urban Tree Canopy Cover Standard does not cover the establishment of new trees. There is a need to ensure trees are successfully established through an initial maintenance period once planted.

Question: Do you agree with this approach and why?

Question: Are there any approaches which can be taken to ensure the policy can better reflect the Council's cooperate priorities?

Policy N/CELLC: Conserving and Enhancing the Landscape and Landscape Character

Background

9.216 The National Planning Policy Framework (NPPF) requires local authorities to take a criteria-based approach to protecting the landscape. This approach requires an understanding of landscape character that is valued and an understanding of the significance of landscapes and their components rather than just carrying out a crude check whether the landscape is designated or not. The established process of landscape character assessment is the key tool for guiding decisions.

9.217 Placemaking Plan Policy NE2 seeks to protect, conserve and enhance the character and quality of the landscape of the District.

9.218 The purpose of Policy NE2A is to protect, conserve and enhance the landscape setting of settlements.

9.219 Policy NE2B provides specific control over the enlargement of residential curtilages. Such enlargement can, depending on the circumstances, have a detrimental effect on the special landscape qualities and character of the area and lead to 'suburbanisation' of the countryside.

9.220 The detailed background and evidence relating to the policy is set out in the Natural Environment Topic Paper. INSERT LINK

Policy Approach - Proposed Options Policy NE2

9.221 Policy NE2 remains fit for purpose. The current policy accords with national policy and local strategies, however, changes could be incorporated to ensure the policy has clear links to wider natural environment policy, including reference to non-designated landscapes. The policy remains fit for purpose.

N/CELLC: Conserving and Enhancing the Landscape and Landscape Character			
	Option	**Advantages**	**Disadvantages**
1	Retain policy NE2 with amendments to reference non-designated landscapes.	Adopted policy tested recently at LPPU examination.	None identified.

Question: Do you agree with this approach and why?

Policy Approach - Proposed Options Policy NE2A

9.222 Policy NE2A remains fit for purpose and appears effective in use. The current policy accords with national and local strategies. The policy seeks to ensure that only development which conserves and enhances the landscape setting of a settlement takes place and that development which would adversely affect the setting is not permitted. The currently defined landscape setting of individual settlements are also considered to be effective and justified. However, through this consultation there is an opportunity to identify whether the boundaries of any existing landscape settings identified on the policies map should be amended. Link to the policies map.

9.223 Regarding landscape setting the following questions are proposed:

Question: Are the existing landscape Settings identified on the policies map effective/ justified?

Question: Are any of the existing Landscape Setting Boundaries ineffective? If so, are there any recommended changes to Landscape Setting Boundaries?

Question: Are there any Landscape Settings not identified on the policies map which should be?

N/CELLC: Landscape Setting of Settlements			
	Option	**Advantages**	**Disadvantages**
1	Retain policy NE2A with amendments.	Adopted policy is well used by Development Management in determining planning applications. No evidence to suggest major changes are required.	None identified.

Policy Approach - Proposed Options Policy NE2B

9.224 Policy NE2B (extension of residential gardens in the countryside) remains fit for purpose. The current policy accords with national and local strategies. The policy is therefore, included in the policies listed in Appendix 1 as being retained without any changes.

Policy N/FRSD: Flood Risk Management and Sustainable Drainage

Background

9.225 The NPPF requires for new development to be in sustainable locations, at the least risk of flooding, taking into account vulnerability to flooding. Appropriate mitigation should be provided where necessary to ensure that development remains safe, resilient to the impacts of flooding, and does not increase the risk of flooding elsewhere.

9.226 Existing Policy CP5, in line with the NPPF, seeks to avoid inappropriate development in areas at risk of flooding and directing development away from areas at highest risk.

9.227 Placemaking Plan Policy SU1 covers sustainable drainage systems (SuDS), which are a key component of managing surface water. SuDs re-create the benefits of natural drainage systems and collect, store, slow and treat the quality of surface water to mitigate the impacts of development on run-off rates, volumes and quality. SuDS can be implemented through natural/open water means which presents multiple benefits, such as enhancing biodiversity and creating amenity space with health and well-being benefits.

9.228 The detailed background and evidence relating to the following options is set out in the Natural Environment Topic Paper. INSERT LINK

Policy approach options

9.229 National Guidance and associated Technical Guidance provides the national requirements in terms of the Sequential and Exception Test, the need for planning applications to be supported by a Flood Risk Assessment, and the priority given to utilising sustainable drainage techniques in new development.

9.230 Going further there are opportunities to present robust links with GI policy and landscape. The use of open water/ natural SuDS will present key links with nature-based solutions which is a target set out under the Natural England Green Infrastructure Principles and Standards. This matter is covered further under the approaches and options sought for policy NE4. In addition, exploring how minor applications can efficiently manage property-level rainwater management through a requirement for local capture, re-use and discharge back to the environment.

9.231 As such, the following options are proposed:

N/FRSD: Flood Risk Management and Sustainable Drainage			
	Option	**Advantages**	**Disadvantages**
1	Rely on the existing policy approach supplemented by national planning policy.	The existing approach is well understood and implemented by Development Management in determining planning applications.	Increased local concern relating to surface water runoff presented by developments when using the existing policy. Regarding major schemes the up take in natural/open water SuDS is limited as it is often achieved in underground infrastructure with small ponds implemented. The management of rainwater has not been considered holistically due to the fragmented ownership of its management.

2	Requiring that SuDS are constructed for the disposal of surplus rainwater, regardless of the size of new developments, and that there should be no net increase in rainwater discharged to combined sewers.	Opportunity to link the implementation of SuDS with Green/ Blue Infrastructure and BNG within wider site design. Options for Urban Greening which are being explored can provide links to better SuDS design. The revised GI Strategy will evidence where new or enhanced GI is required to address water management. The GI Policy if revised will reference the NE Green Infrastructure Framework standards including the Urban Greening Factor that seeks to retain and ideally increase more permeable surfaces. Will ensure that developments are not worsening water quality and thereby not increasing pressure on in-river ecology.	Whether there is sufficient evidence for justification regardless of the size of new developments.

Question: Which option do you prefer and why?

Policy N/ES: Ecosystem Services

Background

9.232 The NPPF paragraph 180 b) sets out that planning policies and decisions should contribute to and enhance the natural and local environment by amongst other things:

9.233 'Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'

9.234 Placemaking Plan Policy NE4 seeks to protect and enhance supporting services, provisioning services, regulatory services and cultural services.

9.235 The detailed background and evidence relating to the following options is set out in the Natural Environment Topic Paper. INSERT LINK

Policy approach options

9.236 Natural England (NE) have released a tool to help towns and cities turn greener. A standard within the tool promotes urban nature recovery. This standard aims to boost nature recovery, create and restore rich wildlife habitats and build resilience to climate change, while incorporating nature-based solutions, including trees and wildflowers, into the design of towns and cities will increase carbon capture, prevent flooding and reduce temperatures during heatwaves. As such, the following options are proposed:

N/ES: Ecosystem Services			
	Option	**Advantages**	**Disadvantages**
1	Leave policy as existing.	Limited issues from a development management perspective.	The existing policy is currently underused and general in its approach.
2	Adapt policy NE4 to better address/require a nature-based solutions approach as set out within NE GI Framework – Principles and Standards.	Will take account of most current and up to date guidance set out within NE GI Framework, particularly promoting the need to manage and enhance natural assets. Will ensure that developments are maximising benefits for people and nature and are contributing to nature's recovery.	Need to provide sufficient evidence for justification.

Question: Which option do you prefer and why?

Policy N/EN: Ecological Networks & Nature Recovery – Local Nature Recovery Strategies

Background

9.237 The NPPF paragraph 180 d) sets out that planning policies and decisions should contribute to and enhance the natural and local environment by amongst other things:

'Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.'

9.238 The NPPF further sets out under paragraph 185 a) to protect and enhance biodiversity and geodiversity, plans should:

'Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation.'

9.239 In addition to the requirement in the NPPF for mapping Ecological Networks, the Government have set out through the Environment Act 2022 'a new, England-wide system of spatial strategies that will establish priorities and map proposals for specific actions to drive nature's recovery and provide wider environmental benefits', the system being named Local Nature Recovery Strategies (LNRS). A LNRS is currently being prepared covering the West of England (Bath and North East Somerset, Bristol, North Somerset and South Gloucestershire).

9.240 Placemaking Plan Policy NE5 (updated as part of the LPPU) seeks to ensure development proposals demonstrate a positive contribution will be made to regional Nature Recovery Networks. The policy also seeks the maintenance or creation of local ecological networks through habitat creation, protection, enhancement, restoration and/or management. Existing mapped networks are displayed on the councils Policies Map.

9.241 The West of England LNRS will also have a role in Biodiversity Net Gain by defining areas of strategic importance and providing a 'strategic multiplier' of 15% to BNG Units.

9.242 The detailed background and evidence relating to the following options is set out in the Natural Environment Topic Paper. INSERT LINK

Policy approach options

9.243 Once the LNRS is published it will be necessary for local plans to 'take account' of them and recognise their significance. Policy NE5 will need to be updated to take account of these forthcoming changes. As such, the following options are proposed:

N/EN: Ecological Networks			
	Option	**Advantages**	**Disadvantages**
1	Adapt policy NE5 to address the forthcoming Local Nature Recovery Strategy as it relates to B&NES and the wider West of England area.	Will take account of most current and up to date/ emerging priority networks. Will ensure alignment of the Local Plan with legislation.	Full national guidance on LNRS delivery is not currently available.

Question: Do you agree with this approach and why?

Green Belt

Policy GB/GB

Background

9.244 The National Planning Policy Framework (2023) has introduced some changes in the way that Green Belt should be considered. Through the LPPU we have recently reviewed adopted policies relating to Green Belt against the revised NPPF and consider that they remain consistent with National Policy. As such no changes are proposed to policies CP8, GB1 and GB3.

9.245 Policy GB2, in relation to infilling in villages washed over by the Green Belt, was updated through the LPPU and while we consider that the policy is consistent with national policy the Options document gives the opportunity for the approach to be tested further in response to comments made during engagement in preparing the Options document.

Policy Approach Options

9.246 The comments received highlight the importance of making sure that new developments provide smaller homes that meet the local demand or need, rather than building large or detached houses which often do not meet local need and may change the character of villages. In relation to Policy GB2, an option is therefore set out where the policy requires applications for infill development to demonstrate that they're offering housing that meets the specific needs of the local area, based on robust evidence. To meet this requirement, a parish would need to carry out a survey to understand the housing needs within their village. If they don't do this, applicants would have to rely on a broader District-wide assessment called the Local Housing Needs Assessment.

GB/GB: Infilling in the Green Belt (existing GB2)			
	Option	**Advantages**	**Disadvantages**
1	Retain policy as existing.	Accords with the NPPF in that limited infilling in villages within the Green Belt is not regarded as inappropriate development, infill boundaries have been defined in the LPPU in consultation with parish councils for all villages washed over by the Green Belt.	None identified
2	Amend policy to require that applications for infill development to demonstrate that they're delivering housing that meets the specific needs of the local area	Helps maintain village character. Development meeting existing needs.	May be seen as too restrictive

Jobs and Economy

Policy J/O: Office Development and Change of Use

Background

9.247 The Council's Economic Strategy seeks to support and enable the Bath and North East Somerset economy to become more prosperous, sustainable and fairer. In order to help improve economic performance and drive moves towards greater innovation and a more creative economy there needs to be sufficient space for businesses to thrive. This includes office space suitable for modern occupiers. The National Planning Policy Framework (2023) paragraph 85 also states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

9.248 Evidence shows that the net requirement for office floorspace in B&NES is between 91,000 and 94,000 sq m. The majority (around 75%) of the office floorspace and land requirement forecast across B&NES is in Bath City.

9.249 Changes in the Use Class Order and the new Class E use 'Commercial, Business and Service' combines former B1 Use Classes with a number of former uses commonly found in town centres. This introduction of the E Use Class allows the change of use to other uses within the Class E use without the need for planning permission. In addition, with Permitted Development Rights for change of use from Class E to residential, there is increasing pressure for redevelopment of office stocks to other uses. However, it is important to note that permitted development rights do not apply in World Heritage Sites, i.e. Bath, or in the case of Listed Buildings.

9.250 The phased introduction of Minimum Energy Efficiency Standards (MEES) requirements means that since April 2023 it is an offence to continue to let non-domestic properties with an Energy Performance Certificate (EPC) rating below E. It is uncertain at this point whether this will reduce replacement rates as buildings are refurbished and thus their useful life extended or will drive an increase in replacement rates as buildings cannot be improved sufficiently to meet increasing standards.

9.251 In addition to the regulations requiring energy efficiency, older stocks are less likely to be able to accommodate modern infrastructure such as Heating Ventilation, and Air Conditioning (HVAC), electricity supply etc. and the demands of the market can shift, meaning that office stock can be no longer of a desirable quality or location.

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9.252 Evidence suggests overall the trend in the market is of a 'flight to quality', driven by the need to demonstrate ESG (environmental, social and governance) credentials and the need to provide a high quality offering to attract staff to workplaces post pandemic, including through excellent access to amenities. The effect of this is that poorer quality space is expected to struggle within the market without significant refurbishment. This becomes even more challenging in locations that do not offer worker amenities.

9.253 Evidence suggests that whilst there is a degree of uncertainty relating to occupier space needs, it is anticipated that as lease events, including for example rent reviews, break clauses, lease renewals/ends, occur, there will be a move to consolidate or upgrade space. The theme is an exchange of quantity for quality that needs to be facilitated through planning policy. This could mean a further release of poorer quality stock back to the market coupled with increased take up of and demand for high quality (or grade A) space leading to reduced availability and pressure on the best quality space.

Policy approach options

9.254 The NPPF requires that Local Plans should be prepared with the objective of contributing to the achievement of sustainable development "and make sufficient provision for among other uses employment, and other commercial development".

9.255 The stock of office floor space in B&NES needs to be managed, upgraded and increased to enable the delivery of the identified need for offices, and the Council's Economic Strategy.

9.256 It is acknowledged that occupiers seeking office space have mixed quality and specification requirements. Large companies seek better quality accommodation, but some smaller occupiers require cheaper space. Changes to government legislation on EPC certification requirements for commercial buildings may lead to cheaper offices becoming unlettable. Whilst larger and well backed companies will take grade A space, and start-ups/micro business will be able to look at the serviced office sector, cost-conscious companies that need their own office may not have options.

9.257 Therefore, the policy approach is to encourage the development of Grade A offices to meet the need for high quality floorspace, and upgrading of Grade B offices. With regard to smaller premises within Georgian buildings these should not be retained where they are of poor quality, however retaining some Georgian stock will provide diversity in supply and meet the needs of certain small occupiers and sectors. Hence, we need to ensure that the policy can protect office stock on a case by case basis.

9.258 The following options in relation to protecting office development from change of use to other higher value uses is as follows:

J/O: Change of use of Office use to other uses (existing ED1B, ED1C)			
	Option	**Advantages**	**Disadvantages**
1	Not permit redevelopment / change of use to residential, (including all types of residential plus Purpose Built Student Accommodation) unless it can be robustly evidenced that: a) the site is of poor quality; and b) no longer suited to current or future business needs; and c) there is a lack of demand for office use; and d) there is a supply of available alternative premises in the locality, suitable for any displaced existing occupiers or potential occupiers looking for premises in the locality. In the case of redevelopment change of use to non residential (non Class E) uses, the above criteria would apply. In addition, the proposal will be required to secure suitable alternative employment opportunities of at least equivalent economic benefit. Issues to be taken into account will be site information including access considerations, EPC maintenance costs, the cost and ability to upgrade the floorspace, and rental information	In order to meet the Objectively Assessed Need (OAN) for offices the Council needs to take a number of approaches, including provision of high quality office space. Key to the provision of the office space is the need to protect the office floorspace that we have from redevelopment and change of use to higher value uses, in particular residential. The Council notes that there may be circumstances where the loss of some business floorspace, in particular period properties, may be acceptable, but these circumstances can be considered on a case by case basis. The loss of all smaller offices would run counter to the objective to maintain a diverse business sector.	The need for consistent information to ensure a consistent approach in implementing the policy. The Council recognises that planning permission is not required for changes of use within the E class, and permitted development rights exist outside Bath. The policy will reflect this.

2	Above option together with adding the requirement to demonstrate there is a lack of demand for office use by a marketing statement and evidence of marketing for 12 months	This serves to provide actual market evidence of the level of demand on an objective basis.	There is a need to ensure that developers are not manipulating the marketing process.

Question: Which option do you prefer and why?

Policy J/I Strategic Industrial Locations and Locally Significant Industrial Sites Policy

Background

9.259 The Council's Economic Strategy seeks to support and enable the Bath and North East Somerset economy to become more prosperous, sustainable and fairer. In order to help facilitate economic prosperity and moves towards greater innovation and a more creative economy there needs to be sufficient space of varying types and scales for businesses to thrive in both well established, growing and emerging sectors. The NPPF requires that Local Plans should give significant weight to supporting economic growth and productivity. Evidence shows that there is a need for significant industrial and warehousing floorspace in the District to meet economic needs, and to accord with the Economic Strategy objectives. It is forecast that there is a need for in the range of 53,000-78,000sq m net additional industrial floorspace across the district, and circa 83,000sq m of warehousing /logistics floorspace.

9.260 The monitoring data shows a significant net loss in industrial floorspace during the current plan period. Due to high land values, particularly in Bath, there are continuing pressures for the redevelopment of existing employment sites for other higher value uses, particularly residential. At the same time, evidence shows that demand for industrial space has increased. However, there are limited site opportunities to provide new industrial floorspace, particularly in Bath. Therefore, it is important to ensure that existing sites are adequately protected to support the economy given the acute need for further industrial/ distribution space and to encourage the renewal and intensification of existing sites.

Policy Approach

9.261 The policy approach is to safeguard strategic and locally significant industrial sites due to their economic importance to the district and in order to support a diverse and inclusive economy.

9.262 The aim is to reserve these areas for industrial, distribution and related uses only. The areas are suitable for the retention and renewal of industrial and warehousing premises and are able to accommodate a wide range of sectors including research and development (use class E(g)(ii)), creative industries, health and life sciences and a variety of general industry (Class E (g)(iii) and B2 together with warehousing/ last mile logistics (B8).

9.263 The proposed approach in relation to new industrial development and the protection of sites is as follows:

J/I: Strategic and Locally Significant Industrial Sites			
	Option	**Advantages**	**Disadvantages**
1	Light industrial, heavy industrial, warehousing (classes E(g)(ii),(iii), B2, B8),and builders merchants will be acceptable in principle within Strategic and Locally Significant Industrial Sites Development involving the loss of industrial and distribution floorspace/land will not be permitted unless the development is for a use referred to above; and would not have an adverse impact on the operation of the remaining premises, site. (Refer to Appendix 2 for list of industrial sites to be protected)	This would assist in meeting the forecast need for industrial and warehousing /last mile logistics uses and facilitating the forecast job growth within the Plan period. This reflects the priorities of the Economic Strategy, supports the growing economic sectors and aligns with housing growth.	We recognise that a change of use of one Class E use to another is not development which requires planning permission. It is in some cases beyond the planning system to resist the loss of Class E light industrial uses to other Class E uses.

Policy J/UI Undesignated Industrial sites Policy

Background

9.264 Reflecting the latest national policy (NPPF 2023) and the significant losses of industrial land that have occurred in the current Local Plan period; and the increased demand for industrial accommodation; there is an established need for industrial premises in the district and a chronic shortage, particularly in Bath. To help meet this need, all existing industrial and warehousing premises should be protected from redevelopment to higher value uses, in particular residential. Many of the existing smaller scale industrial and warehousing premises are within residential areas or closely related to villages and hence serve a local need and are easily accessible to communities enabling the potential for active travel, and the reduction in commuting distance.

Policy Approach

9.265 In light of the chronic shortage of industrial and warehouse premises, we propose to strengthen the policy on non-designated industrial sites to provide greater policy protection. In particular, we will require evidence to demonstrate that tenants have not been served notice with a view to redevelopment, and premises have not been run down by lack of maintenance with a view to redevelopment to higher value uses. There may also be the potential to redevelop or intensify the use of some of these sites for industrial and warehouse uses and this will be acceptable in principle. In order to assist with the viability of redevelopment or intensification it may be necessary to incorporate an element of higher value uses. Subject to other policies higher value uses may be acceptable as an element of a proposed scheme, but only where there is no net loss of floorspace on the site that is currently used for or, if vacant, last used for industrial and warehousing purposes. In addition, the higher value uses will exclude Purpose Built Student Accommodation.

9.266 Our proposed policy approach is outlined as follows:

J/UI: Undesignated Industrial Sites			
	Option	**Advantages**	**Disadvantages**
1	Light industrial, heavy industrial, warehousing (classes E(g)(ii),(iii), B2, B8), builders merchants will be acceptable in principle. A number of criteria will need to be demonstrated in the case of development involving the net loss of industrial and warehousing/logistics floorspace, including: - if the premises are vacant the reasons for vacancy -evidence that the site has not been made purposefully vacant; -details of maintenance demonstrating that the site has not purposefully been left to disrepair; -viability assessment which considers the ability of the current or alternative employment use to continue; - marketing evidence to enable the determination of whether there is genuinely no demand to continue in its current planning use; and marketing for one year based on a protocol to be set out. The criteria relating to ensuring that the development does not adversely affect remaining industrial uses would be retained.	This would assist in meeting the forecast need for industrial and warehousing /last mile logistics uses and facilitating the forecast job growth within the Plan period. This reflects the priorities of the Economic Strategy, supports the growing economic sectors and aligns with housing growth.	We recognise that a change of use of one Class E use to another is not development which requires planning permission. It is in some cases beyond the planning system to resist the loss of Class E light industrial uses to other Class E uses.

Policy J/EM: Employment and Skills

Background

9.267 The NPPF states at para 86 that planning policies should “a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.”

9.268 The Council’s Economic and Health & Wellbeing Strategies are committed to providing opportunities for residents to be able to access and thrive in good work and tackling issues of worklessness, inequality and the effects that this can have on the health & wellbeing of residents. The Council is also preparing a Business and Skills Plan which functions to deliver on three of the core objectives of the Economic Strategy - Good Work, Resilient Business and Inclusive Innovation. Overall, the Business and Skills Plan will focus on delivering sustainable, inclusive growth, enabling residents and businesses to meet their full economic potential in our district. Success will be measured by monitoring progress against a range of outcomes including: relative wage growth, lower NEET (Not in Employment, Education or Training) rates, improved staff retention. The Plan includes a delivery and implementation plan to ensure focus over its three year timeframe. The Planning Obligations Supplementary Planning Document sets out requirements for Targeted Recruitment and Training. This was updated to reflect implementation of the Local Plan Partial Update 2023 policies.

Policy Approach

9.269 In order to reinforce the Council’s objective of delivering sustainable and inclusive growth and securing a workforce with the necessary skills to ensure a prosperous economy and having regard to the Planning Obligations SPD, it is proposed to have a new policy encouraging the provision of training schemes.

J/EM: Employment and Skills			
	Option	**Advantages**	**Disadvantages**
1	Require an Employment, Apprenticeship and Training Plan, and financial contribution having regard to the Planning Obligations Supplementary Planning Document, for all developments of 10 or more Residential and Extra Care units and all Commercial Premises (including Purpose Built Student Accommodation and Care Homes) of over 1,000sq m, to be prepared in partnership with B&NES Council	This will assist in supporting inclusive and sustainable economic growth and have health and wellbeing benefits.	None identified.

Do you agree with this approach?

Healthy and Vibrant Communities

Policy HVC/TC

Retail Hierarchy and Development

9.270 The NPPF states that planning policies should define a network and hierarchy of town centres and promote their long-term vitality and viability; define the extent of town centres and primary shopping areas and set policies which make clear which uses will be permitted in such locations.

9.271 The retail and leisure sector is undergoing a period of unprecedented change particularly affected by the continued rise of online shopping and home delivery. Town centres are having to evolve to become more than simply a place to shop, presenting themselves as multi-purpose destinations and increasingly places for leisure.

9.272 A key aspect of sustainable communities is good access to shops and other local services which help meet the day-to-day needs of local communities. It is therefore important that both new and existing communities have easy access to facilities, to reduce the need to travel and to maintain vibrant and viable centres. Local shopping is also important as it provides options for active travel.

9.273 Within Bath and North East Somerset there are a number of centres that serve different roles. Bath city centre acts as a sub-regional shopping and employment centre and is a major visitor destination; Keynsham, Midsomer Norton and Radstock town centres serve the residents of the respective towns and the surrounding catchment areas, Moorland Road District Centre acts as a key centre for the south west of Bath, and the local centres primarily serve local needs within the urban and rural parts of the District. The City Centre and Town Centres have Primary Shopping Areas designated which are the focus for new retail development.

9.274 The purpose of designating centres and defining their boundaries is to ensure their successful future functioning as the economic and social focal points of communities, maintaining and improving their vitality and viability and enabling a compatible mix of uses within them.

9.275 The NPPF no longer requires Primary Shopping Frontages to be identified in centres. As the new Class E use class covering ‘Commercial, Business and Service’ uses does not distinguish between shops, restaurants and other business and service uses, the practical application of focusing shops (former A1 use class) within a primary shopping frontage designation is no longer appropriate.

9.276 However, Primary Shopping Areas, where there is a contiguous concentration of main town centre uses, are still required to be the focus for retail development, and the Primary Shopping Area boundary forms the boundary for applying the sequential test (town centre first) policy for retail proposals.

9.277 The Primary Shopping Area will be the main focus, particularly at ground level, for active uses that attract pedestrians to the centre for example shops and restaurants (Refer policy option relating to Development within Bath and North East Somerset's Town, District and Local Centres below). The area outside the Primary Shopping Area but within Bath City Centre and the Town Centres are proposed for a wider diversity of main town centre uses including for example offices, hotels, leisure uses. Having regard to this, there are locations where it is considered that the Primary Shopping Area in Bath should be extended to maintain and provide active frontages, in particular within Bath City Centre along Walcot Street which has a specialist retail role, supplementing the city centre retail offer; and along James Street West, Bath which was identified as a location to extend the retail, food and drink offer within the City Centre, and contribute to the vitality and viability of the City Centre.

9.278 It is acknowledged there are significant differences between local centres, particularly in terms of their function, layout and scale. This reflects the fact that centres have developed and evolved over time, as has the way in which communities use these centres. It is recognised that there is a degree of separation and fragmentation of uses within some local centres due to residential units being located between main town centre uses, however, overall the main activity within the centres is grouped together and concentrations of main town centre uses collectively represent a visible and functional centre. Having regard to the future growth areas there will be potential for new local centres. A Retail Assessment that considers the quantitative and qualitative needs of the district and growth areas will inform the draft Local Plan.

Policy approach options

9.279 The approach is to retain the retail hierarchy policy as set out in the Core Strategy policy CP12, however, adapted to ensure that the 'Development in Centres' policy makes clear which uses will be permitted in such locations.

9.280 Bath City Centre should remain the principal sub-regional centre and the three existing town centres – Keynsham, Midsomer Norton and Radstock - should continue to be designated as town centres in the Local Plan.

9.281 The Primary Shopping Area within Bath City Centre should be extended to include Walcot Street (that part currently outside the Primary Shopping Area and the Local Centre designations), which has a specialist retail function and active ground floor uses contributing to the character, vitality and viability of the core Primary Shopping Area. In addition, it is proposed that the Bath City Centre Primary Shopping Area is extended to incorporate James Street West, enabling an extension of the core retail area of Bath and maintaining and requiring active uses at ground floor to contribute to the vitality and viability of the centre.

9.282 Other locations outside Primary Shopping Areas but within Bath City Centre and Keynsham, Midsomer Norton, and Radstock Town Centres where active ground floor uses should be maintained / provided within the centres may be identified for the Draft Local Plan.

9.283 As a result of the changes to the use class order (in particular Class E use) and having regard to some changes of use and other developments since the Placemaking Plan was adopted, there are changes required to some of the local centre boundaries. Some units are proposed to be added to the centre designation as they are considered to make a contribution to the successful functioning of the centre, and in other instances some units are proposed to be removed from the designated centre due to a change of use to a non-town centre or Class E use.

9.284 The emerging policy for the retail and town centre hierarchy is as follows:

HVC/TC: Town Centre Network and Hierarchy			
	Option	**Advantages**	**Disadvantages**
1	Adapt Policy CP12 Centres and Retailing to focus on the retail hierarchy. Update the Bath City Centre Primary Shopping Area to include Walcot Street, and James Street West, Bath. Revise district and local centre boundaries listed below. Refer to Appendix 3 for detailed changes:	Extending the Primary Shopping Area will The boundaries will be in line with changes and revisions to the Use Class Order, for example health clinics are now a Class E use.	None identified.

	Proposed Changes to designations within the following Centres (see maps in Appendix 3): Batheaston Local Centre Camden Road and Fairfield Road Local Centre The Avenue, Combe Down Local Centre Larkhall Local Centre Chelsea Road Local Centre Nelson Place East & Cleveland Place Local Centre Odd Down (Frome Road Local Centre and Upper Bloomfield Road Local Centre) Walcot Street Local Centre Weston High Street Local Centre Widcombe Local Centre Keynsham - Queen's Road Local Centre Saltford Local Centre Paulton Local Centre Peasedown St John Local Centre Batheaston Local Centre Chew Magna Local Centre Whitchurch Local Centre **Minor changes** Moorland Road, Bath District Centre Margaret's Buildings Local Centre Twerton High Street Local Centre	To take into account Class E uses and main town centre uses not currently identified within the centres, and units which are no longer appropriate for designation, for example where there has been a redevelopment to residential use. The NPPF is clear that a town centre, including local centres, should be an area that is predominantly occupied by main town centre uses.	None identified.

	Retain with no changes the following local centres: Julian Road, St James Square Lansdown Road, London Road Bathwick Street, Bathwick Hill, Bear Flat, Bradford Road, Mount Road Lower Bristol Road (currently designated on the Policies Map but not within policy text) Keynsham – Chandag Road Westfield Timsbury Bathampton		

Question: Do you have any comments on the policy approach and proposals to the local centre designations in Appendix 3?

Policy HVC/TCD- Development within Bath and North East Somerset's Town, District and Local Centres

Background

9.285 The NPPF states that planning policies should set out policies which make clear which uses will be permitted in the centres within the hierarchy.

9.286 Changes in the Use Class Order and the new Class E use 'Commercial, Business and Service' combines a number of former uses commonly found in town centres, in particular shops, restaurants, health clinics, offices, some leisure such as gyms into a single Use Class E. Public houses, and entertainment venues for example cinemas, theatres and nightclubs and hot food takeaways and betting shops are not within a use class (sui generis) and therefore would need permission for any change of use. The Government noted that the reforms were primarily aimed at creating vibrant, mixed use town centres by allowing businesses greater freedom to change to a broader range of compatible uses which communities expect to find on modern high streets, as well as more generally in town and city centres.

9.287 The NPPF no longer requires Primary Shopping Frontages to be identified in centres. As the new Class E use class does not distinguish between shops and other business and service uses, the practical application of focusing shops (former A1 use class) within this designation is no longer appropriate. However Primary Shopping Areas, where there is a contiguous concentration of main town centre uses, are still required to be the focus for retail development, and the Primary Shopping Area boundary forms the boundary for applying the sequential test (town centre first) policy.

Policy approach options

9.288 As stated above the Primary Shopping Frontage policy including policy map designations and related requirements in Policy CR3 is no longer aligned to national policy and use class E. Therefore, Primary Shopping Frontages are not proposed to be defined in this Local Plan. In relation to development in town centres, the proposed policy identifies the approach in Primary Shopping Areas and within district and local centres. Flexibility and diversity, and maintaining active ground floor uses is a key consideration in the policy approach. Outside the Primary Shopping Areas flexibility and supporting a diversity of town centre uses is also important. Within Conservation Areas and in Listed Buildings there is also increased control based on the character of the area and shop frontages.

The proposed approach is as follows:

HVC/TCD: Development within Centres			
	Option	**Advantages**	**Disadvantages**
1	Adapt policy CR3 to delete reference to Primary Shopping Frontages. Provide criteria for development in Primary Shopping Areas (PSA), and District/ Local Centres. Maintaining or providing an active ground floor use/ frontage within Primary Shopping Areas. Not fragment any part of the Primary Shopping Area by creating a significant break in the active frontage. In the case of District and Local Centres, ensuring that the overall function of the centre in providing day to day needs is not undermined, and retains active ground floor uses and generates footfall to the centre.	Maintaining and enhancing the retail function of centres is important in enabling residents and visitors to meet their shopping needs in the most sustainable way, in the most accessible locations. Encouraging the use of upper floors for offices, residential and other use via mixed uses, will make best use of land, capitalising on the availability of services within walking distance, and accessibility by public transport.	None identified.

Question: Do you agree with this approach and why?

Policy HVC/LS Dispersed Local Shops

Background

9.289 Outside the centres identified in retail hierarchy there are many small shops throughout the District both within the urban areas and in villages. These can often serve day to day needs and offer valuable social and community benefits, but a wide range of factors has contributed to a gradual reduction in the number of such units, including viability.

9.290 This policy reflects the changes to the Use Class Order. A new Use Class F2 Community Uses has been introduced which is separate from Class E (Commercial, business and service) use. The Government recognises the importance of small, local shops in meeting the day to day shopping needs of local communities, particularly in rural communities, large residential estates and outside main shopping areas generally. It states “Alongside community social facilities, the F2 class includes what would be considered shops servicing the essential needs of local communities. This is defined as a shop mostly for the sale of a range of essential dry goods and food to visiting member of the public where there is no commercial class retail unit within 1,000 metres and the shop area is no larger than 280sq m . This provides some protection for such shops, while placing those shops found on high streets and town centres in the new ‘commercial’ class.”

Policy Approach

9.291 It is considered that the policy should be updated to clarify that the shops are for the sale of essential goods including food, in line with the Class F2 Community Use Local Shop definition.

9.292 The proposed approach is as follows:

HVC/LS: Dispersed Local Shops			
	Option	**Advantages**	**Disadvantages**
1	Retain policy protecting dispersed local shops with amendment to clarify that the local shops are for the sale of essential goods including food (use class F2).	This recognises the importance of small, local shops in meeting the day to day shopping needs of local communities, particularly in rural communities, large residential estates and outside main shopping areas. Protecting existing and making provision for new local shops also facilitates walking and cycling, minimising the reliance on, and discourages unnecessary use of, private cars, especially for local trips	None identified.

Question: Do you agree with this approach and why?

Policy HVC/H: Health and Wellbeing

Healthy places

9.293 The National Planning Policy Framework (NPPF) states that planning policy should promote health and wellbeing. NPPF Paragraph 96 outlines that this should be achieved through promoting social interaction, making spaces safe and accessible, and creating places that enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs.

9.294 The B&NES Joint Health and Wellbeing Strategy sets out the ambition that the local plan is utilised to deliver health places and reduce inequalities, and therefore it is appropriate to develop a specific health and wellbeing policy.

9.295 Therefore, it is proposed to include a policy in the Local Plan that requires new development to contribute towards creating healthy places. This will be demonstrated through completion of a health impact assessment to be submitted as part of a planning application. Further evidence can be found in the topic paper.

HVC/H: Healthy Places			
	Option	**Advantages**	**Disadvantages**
1	All development must contribute toward creating healthy places, including encouraging active travel, creating inclusive and accessible public realm, and supplying access to green space. This will be assessed through health impact assessments, required as part of an application for any major development, or development with an anticipated major impact, including cumulatively.	Including HIA requirements within the policy makes it easier to assess.	Becomes a very lengthy policy. Focus on the health impact assessment element of the policy may lead to reduced emphasis on the components of a healthy place.
2	All development must contribute toward creating healthy places, and the policy will outline the ways in which this should be done. Details on health impact assessments are left out, and instead included in a separate policy (see below).	Gives more weight to the components of healthy places and acts as a statement of intent for our approach to health in planning.	No metrics - may make it harder to assess in determining the planning application.

Health Impact Assessments

9.296 Health Impact Assessment (HIA) is a practical tool which is used to assess the potential health impacts of a policy, programme or project on a population. The Planning Practice Guidance identifies HIAs as a useful tool where a development is expected to have a significant impact. HIAs should be completed and submitted by the applicant as part of a planning application for major development.

HVC/H: Health Impact Assessments			
	Option	**Advantages**	**Disadvantages**
1	Health Impact Assessments will be required on any major development, or development likely to have a major impact, including through cumulative impact. The definition of a 'major development' will be outlined within the policy.	Triggers are clearly laid out, makes the policy easy to implement.	None identified.
2	No separate policy. Health impact assessments instead included within the overarching healthy places policy.	Provides context to policy and makes the Healthy Places policy easier to implement.	Makes a very long policy, which may lead to details on HIAs being excluded.

Hot Food Takeaways

9.297 The national health policy context now sets a clear ambition for taking decisive action for healthy weight. The Planning Practice Guidance for Health and Wellbeing supports the use of planning by local authorities to limit hot food takeaways in Paragraph 004, especially through exclusion zones.

9.298 The evidence paper highlights how national and local evidence supports using the Local Plan to restrict hot food takeaways on the basis of proximity to schools and to prevent high concentrations and clustering of hot food takeaways.

9.299 Therefore, in line with the B&NES Joint Health and Wellbeing strategy, it is appropriate to use the local plan to reduce health inequalities.

HVC/H: Hot Food Takeaways			
	Option	**Advantages**	**Disadvantages**
1	Policy restricting hot food takeaways based on their proximity to schools and other places where children gather, as well as the local density of existing hot food takeaways. Proposed hot food takeaway use will not be allowed with 400m of a school, within 400m of at least 2 existing hot food takeaway uses, if it would cause more than 2 hot food takeaways to be adjacent to each other, or if it would lead to more than 10% of units in a local centre to be in hot food takeaway use.	Clear parameters would make the policy easier to enforce. Aligned with the PPG.	Likely to be appealed/lobbied against by industry.
2	Similar policy, but proposed hot food takeaways within 400m of a school will be allowed if situated within a designated local centre.	Recognises the function of local centres and the role hot food takeaways can play in increasing footfall, slightly less restrictive so potentially less controversial.	The option may be appealed/lobbied against by industry. The option does not reduce exposure to hot food takeaways on school journeys for children and young people attending schools within designated local centres.

HVC/CF: Community Facilities

9.300 Policy RA3 was adopted through the Core Strategy in 2014 and policy LCR2 was adopted through the Placemaking Plan in 2017. Both policies seek to encourage the development of new community facilities. Policy RA3 allows for the provision of new community facilities within or adjoining villages. Policy LCR2 allows for new facilities outside of the scope of RA3. The policy also allows for new facilities where there is inadequate provision. Both policies are fit for purpose and could be retained. However, there is an option to consolidate the wording into one policy. The aims of the policies would remain the same and perform the same function.

9.301 The policy wording can also be expanded to acknowledge the importance of cultural facilities as community assets. As with community facilities, cultural facilities should be protected and new development should be supported.

HVC/CF Community Facilities			
	Options	**Advantages**	**Disadvantages**
1	Combine the wording of policies RA3 and LCR2 to result in a single policy regarding new community facilities. The policy would continue to encourage the provision of new facilities within or related to settlements and to meet any shortfalls arising from new development. Expand the policy wording to take account of cultural and social facilities being a valued community facility.	A policy that is easier to understand and applied to all community facilities across the district.	The policy would not be place specific.

Question: Do you agree with this policy approach and why?

HVC/PS: Safeguarding Land for Primary School Use

9.302 Policy LCR3 includes a list of land which is safeguarded for the expansion of primary schools as follows;

School	Land Size
Oldfield Park Junior School, Claude Avenue	0.21ha
St Saviours Primary School	0.1ha
St Keyna Primary School	0.65ha
Welton Primary School	1.1ha
Land at Silver Street, Norton Hill, Midsomer Norton	4.7ha
St Mary's Primary, Writhlington	1.0ha
Camerton Primary School	0.6ha
Clutton Primary School	0.6ha
East Harptree Primary School	0.25ha
Freshford Primary School	0.3ha
Marksbury Primary School	0.8ha
Shoscombe Primary School	0.4ha

9.303 Three of the sites on the list above. Land at Silver Street and Camerton Primary School can now be removed as the sites have been developed. Land at St Keyna Primary School has been added to the school site to facilitate enlargement and can also be removed from the list.

9.304 The list can be further reviewed if through the consultation it is demonstrated that further sites are no longer required for educational purposes.

9.305 The allocation of new housing sites in the draft Local Plan may result in additional sites being added to the list of safeguarded land.

HVC/PS: Safeguarding Land for Primary School Use	
	Option
1	Remove Land at Silver Street, Camerton Primary School and St Keyna Primary School from the list of safeguarded land.

Question: Do you agree with this policy approach and why?

HVC/PSC Primary School Capacity

9.306 The current policy seeks to only allow development where there is a primary school within a reasonable distance and that has capacity to accommodate new or additional children that will be generated by the proposed development. The policy seeks to ensure that travel to primary schools is not undertaken by car and does not extend outside the local area. However, the current policy does not take into account early years education and childcare provision and secondary school provision.

9.307 The evidence shows that there is a shortfall of early years education and childcare provision in some areas and therefore it is important to ensure that new development does not put unacceptable pressure on existing services and can provide for the additional population.

9.308 As stated in the Planning Obligations SPD CIL forms the main mechanism for funding further development relating to school places. However, Section 106 is utilised to fund more strategic needs for schools as larger developments will have a greater impact on school capacity.

9.309 Option 1 proposes to retain the existing policy to ensure that any new development does not put pressure on existing primary schools that cannot be appropriately accommodated and therefore, that residents in settlements can access their local school.

9.310 Option 2 proposes to widen the scope of the existing policy by including early years education and childcare provision and secondary school places. This would ensure that occupiers of new development can access their local school and recognises that the need exists for all ages of children generated by development being able to access education locally. School places must be accessible via a sustainable means of transport.

HVC/PSC Primary School Capacity			
	Options	**Advantages**	**Disadvantages**
1	Retain the existing policy	The policy has been proven to ensure that development is only acceptable where there is access to primary school places for children generated by the proposed development.	The policy only relates to primary schools and does not take account of early years education and childcare provision or secondary school provision.
2	Update the policy to include secondary school provision and early years education and childcare provision. The proposed policy would require that where residential development is permitted there is early years education and childcare, primary school and secondary school places within a reasonable distance. Sufficient spare capacity must exist or additional capacity be created with the expansion of schools.	The proposed changes will take account of all areas or levels of education. There is a known deficit of early years education and childcare places and the cumulative impact of development including on allocated sites could also put pressure on secondary school places.	The policy could restrict the location of development and result in viability problems.

Question: Do you agree with this policy approach and why?

HVC/C Safeguarding Land for Cemeteries

9.311 The Council owns and manages Haycombe Cemetery, on the edge of Bath, and Harptree Cemetery and is responsible for the maintenance for 30 closed cemeteries. Others are owned and managed by the Town and Parish Councils or Parochial Church Councils. Land has been safeguarded in the previous Local Plan for the extensions to cemeteries identified to ensure future needs are met at Haycombe Cemetery and the cemetery at Eckweek Lane which is managed by the parish council. The land that was safeguarded in Haycombe is now in use.

9.312 Haycombe and the Durley Hill cemeteries are both in the Green Belt. The NPPF confirms that provision for cemeteries in the Green Belt is not inappropriate development providing it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it.

9.313 The council has identified land to the west of Haycombe cemetery to be used to expand Haycombe cemetery. The Policies Map can be amended to include this land as safeguarded land for cemetery use. The area of land is outlined on the diagram below.



Figure 63: Map showing area that could be safeguarded for cemetery use

9.314 The land identified to be safeguarded will need to take account of the existing landscape sensitivities of the area and care would need to be taken to preserve the landscape character. Haycombe is located within the World Heritage Site and any further expansion of the cemetery would need to take account of the impact the World Heritage Site and its setting. The policy requirement should ensure that development is in a form which minimises and mitigate impact on the landscape setting.

HVC/C Safeguarding Land for Cemeteries			
	Options	**Advantages**	**Disadvantages**
1	Retain the existing policy and safeguard no further land	The openness of the green belt and setting of the World Heritage Site is retained.	If further burial capacity is needed then the land required will not have been safeguarded meaning the need may not potentially be met.
2	Through the council's bereavement services identify and assess if the identified land at Haycombe should be safeguarded for use as additional burial capacity.	Any expansion of cemeteries will be facilitated through safeguarding land thereby providing additional burial capacity for the district.	If land were to be allocated at Haycombe further expansion into the green belt may harm the openness of the green belt and the World Heritage Site and its setting, albeit such harm should be minimised and mitigated through the policy requirements.

Question: Do you agree with this policy approach and why?

HVC/A Protecting Allotments

9.315 Local food growing spaces are not only an important leisure resource, but they are recognised locally and nationally for their value as open spaces, especially in urban areas and for their contribution to sustainable development and health objectives including local food production, promoting physical activity, community cohesion, green infrastructure networks, biodiversity and their potential for education opportunities.

9.316 The council currently manages 24 allotments across Bath and elsewhere other allotments are managed by local bodies such as social housing organisations and parish councils.

9.317 Since policy LCR8 was adopted a new allotment site was permitted under reference 17/00329/FUL. These allotments were granted permission to replace allotments lost under reference 16/05548/MINW which resulted in the loss of allotment land to mineral extraction. The site sits within a minerals allocation area.

9.318 A new allotment has also been provided by the council at Fairfield Valley between Fairfield Park Road and Fairfield Avenue.

9.319 Policy LCR8 is a strong policy which affords protection to statutory, temporary, and private allotments. The new land at Combe Down allotments and the new site at Fairfield Valley are statutory allotments run by the council and therefore the Policies Map should be amended to include these sites as set out in the maps below.



Figure 64: Proposed policies map amendment



Figure 65: Proposed policies map amendment

9.320 During the course of the Local Plan period new sites for housing will be allocated which will likely result in requirements for additional allotment land. The Planning Obligations SPD sets out the requirements for allotment land. Under the adopted policy any new allotments provided in the plan period would be afforded the same protection as the allotments on the proposals map.

HVC/A Protecting Allotments			
	Options	**Advantages**	**Disadvantages**
1	Amend the proposals map to include the new allotment land permitted under application reference 17/00329/FUL and the new allotment site at Fairfield Valley	Recently permitted allotment land will be afforded the same protection as existing allotments.	

Question: Do you agree with this policy approach and why?

HVC/B: Broadband

9.321 Building Regulations Part R requires new residential properties to be connected to broadband. The requirements of LCR7B are now required under building regulations. Therefore, this policy is no longer needed and is proposed to be deleted.

HVC/LGS: Local Green Spaces

Background

9.322 Local Green Spaces that are of demonstrable importance to local communities can be designated and protected from development. The National Planning Policy Framework (NPPF) Section 8 provides guidance for local green space designation. Relevant paragraphs concerning Local Green Space Designation are as follows:

105. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.

106.The Local Green Space designation should only be used where the green space is:

a) in reasonably close proximity to the community it serves;

b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

c) local in character and is not an extensive tract of land.

107. Policies for managing development within a Local Green Space should be consistent with those for Green Belts.

9.323 National Policy makes clear that blanket designation of all green space is not appropriate. Proposed designations must be supported by evidence that the green area is special to the local community. There are several specific exceptions, where designating a local green space would not be appropriate:

- Education sites – The NPPF places great weight (para 99 (a)) on the need for Schools and Colleges to expand/alter. Because of this, local green space designations within school ground including playing fields are very unlikely to be suitable for designation.

- Highway Land/Verges - Land adjoining the highway is subject to permitted development rights and may need to be utilised or reconfigured for highway works and is therefore not suitable for designation.

9.324 Planning Practice Guidance (PPG) cites examples of what green areas can be identified as Local Green Space - For example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis.

9.325 Sites with planning permission – A green space within a site with extant planning permission (within the red line) cannot be designated until the development is complete.

9.326 Land cannot be excluded because there is an existing planning designation, although national guidance recommends that the bar is higher for land within the Green Belt/ Area of Outstanding Natural Beauty (AONB) or with another national designation i.e. the added value of the designation needs to be clearly demonstrated over and above the existing designation. On this basis it is very unlikely that land within the Green Belt/AONB or within a nationally designated Historic Park & Garden would be suitable for designation.

9.327 Bath and North East Somerset Placemaking Plan (PMP) reflects national guidance through policy LCR6A: Local Green Spaces:

> *1. Development that would conflict with the reasons that the local green space has been demonstrated to be special to the local community and holds a particular local significance; and prejudice its role as Local Green Space will not be permitted unless very special circumstances are demonstrated.*
>
> *2. Local Green Spaces are defined on the Policies Map and additional areas may also be designated as Local Green Space in Neighbourhood Plans.*

Consultation/ Methodology

9.328 In preparing the new Local Plan Options document we have sought new sites for nomination as local green spaces. Land which has previously been assessed as part of the Placemaking Plan (PMP) is not proposed to be reassessed as part of the new local plan.

9.329 For example, land that is already designated as local green space will continue to hold such a designation. Land previously nominated and not designated will also not be reassessed. The reason being sites previously put forward were assessed by both the Council and a Planning Inspector as part of the PMP examination, and under a policy framework and guidance which is the same as that used for this current consultation. Therefore, it was requested that only new land not previously put forward be nominated now for designation.

9.330 As the local green space designation is linked to community value, which must be demonstrated, it was decided that community nominations would be sought. This was facilitated by means of a proforma and guidance to communities.

9.331 Each of the sites nominated for designation was then assessed against the three NPPF criteria outlined above, and the other exceptions were considered.

9.332 Where landowners are not a ward councillor/parish council/community organisation nominating the site as a Local Green Space, B&NES Council contacted landowners to notify them that their land has been nominated and to ask for their comments.

Proposed Approach

9.333 The policy provides safeguarding against the loss of local green spaces which hold community value. The current policy accords with national policy and is fit for purpose. It is therefore proposed to retain the existing policy and to potentially designate additional local green spaces.

9.334 In total 72 sites have been nominated. Of the sites 34 are situated within the city of Bath, the remaining 38 set across the wider district.

9.335 Of these 72 nominations one nomination had been withdrawn, and two are already designated as local green spaces. The remaining 69 sites have been assessed in line with the above policy and methodology.

9.336 In line with the consultation and assessment the 26 sites proposed for new Local Green Space designation are outlined within Appendix 4. The full list of sites nominated sites with completed pro-formas, and assessments can be accessed via the associated Local Green Spaces Topic Paper.

Question: Are the proposed new Local Green Spaces identified in Appendix 4 effective/ justified?

Question: Are there any green spaces not already nominated for Local Green Space designation which should be?

Heritage and Design

Policy HD/EQ: Environmental Quality

Background

9.337 The NPPF sets out the approach to design under Section 12 'Achieving well-designed places'. Paragraph 131 is of key consideration and notes the following:

9.338 'The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.'

9.339 Design policies are a key consideration in addressing the Local Plan's spatial priorities. The spatial priorities for the Local Plan that are particularly relevant include:

- Attractive, Healthy and Sustainable Places;
- Improved Connectivity for All and Reduced Need to Travel;
- Conserving and Enhancing Heritage Assets; and
- Improve Physical and Mental Health and Wellbeing for all.

9.340 All policies will need to be updated to reflect the national policy context, particularly the National Design Guide and the requirement for Design Codes (see section on Design Codes from para 9.422 below).

9.341 The West of England Combined Authority (the CA) and the region's local authorities are committed to bringing forward clean, inclusive growth and creating healthy, happy places. The CA and the four West of England Unitary Authorities worked together through 2020 to develop a Placemaking Charter in dialogue with stakeholders. The Charter sets out a shared ambition for the quality of development in the West of England and communicate the authorities' priorities and expectations to support clean, inclusive growth, responding to the climate and ecological emergencies.

9.342 At a local level design review, policy support, consultation and training for the South West is provided by Design West. Design West brings together expertise from across the built and natural environment sectors. The service is independent and not-for-profit working collaboratively with the development sector and decision-makers to shape better places.

9.343 Adopted Policy CP6 is an overarching design policy. The policy seeks to ensure Bath & North East Somerset's environmental quality is fostered both for existing and future generations.

9.344 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper. INSERT LINK

Policy Approach

9.345 The policy remains broadly fit for purpose. The policy broadly aligns with the National Design Guide 10 characteristics of good design, which reflects the government's priorities and provides a common overarching framework for design. Going forward as part of the new local plan the policy approach will seek to strengthen and provide more precise hooks/ links to the National Design Guide 10 characteristics of good design, the B&NES Corporate Strategy and priorities and WECA Placemaking Charter. Existing references to 'Building for Life 12' will be updated to its next iteration 'Building for a Healthy Life'.

HD/EQ: Environmental Quality			
	Option	**Advantages**	**Disadvantages**
1	Retain policy CP6 with amendments as set out above.	Adopted policy presents no issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required.	None identified.

Question: Do you agree with this approach and why?

Policy HD/WHSS: World Heritage Site and its Setting

Background

9.346 The National Planning Policy Framework (NPPF) Section 16 – Conserving and Enhancing the Historic Environment sets out under paragraph 196 the following:

'Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;

b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;

c) the desirability of new development making a positive contribution to local character and distinctiveness; and

d) opportunities to draw on the contribution made by the historic environment to the character of a place.'

9.347 Policy B4 seeks to prevent harm to the Outstanding Universal Value of the City of Bath World Heritage Site and its setting and is a material consideration when making planning decisions.

9.348 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper. INSERT LINK

Policy Approach

9.349 The policy remains fit for purpose. The current policy accords with national and local strategies, however, amendments will be incorporated to reference the second UNESCO World Heritage Site inscription as one of the 11 Great Spa Towns of Europe – fashionable spa towns laid out around natural springs which are used for health and wellbeing. Inscribed on the World Heritage List on the 24th July 2021.

9.350 The new inscription will need to be referenced and linked with policy PCS8: Bath Hot Springs.

9.351 In addition reference will be required to making use of the management plan(s) and the WHS Setting SPD when considering development within the site or its setting and when carrying out Heritage Impact Assessments (HIAs).

HD/WHSS: World Heritage Site and its Setting			
	Option	**Advantages**	**Disadvantages**
1	Retain policy B4 with amendments.	Adopted policy presents no significant issues or concerns arising from the determination of planning applications. No evidence to suggest major changes are required.	None identified.

Question: Do you agree with this approach and why?

Policy HD/HE: Historic Environment

Background

9.352 The NPPF Section 16 – Conserving and Enhancing the Historic Environment (para 196) sets out the context for local policy as outlined in the section of this document above.

9.353 The NPPF further highlights key considerations regarding proposals affecting heritage assets (Paragraphs 200-204), and consideration to potential impacts (Paragraphs 205-214).

9.354 Policy HE1 aims to manage the historic environment in the most efficient and effective way, and to sustain its overall value to society. The policy also seeks to ensure the proper assessment and understanding of the significance of a heritage asset and the contribution of its setting in the development process.

9.355 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper. INSERT LINK

Policy Approach

9.356 The policy remains fit for purpose. Policy HE1 is, in the main, a robust policy. Consultation with Historic England indicates the policy is reasonable, appropriate and consistent with national policy. However, adjustments are suggested to improve its clarity, consistency with national policy and guidance, and effectiveness. Specific changes are proposed as follows:

- Adding a reference to the World Heritage Site setting, and ensuring consistency when referencing the World Heritage Site;
- Reference required for Locally Listed Heritage Assets;

- Consideration regarding the evolving nature of energy efficiency in listed buildings or on Heritage Assets (Heritage assets are wide ranging and include designated and undesignated buildings), and how to facilitate energy efficiency within these buildings; and

- Consideration to the natural environment veteran and ancient trees/ woodlands.

HD/HE: Historic Environment			
	Option	**Advantages**	**Disadvantages**
1	Retain policy HE1 with amendments as outlined above.	Adopted policy is well used by Development Management Officers. Amendments outlined above will improve its clarity, consistency with national policy and guidance, and effectiveness.	None identified.

Question: Do you agree with this approach and why?

Policy HD/SCCW: Somersetshire Coal Canal and the Wansdyke

Background

9.357 The Somersetshire Coal Canal and the Wansdyke earthwork are two important linear historic assets in Bath and North East Somerset.

9.358 The Wansdyke is a nationally important heritage asset and is one of the most significant historical features within the area and is a Scheduled Monument. This is defined as a Designated Heritage Asset within the National Planning Policy Framework (NPPF). The Somersetshire Coal Canal is also a Designated Heritage Asset.

9.359 The NPPF Section 16 – Conserving and Enhancing the Historic Environment paragraph 196 sets out the context for local policy.

9.360 The NPPF sets out the approach to considering impacts to designated heritage assets under paragraph 205 notes the following:

'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'

9.361 Paragraph 206 further notes the following:

'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.'*

9.362 These historic assets benefit from the provisions of Core Strategy Policy CP6 and Policy HE1. However, the importance of these linear routes is highlighted in a separate policy and are defined on the Policies Map with a buffer to catch the widest point of the assets.

9.363 Policy HE2 seeks to ensure there is appropriate mitigation and/or enhancement (consistent with Policy HE1) for any development adversely affecting the physical remains and/or historic routes of the Wansdyke or Somersetshire Coal Canal, as defined on the Policies Map, and/or their setting.

9.364 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper. INSERT LINK

Policy Approach

9.365 The policy remains fit for purpose. However, the policy could be reworded to also encourage development or improvements which would sustain/enhance or better reveal the significance of the Wansdyke and/or Somersetshire Coal Canal. Amendments sought would also seek further consistency with national policy and guidance, and effectiveness.

HD/SCCW: Somersetshire Coal Canal and the Wansdyke			
	Option	**Advantages**	**Disadvantages**
1	Retain policy HE2 with amendments as outlined above.	Adopted policy presents no significant issues or concerns arising from Development Management Officers in its implementation. Amendments sought would also provide further consistency with national policy and guidance, and effectiveness.	None identified.

9.366 The boundary of the Somersetshire Coal Canal and the Wansdyke is displayed on the policies map. Development that would harm the assets within the defined boundary for Policy HE2 area is restricted through the policy. However, consultation with the Somersetshire Coal Society has indicated some developments have taken place which will present significant challenges to the successful restoration of the Somersetshire Coal Canal to navigation.

9.367 The Somersetshire Coal Society's current focus is the conservation of the Combe Hay Lock Flight and the restoration of the canal profile and stonework structures leading to the Paulton / Timsbury terminus with the objective of restoring the western terminus of the canal to water.

9.368 Several locations already protected from development (as defined by policy HE2 on the Policies Map) have been highlighted as having potential for expansion. The expansions are required to allow for diversions from the historic route where the original canal line has been blocked by recent developments.

9.369 This approach seeks to offer a solution which allows the canal to be restored to navigation while minimising the impact of that restoration on landowners/homeowners. The expansions indicated below are proposed to be shown on the Policies Map accompanying the Draft Local Plan and are situated at the following locations (expansions highlighted in red with the existing route shown in blue):

Radford



Figure 66: Proposed amendment to the Policies Map - Radford

Camerton

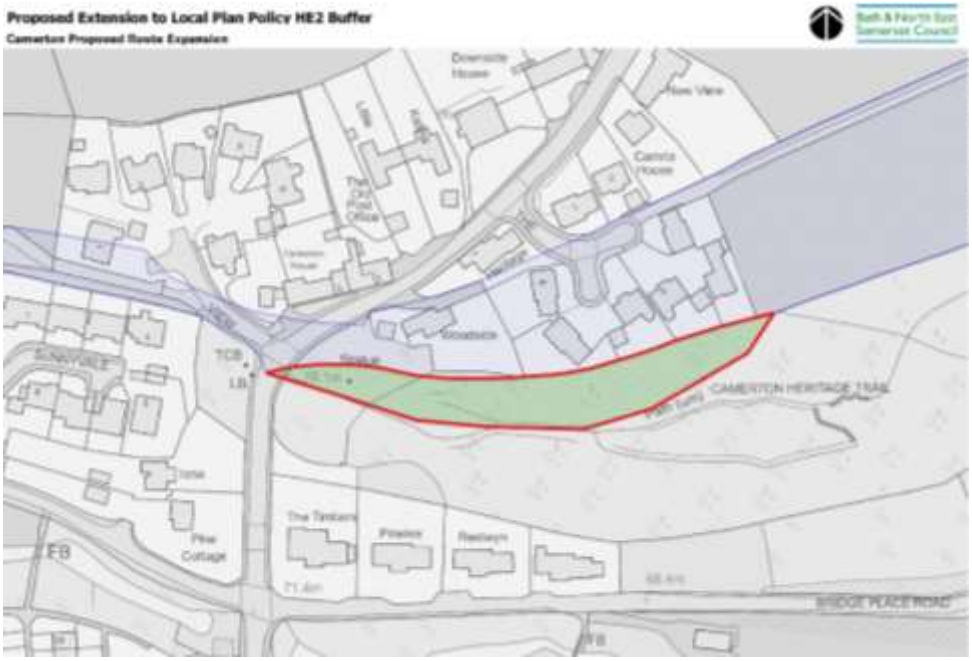


Figure 67: Proposed amendment to the Policies Map - Camerton

Camerton - New Pit



Figure 68: Proposed amendment to the Policies Map - Camerton New Pit

Dunkerton

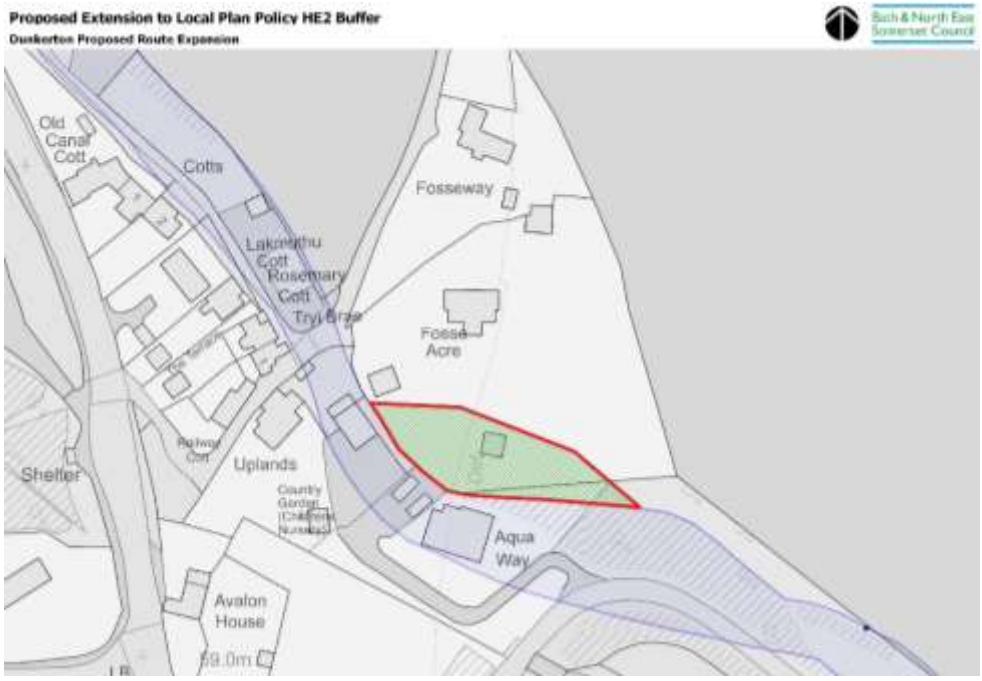


Figure 69: Proposed amendment to the Policies Map - Dunkerton

Combe Hay Cemetery

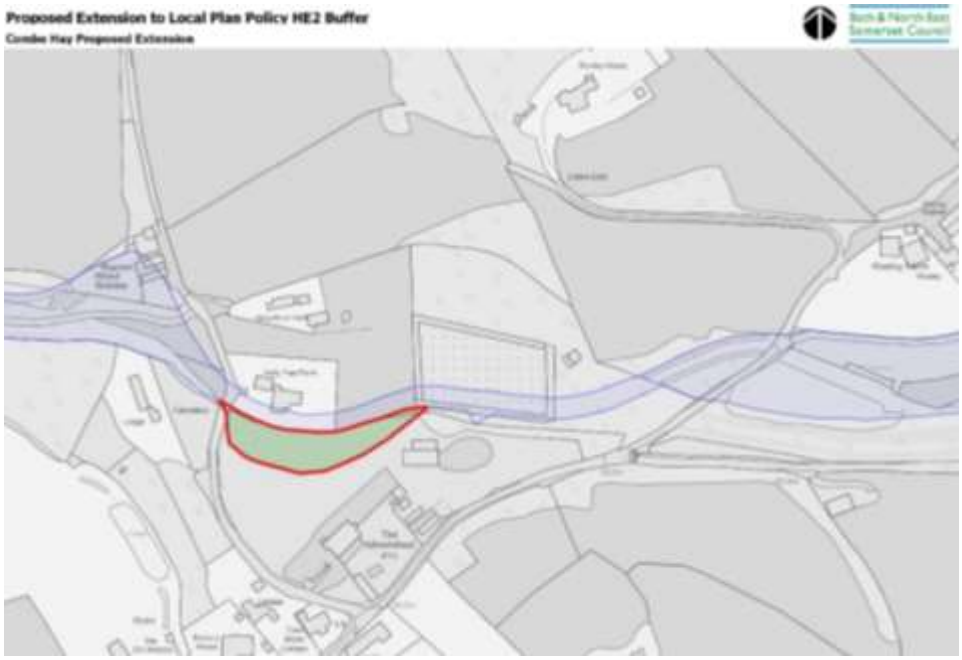


Figure 70: Proposed amendment to the Policies Map - Combe Hay Cemetery

Question: Do you agree with this approach and why?

Question: Are the proposed expansions to the Somersetshire Coal Canal route identified effective/ justified?

Policy HD/GUDP: General Urban Design Principles

Background

9.370 The delivery of well-designed places is a key consideration set out within the NPPF. Section 2 - Achieving sustainable development notes the planning system has three overarching objectives, paragraph 8 b) which sets out the 'Social objective' notes the following:

'To support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.'

9.371 The NPPF further sets out the approach to design under Section 12. Achieving well-designed places. Paragraph 131 is of key consideration and notes the following:

'The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.'

9.372 Paragraph 132 is also of consideration and sets out the following:

'Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so, they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.'

9.373 The West of England Combined Authority and the four West of England Unitary Authorities worked together through 2020 to develop a Placemaking Charter in dialogue with stakeholders. The Charter sets out a shared ambition for the quality of development in the West of England and communicate the authorities' priorities and expectations to support clean, inclusive growth, responding to the climate and ecological emergencies.

9.374 At a local level design review, policy support, consultation and training for the South West is provided by Design West. Design West brings together expertise from across the built and natural environment sectors. The service is independent and not-for-profit working collaboratively with the development sector and decision-makers to shape better places.

9.375 Policy D1 sets out the general urban design principles that will be applied at a high level. These are particularly relevant for large development sites or Masterplans but apply equally to all development scales.

9.376 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper. INSERT LINK

Policy Approach

9.377 The policy remains fit for purpose. The policy broadly aligns with the National Design Guide 10 characteristics of good design, which reflects the government's priorities and provides a common overarching framework for design.

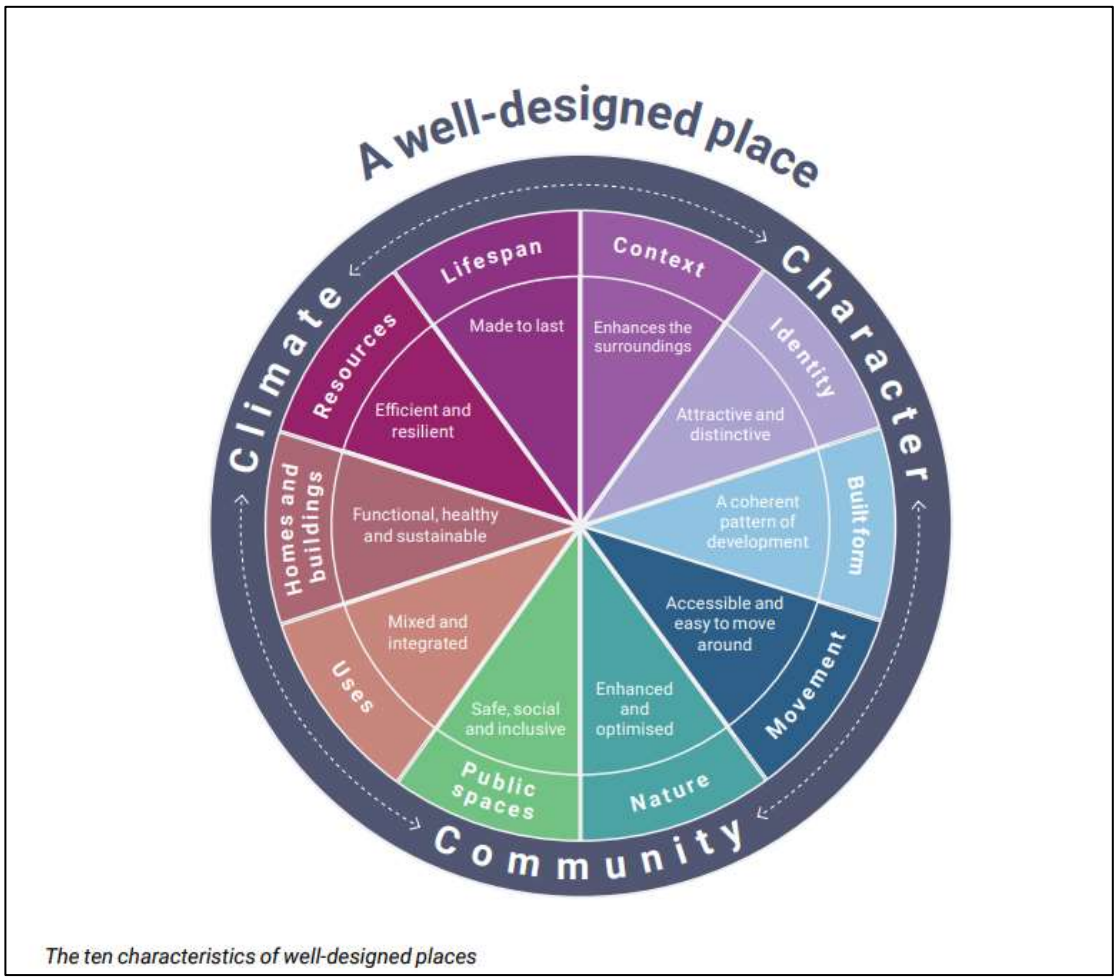


Figure 71: Source - National Design Guide 2021

9.378 Going forward as part of the new local plan the policy approach will be updated and amended to better reflect the National Design Guide 10 characteristics of good design, the B&NES Corporate Plan and priorities and WECA Placemaking Charter.

HD/GUDP: General Urban Design Principles			
	Option	**Advantages**	**Disadvantages**
1	Retain policy D1 with updates and amendments as outlined above.	Adopted policy presents no significant issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required.	None identified.

Question: Do you agree with this approach and why?

Policy HD/LCD: Local Character and Distinctiveness

Background

9.379 The delivery of well-designed places is also a key consideration set out within the NPPF. Section 2 - Achieving sustainable development notes the planning system has three overarching objectives which set the overarching context for local policy.

9.380 The NPPF further sets out the approach to design under Section 12. Achieving well-designed places. Paragraph 126 is of key consideration and notes the following:

'The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.'

9.381 Placemaking Plan Policy D2 sets out the policy on local character and distinctiveness, and designs should respond to an analysis of the place in a positive way. Evidence of locally specific analysis which underpins the design rationale will be sought to demonstrate that this policy has been met. Existing local character appraisals, site briefs, and other evidence should be considered when establishing the local character and distinctiveness.

9.382 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper. INSERT LINK

Policy Approach

9.383 The policy remains fit for purpose. The policy broadly aligns with the National Design Guide 10 characteristics of good design, which reflects the government's priorities and provides a common overarching framework for design. Going forward as part of the new local plan the policy approach will seek to strengthen and provide more precise hooks/links to the National Design Guide 10 characteristics of good design, the B&NES Corporate Plan and priorities and WECA Placemaking Charter.

9.384 The policy presents links/ crossovers to policies NE2 and NE2A (covered in greater detail within the Nature and Ecosystems Topic Paper). Any changes or amendments to this policy will need to reference the links/ crossovers.

HD/LCD: Local Character and Distinctiveness			
	Option	**Advantages**	**Disadvantages**
1	Retain policy D2 with amendments as outlined above.	Adopted policy presents no significant issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required.	None identified.

Question: Do you agree with this approach and why?

Policy HD/UF: Urban Fabric

Background

9.385 The delivery of well-designed places is also a key consideration set out within the NPPF. Section 2 - Achieving sustainable development amongst other things notes the planning system has three overarching objectives which set the overarching context for local policy. As outlined in the section above the NPPF further sets out the approach to design under Section 12 - Achieving well-designed places (see in particular para 126).

9.386 Placemaking Plan Policy D3 relates to the way in which development needs to weave together and connect urban fabric, to ensure that places are well connected, safe, inclusive and walkable.

9.387 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper. INSERT LINK

Policy Approach

9.388 The policy remains fit for purpose. The policy broadly aligns with the National Design Guide 10 characteristics of good design, which reflects the government's priorities and provides a common overarching framework for design. Going forward as part of the new local plan the policy approach will seek to strengthen and provide more precise hooks/links to the National Design Guide 10 characteristics of good design, the B&NES Corporate Plan and priorities and WECA Placemaking Charter.

HD/UF: Urban Fabric			
	Option	**Advantages**	**Disadvantages**
1	Retain policy D3 with amendments as outlined above.	Adopted policy presents no significant issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required.	None identified.

Question: Do you agree with this approach and why?

Policy HD/SS: Streets and Spaces

Background

9.389 The delivery of well-designed places is also a key consideration set out within the NPPF. Section 2 - Achieving sustainable development amongst other things notes the planning system has three overarching objectives which set the overarching context for local policy The NPPF further sets out the approach to design under Section 12 - Achieving well-designed places. Paragraph 126 as outlined above is of key consideration.

9.390 Placemaking Plan Policy D4 seeks to reinforce the importance of development making appropriate connections and relates specifically to streets, highways design and public realm.

9.391 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper. INSERT LINK

Policy Approach

9.392 The policy remains broadly fit for purpose and accords with national and local strategies, however, amendments could be incorporated.

9.393 Going forward the policy could be amended to better strengthen the requirement for street trees. The current policy requires for street trees and green spaces to contribute to a network of Green Infrastructure and should be adequately sited to promote connectivity for people and wildlife. Trees are also important in respect of street design and quality. Streets need to be appropriately designed with sufficient space to accommodate trees without being too close to buildings and to accommodate walkers including for example wheelchairs and buggies, street furniture and underground services. This should be made clearer in Policy D4.

9.394 The policy broadly aligns with the National Design Guide 10 characteristics of good design, which reflects the government's priorities and provides a common overarching framework for design. Going forward as part of the new local plan the policy approach will seek to strengthen and provide more precise hooks/ links to the National Design Guide 10 characteristics of good design, the B&NES Corporate Plan and priorities and WECA Placemaking Charter.

HD/SS: Streets and Spaces			
	Option	**Advantages**	**Disadvantages**
1	Retain policy D4 with amendments outlined above.	Adopted policy presents no significant issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required.	None identified.

Question: Do you agree with this approach and why?

Policy HD/BD: Building Design

Background

9.395 The delivery of well-designed places is also a key consideration set out within the NPPF. Section 2 - Achieving sustainable development amongst other things notes the planning system has three overarching objectives, paragraph 8 b) sets out the context for local policy as outlined above. The NPPF further sets out the approach to design under Section 12 - Achieving well-designed places. Paragraph 126 as outlined above is of key consideration.

9.396 Placemaking Plan Policy D5 relates specifically to building-scale, design and materials. Reference is also made to the need to design-out nesting and roosting area for seagulls which can pose public health and safety problems.

9.397 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper. INSERT LINK

Policy Approach

9.398 The policy remains fit for purpose. The current policy accords with national and local strategies, however, amendments could be incorporated.

9.399 The policy broadly aligns with the National Design Guide 10 characteristics of good design, which reflects the government's priorities and provides a common overarching framework for design. Going forward as part of the new local plan the policy approach will seek to strengthen and provide more precise hooks/links to the National Design Guide 10 characteristics of good design, the B&NES Corporate Plan and priorities and the WECA Placemaking Charter.

9.400 Opportunities will also be sought to strengthen the requirement of the inclusion of habitat features (e.g. nesting birds within buildings and connectivity measures for hedgehogs), aligning with the options and approaches as set out under the nature and ecosystem services section.

HD/BD: Building Design			
	Option	**Advantages**	**Disadvantages**
1	Retain policy D5 with amendments outlined above.	Adopted policy presents no significant issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required.	None identified.

Question: Do you agree with this approach and why?

Policy HD/A: Amenity

Background

9.401 The delivery of well-designed places is also a key consideration set out within the NPPF. Section 2 - Achieving sustainable development amongst other things notes the planning system has three overarching objectives, paragraph 8 b) sets the overarching context for local policy. The NPPF further sets out the approach to design under Section 12 - Achieving well-designed places. Paragraph 126 as outlined above is of key consideration.

9.402 Placemaking Plan Policy D6 covers the issue of amenity, ensuring that developments provide the appropriate level of amenities for new and future occupiers, relative to their use and avoiding harm to private amenity in terms of privacy, light and outlook/overlooking.

9.403 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper. INSERT LINK

Policy Approach

9.404 The policy remains fit for purpose. The policy broadly aligns with the National Design Guide 10 characteristics of good design, which reflects the government's priorities and provides a common overarching framework for design.

9.405 Going forward as part of the new local plan the policy approach will seek to strengthen and provide more precise hooks/links to the National Design Guide 10 characteristics of good design, the B&NES Corporate Plan and priorities and WECA Placemaking Charter.

9.406 There are also opportunities to better align with the NPPF in particular the 'Agent of Change' requirement whereby existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established as outlined by paragraph 192.

HD/A: Amenity			
	Option	**Advantages**	**Disadvantages**
1	Retain policy D6 with amendments as outlined above.	Adopted policy presents no significant issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required.	None identified.

Question: Do you agree with this approach and why?

Policy HD/IBD: Infill & Backland Development

Background

9.407 The delivery of well-designed places is also a key consideration set out within the NPPF. Section 2 - Achieving sustainable development notes the planning system has three overarching objectives, paragraph 8 b) sets the overarching context for local policy as outlined above. The NPPF further sets out the approach to design under Section 12 - Achieving well-designed places, paragraph 126 also as outlined above is of key consideration.

9.408 Placemaking Plan Policy D7 relates specifically to infill and backland development, it applies to all parts of the district both urban and rural and emphasises the importance of an approach based on a sound understanding of character and context.

9.409 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper. INSERT LINK

Policy Approach

9.410 The policy remains fit for purpose. The current policy accords with national and local strategies, however, amendments could be incorporated to ensure the policy is clearer particularly regarding planning balance and judgement.

HD/IBD: Infill & Backland Development			
	Option	**Advantages**	**Disadvantages**
1	Retain policy D7 with amendments as outlined above.	Adopted policy presents no significant issues or concerns arising from development management officers in its implementation, but the proposed change would aid implementation. No evidence to suggest major changes are required.	None identified.

Question: Do you agree with this approach and why?

Policy HD/L: Lighting

Background

9.411 The NPPF makes it clear that planning policies should limit the impact of light pollution from artificial light. Section 15 – Conserving and enhancing the natural environment sets out amongst other things the following:

'Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.'

9.412 National Planning Policy Guidance (NPPG) includes further guidance on the factors that are relevant in considering the implications of light pollution, including ecological impact.

9.413 Placemaking Plan Policy D8 sets out the general principles that apply to all proposals for artificial lighting.

9.414 Within Bath and other urban areas, a high level of lighting exists and is generally accepted whilst recognising even within the urban area, important dark corridors and dark spaces do exist and these are used by, if not essential for, wildlife. The floodlighting of many historic buildings enhances the night time scene. However, badly designed lighting schemes can be just as damaging to private and public amenity as in darker rural areas. New light sources can have a disproportionate impact because of the area's topography.

9.415 Within the district's open countryside external lighting is generally not acceptable. Lighting can be extremely prominent and, in many cases, visible over a large area and can often introduce an urban appearance to the countryside which for the most part is not lit at night.

9.416 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper. INSERT LINK

Policy Approach

9.417 The policy remains fit for purpose. The current policy accords with national and local strategies, however, some amendments should be incorporated.

9.418 The approach sought within the new local plan will be to update policy D8 to address requirements for all new external and public space lighting to have minimal blue light content, and to specify a general requirement for a colour temperature requirement in ecologically sensitive areas, and within protected landscapes.

HD/L: Lighting			
	Option	**Advantages**	**Disadvantages**
1	Retain policy D8 with amendments.	Adopted policy presents no issues or concerns arising from development management officers in its implementation. Controlling light pollution will provide benefits to the environment and greenhouse gas emissions. It will also present opportunities to reduce harm to humans' health and wellbeing and wildlife benefiting nature recovery.	None identified.

Question: Do you agree with this approach and why?

Question: Should we consider defining Environmental Zones for the district?

Question: Should B&NES and/or City of Bath consider applying for dark sky status?

Question: Could/should B&NES aspire to become blue light free within its care spaces?

Policy HD/AOSF: Advertisements & Outdoor Street Furniture

Background

9.419 The NPPF highlights planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).

9.420 This is in addition to ensuring developments establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit. Developments should also optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks.

9.421 The NPPF paragraph 136 further sets out the following:

'The quality and character of places can suffer when advertisements are poorly sited and designed. A separate consent process within the planning system controls the display of advertisements, which should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.'

9.422 Placemaking Plan Policy D9 aims to provide guidance that will be used in the determination of planning, advertisement and listed building consent in relation to advertisement and outdoor street furniture for commercial premises – including signage (both fascia and ancillary signage/advertising), outdoor tables and chairs, low level barriers etc. The policy seeks to ensure the delivery of good design, in line with NPPF.

9.423 The policy is in two parts: Advertisement policy, and Outdoor Street furniture policy. Additional detail is also provided for Bath Conservation Area in line with the stewardship principles WHS Management Plan (2014, or successor document).

9.424 It is noted that the Regeneration and Levelling Up Act 2023 (Schedule 22 - Pavement Licences) has confirmed the government's intention to progress with pavement licencing regime (via licencing) with no further requirement for a tables and chairs on the highway (via planning consent), as such this element of the policy will become redundant.

9.425 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper. INSERT LINK

Policy Approach

9.426 The policy remains fit for purpose. The current policy accords with national and local strategies, however, amendments could be incorporated to ensure the policy is clearer particularly regarding planning balance and judgement. Elements of the policy concerning tables and chairs on the highway will also be removed to reflect the Regeneration and Levelling Up Act 2023 (Schedule 22) as they will become redundant.

HD/AOSF: Advertisements & Outdoor Street Furniture			
	Option	**Advantages**	**Disadvantages**
1	Retain policy D9 with amendments to take account of Regeneration and Levelling Up Act 2023 (Schedule 22).	Adopted policy presents no issues or concerns arising from development management officers in its implementation.	None identified.

Question: Do you agree with this approach and why?

Policy HD/PR: Public Realm

Background

9.427 The NPPF highlights planning policies and decisions should ensure that developments, among other things, establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.

9.428 The Public realm is defined as any publicly owned streets, pathways, right of ways, parks, publicly accessible open spaces and any public and civic building and facilities. Development proposals often include areas of public realm as part of their proposals and/or contribute financially to the creation to new or enhanced streets and spaces.

9.429 Several strategies and guidance to support the delivery and coordination of quality of public realm improvements and maintenance have been prepared. In addition, Neighbourhood Plans often include detailed public realm proposals and policies.

9.430 Placemaking Plan Policy D10 requires proposals to be designed to enhance the public realm and to contribute towards achieving public realm infrastructure improvements, in line with the Planning Obligations SPD, and successor documents.

9.431 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper. INSERT LINK

Policy Approach

9.432 The policy remains fit for purpose.

9.433 The current policy accords with national and local strategies, however, amendments could be incorporated to ensure the policy is clearer.

9.434 This could include some headline principles from the pattern book and Public Realm and Movement Strategy being incorporated within the policy so that it is able to better define what good public realm is. This is with an aim of aiding planning balance and judgement.

HD/PR: Public Realm			
	Option	**Advantages**	**Disadvantages**
1	Retain policy D10 with amendments as outlined above.	Adopted policy presents no significant issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required.	None identified.

Question: Do you agree with this approach and why?

Policy HD/DC: Design Codes

Background

9.435 The NPPF (para 133-134) sets out local authorities should seek to provide maximum clarity about design expectations at an early stage. These paragraphs note the following:

‘para 133: … Design guides and codes provide a local framework for creating beautiful and distinctive places with a consistent and high-quality standard of design. Their geographic coverage, level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place and should allow a suitable degree of variety.

Para 134: Design guides and codes can be prepared at an area-wide, neighbourhood or site specific scale, and to carry weight in decision-making should be produced either as part of a plan or as supplementary planning documents.Landowners and developers may contribute to these exercises, but may also choose to prepare design codes in support of a planning application for sites they wish to develop.

Whoever prepares them, all guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area, taking into account the guidance contained in the National Design Guide and the National Model Design Code. These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes.'

9.436 The detailed background and evidence relating to the policy is set out in the Heritage and Design Topic Paper. INSERT LINK

Policy Approach

9.437 Development of a policy with overarching design code principles. The design codes would be expected to include the following:

- Context - Local character and built heritage
- Movement - Design of the street network, active travel and public transport
- Nature - Design of green infrastructure, play spaces, SUDS and the protection of biodiversity
- Built Form - Density, built form and urban design
- Identity - character of buildings
- Public space - Design and of streets and public spaces
- Homes and Buildings - Type and tenure of homes
- Uses - Mix of uses and active frontage
- Resources - Environmental design, renewable energy provision and low energy networks
- Lifespan - Management and adoption standards

HD/DC: Design Codes			
	Option	**Advantages**	**Disadvantages**
1	Development of a policy with overarching design code principles as outlined above.	Implementation of design codes will present a positive opportunity to engage with communities – particularly where there are large allocations. The approach will present wider master planning opportunities to support communities. Will present delivery requirements i.e., developments of greater significance owing to their scale, location, or impact on sensitive areas or important assets.	None identified.

Question: Do you agree with this approach and why?

Sustainable Transport

9.438 The Sustainable Transport Policies were reviewed through the Local Plan Partial Update. The primary purpose of this was to better align policy with the Climate Emergency and strengthen the sustainability requirements for transport. The revised policies went through Examination, were found sound and adopted. The policies align with national policy and have been applied for more than 12 months since adoption, and are considered to be working well.

9.439 The review of these policies for the Local Plan considers whether they could be strengthened, clarified or updated, based on experience of applying the policies through Development Management, and Industry Best Practice.

Policy ST/HS

9.440 Policy ST1 ensures the delivery of well-connected places accessible by sustainable means of transport. It sets out the key principles which should be addressed when locating, planning, and designing development.

9.441 The policy was strengthened in the LPPU by explicitly recognising the importance of location and design in the transport sustainability of development. However, there is now an opportunity through the Local Plan to further strengthen the policy to enhance the potential to enable travelling by sustainable transport modes.

ST/HS: Promoting Sustainable Travel And Healthy Streets			
	Options	**Advantages**	**Disadvantages**
	Retain the fundamental elements of the Policy and make minor amendments to wording to update terminology, provide additional clarity and strengthen application. Amend the policy to require developments to enable, and where appropriate deliver travel by sustainable modes as opposed to encouraging, promoting and supporting sustainable travel options. Proposed to also remove wider policy references to the natural and built environment. These will instead be contained within specific policies relating to each of these matters.	Stronger, language will engender a more positive and proactive approach to sustainable travel which will provide genuine travel options and minimise travel distances therefore making a positive contribution to addressing the Climate Emergency. Reviewing wording to provide additional clarity will strengthen application in line with the purpose of the policy. Including references to the natural and built environment is unnecessary as it is covered by other relevant policies. Removing this provides clarity.	The amendments to policy are not considered to introduce negative implications. The Policy has been worded to ensure that it will be applied appropriately to the site context. This was tested through the LPPU Examination and has not materially changed.

Policy ST/AT

9.442 The council are currently progressing an Active Travel Masterplan which will set out a comprehensive plan for the existing and future active travel infrastructure required to enable and provide for sustainable forms of transport. This is being developed alongside the Local Plan 2022-2042.

9.443 The Local Plan is a critical tool in helping deliver the active travel infrastructure needed, not just for those developments contained in and facilitated by the plan but for the wider community. In order to ensure that those dedicated and protected routes identified in the Active Travel Masterplan are not compromised or prejudiced by development, existing and proposed active travel routes will be safeguarded through the Local Plan.

9.444 Policy ST2a seeks to make sure that any publicly accessible active travel routes are not adversely affected by development proposals and that opportunities to enhance the active travel route network are taken up. It also ensures that opportunities to make and enhance strategic connections between, and within, urban areas and other key origins/destinations, utilising identified routes, should be investigated, and implemented wherever feasible and necessary.

9.445 It is proposed to review the current safeguarded routes contained within ST2 and ST2a in order for the development plan to reflect current built infrastructure. Any revisions to the current safeguarded route will be shown on the Policies map accompanying the Draft (Reg 19) Local Plan. ST2a is proposed to be updated to include reference to the Active Travel Masterplan to ensure that future developments have regard for the plan.

ST/AT: Active Travel Routes			
	Options	**Advantages**	**Disadvantages**
	Update the policy to have regard for the council's Active Travel Masterplan.	Ensures that development which adversely affects any identified active travel route within the plan provides appropriate mitigation.	None identified.

Policy ST/RMD

9.446 Policy ST7 sets out the policy framework for considering the requirements and implications of development for the highway, transport systems and their users.

9.447 The updated policy seeks to make it explicit that developments must take a “Decide and Provide” approach to Transport Planning. A decide and provide approach offers the opportunity for more positive and integrated transport and land use planning by identifying a vision and providing the means to work towards achieving it. This offers the opportunity for positive transport planning and will help to implement the transport user hierarchy by prioritising walking, cycling and public transport first and foremost.

9.448 This is not a new approach for B&NES, as it has been established through ST1 in the LPPU. The purpose of including explicit requirement for a “Decide and Provide” approach in ST7 is to improve clarity by using the accepted Industry terminology, and to be clear that the requirements of ST1 are consistent with ST7 and are intended to be applied as such.

ST/RMD: Transport Requirements for Managing Development			
	Options	**Advantages**	**Disadvantages**
	Update the policy to emphasise the need for transport mitigation to be vision-led in line with a 'decide and provide' approach, and therefore deliver sustainable travel opportunities. This has been established in ST1, and the purpose is to strengthen ST7 in line with this. Proposed to remove wider policy references to the natural and built environment. These will instead be contained within specific policies relating to each of these matters.	Stronger, more positive approach to sustainable travel which will provide genuine travel outcomes therefore making a positive contribution to addressing the climate emergency. Greater clarity on consistency between ST1 and ST7. Including references to the natural and built environment is unnecessary as it is covered by other relevant policies. Removing this provides clarity.	More complicated and potentially lengthy to agree the vision to work towards.

Pollution, Contamination and Safety

Policy PCS/NV: Noise and Vibration

Background

9.449 The 2010 Noise Policy Statement for England sets out the following in relation to noise:

Through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development:

- avoid significant adverse impacts on health and quality of life;
- mitigate and minimise adverse impacts on health and quality of life; and
- where possible, contribute to the improvement of health and quality of life.

9.450 The above is further reflected within the National Planning Policy Framework (NPPF) which sets out the following in relation to noise:

'Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;

b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.'

9.451 Placemaking Plan Policy PCS2 highlights the planning system as having a role in seeking to ensure that new noise sensitive development such as housing and schools is not located close to existing sources of noise, including industrial uses and noise generated by vehicles and other forms of transport that would lead to nuisance. Also, it should ensure that potentially noise creating uses such as some industrial processes or some recreational activities are not located where they would be likely to cause nuisance.

9.452 The detailed background and evidence relating to the policy is set out in the Pollution Contamination and Safety Topic Paper. INSERT LINK

Policy Approach

9.453 The policy remains fit for purpose. The current policy accords with national and local strategies, however, amendments could be incorporated to ensure the policy is clearer particularly regarding planning balance and judgement.

9.454 It is proposed to amend the policy to better reflect the aims as set out within the NPPF and the 2010 Noise Policy Statement for England. Particularly, the aim of seeking to improve health and quality of life, which can be used to protect quiet areas.

PCS/NV: Noise and Vibration			
	Option	**Advantages**	**Disadvantages**
1	Retain policy PCS2 with amendments as outlined above.	Adopted policy presents no significant issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required. Minor amendment will improve clarity.	None identified.

Policy PCS/AQ: Air Quality

Background

9.455 The National Planning Policy Framework (NPPF) sets out the following in relation to air quality:

'Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.'

9.456 Placemaking Plan Policy PCS3 seeks to ensure that the effects of a development on the local air quality are properly considered. Local policy, latest Government regulations and guidelines are used to determine the suitability of any proposal as it relates to local air quality.

9.457 The detailed background and evidence relating to the policy is set out in the Pollution Contamination and Safety Topic Paper. INSERT LINK

Policy Approach

9.458 The policy remains fit for purpose. The current policy accords with national and local strategies, however, amendments could be incorporated to ensure the policy is clearer particularly regarding planning balance and judgement and strengthening the approach with regards to air quality.

PCS/AQ: Air Quality			
	Option	**Advantages**	**Disadvantages**
1	Retain policy PCS3 with amendments as outlined above.	Adopted policy presents no significant issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required. Minor amendments improve clarity.	None identified.

Policy PCS/BHS: Bath Hot Springs

Background

9.459 The Hot Springs are one of the six key attributes of the City of Bath World Heritage Site. Since Roman times with the development of 'Aquae Sulis' as a retreat for health therapy, worship and relaxation, Bath's Hot Springs have been the centre of social, economic and cultural developments in Bath. Settlement grew up around this resource which has culminated in the modern City of Bath. The Springs now attract many visitors annually with the opening of the Thermae Bath Spa.

9.460 There are three Hot Springs in the centre of Bath: the Kings Springs within the Roman Bath complex, the Cross Bath Spring, and the Hetling Spring in Hot Bath Street. Together they produce around 1.3 million litres of mineral-rich thermal water per day with a temperature of between 41 and 46°C. These thermal waters arise from the Carboniferous Limestone via fissures in the overlying layers (a layer of alluvium, successive layers of Lias Clay and limestone and Triassic Mercia mudstone) and appear as springs on the surface.

9.461 As the Bath Hot Springs are inextricably linked with the World Heritage Site, Core Strategy Policy B4 applies to their general protection. Policy PCS8 seeks to ensure that both the quality and quantity of the groundwater source is protected from development that is likely to have any adverse effect on this resource. It is also important to have this policy in place should the Council receive any planning applications for energy mineral exploration and extraction which may impact on Hot Springs and their sources (see Policy M5).

9.462 The current policy accords with national and local strategies, however, amendments could be incorporated to reference the second UNESCO World Heritage Site inscription as one of the 11 Great Spa Towns of Europe – fashionable spa towns laid out around natural springs which are used for health and wellbeing. Inscribed on the World Heritage List on the 24th July 2021.

9.463 The detailed background and evidence relating to the policy is set out in the Pollution Contamination and Safety Topic Paper. INSERT LINK

Policy Approach

9.464 The policy remains fit for purpose. The current policy accords with national and local strategies, however, amendments could be incorporated to take account of the second UNESCO World Heritage Site inscription.

PCS/BHS: Bath Hot Springs			
	Option	**Advantages**	**Disadvantages**
1	Retain policy PCS8 with amendments as outlined above.	Adopted policy presents no significant issues or concerns arising from development management officers in its implementation. No evidence to suggest major changes are required. Proposed amendments seek an update in respect of the World Heritage Site inscription.	None identified.

Minerals and Waste

Minerals

Policy MIN/M: Strategic Approach to Minerals (Existing CP8A)

Background

9.465 The NPPF places importance on facilitating the sustainable use of minerals and asks local authorities to include policies relating to the extraction, prior extraction of minerals and for reclamation and restoration, to set out environmental criteria, and to define Minerals Safeguarding Areas.

9.466 Limestone is the principal commercial mineral worked in the District. There are currently two active sites – one surface working and one underground mine. Upper Lawn Quarry at Combe Down in Bath and Stoke Hill mine near Limpley Stoke both produce high quality Bath Stone building for renovation projects.

9.467 Bath & North East Somerset also has a legacy of coal mining and there are still coal resources within the area. Although no longer worked, there are potential public safety and land stability issues associated with these areas. These areas are currently safeguarded and the current Local Plan shows the general extent of the surface coal Mineral Safeguarding Area within the District. The Coal Authority has since advised in its guidance to Local Planning Authorities (LPAs) – Jan 2023 that it no longer requires the safeguarding of surface coal resource.

9.468 Historically Bath & North East Somerset has never made any significant contribution to regional aggregates supply and because of the scale and nature of the mineral operations in the District and the geology of the area it is considered that this situation will continue. Bristol is also in no position to make a contribution to regional aggregates supply, other than the provision of wharf facilities. However, North Somerset and South Gloucestershire have extensive permitted reserves of aggregates and have historically always met the sub regional apportionment for the West of England.

9.469 Current Local Plan Policy CP8a sets out the strategic approach to minerals for Bath & North East Somerset and seeks to ensure that mineral resources continue to be safeguarded. It also requires that potential ground instability issues, including those associated with the historical mining legacy, and the need for related remedial measures should be addressed as part of any proposal. The policy covers the strategic approach to extraction of minerals, environmental impact, and restoration.

9.470 A review of the policies and Mineral allocations and Safeguarding Areas has been undertaken by Atkins for the Council.

Policy Approach

9.471 Minor changes are proposed to the policy as follows:

MIN/M: Strategic Approach to Minerals (Existing CP8A)			
	Option	**Advantages**	**Disadvantages**
1	Retain policy CP8A with amendments Add reference to note that secondary and recycled aggregate facilities will be supported, subject to satisfying relevant policy requirements. Add reference to requiring progressive and effective restoration of mineral sites and have regard to recognition of cumulative environmental impacts, in relation to reclamation and restoration.	The research highlights that development proposals which increase the supply of secondary and/or recycled aggregates will be supported, and that secondary and recycled facilities should be prioritised. Progressive restoration is favourable to limit environmental impacts and re-create priority habitats at the earliest opportunity at the same time as addressing the impacts of climate change. The cumulative impacts of minerals development should be addressed as part of the reclamation and restoration process	None identified.

Policy MIN/MSA: Mineral Safeguarding Areas (Existing M1)

Background

9.472 Mineral Safeguarding Areas are defined around the active mineral sites in the Plan area. The purpose of these areas is to avoid the needless sterilisation of mineral resources by non-mineral development. There is no presumption that any of these areas will be acceptable for mineral working and nor should they be used to automatically preclude other forms of development. Instead, they are to make sure that mineral resources are adequately and effectively considered in land use planning decisions.

9.473 The general extent of the Mineral Safeguarding Areas within the District are shown on the Policies Map. The existing Policy M1 clarifies how applications for non-mineral development within Mineral Safeguarding Areas will be considered.

9.474 Currently there are four key Mineral Safeguarding Areas (MSAs) – the MSAs around Upper Lawn quarry; and Stokes Hill mine - Hayes Wood to Hog Wood MSA , the Coal reserves MSAs between Keynsham and Radstock and an MSA to the east of Bishop Sutton, surrounding the former Stowey Quarry. Only the Upper Lawn quarry and Stokes Hill mine are active sites. As above, the Coal Authority no longer requires the safeguarding of coal resources and it is proposed that this should be deleted from the Policies Map in the Draft Local Plan. In relation to the East of Bishop Sutton MSA, it is recommended that this is retained, and development is not permitted that would sterilise the reserves, in case there is future interest in working in this area.

9.475 Atkins has consulted with the mineral industry and advises that the operators of Stoke Hill Mine, near Limpley Stoke, have requested that the MSA surrounding the active Stoke Hill Mine is extended southwards and westwards to take into account that the reserves of Chalfield Oolitic limestone extend much further south than the current MSA. The plan below shows the proposed extension.

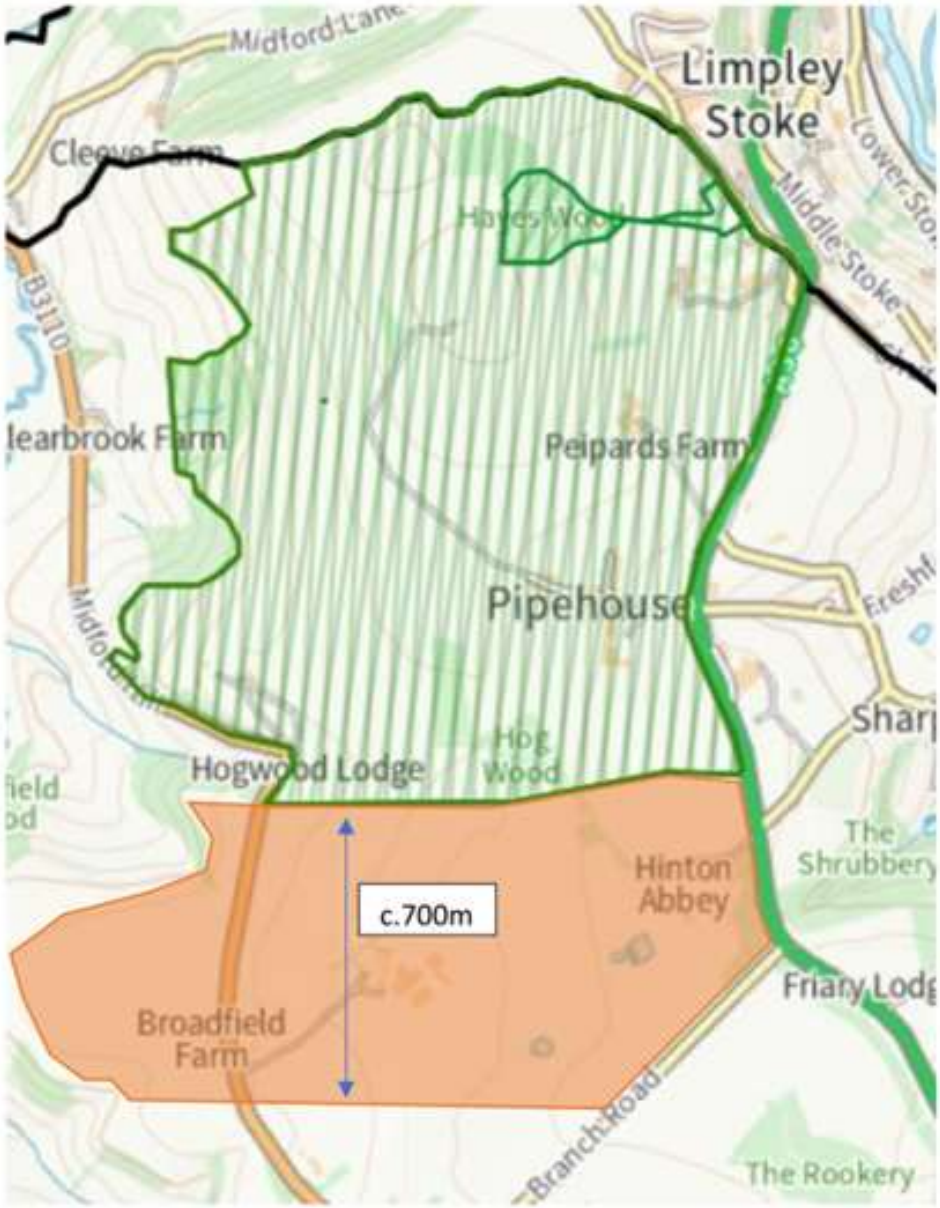


Figure 72: Proposed extension

Proposed Policy Approach

9.476 The current wording of existing Policy M1 remains relevant. It is proposed to retain the policy with amendments. Changes to the Policies map to reflect the extension of the MSA at Limpley Stoke to accord with the evidence of minerals, and deletion of the coal MSAs having regard to the Coal Authority advice are proposed.

MIN/MSA: Minerals Safeguarding Areas (Existing M1)			
	Option	**Advantages**	**Disadvantages**
1	Retain policy with additional reference to provide clarity on what is covered in a Minerals Safeguarding Area; and to make clear that important minerals infrastructure should be protected and therefore safeguarded in the same way that minerals reserves are. In addition, the policy wording will clarify the evidence that developers will need to submit for proposed non-mineral related developments.	Adds clarity.	None identified.

MIN/MSA: Minerals Safeguarding Areas – Policies Map			
	Option	**Advantages**	**Disadvantages**
1	Propose extending the Hayes Wood to Hog Wood MSA southwards and westwards.	Reflects the greater extent of the mineral reserve to be safeguarded.	None identified subject to the planning constraints and policy framework.
2	Propose deletion of coal Mineral Safeguarding Areas	This is in accordance with the Council's Climate Emergency declaration.	None identified.

Policy MIN/MA: Mineral Allocations (Existing M2)

Background

9.477 Active mineral working continues at both Upper Lawn Quarry and Stoke Hill Mine. However, Stowey Quarry, previously identified for future extraction, has now been worked to its maximum extent and the current planning permission for mineral extraction has expired.

9.478 The Upper Lawn Quarry has been extended since the Placemaking Plan was adopted under planning permission reference 16/05548/MINW. This covers a period of working up to 2035, therefore within the plan period. There have been no issues raised regarding the Preferred Area designation which covers a larger area than the permission site, within the MSA. Preferred Areas are defined in the NPPG as areas of known resources where planning permission might reasonably be anticipated. Such areas may also include essential operations associated with mineral extraction.

9.479 The Stoke Hill mine is subject to a small allocation to cover the operational area above ground (as shown in the plan above of the MSA). The current site is subject to planning permission area 04/03910/MINW which was to "Extend the planning boundary to 70ha and the end date of the existing permission (ref: 96/02045/FUL) to 2042."

9.480 The Stoke Hill Mine / Hayes Wood to Hog Wood MSA covers 175ha and aligns with an Area of Search. Areas of Search are defined as an area where knowledge of mineral resources may be less certain but within which planning permission may be granted, particularly if there is a potential shortfall in supply. There remains therefore a substantial area identified for potential future working and this is considered likely to be adequate for the Local Plan period and should therefore be retained.

Proposed Policy Approach

9.481 It is proposed that the current policy text is retained.

9.482 The Upper Lawn Quarry allocation on the Policies Map is proposed to be amended to include the quarry extension area as approved and implemented. No changes are recommended to the Preferred Area designation.

9.483 No changes are proposed for the Stoke Hill mine allocation which covers the above ground operations of the permitted site. No changes are currently proposed for the Area of Search, which is significantly larger in extent than the permission site, which allows operations to 2042.

MIN/MA: Minerals Allocations – Policy Map			
	Option	**Advantages**	**Disadvantages**
1.	Amend Upper Lawn Quarry allocation to take into account 2016 permission site area	To reflect the current workings and site area.	None identified.
2	Retain Upper Lawn Quarry Preferred Area	No issues have been raised with the Preferred Area as designated.	None identified
3	Retain Stoke Hill Mine Allocation	No issues have been raised with the allocation.	None identified
4	Retain the Stoke Hill Mine Area of Search to align with the current Mineral Safeguarding Area	This allows for potential expansion within the Area of Searchshould there be a potential shortfall in supply subject to planning framework.	This is an existing allocation. None identified.

MIN/RF: Aggregate Recycling Facilities (Existing M3)

Background

9.484 Existing or approved aggregate recycling facilities in the Plan area are located at the former Fullers Earthworks site, Odd Down

9.485 Having regard to the often temporary nature of these facilities it is considered preferable for any future proposals that may come forward to be dealt with by a criteria based policy as set out below rather than by allocating specific sites/areas.

Proposed Policy Approach

9.486 Current Policy M3 establishes the policy approach to considering proposals for aggregate recycling facilities. It is proposed to retain the existing criteria-based approach with amendments to clarify that the development of aggregate recycling facilities will be supported, to increase aggregate reuse and recycling and to refer to specific additional siting considerations.

9.487 .The proposed approach is as follows:

MIN/RF: Aggregate Recycling Facilities			
	Option	**Advantages**	**Disadvantages**
1	Retain policy text with minor amendments to reflect a more pro-active approach and to specify additional siting considerations .	This aligns with the NPPF priority for reuse and recycling of aggregates.	None identified.

Question: Do you agree with this approach and why?

MIN/WW: Winning and Working of Minerals (Existing M4)

Background

9.488 There is historically a low level of mineral activity within Bath and North East Somerset and this situation is unlikely to significantly change during the Plan period. A policy framework is therefore in place against which all minerals developments will be determined, and to ensure full consideration is given to minerals related planning applications.

Proposed Policy Approach

9.489 It is proposed to retain the existing policy, with minor amendments to clarify expectations from developers with regard to proposals.

9.490 The proposed approach is as follows:

MIN/WW: Winning and Working of Minerals			
	Option	**Advantages**	**Disadvantages**
1	Retain policy text with minor amendments to demonstrate a more prescriptive and ambitious approach that provides clarity on the expectations of B&NES in terms of applications made under this policy. .	This provides greater certainty on what evidence developers are expected to submit with planning applications	None identified.

Question: Do you agree with this approach and why?

MIN/MD: Minerals development: environmental enhancement through restoration

Background

9.491 The NPPF states that planning policies should ensure that worked land is reclaimed at the earliest opportunity, and that high quality restoration and aftercare of mineral sites takes place (para 210 h). The Ecological Emergency Action Plan and Green Infrastructure Strategy together with requirements for Biodiversity Net Gain reinforce the need to address this issue.

Policy Approach

9.492 A new policy is proposed which aims to ensure that minerals developments is supported by reclamation and restoration proposals that prioritise environmental enhancement seeking positive improvements and a net gain in biodiversity. This will align with the adopted and proposed policy on Biodiversity Net Gain, the WECA Local Nature Recovery Network and Joint Green Infrastructure Strategy.

MIN/MD: Minerals development: environmental enhancement through restoration			
	Option	**Advantages**	**Disadvantages**
1	New policy to ensure that minerals developments is supported by the phased restoration and aftercare of the site in order to ensure an appropriate and beneficial re-use, including recreational, leisure and other related uses that have a wider public benefit. Restoration proposals should improve the environment, with particular regard to the quality of soil, water, biodiversity and geodiversity, as well as flood risk, climate change, land stability and landscape character.	This policy reinforces the need for phased restoration of sites and environmental benefits and aligns with the Climate and Ecological Emergency, West of England Combined Authority Local Nature Recovery Network and Joint Green Infrastructure Strategy. It also ensures mineral sites are subject to the Biodiversity Net Gain policy framework.	None identified.

Question: Do you agree with this approach and why?

MIN/HC: Conventional and Unconventional Hydrocarbons (Existing M5)

Background

9.493 Conventional hydrocarbons are oil and gas (energy minerals) where the reservoir is sandstone or limestone. Unconventional hydrocarbons refer to oil and gas which comes from sources such as shale or coal seams which act as the reservoirs.

9.494 The Government is responsible for issuing Petroleum Exploration and Development Licences (PEDLs) which give exclusive rights for exploration and extraction of oil and gas resources within a defined area. Gaining a licence does not convey consent to drill or undertake any other form of operations. All operations require other permissions as appropriate, such as Environment Agency permits, Health and Safety Executive (HSE) scrutiny, and Department for Energy Security and Net Zero (DESNZ) consent, together with planning permission.

9.495 Whilst there are currently no PEDLs within Bath & North East Somerset it is nonetheless important to have in place a robust planning policy framework for considering planning applications relating to conventional and unconventional hydrocarbons related development within Bath & North East Somerset should this situation change in the future. Planning permission would be required for all stages, including exploration, appraisal and production.

9.496 The particular concern for Bath & North East Somerset is the potential involvement of the deep drilling and fracturing or 'fracking' of deep geological resources in order to extract shale gas. This has implications for the Bath Hot Springs which rely on underground water resources from a wide geographical area and therefore there is a concern relating to the potential disruption that deep drilling and hydrofracturing (fracking) may cause.

9.497 The hot springs are very special to Bath and have always been, and continue to be, at the centre of economic, social and cultural developments in the City. As a Council, we are responsible for protecting and monitoring the springs. The Bath's World Heritage Site - Statement of Outstanding Universal Value - includes the Hot Springs.

9.498 The Council has also declared a Climate and Ecological Emergency, and the exploration, appraisal and processing of fossil fuels would be contrary to the priority to lead to carbon neutrality by 2030. It is also noted that the draft Overarching National Policy Statement for Energy, paragraph 3.4.7, suggests the need to move away from hydrocarbons as quickly as possible and the need to scale up the production of low carbon alternatives such as hydrogen and biofuels, but to manage the transition in a way that protects jobs and investment, uses existing infrastructure, maintains security of supply, and minimises environmental impacts.

9.499 Existing Policy M5 employs the precautionary principle in setting out a stringent framework within which development involving the exploration and/or appraisal of oil and gas resources will be considered.

Proposed Policy Approach

9.500 Having regard to the World Heritage Site status of Bath, the importance of the Hot Springs, and the Climate and Ecological Emergency, we propose to tighten the policy to indicate a presumption against development involving the exploration and/or appraisal of oil and gas resources in Bath and North East Somerset, whilst retaining a policy framework in the event that proposals come forward. The proposed approach is as follows:

MIN/HC: Conventional and Unconventional Hydrocarbons (existing policy M5)			
	Option	**Advantages**	**Disadvantages**
1.	Tighten up the policy to indicate a presumption against development involving the exploration and/or appraisal of oil and gas resources using in Bath and North East Somerset. Retain policy criteria for assessing proposals. Should alternative technologies and techniques emerge for the exploration and/or appraisal of oil and gas resources, developers would be required to provide compelling evidence of need for the proposed exploration/appraisal of oil and gas resources, having regard to the hierarchy of mineral sources; and demonstrate that there would be no unacceptable adverse effects on the environment, climate change, local communities and the transport network as a consequence of the proposed development	This will retain a policy framework in the event that a proposal is submitted. This would only be the case if a Petroleum Exploration and Development Licence (PEDL) were to be issued by the Government, and having regard to the other regulatory requirements).	This does not form an outright ban on "fracking", which would align with the Council's declared Climate Emergency. However, such a ban would be contrary to national policy and leave the Council with no local policy framework for determining any future proposals.

Question: Do you agree with this approach and why?

Waste

The Joint Waste Core Strategy was prepared by the West of England authorities (Bath and North East Somerset, Bristol City, North Somerset and South Gloucestershire) and adopted in 2011. It sets out the strategic spatial planning policy for the provision of waste management infrastructure across the sub region plan area and is part of the statutory development plan for Bath and North East Somerset when considering development proposals for waste management. The Joint Waste Core Strategy also contains policies to direct the development of waste treatment facilities (that involving the recycling, composting, storage and transfer of wastes) and for the disposal of waste and includes site allocations for residual waste treatment facilities under Policy 5, subject also to development management policies.

One of the sites within the Joint Waste Core Strategy allocated for residual waste facilities within Bath and North East Somerset is at Broadmead Lane, Keynsham. This waste facility site allocation falls within an area that is being considered and has been identified in this Local Plan Options document as a proposed option for a major mixed-use development (that wouldn't include a waste facility) at North Keynsham (see chapter 6). Superseding this waste site allocation with a Local Plan allocation for mixed use development in the Draft Local Plan would potentially have implications for waste planning in the district and sub-region.

Notwithstanding this, there have been a number of changes since the Joint Waste Core Strategy was adopted in 2011. For example, the Waste Management Plan for England (2021) seeks to encourage a more sustainable and efficient approach to resource management and outlines the policies that are in place to help move towards a zero waste economy. The Environment Act 2021 and associated emerging regulations bring in statutory targets for residual waste, recycling and waste collections. Environment Act regulations coming into force in March 2025 require businesses to recycle food, glass, metal, plastic, paper and card. Whilst this is unlikely to increase the overall waste arisings this should increase the demand for recycling.

The proposed approach to waste planning will be investigated further in preparing the Draft Local Plan and in conjunction and co-operation with our neighbouring West of England authorities. This is particularly important given the cross boundary strategic nature of waste apportionment and treatment which is currently dealt with in the adopted West of England Joint Waste Core Strategy. As part of formulating waste policies for the new Local Plan, new waste technologies including opportunities to deliver small scale or micro waste management facilities on strategic development sites should be explored - these would have the potential to treat residual waste arisings from developments on-site.

I/I: Infrastructure Provision (existing CP13)

Background

9.501 The National Planning Policy Framework (NPPF) (2023) and associated Planning Practice Guidance (PPG) highlights the importance of the proper planning and delivery of infrastructure as part of the plan making process. The timely delivery of infrastructure required to support future development is also highlighted as one of the spatial priorities of the Local Plan.

9.502 The Council is working with and will continue to work with infrastructure providers, developers and other key stakeholders to support the delivery of the infrastructure necessary to enable the development set out in the Local Plan. The Council has prepared an Infrastructure Delivery Plan to accompany the adopted Local Plan, and this forms a baseline for future infrastructure needs which will arise from the emerging Local Plan policy requirements and site allocations set out in the Draft Local Plan (Regulation 19). The Infrastructure Delivery Plan will be updated alongside the Draft Local Plan to ensure infrastructure information remains up to date and is monitored effectively.

9.503 In preparing this Options document we have engaged with infrastructure providers including the water companies, energy companies, NHS and internal services such as schools to understand the implications of growth and to identify how any infrastructure capacity constraints might have implications for the Local Plan spatial strategy.

9.504 The details of the infrastructure needed for new developments and that which is needed to reduce deficiencies in existing infrastructure will be highlighted in the relevant sections of the place chapters of the Local Plan. There will also be a general District-wide policy that makes sure that all new developments are supported by the necessary infrastructure. This will be additional to specific policies requiring for example green infrastructure, active travel requirements, and policy requirements for allocations which set out the infrastructure required to support development.

9.505 A Viability Assessment will be undertaken to assess the viability of all policy requirements such as Affordable Housing, green infrastructure and transport measures in order to inform the Draft Local Plan (Regulation 19).

9.506 The existing Planning Obligations Supplementary Planning Document (SPD) which aligns with the current Local Plan will need to be updated to reflect the updated infrastructure requirements within the new Local Plan – policies and site allocations and the associated developer contributions. This is particularly important in the case of Affordable Housing which includes detailed requirements within the SPD.

9.507 An important issue that has arisen in the implementation of the adopted policy CP13 is the timing of infrastructure. It is important to ensure that infrastructure is delivered at the earliest opportunity to be in place for when developments are occupied. Notwithstanding this, the timing of delivery infrastructure in the programming of developments is a key issue for developers in terms of financing and viability.

Proposed Policy Approach

9.508 We propose to retain a generic policy requiring that new developments must be supported by the delivery of the required infrastructure to provide balanced and more self-contained communities. It will ensure that infrastructure is delivered at the earliest opportunity and in a co-ordinated way prior to occupation of new development. The policy will refer to developer contributions and an updated Planning Obligations Supplementary Planning Document.

I/I: Infrastructure Provision (Existing Policy CP13)			
	Option	**Advantages**	**Disadvantages**
1	Retain policy CP13 with minor amendment to reference the timely delivery of infrastructure to ensure that infrastructure is delivered at the earliest opportunity.	This will aim to ensure that infrastructure is in place before occupation.	Viability may be an issue in terms of the cost of development finance for delivery of infrastructure at an early stage.

Question: Do you agree with this approach and why?

Appendix 1 – Policies retained from Local Plan Partial Update, Placemaking Plan and Core Strategy

The list below sets out the policies adopted in the Local Plan Partial Update, Placemaking Plan and Core Strategy, which are not proposed to be updated through preparation of the Local Plan.

Policies to be retained	
	Responding to Climate Change
LPPU	Policy CP1 Retrofitting Existing Buildings
LPPU	Policy CP4 District Heating
LPPU	Policy SCR9 Electric vehicles charging infrastructure
PMP	Policy SCR2 Roof Mounted/Building Integrated Scale Solar PV
PMP	Policy SCR5 Water Efficiency
PMP	Policy SU1 Sustainable Drainage
CS	Policy CP5 Flood Risk Management
	High Quality Design
LPPU	Policy D5 Building Design
LPPU	Policy D8 Lighting
PMP	Policy D1 General Urban Design Principles
PMP	Policy D2 Local Character & Distinctiveness
PMP	Policy D3 Urban Fabric
PMP	Policy D4 Streets and Spaces
PMP	Policy D6 Amenity

PMP	Policy D7 Infill & Backland Development
PMP	Policy D9 Advertisements & Outdoor Street Furniture
PMP	Policy D10 Public Realm
	Landscape
PMP	Policy NE2B Extension of residential curtilages in the countryside
	Green Belt
LPPU	Policy GB3 Extensions and alterations buildings in the Green Belt
PMP	Policy GB1 Visual amenities of the Green Belt
CS	Policy CP8 Green Belt
	Pollution, Contamination and Safety
LPPU	Policy PCS5 Contamination
PMP	Policy PCS1 Pollution and nuisance
PMP	Policy PCS4 Hazardous substances
PMP	Policy PCS6 Unstable land
PMP	Policy PCS7 Water Source Protection Zones
PMP	Policy PCS7A Foul sewage infrastructure
	Meeting Housing Needs

LPPU	Policy H2 Houses in Multiple Occupation
LPPU	Policy H3 Residential Use in Existing Buildings
LPPU	Policy H5 Retention of Existing Housing Stock
	Meeting Local Community and Recreational Needs
PMP	Policy LCR1 Safeguarding local community facilities
PMP	Policy LCR1A Public houses
PMP	Policy LCR5 Safeguarding existing sport and recreational facilities
PMP	Policy LCR7 Recreational development proposals affecting waterways
PMP	Policy LCR7A Telecommunications development
PMP	Policy LCR7C Commercial riding establishments
PMP	Policy LCR9 Increasing the Provision of Local Food Growing
	Economy
LPPU	Policy RE1 Employment uses in the countryside
PMP	Policy ED1A Office Development
PMP	Policy RE2 Agricultural development
PMP	Policy RE3 Farm diversification
PMP	Policy RE4 Essential dwellings for rural workers

PMP	Policy RE5 Agricultural land
PMP	Policy RE6 Re-use of rural buildings
PMP	Policy RE7 Visitor accommodation
	Centres and Retailing
LPPU	Policy CR1 Sequential Test
LPPU	Policy CR2 Impact Assessments
	Sustainable Transport
PMP	Policy ST4 Rail freight facility
	Bath
LPPU	Policy SB14 Twerton Park
LPPU	Policy SB24 Sion Hill
LPPU	Policy SB25 St Martin's Hospital
LPPU	Policy SB26 Park and Ride Sites
PMP	Policy SB9 The Bath Press
PMP	Policy SB15 Hartwells Garage
PMP	Policy SB16 Burlington Street
PMP	Policy SB17 Englishcombe Lane

CS	Policy B3A: Land adjoining Odd Down, Bath Strategic Site Allocation
	Keynsham
LPPU	Policy KE2B: Riverside and Fire Station Site
LPPU	Policy KE3C: East of Keynsham – Former Safeguarded Land
LPPU	Policy KE3D: East of Keynsham – Former Safeguarded Land
LPPU	Policy KE5: Treetops
PMP	Policy KE2A: Somerdale
PMP	Policy KE3A: Land Adjoining East Keynsham Strategic Site Allocation
	Somer Valley
LPPU	POLICY SSV4: Former Welton Manufacturing Site
LPPU	POLICY SSV21: Silver Street
LPPU	POLICY SSV9: Old Mills Industrial Estate (Incorporating Somer Valley Enterprise Zone
LPPU	POLICY SSV22: Former Paulton Printworks
PMP	POLICY SV2 Midsomer Norton Town Centre Strategic Policy
PMP	POLICY SSV1: Central High Street Core Site
PMP	POLICY SSV3: Midsomer Norton Town Park

PMP	POLICY SSV17: Former Radstock County Infants
PMP	POLICY SSV20: Former St Nicholas School
PMP	POLICY SSV18: Somer Valley Campus
PMP	POLICY SSV11: St Peter's Factory Site
CS	POLICY SV3: Radstock Town Centre Strategic Policy
	Rural Areas
PMP	SR5 – Pinkers Farm
PMP	SR14 – Wheelers Manufacturing Block Works
PMP	SR15 – Land to the East of the St Mary's School Context

Question: Do you agree that these policies should be retained?

Appendix 2
Proposed Safeguarded Strategic and Locally Significant Industrial Sites

Bath

- Newbridge Riverside (Brassmill Lane, Locksbrook Road Estate and The Maltings) excluding Locksbrook Creativity Hub and the Fashion Collection Archive.
- Victoria Park Business Centre, Kelso Place, Lower Weston, Bath
- Stable Yard, Windsor Bridge Road, Twerton, Bath
- Railway Arches, Wood Street, Lower Bristol Road, Bath
- Polamco, Western Lock, Lower Bristol Road, Bath
- Pinesway Industrial Estate, Ivo Peters Road, Bath
- Commercial space, Cheltenham Street, Bath
- Bath Self Storage, Bellotts Road, Twerton, Bath
- M & B Engineering, Bellotts Road, Twerton, Bath
- Booker Mcconnell Plc, Bellotts Road, Twerton, Bath
- Workman's Yard, Claude Avenue, Twerton, Bath
- Commercial space, Lymore Gardens, Twerton, Bath,
- Commercial buildings to the north of Dartmouth Avenue, Twerton, Bath
- Bath Trade Park, Westmoreland Station Road, Westmoreland, Bath
- Broadway Court, Miles Street, Widcombe, Bath
- Ferry Court, Ferry Lane, Bathwick, Bath
- Cross Manufacturing, Midford Road, Odd Down, Bath

Keynsham

- Broadmead Lane, Ashmead Road & Unity Road Estate, including World's End Lane Extension
- Pixash Lane

- Wansdyke Workshops, Unity Road, Keynsham

Somer Valley

- Bath Business Park, Peasedown St John
- Old Mills Industrial Estate, Paulton
- Midsomer Enterprise Park, Radstock
- Mill Road, Radstock
- Haydon Industrial Estate, Radstock
- Westfield Industrial Estate
- Coombend, Radstock
- Former Sewage Works, Welton Hollow and Land West of Midsomer Enterprise Park

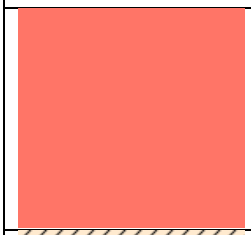
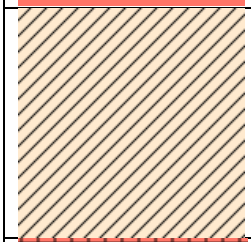
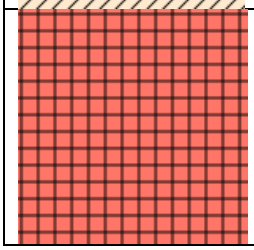
Rural Area

- Cloud Hill Industrial Estate/Trident Works, Temple Cloud
- Temple Bridge Business Park, Temple Cloud
- Hallatrow Business Park, Wells Road, Hallatrow
- Farrington Fields Trading Estate, Farrington Gurney
- Church Farm Business Park, Ashton Hill, Corston
- Burnett Business Park, Gypsy Lane, Keynsham
- Timsbury Village Workshops, Hayeswood Road, Timsbury

Appendix 3: Proposed Changes to District and Local Centre Designations

Map Details

- Plans are diagrammatic only and are not to scale
- In all cases plan extracts are shown so that north is at the top of the box.

Key:	
	**Current District / Local Centre designation**
	**Proposed Addition of Local Centre designation**
	**Proposed deletion of District /Local Centre designation**

Appendix 3 Contents

District Centres

- Moorland Road, Bath

Local Centres
In Bath

- Camden Road & Fairfield Road
- Chelsea Road Local Centre (extract)
- The Avenue, Combe Down Local Centre
- The Avenue, Combe Down Local Centre (separated units)
- Larkhall Local Centre
- Margaret's Buildings Local Centre
- Nelson Place East & Cleveland Place Local Centre
- Odd Down (Frome Road Local Centre and Upper Bloomfield Road Local Centre)
- Odd Down - Upper Bloomfield Road Local Centre (extract)
- Twerton High Street Local Centre
- Walcot Street Local Centre (extract)
- Weston High Street Local Centre
- Widcombe Parade Local Centre

Keynsham/ Saltford area

- Queen's Road Local Centre
- Saltford Local Centre

Somer Valley

- Paulton Local Centre
- Peasedown St John Local Centre (extract)

Rest of District

- Batheaston Local Centre
- Chew Magna Local Centre
- Whitchurch Local Centre

Review of District Centre

Moorland Road District Centre	Proposed Change
	Deletion of part of the old Co-op to reflect the redevelopment of the site for mixed uses which has been implemented. (application ref 21/04049/FUL)

Review of Local Centres

Camden Road & Fairfield Road Local Centre	Proposed Addition of unit
	Proposed addition of health centre. Health Centres are now a Class E (Commercial, Business and Service) use.

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Chelsea Road Local Centre (extract)	Proposed Deletion of unit
	Delete No 18 Newbridge Road, Bath BA1 3JY. Property was built as a semi detached dwelling and is peripheral with no visual linkage to the Chelsea Road Local Centre shopping area.

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The Avenue, Combe Down Local Centre	**Proposed Addition of unit**
	Add 3, Avenue Place, The Avenue, Combe Down, Bath, BA2 5EE This is a shop with a shopfront and is a Main Town Centre Use.
The Avenue, Combe Down Local Centre (separated units)	**Proposed deletion of units**
	Delete Hair salon at 64, Combe Road, Combe Down, Bath, BA2 5HZ, a residential unit at 66 Combe Road and a store at 68 Combe Road. Only the hair salon is a use attracting footfall. This unit is physically unrelated to the main focus of the local centre at the Avenue, Combe Down.

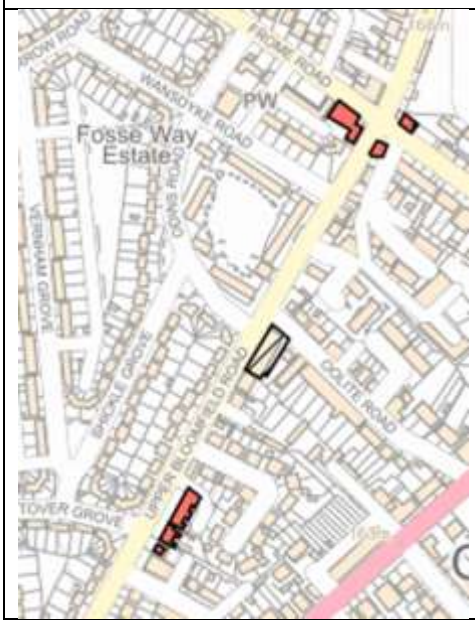
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Larkhall Local Centre	Proposed Addition of units.
	Add Leak, Larkhall Square, Larkhall (gift shop and public toilet) as Main Town Centre use Add Burger Steakhouse, St Saviour's Road, Lambridge, Bath, BA1 6RT as Main Town Centre use Add 1A and 2, Beaufort Place, Lambridge, Bath, BA1 6RP these are Main Town Centre uses Class E Uses with shopfronts.

Margaret's Buildings Local Centre	Proposed deletion of unit
	Delete 20, Catharine Place, Bath, BA1 2PR as a residential use**.**

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Nelson Place East & Cleveland Place Local Centre	Proposed addition of unit
	Add Piano Shop, 1 & 2 Canton Place, London Road, Walcot, Bath, BA1 6AA as a Main Town Centre Use

Odd Down (Frome Road Local Centre and Upper Bloomfield Road Local Centre)	Proposed addition of unit and merging of
	Merge “Frome Road Local Centre” and “Upper Bloomfield Road Local Centre”. Add Odd Down Co-op, Upper Bloomfield Road, Odd Down, Bath, BA2 2RY as Main Town Centre Use

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Odd Down - Upper Bloomfield Road Local Centre	Proposed Deletion of Unit
	Delete 47 Upper Bloomfield Road as this is residential, built as residential.

Twerton High Street Local Centre	
	Delete 82 High Street, Twerton – this is residential.

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Walcot Street Local Centre (extract)	
	Add the The Bell Inn, 103 Walcot St, Bath BA1 5BW as Main Town Centre Use Add Bath Aqua Glass Glassblowing Studio, Walcot Street Bath BA1 5BW This is a Class E use.

Weston High Street Local Centre	
	Add 128A High Street, Upper Weston, Bath BA1 4DF. This is a café –Main Town Centre Use. Add Maison Nesta Hair Stylist, 22A, High Street, Upper Weston, Bath, BA1 4B as this is a Main Town Centre Use.

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Widcombe Local Centre	Proposed Additions
	Add Main town centre uses as follows: Co-op, Widcombe Wharf, Widcombe Hill, Bath, BA2 6AA White Hart Inn, Widcombe, Bath, BA2 6AA Widcombe Pharmacy, 4A, Widcombe Parade, Bath, BA2 4JT Offices, 1-2, Widcombe Parade, Widcombe, Bath, BA2 4JT Class E use: Widcombe Surgery 3-4, Widcombe Parade, Bath, BA2 4JT

Keynsham and Saltford Area

Keynsham – Queen's Road Local Centre	
	Add Co-op, 61, Queens Road, Keynsham, Bristol, BS31 2NW as this is a Main Town Centre Use directly adjacent to the existing Local Centre.

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Saltford Local Centre	
	Add The Little Coffee Shop, Manor Road, Saltford, Bath, BS31 3DL as Main Town Centre Use linked to the local centre.

Somer Valley

Paulton Local Centre	
	Add Red Lion, High Street, Paulton, Bristol, BS39 7NW as Main Town Centre Use within the centre. Delete residential properties, High Street Paulton.

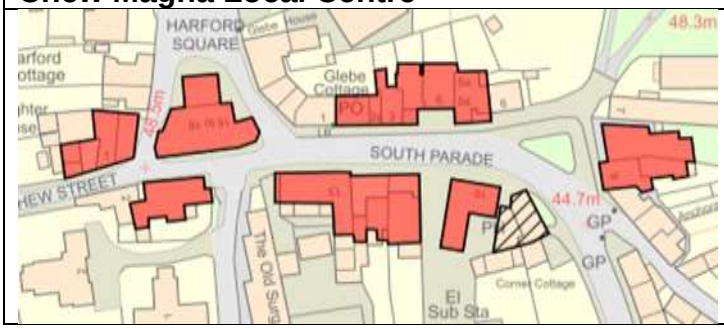
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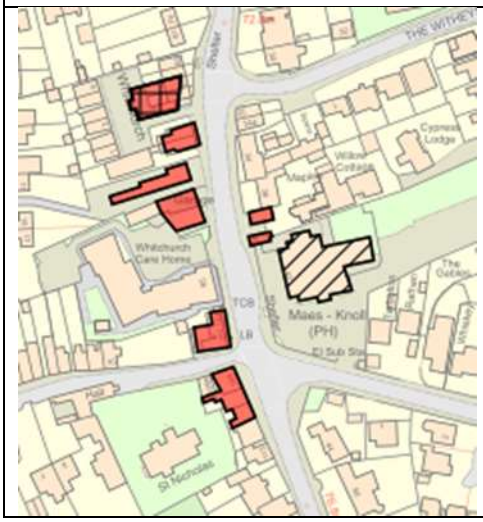
Peasedown St John Local Centre (extract)	
	Add Tesco Express, Bath Road, Peasedown St John, Bath, BA2 8DN as Main Town Centre Use Delete 9, Bath Road, Peasedown St John, Bath, BA2 8DX A former butcher changed use to residential. Delete 64-65, Bath Road, Peasedown St John, Bath, BA2 8DT 2 dwellings built as semi detached houses.

Rest of District

Batheaston Local Centre	
	Proposed addition of health centre. Health Centres are now a Class E (Commercial, Business and Service) use.

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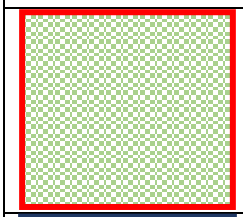
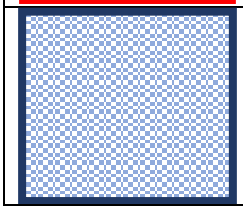
Chew Magna Local Centre	
	Add Extension to The Pelican Inn 10, South Parade, Chew Magna, Bristol, BS40 8SL as Main Town Centre Use within the centre

Whitchurch Local Centre	
	Delete 85A, Bristol Road, Whitchurch, Bristol, BS14 0PS as site redeveloped for residential. Add Toby Carvery, 42, Bristol Road, Whitchurch, Bristol, BS14 0PT as Main Town Centre use within the centre.

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Appendix 4: Proposed Local Green Spaces

- Plans diagrammatic only. Not to scale.
- In all cases plan extracts are shown so that north is at the top of the box

Key:	
	**Proposed Local Green Space (for designation in Local Plan 2022-2042)**
	**Existing Local Green Space (designated in the adopted Placemaking Plan)**

Appendix 4 Contents

Bath

Lambridge

Batstone Close
Fairfield Valley Woodland
Toll Bridge Road

Lansdown

Catherine Place Garden
Cavendish Crescent Communal Garden
Lansdown Heights
Solsbury Way Green Spaces
St Andrews Green

Newbridge

Newbridge Open Space (Newbridge Park)

Walcot

Corner of Kensington Gardens/Upper East Hayes

Weston

Gainsborough Gardens Woods

Widcombe and Lyncombe

Abbey View Allotments
Canal Gardens Allotments
The Gore

Wider District

Chew Stoke

Bilbie Road Play Park
Rectory Field

East Harptree

East Harptree Playing Field

Hinton Blewett

The Barbury

Monkton Combe

The Island Mill Lane

Radstock

Green Parcel of land off Frome Road

Shoscombe

Shoscombe Recreation Field

Stanton Drew

Stanton Wick Triangle

Whitchurch

White Church Court Play Area
White Church Court Allotment Site
Green Space surrounding Whitchurch Village Community Centre
Bristol 107th Scout Hut & surrounding Green Space

Lambridge

Ward:	Lambridge
Site name:	Batstone Close Green Space
Site number:	LGSB5
Map:	

Ward:	Lambridge
Site name:	Fairfield Valley Woodland
Site number:	LGSB6
Map:	

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Ward:	Lambridge
Site name:	Toll Bridge Road
Site number:	LGSB7
Map:	

Lansdown

Ward:	Lansdown
Site name:	Catharine Place Garden
Site number:	LGSB13
Map:	

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Ward:	Lansdown
Site name:	Cavendish Crescent Communal Garden
Site number:	LGSB14
Map:	

Ward:	Lansdown
Site name:	Lansdown Heights
Site number:	LGSB15
Map:	

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Ward:	Lansdown
Site name:	Solsbury Way Green Spaces
Site number:	LGSB16
Map:	

Ward:	Lansdown
Site name:	St Andrew's Green
Site number:	LGSB17
Map:	

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Newbridge

Ward:	Newbridge
Site name:	Newbridge Open Space (Newbridge Park)
Site number:	LGSB23
Map:	

Walcot

Ward:	Walcot
Site name:	Kensington Gardens
Site number:	LGSB26
Map:	

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Weston

Ward:	Weston
Site name:	Gainsborough Gardens Woods
Site number:	LGSB27
Map:	

Widcombe and Lyncombe

Ward:	Widcombe and Lyncombe
Site name:	Abbey View Allotments
Site number:	LGSB31
Map:	

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Ward:	Widcombe and Lyncombe
Site name:	Canal Gardens Allotments
Site number:	LGSB32
Map:	

Ward:	Widcombe and Lyncombe
Site name:	The Gore
Site number:	LGSB33
Map:	

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Chew Stoke

Parish:	Chew Stoke
Site name:	Bilbie Road Play Park
Site number:	LGSR3
Map:	

Parish:	Chew Stoke
Site name:	Rectory Field
Site number:	LGSR4
Map:	

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East Harptree

Parish:	East Harptree
Site name:	East Harptree Playing Field
Site number:	LGSR8
Map:	

Hinton Blewett

Parish:	Hinton Blewett
Site name:	The Barbury
Site number:	LGSR14
Map:	

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Monkton Combe

Parish:	Monkton Combe
Site name:	The Island – Mill Lane
Site number:	LGSR15
Map:	

Radstock

Parish:	Radstock
Site name:	Green Parcel of land off Frome Road
Site number:	LGSR19
Map:	

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Shoscombe

Parish:	Shoscombe
Site name:	Shoscombe Recreation Field
Site number:	LGSR23
Map:	

Stanton Drew

Parish:	Stanton Drew
Site name:	Stanton Wick Triangle
Site number:	LGSR27
Map:	

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Whitchurch

Parish:	Whitchurch
Site name:	White Church Court Play Area
Site number:	LGSR29
Map:	

Parish:	Whitchurch
Site name:	White Church Court Allotment Site
Site number:	LGSR30
Map:	

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Parish:	Whitchurch
Site name:	Green Space surrounding Whitchurch Village Community Centre
Site number:	LGSR31
Map:	

Parish:	Whitchurch
Site name:	Bristol 107th Scout Hut & surrounding Green Space
Site number:	LGSR32
Map:	

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Appendix 5: Glossary

- The Glossary will be attached to the consultation version of the Options Document.

Bath & North East Somerset Council		
MEETING:	**Cabinet**	
MEETING DATE:	**1st February 2023**	EXECUTIVE FORWARD PLAN REFERENCE E 3510
TITLE:	**Somer Valley Enterprise Zone Local Development Order – Commitments**	
WARD:	Paulton	
AN OPEN PUBLIC ITEM		

List of attachments to this report:

Please list all the appendices here, clearly indicating any which are exempt and the reasons for exemption.

- Appendix 1- Biodiversity Net Gain Policy Flow Diagram
- Appendix 2- Combined Walking/Cycling Plan for A362.

1 THE ISSUE

1.1 The Council is committed to delivering the Somer Valley Enterprise Zone (SVEZ). This is a priority in the adopted Local Plan and the Bath and North East Somerset Economic Strategy under Cabinet paper E3499.

1.2 There is a market failure in the provision of employment space in Bath and North East Somerset, including in the Somer Valley where there is clear evidence of a reduction in good quality, local jobs and increase in out-commuting. The Council's new Economic Strategy therefore prioritises action to:

a) Create **Resilient Businesses** by building a diverse, creative, and sustainable base.

b) Support **Stronger Places**, building resilience and sharing prosperity more fairly.

c) In addition, the Economic Strategy expresses our commitment to supporting a **greener economy**.

1.3 SVEZ will create an exemplar, net zero green business park for new business and employment and will contribute to the development of a diverse, creative and sustainable local business base. The Enterprise Zone will provide a sustainable green business park location to grow our green economy (examples being renewables, battery technology, hydrogen, carbon reduction, green tech, carbon sequestration, green finance), providing businesses an environment to maximise their contribution to tackling the climate emergency.

1.4 The green economy encompasses more than the renewable energy and environmental services sectors. The natural resources sector is growing and will continue to do so to deliver biodiversity net gain and nature-based solutions to address climate change and local needs. The Council is committed to work with businesses to green all sectors, enabling local organisations to act on new market opportunities to position us as leaders in green inclusive growth. The SVEZ is a critical intervention to ensure that these businesses are able to base themselves and grow in the Somer Valley.

1.5 A proactive approach is required to achieve these aims and stem the decline in local employment available around Midsomer Norton, Radstock, Paulton and Farrington Gurney, reducing the traffic and emissions caused by out-commuting. The Council has set out to deliver appropriate economic development through the creation of this Enterprise Zone.

1.6 The Council's ambition for the SVEZ is to provide high quality jobs and to do so in a way that enhances the environment, provides the infrastructure to enable people to choose walking and cycling and bus transport, and protects the local high street. One of the reasons that the Council is leading the project is to ensure that these aims are fully met.

1.7 The Council proposes to control the development and ensure it meets the aims set out here through a 'double lock'. Firstly, through the adoption of the Local Development Order (Cabinet paper E3486) which provides the planning permission that describes how sustainable development can come forward. Secondly, by securing the land and thereby controlling how to bring development forward, including ensuring the supporting infrastructure is put in place. This is set out in Cabinet paper E3487.

1.8 This paper sets out the commitments the Council has for the SVEZ. Some of these will be delivered by adopting the LDO. Others will require further Council interventions to ensure that the site delivers growth that is sustainable and enhances the lives of residents in the Somer Valley. The plans set out here and in the LDO will seek to deliver an exemplary commercial and green development, creating circa 1,300 jobs while minimising the negative impact on residents and the environment.

2 RECOMMENDATION

The Cabinet is asked to:

2.1 Adopt the 8 aims defined within this paper that set the Council's commitments for the SVEZ.

2.2 Review progress on the Enterprise Zone regularly and agree any further interventions required to ensure that these ambitions are being met.

3 THE REPORT

3.1 The SVEZ comprises 33 acres of land located at Old Mills to the west of Midsomer Norton. The greenfield allocation at this location was agreed in 2007 (Local Plan) and again in 2023 (Local Plan Partial Update) because of the lack of suitable brownfield sites in the area. The legacy of historic industrial sites in the

Somer Valley, in local centres and close proximity to existing housing, did not make these sites suitable for the scale of mixed commercial development required to meet employment needs or business growth in the Somer Valley, historically or now. These town centre brownfield sites have all been allocated.

3.2 The land is designated as an Enterprise Zone which means that all the business rates growth generated by new development will be fully retained by the Council for a period of 25 years.

3.3 The SVEZ has been allocated as an employment site since 2007, yet the market has failed to bring forward development due to significant barriers to the private sector led intervention. The Council has taken responsibility of promoting the site allocation via the LDO.

3.4 The LDO allows the development of commercial buildings on the site within the parameters set out in the LDO and Design Codes, including limits on total floor area, heights of buildings and materials used in construction.

3.5 The Council has set 8 ambitious aims, these fall into two categories: direct ambitions for the SVEZ and mitigations to reduce the impact on residents.

3.6 **Council commitments on the Somer Valley Enterprise Zone**

3.6.1 **Create good quality jobs for residents that will reduce out commuting.**

a) The SVEZ is designed to provide up to 1,300 jobs in 35,800 sqm of mixed commercial floorspace. This is a significant increase in local jobs that seeks to reduce the number of out commuting trips and seek to transition these movements to walking/cycling and sustainable transport modes.

b) The SVEZ will support a resilient business ecosystem that will provide upskilling and development opportunities for local residents. The Council is committed to developing employment pathways through the lifecycle of the SVEZ:

- Working with local schools, Bath College (Somer Valley Campus) and employers to promote career paths and an understanding of business and industry in the Somer Valley

- Working with local businesses and those occupying space at SVEZ to promote employment pathways and apprenticeships during construction and occupational phases.

c) The SVEZ will also seek to encourage the development of new businesses and local start ups and offer a space for these businesses to develop. In particular, the Council's Economic Strategy provides a commitment to green the local economy by supporting growth in green and sustainable businesses and helping existing businesses to transition. Control over the businesses that locate on the SVEZ is provided by ownership of the land, this is the subject of Cabinet paper E3487.

3.6.2 **Provide a sustainable location for green businesses to maximise their contribution to tackling the climate and nature emergency**

a) The Corporate Strategy sets a commitment to improve the abundance and diversity of species by creating and improving habitats. The SVEZ will deliver circa 10 acres of green infrastructure on site, including over 10,000 trees. Off-setting of BNG could deliver circa 16 acres of habitat locally.

b) Drainage management will offer a more natural approach to manage surface water through sustainable drainage ponds that create new habitats leading to an increase in biodiversity at SVEZ.

c) Phase 1 & 2 of the infrastructure works, which includes the perimeter buffer zone and structural planting and landscaping, will deliver 46% BNG. The SVEZ will be net BNG positive during early plot delivery, albeit each plot is also required to deliver to the policy. See Appendix 1 – BNG future position.

d) Development on site will achieve net zero carbon through sustainable construction measures including, but not limited to:

i. Minimising energy use through the use of energy efficient fabric and services.

ii. Maximising opportunities for renewable energy to mitigate all regulated operational emissions.

iii. The SVEZ will help to reduce vehicle-related CO2 emissions through the provision of 20% EV charging on site.

e) The LDO will be reviewed every 5 years and if either legal or policy requirements change then they can be incorporated into the LDO requirements.

3.6.3 **Improve Active Travel**

- The Council's Corporate Strategy sets a commitment to provide more travel choices to all residents. Our commitment is to ensure that a safe cycle path is available between Farrington Gurney and Midsomer Norton before businesses move into the SVEZ, along with promised road improvements and a firm plan in place to extend the cycle track north to Bristol.

- The SVEZ LDO will deliver a segregated walking and cycling track from Old Mills Lane along the A362 to integrate with the Norton Radstock Greenway.

- The Council has been working closely with the Combined Authority's Somer Valley Links Project which, once approved, will provide a shared active travel walking and cycling link from Old Mills Lane to Farrington Gurney. Somer Valley Links has a provisional on site works commencement date of Q3 2025. See Appendix 2 for combined walking/cycling plan for the A362.

- The impact of combined walking/cycling plan shown within Appendix 2 demonstrates the opportunity to focus on increasing pedestrian and cycle movements within the Somer Valley. The Council will seek to increase the transition to walking/cycling and sustainable transport through bus trips.

3.6.4 **Ensure public transport is available from the first occupation.**

- The Council aims to maintain and extend local and rural regular bus service provision beyond 2027 along the A362 so that employees based at the SVEZ can travel to work by bus. We will work with the Combined Authority and First Bus to seek to extend provision in time for the opening of the SVEZ.

- A Bus Service Assessment has been prepared that reviews the current and future need for buses along the A362. At present, bus services meet the target set by the WECA Bus Service Improvement Plan (BSIP) which is due for review in 2027.

3.7 REDUCTING THE IMPACT ON RESIDENTS

3.7.1. Mitigate the risk of worsening air quality

- The Council's Corporate Strategy (2023-7) sets a commitment to lead the UK in Climate Action, including by continually improving air quality. The Council therefore aspires to local limits such as annual concentration of nitrogen dioxide (NO_2) of 36g/m3 to ensure momentum on air quality is maintained.

- Air quality modelling has been undertaken as part of the Council's LDO submission. The model assessed the air quality of the surrounding area with and without SVEZ.

- All modelled test sites demonstrate a negligible impact in both NO2 concentrations and PM10 concentrations with the readings forecasting a <36µg/m3 with or without the SVEZ in all locations.

- The SVEZ green business park will adopt a phased delivery over a number of years. The Council is committed to minimising the impact on air quality of the phasing and will identify steps and procedures that will be implemented to minimise the creation and impact on air quality and dust at the site and neighbouring AQMAs through an approved Construction Environmental Management Plan prior to commencement of development. All development will thereafter be carried out in accordance with the Plan, to meet the planning condition. Air quality monitoring will be undertaken regularly to ensure continuing compliance with local air quality management objectives.

3.7.2 Protect Midsomer Norton High Street

- The Council is working towards an economy that is fair, green, creative, and connected. It is important that our economy is inclusive, and prosperity is shared and, as such, the Council is committed to protecting our local high streets.

- The SVEZ will be a mixed commercial park with a range of use typologies. No standalone retail use is proposed through the LDO, only an ancillary food & beverage use on one plot that must complement the nearby town centres. The precise use on this plot can be determined through ownership of the land. This is the subject of Cabinet paper E3487.

3.7.3. **Minimise the flow of HGVs on our highways.**

- A Deliveries and Collection Strategy for each development plot will be secured through each plot specific Compliance Application. This will include detail of coordination, timings, and arrivals of HGVs. These strategies will control the movement of HGVs during the operational phase of the SVEZ.

- Conditions 21 and 22 of the LDO will deliver site-wide and plot specific Construction Management Plans for construction phases to be submitted prior to development.

- Extensive traffic modelling has taken place which predicts a maximum 4% increase in HGVs on the A37 and 8% on the A362.

3.7.4 **No drive through food outlets that will add litter to our roads.**

- The Council recognises the ambition to reduce the impact of litter on local roads and does not intend to allow a drive-through food and beverage unit on Plot 4 to generate excess litter.

- The way in which Plot 4 is used as a food and beverage unit can be controlled through ownership of the land. This is the subject of Cabinet paper E3487.

4 STATUTORY CONSIDERATIONS

Not applicable.

5 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

5.1 Progression of the future ambitions is reliant on control of the land. Further information can be found within the Statutory Mechanisms paper E3487.

5.2 Implementing some or all future ambitions may impact land value, this will need to be considered through individual plot related business cases.

6 RISK MANAGEMENT

6.1 Risk assessments relating to the issues and recommendations will be undertaken at the time these ambitions come forward in operational delivery or policy terms, in compliance with the Council's decision-making risk management guidance.

6.2 In general, the ambitions do not pose significant risk. If the wording of the ambitions changes that could affect the analysis of risk.

7 EQUALITIES

7.1 An Equality Impact Assessment has been carried out on the SVEZ project. Following a review with the Equalities Team, no adverse impacts have been identified.

8 CLIMATE CHANGE

8.1 The Council declared a Climate Emergency in March 2019, committing it to providing the leadership necessary to enable Bath and North East Somerset to achieve carbon neutrality by 2030.

8.2 The SVEZ represents an opportunity to address several related issues which will help to address the climate emergency. It will help reduce out-commuting in the Somer Valley through the provision of new jobs and it will also provide a range of active and sustainable travel improvements including a new cycle link to the Norton Radstock Greenway and new bus stop.

8.3 The development will achieve a 100% regulated operational carbon emissions reduction from Building Regulations Part L 2021 (or future equivalent legislation). The SVEZ will help to reduce vehicle-related CO2 emissions through the provision of EV charging on site, in line with the Council's local transport policies.

8.4 The LDO is compliant with B&NES Biodiversity Net Gain (BNG) policy. The development will deliver 10% BNG via on- and off-site provision. Offsite BNG will be focussed locally.

9 OTHER OPTIONS CONSIDERED

9.1 Not applicable

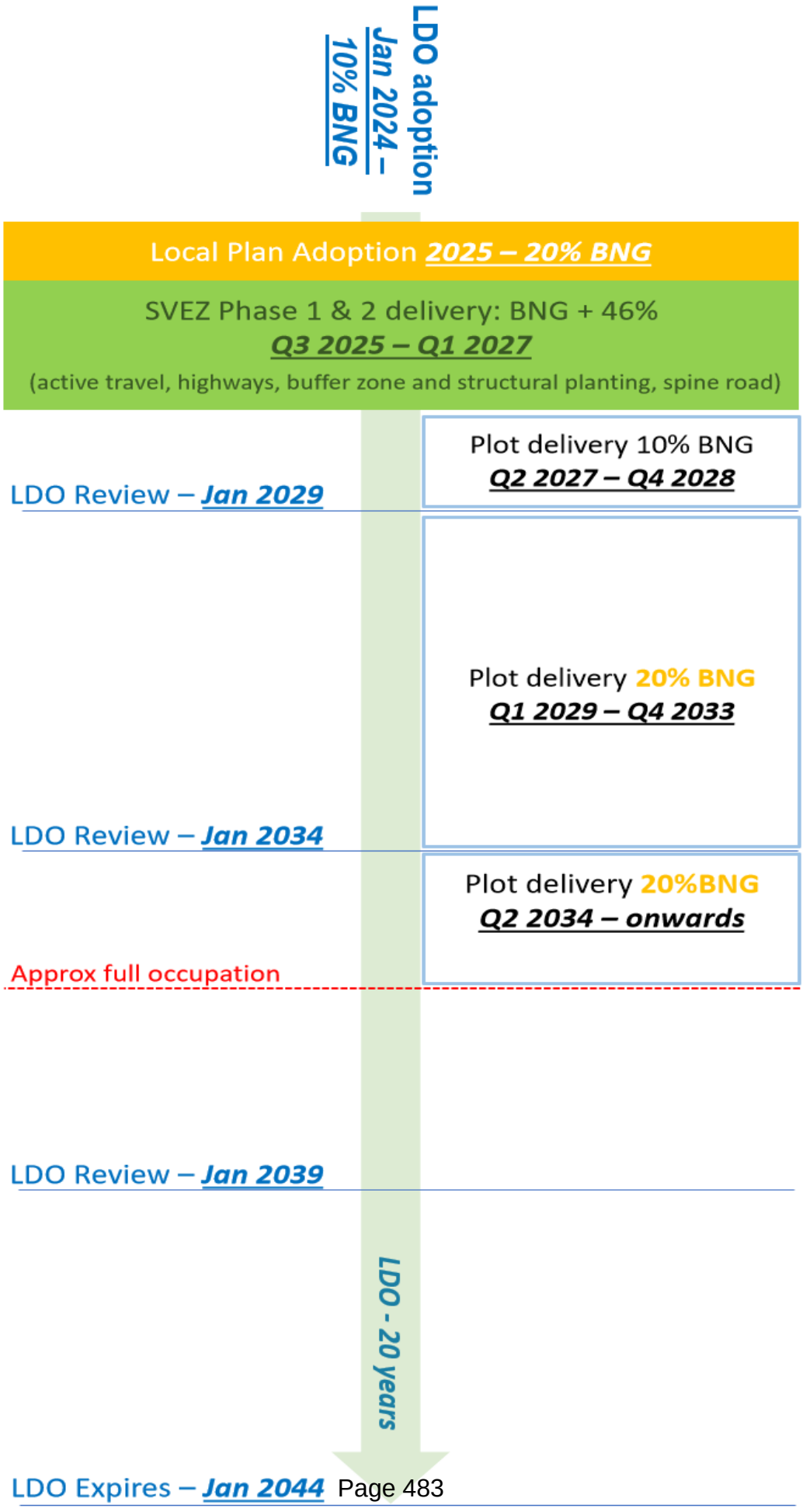
10 CONSULTATION

10.1 An informal engagement was held from 19th May 2022 to 30th June 2022 for stakeholders, Parish Councils, Town Councils, and the public to comment on the illustrative masterplan, proposed highway works and design aspects of the site. During the informal public engagement, a public webinar was held alongside presentations at Westfield Parish Council, Radstock Town Council, Paulton Parish Council and a resident's meeting held in Paulton. Consultation material was held on the B&NES website but also installed in Paulton, Midsomer Norton and Radstock libraries. A hard copy of the engagement questionnaire was also made available at the libraries.

10.2 The LDO statutory consultation began on 16th January 2023 and completed on 13th February 2023. Statutory consultees and the public were able to comment on all relevant LDO documents via the planning portal.

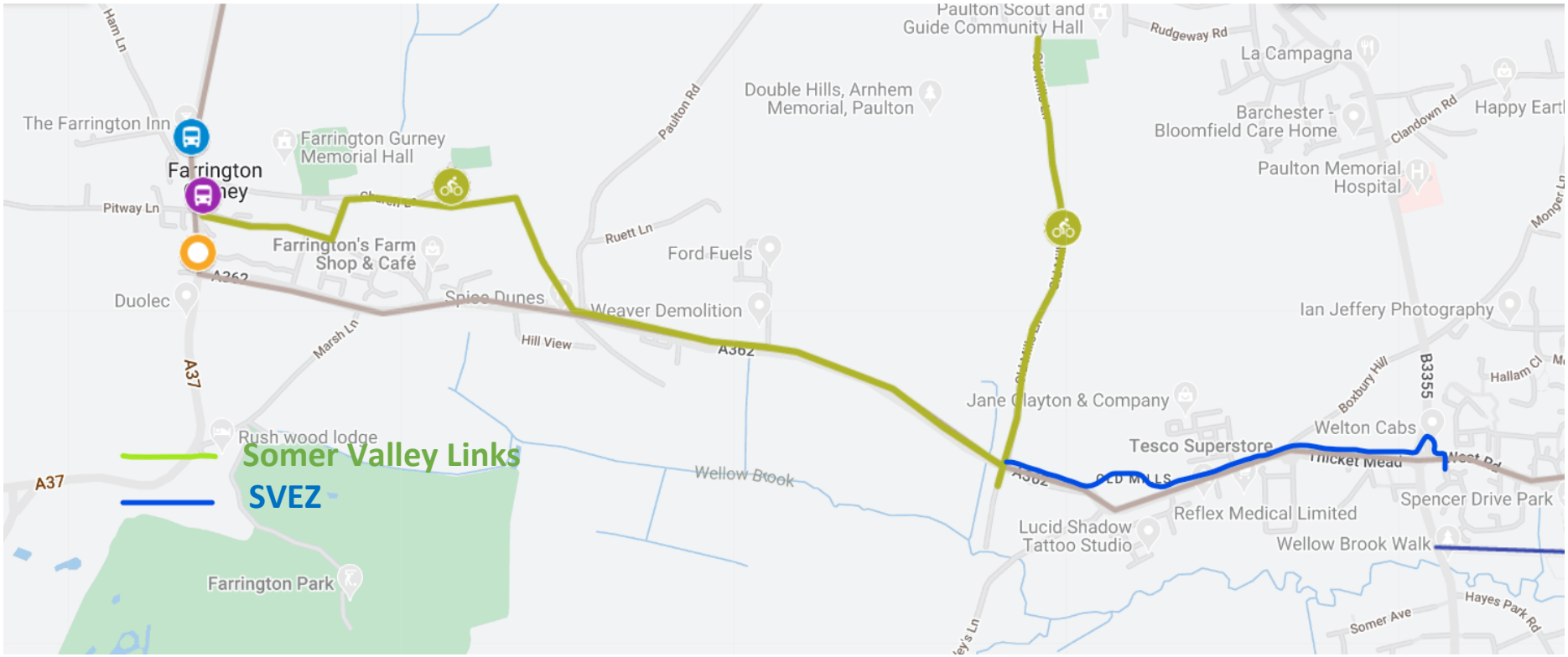
10.3 A revised statutory consultation was carried out from 22nd September 2023 to 26th October 2023. Prior to the revised consultation going live, the project team attended a Somer Valley Links consultation drop in event at Farrington Gurney on the 24th July 2023. In addition, the team presented at Farrington Gurney Parish Council meeting on 18th September 2023 and to the Somer Valley Forum on 20th September 2023.

Contact person	Richard Holden – Operations Manager 01225 477655
Background papers	
Please contact the report author if you need to access this report in an alternative format	


LDO adoption
Jan 2024 –
10% BNG
Local Plan Adoption 2025 – 20% BNG
SVEZ Phase 1 & 2 delivery: BNG + 46%
Q3 2025 – Q1 2027
(active travel, highways, buffer zone and structural planting, spine road)
Plot delivery 10% BNG
Q2 2027 – Q4 2028
LDO Review – Jan 2029
Plot delivery 20% BNG
Q1 2029 – Q4 2033
LDO Review – Jan 2034
Plot delivery 20%BNG
Q2 2034 – onwards
Approx full occupation
LDO Review – Jan 2039
LDO - 20 years
LDO Expires – Jan 2044

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Active Travel Modal Shift- Walking and Cycling Network



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Bath & North East Somerset Council		
MEETING:	**Cabinet**	
MEETING DATE:	**1st February 2024**	EXECUTIVE FORWARD PLAN REFERENCE E 3486
TITLE:	**Somer Valley Enterprise Zone Local Development Order**	
WARD:	Paulton	
AN OPEN PUBLIC ITEM		

List of attachments to this report:

Please list all the appendices here, clearly indicating any which are exempt and the reasons for exemption.

- Appendix 1- E3487
- Appendix 2 - LPA Officer report
- Appendix 3 - LDO and Statement of Reasons
- Appendix 4- Project Financials
- Appendix 5 - Statement of Community Involvement

1 THE ISSUE

1.1 The delivery of Somer Valley Enterprise Zone is a Corporate priority via the Council's Economic Strategy (2014-2030).

1.2 The Council has promoted a Local Development Order (LDO) for the Somer Valley Enterprise Zone (SVEZ) to ensure the (current) Local Plan policy allocation SSV9 is enabled for delivery. When adopted by Cabinet resolution the LDO will grant planning permission for the development of plots and buildings within use classes B2, B8, C1, E and sui generis on the site, subject to conditions and limitations.

1.3 The LDO will remove planning barriers to the development of the site, thereby helping to encourage sustainable economic growth and job creation within the Somer Valley. This paper sets out the background and next steps in delivering the LDO that is being promoted by the Council.

1.4 The SVEZ is an intervention that will make our district more sustainable by delivering changes to movement patterns including walking and cycling and promoting bus transport, offering benefits to residents and wider Somer Valley communities by enabling people to remain local.

1.5 Adoption of the LDO by Cabinet addresses a market failure (see 3.2) and de-risks delivery through a flexible planning framework, that, via Compliance Applications, allows plots to be brought forward for development in a swifter timeframe than a conventional planning route.

1.6 A 'double lock' is provided, firstly through the delivery of the LDO, as the planning permission that controls how sustainable development comes forward, and secondly through the control effected by the acquisition of the land acting as a lever to enable delivery. The Council is then able to decide how to bring development forward, ensure the supporting infrastructure is put in place and that development aligns with the ambitions of the Council.

1.7 In order to address the future of the development, the Council has prepared an Ambitions paper reference E3510 to be read alongside this paper.

1.8 This report requests agreement to accept £9.3m grant funding award from the West of England Combined Authority towards development of the Somer Valley Enterprise Zone capital scheme.

2 RECOMMENDATION

The Cabinet is asked to:

2.1 Resolve to adopt the Local Development Order for the SVEZ site recommended by the Local Planning Authority, and to meet the aims of policy SSV9.

2.2 Delegate to the Director of Regeneration and Housing and the Director of Sustainable Communities (or [the Monitoring Officer / Executive Member] for payments of over £500,000) in consultation with the S151 Officer, authority to take all necessary steps to acquire by agreement land and/or rights required for the SVEZ Scheme and to negotiate and settle all necessary compensation and professional fees (including interim payments) as agreed with landowners, where compensation is within the SVEZ Scheme budget. This will be subject to full due diligence and financial evaluation to ensure value for money and that commitments are in line with approved scheme budgets.

2.3 Delegate the approval to the Director of Regeneration and Housing and the Director of Sustainable Communities in consultation with the s151 Chief Finance Officer to:

- Accept the Investment Fund grants from the West of England Combined Authority, subject to WECA approval at Committee

- On grant acceptance to move from provisional to approved budget for £9.3m continue with land assembly and infrastructure design.

3 THE REPORT

3.1 The Somer Valley Enterprise Zone is an allocated site (Policy SSV9) which seeks to deliver a mixed-use commercial development in the Somer Valley. The SVEZ is located on 13.5 hectares of land at Old Mills, which is situated to the north-west of Midsomer Norton.

3.2 The SVEZ has been allocated as an employment site since 2007, however the market has failed to bring forward the development due to significant barriers to private sector led intervention. These include the following:

- Viability- Development has not been delivered by the private sector as it is rendered unviable by the high enabling infrastructure costs, both on and off site. For example, and not limited to, highways, utilities and issues related to topography, ground conditions and flood risk.

- Fragmented land ownership- The site is held in multiple ownerships. This makes the necessary land assembly very complex and challenges a comprehensive approach to delivery.

- Planning risk/cost- Any developer or occupier would be required to secure planning permission which has time, cost and risk implications. The LDO will help to reduce the planning risk and cost to an occupier and/or developer delivering commercial development.

3.3 The SVEZ will provide circa 1,300 jobs in 35,800 sqm of commercial floorspace.

The SVEZ LDO also:

- Encourages a connected network for walking and cycle.

- A balanced car parking approach, catering to the uses on site whilst also enhancing sustainable transport options.

- Efficient, sustainable, and low energy buildings

- A reduced pressure on resources for both LPAs and applicants.

- Flexibility to ensure that necessary, viable development comes forwards now and in the future.

- Enables growth by positively and proactively shaping sustainable development.

- Can generate £51m GVA.

3.4 The LDO enables a number of highways mitigations to take place on and around the site which are key to responding to any increase in traffic but also facilitating a transport modal shift.

- Speed limit regularisation along A362 – the reduction in speed limit promotes the use of a pedestrian/cycle path

- Additional lane at Sunnyside pinch point- resolves stop/start traffic flows and improves air quality for pedestrians and cyclists

- A new access roundabout to the SVEZ and road straightening on the A362- enables the creation of the segregated walking and cycling path

- Improvements to the design of Thicket Mead roundabout- provides the link to the Norton Radstock Greenway for the pedestrian and cycle path.

- The above highways mitigations, the SVEZ segregated walking and cycling path and the works being delivered by the Somer Valley Links project, will result in a reduction of 409 vehicle movements and an increase of 237 cyclist movements to and from the SVEZ.

3.5 The LDO enables the Council to clearly stipulate what it is seeking to achieve on site, and the parameters the Order sets will promote specific behaviour by developers, driving forward high-quality development and encouraging new employment growth. The LDO will grant planning permission for the development within parameters, including specific use classes and developable plots, specified in the Order. An LDO was selected as the planning mechanism for the site as it expedites the process of development by providing future developers with the greatest level of planning certainty, whilst promoting flexibility to respond to market demands.

3.6 Development on site will be determined by a Design Code that specifies the amount of development that can take place on each plot as well as the characteristics of any buildings, landscaping, and parking. Developers will be required to submit Compliance Applications to the LPA which will show that their development proposals align with the Design Code.

3.7 The submission of Compliance Applications will demonstrate that proposals align with the Design Codes and the Conditions applied to the LDO. The Council will maintain enforcement powers should development not be compliant with the LDO.

3.8 The LDO itself has been informed by a large number of technical reports as well as informal engagement with key stakeholders, local business owners, Parish and Town Councils and the public. The project team has worked with the SVEZ Key Stakeholder Group throughout the project to develop the LDO and an illustrative masterplan with appropriate use classes and building characteristics.

3.9 The LDO provides the planning mechanism to deliver the SVEZ, it does not at present commit the Council to any development on site but unlocks the site to further land acquisition discussions (including through the adoption of 'In Principle' Statutory Mechanisms set out in E3487, Appendix 1), progression with supporting on site and off-site infrastructure works including highways works and helps to enable developing discussions about extending local bus services.

3.10 The LDO and Statement of Reasons contains pre-commencement conditions including, but not limited to:

- No development on any plot shall commence until the highways infrastructure as been completed.

- No development shall commence until a Strategic Biodiversity Net Gain Delivery and Management Plan has been approved by the Local Planning Authority.

- Structural landscaping will be delivered in accordance with the approved Phasing Plan.

3.11 The initial LDO statutory consultation was open from 16th January 2023 to 13th February 2023.

Following the initial consultation, the project team engaged in workshops with Development Management to review and amend a number of LDO documents.

A revised statutory consultation ran from 22nd September 2023 to 26th October 2023. An officer report on the LDO consultation can be found in Appendix 2.

3.12 The changes since the initial statutory consultation include:

- The perimeter buffer zone depth increased from 10m to 15m-20m which creates wildlife dark corridors
- The removal of the perimeter path
- Inclusion of a primary substation on site.

3.13 The Council is committed to developing employment pathways through the lifecycle of the SVEZ:

- Working with local schools and employers to promote career paths and an understanding of business and industry in the Somer Valley
- Working with local businesses and those occupying space at SVEZ to promote employment pathways and apprenticeships during construction and occupational phases.
- Developing pathways in collaboration with Bath College (Somer Valley Campus) in Westfield
- Further workstreams will be developed post adoption of the LDO.

3.14 The Council is committed to managing flood risk and drainage associated with development through:

- Separate foul and surface water systems within the site boundary
- Surface water runoff discharged at controlled rates, via flow control, into Wellow Brook watercourse
- Surface water system to incorporate Sustainable Drainage Systems (SuDS) measures including permeable paving serving the commercial plots, ponds and attenuation tanks to serve roof and other hardstanding areas. SuDS offer a more natural approach to manage surface water drainage and can also create new habitats leading to an increase in biodiversity at SVEZ.

4 DELIVERY STRATEGY

4.1 A Delivery Strategy has been commissioned to advise the Council on the next steps for site delivery after the infrastructure works have been completed. Progression with the delivery of the site, following land acquisition, will be subject to internal business cases which will be approved via Infrastructure & Development Group (IDG) and Sustainable Places Board (SPB).

5 LAND ACQUISTION

5.1 Following adoption of the LDO, we expect the land acquisition process to take approximately 18 months. The project will then go through a Full Business Case process and full design and procurement of the highways and site enabling works. It is predicted that construction could be on site for the highways infrastructure by Q4 2025 – Q1 2026.

6 POST LDO ADOPTION

6.1 A key commitment for the Somer Valley Enterprise Zone is the provision of a cycle path from Farrington Gurney to Midsomer Norton.

6.2 The SVEZ LDO will deliver a segregated walking and cycling track from Old Mills Lane along the A362 to integrate with the Norton Radstock Greenway.

6.3 The project team has been working closely with the West of England Combined Authority Somer Valley Links Project which, once approved, will complete the link from Old Mills Lane to Farrington Gurney. The Somer Valley Links project will submit an Outline Business Case in January 2024 and have a provisional on site works commencement date of Q3 2025.

6.4 The Council is also committed to ensure that SVEZ will be served by buses right from the start. A Bus Service Assessment has been prepared that reviews the current and future need for buses along the A362. At present, bus services meet the target set by the WECA Bus Service Improvement Plan (BSIP) which is due to be reviewed again in 2027. Conversations with First Bus have begun with the aim of maintaining and extending bus service provision beyond 2027.

6.5 The LDO will be reviewed on a 5 yearly basis to ensure that the site meets the original policy objectives and/or whether those objectives have become out of date. The LDO can be reviewed, modified or revoked at any time.

6.6 Further information regarding the future ambitions for the LDO can be found within Cabinet paper E3510.

7 STATUTORY CONSIDERATIONS

7.1 Section 61A of the Town and Country Planning Act 1990 (TCPA 1990) gives an LPA the power to make an LDO. The statutory provision confirms that the LDO grants planning permission for the development specified in the LDO including for development of any planning use class specified. Section 61C of the TCPA provides that an LDO may be granted unconditionally or subject to conditions and limitations as set out in the order.

7.2 The SVEZ LDO includes conditions and limitations to control how the SVEZ will be developed. This will ensure that the SVEZ is delivered in accordance with the Council's overarching vision for the scheme – as informed by the various technical assessments – and broadly in line with the illustrative masterplan for the SVEZ (to be submitted as part of the LDO).

7.3 Sections 38 and 41 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 set out the procedural requirements for the making of an LDO, including the need for consultation. The Council is satisfied that it has complied with these requirements insofar as they have fallen due.

7.4 Paragraph 3 of Schedule 4A of the TCPA 1990 prevents an LDO having effect unless it is adopted by resolution of the LPA. An LPA is defined in the TCPA 1990 as being the relevant council. The Council has taken legal advice to confirm that the decision to adopt the LDO should be taken by Cabinet. As the adoption of an LDO is not listed as a non-executive function in the Local Authorities (Functions and Responsibilities) (England) Regulations 2000, it should therefore be considered an executive function and the decision taken by Cabinet.

8 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

8.1 Capital spending to the end of December 2023 for work to develop the business case and design the scheme totals £1.9m. WECA has agreed £1.82m grant funding for this current scheme in the approved capital programme and it is supplemented by B&NES match funding of £665k.

8.2 An Outline Business Case '+' (OBC+) has been submitted to WECA to request grant funding of £9.3m for project development costs such as land assembly and detailed technical design which are to be funded from the current £14.9m WECA grant allocation already included in the provisional capital programme.

8.3 In 2025 we plan to submit a Full Business Case (FBC) for project implementation costs of a further £20.6m which includes enabling works and completion of highways work, a new roundabout and perimeter landscaping. We propose to ask WECA to grant fund £19.5m of these costs, using the remaining £5.6m of the current £14.9 allocation plus an additional new grant allocation of £13.9m

8.4 In total, costs of £29.9m are estimated for completion of the next stage of the scheme for both OBC+ and FBC costs and to be funded from B&NES match funding of £1.1m together with requests for WECA grant funding of £28.8m.

8.5 B&NEs match funding of £1.1m will contribute towards FBC project implementation costs. CIL (Community Infrastructure Levy) funding totals £756k. CIL of £375k was allocated to the scheme in 2023/24 to fund the eastern cycle track to lead from the SVEZ development and link in with the Norton Radstock Greenway. The balance of £381k CIL funding is earmarked for allocation in a future financial year. The project also has funds available from developer contributions paid through agreements under s.106 of the Town and Country Planning Act 1990 (TCPA) estimated at £329k.

8.6 See Appendix 4 for full financial tables being submitted to WECA. Adoption of the LDO will be subject to the confirmation of the OBC+ approval at WECA Committee and a signed Grant Offer Letter.

9 RISK MANAGEMENT

9.1 A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision-making risk management guidance.

9.2 A Risk Register is maintained for the project.

9.3 The top project risks at present are:

- The land is currently in third party ownership and in order to implement the LDO the land will need to be acquired via negotiation or statutory mechanisms. See Appendix 1.

- Planning- should the employment allocation on the site not be delivered, there is the potential for a hostile application for residential development to be submitted for the site by landowners/promoter. This may also present a challenge for the new Local Plan in defending the employment allocation and a review will be required to establish employment land use in the Somer Valley.

- Funding- Current project spend of £1.8m. Risk of WECA requesting a capital reversion and Council required to repay current expenditure.

- Loss of Provisional Capital Programme- Current WECA 'tail' capital allocation of £14.9m could be removed from SVEZ and reallocated to the WECA capital programme and another Unitary Authority.

- Maintaining the Somer Valley Links project as a priority for delivery under CRSTS to enable delivery of the commitment for a shared pedestrian and cycle path to the Farrington Gurney

10 EQUALITIES

10.1 An Equality Impact Assessment has been carried out on the SVEZ project. Following a review with the Equalities Team, no adverse impacts have been identified.

11 CLIMATE CHANGE

11.1 The Council declared a Climate Emergency in March 2019, committing it to providing the leadership necessary to enable Bath and North East Somerset to achieve carbon neutrality by 2030

11.2 The SVEZ represents an opportunity to address several related issues which will help to address the climate emergency. It will help reduce out-commuting in the Somer Valley through the provision of new jobs and it will also provide a range of active and sustainable travel improvements including a new cycle link to the Norton Radstock Greenway and new bus stop.

11.3 The development will achieve a 100% regulated operational carbon emissions reduction from Building Regulations Part L 2021 (or future equivalent legislation), in line with the hierarchy set out in Policy SCR7 and the B&NES Sustainable Construction Checklist SPD (2023). The SVEZ will help to reduce vehicle-related CO2 emissions through the provision of EV charging on site, in line with the Council's local transport policies and climate emergency declaration.

11.4 The LDO is compliant with B&NES NE3a Biodiversity Net Gain (BNG) policy. The development aims to deliver 10% BNG via on- and off-site provision. Offsite BNG provision will follow the mitigation hierarchy set out with the NE3a policy with a focus on local provisions.

12 OTHER OPTIONS CONSIDERED

12.1 The project explored 5 approaches for development on site:

- Do nothing- the public sector undertakes no works.
- Low intervention- encourage landowner agreement and prepare a masterplan/development brief to support delivery of the site.
- Medium intervention- encourage landowner agreement, advance a Local Development Order and provide initial site servicing.
- High intervention- acquire part/all of the site, prepare a Local Development Order and service land within public sector ownership.
- Full intervention- all of the works highlighted above, plus delivery of a first phase.

12.2 The 'do nothing', 'low intervention' and 'medium intervention' approaches were discounted as they did not provide the public sector with sufficient control to bring forward appropriate development.

12.3 The preferred option taken forward to the Outline Business Case for WECA in 2019 was the 'high intervention' route.

13 CONSULTATION

13.1 An informal engagement was held from 19th May 2022 to 30th June 2022 for stakeholders, Parish Councils, Town Councils and the public to comment on the illustrative masterplan, proposed highway works and design aspects of the site. During the informal public engagement, a public webinar was held alongside presentations at Westfield Parish Council, Radstock Town Council, Paulton Parish Council and a resident's meeting held in Paulton. Consultation material was held on the B&NES website but also installed in Paulton, Midsomer Norton and Radstock libraries. A hard copy of the engagement questionnaire was also made available at the libraries.

13.2 The LDO statutory consultation began on 16th January 2023 and completed on 13th February 2023. Statutory consultees and the public were able to comment on all relevant LDO documents via the planning portal.

13.3 A revised statutory consultation was carried out from 22nd September 2023 to 26th October 2023. Prior to the revised consultation going live, the project team attended a Somer Valley Links consultation drop in event at Farrington Gurney on the 24th July 2023. In addition, the team presented at Farrington Gurney Parish Council meeting on 18th September 2023 and to the Somer Valley Forum on 20th September 2023.

13.4 Full information regarding the consultation can be found in Appendix 5: Statement of Community Involvement.

Contact person	Richard Holden – Operations Manager 01225 477655
Background papers	
Please contact the report author if you need to access this report in an alternative format	

Bath & North East Somerset Council		
MEETING	**Cabinet**	
MEETING	**1st February 2024**	EXECUTIVE FORWARD PLAN REFERENCE: E 3487
TITLE:	**Somer Valley Enterprise Zone – In Principle Statutory Mechanisms**	
WARD:	Paulton	
OPEN PUBLIC ITEM – CONTAINS EXEMPT APPENDICES		
List of attachments to this report: • Appendix 1 (Exempt): Statutory Mechanisms • Appendix 2 (Exempt): Equalities Impact Assessment		

THE ISSUE

1. The Council is promoting the Somer Valley Enterprise Zone (SVEZ), a mixed use commercial development at Old Mills north-west of Midsomer Norton with associated highway works (the SVEZ Scheme). The land required to deliver the SVEZ Scheme is currently held in multiple ownerships, as outlined in further detail below.

2. In order to construct the SVEZ Scheme, it is necessary to acquire the land and rights required for the commercial development, together with several small parcels of land outside of the existing highway boundary required for the associated highway improvements (such as cycle and pedestrian path connectivity). Negotiations for the acquisition of the land and rights needed for the delivery of the SVEZ Scheme have commenced. However, to ensure certainty of delivery and timescales for delivery officers are now contemplating the use of additional statutory mechanisms to support land assembly.

3. This Report provides Cabinet with an overview of the current progress of negotiations with landowners. A separate appendix (**Appendix 1 (Statutory Mechanisms)**) provides commentary on the statutory mechanisms and powers available to the Council to enable land acquisition by compulsory purchase should this be necessary as a last resort. The Council is considering all available mechanisms to deliver the land, including the making of a compulsory purchase order (CPO) for the Scheme, in order to protect its position and ensure the deliverability of the development. Any such mechanisms would run in parallel to ongoing negotiations for voluntary land acquisition. This Report seeks authority for an 'in principle' decision to progress these statutory mechanisms, and authority to proceed now with related early activities.

Should the use of CPO or any other statutory mechanisms be determined to be required, further Cabinet approval would be secured to authorise the next stages of the process.

RECOMMENDATIONS

The Cabinet is asked to:

1. Note the ongoing progress which has been made towards the acquisition of land required to develop the SVEZ Scheme.

2. Authorise the carrying out of formal land referencing (including the procurement of a land referencing agent and the issue requisitions for information under the Acquisition of Land Act 1981 and/or any relevant or associated statutes) across the area being considered for the SVEZ Scheme in order to identify landowners, their interests and to gather as much information as possible about the land. This will include full due diligence and financial evaluation to ensure value for money.

3. Authorise the entry into negotiations by the Council (and on behalf of the Council) with landowners and others with an interest in the relevant land required for the delivery of the SVEZ Scheme in order to acquire land and rights by agreement where possible.

4. Authorise the acquisition of land or rights required for the SVEZ Scheme subject to relevant financial limits, whereby the decision to proceed with any purchase in excess of the SVEZ Scheme budget would be referred to [Cabinet /Single Member Decision] for authorisation;

5. Delegate to the Director of Regeneration and Housing and the Director of Sustainable Communities (or [the Monitoring Officer / Executive Member] for payments of over £500,000), in consultation with the S151 Officer, authority to take all necessary steps to acquire by agreement land and/or rights required for the SVEZ Scheme and to negotiate and settle all necessary compensation and professional fees (including interim payments) as agreed with landowners, where compensation is within the SVEZ Scheme budget. This will be subject to full due diligence and financial evaluation to ensure value for money and that commitments are in line with approved scheme budgets.

6. Authorise the taking of all steps (including the drafting of a CPO and related documentation) necessary to prepare for a subsequent report to Cabinet to determine the use of compulsory purchase powers to acquire the land and rights in land required for the SVEZ Scheme.

THE REPORT

BACKGROUND

1. In December 2016, the Council entered into a Memorandum of Understanding (MoU) with the Secretary of State for Communities and Local Government, now the Secretary of State for Levelling Up Housing and Communities. The MoU governed the provision of business incentives in the Enterprise Zone (EZ) and included provisions in relation to the delivery and marketing of an EZ.

2. Subsequently, the SVEZ was established in April 2017 to support local businesses and to attract new businesses and growth to the area, following its inclusion in the wider Bath & Somer Valley Enterprise Zone. EZs were designated areas across England which may offer business rate discounts or enhanced capital allowance for new businesses locating on the sites. EZs were designated on sites which would ordinarily not be expected to generate significant business growth or to generate any business rates without incentives and/or dedicated local stakeholder support. EZs also benefit from opportunities presented by simplified planning regimes, such as the use of Local Development Orders (LDO), as is proposed for the SVEZ Scheme.

3. The MoU was a statement of serious intent that was entered into voluntarily by the respective parties, and had moral force rather than creating legal obligations. The MoU covered the period up to March 2020.

4. The Enterprise Zone status was granted for a period of 5 years, which has now expired. The MoU is also no longer in effect. Without that formal status, some associated benefits for prospective occupier (such as business rates discounts and enhanced capital allowance) will not be available. However, the establishment of the SVEZ has still been instrumental in the promotion of the project. It has allowed for the promotion of the LDO and has been central to securing programme entry with WECA. The need for the SVEZ Scheme, and the demand that it is anticipated to generate, is still clearly demonstrated.

5. The SVEZ comprises greenfield land extending to approximately 13.5 hectares / 33 acres. It is located at Old Mills to the north west of Midsomer Norton and is fully allocated in the adopted Local Plan for new employment space following the adoption of the Local Plan Partial Update (LPPU) in January 2023.

6. The SVEZ site has not been brought forward to date for a number of reasons, including because it has not been possible to secure all of the land and rights required by negotiation. The other key issue is the high costs of delivering the enabling infrastructure, which means the SVEZ Scheme is not viable for the private sector. It is these issues which have led to the need for public sector intervention to assemble the land and deliver the SVEZ.

7. In line with its obligations under the (now expired) MoU, the Council remains committed to the delivery of the SVEZ Scheme to secure a number of important economic, transport and environmental benefits. These include:

Economic benefits

- Supporting the Somer Valley to thrive and become more self-reliant by enabling economic growth through the creation of 1,300 new jobs increasing prosperity for the area;

- Diversifying the type of employment available in the area, offering flexible space to accommodate new and expanding local businesses and creating circa 35,800sqm of new commercial space;

- Delivering new highly sustainable and attractive new commercial and industrial space, helping to address business demand and employment land losses experienced in the Somer Valley;

- Offering opportunities for expanding local companies and businesses relocating to the area that are attracted by the skilled local workforce;

- Delivering important jobs to the local area and to assist with achieving the Local Plan aspirations for at least 900 new jobs by 2029;

- Generating business rates income. The potential business rates income (estimated to be in the region of £10,500,000 by 2040 / 2041) that would at least partially be retained by the Council; and

- Contributing circa £51,000,000 pa of net additional GVA to the West of England economy, and raising employment in this area by approximately 0.2%.

Transport improvements

- Helping to address the patterns of out-commuting by offering new local job opportunities that are more accessible through improvements to specific local transport links;

- Improvements to traffic flows on the A362 between Old Mills and Farrington Gurney through speed limit regularisation and widening of the Sunnyside pinch-point;

- Supporting a sustainable travel modal shift through the provision of improved bus infrastructure and through the provision of a pedestrian and cycle track between the SVEZ and the Norton Radstock Greenway to the East; and

- Improvements to traffic flows through upgrades to the Thicketmead roundabout.

Environmental

- Delivering a sustainable, Net Zero mixed-used commercial development which will achieve 10% biodiversity net gain; and

- Reduce out commuting in the Somer Valley through the provision of new jobs and providing a range of active and sustainable travel improvements.

- The development will achieve a 100% regulated operational carbon emissions reduction from Building Regulations Pat L 2021 (or future equivalent legislation), in line with the hierarchy set out in Policy SCR7 and the B&NES Sustainable Construction Checklist SPD (2023). The SVEZ will help to reduce vehicle-related CO2 emissions through the provision of EV charging on site, in line with the Council's local transport policies and climate emergency declaration

Wider benefits

- Securing external funding through the West of England Combined Authority (WECA) to deliver infrastructure improvements that will benefit the Somer Valley; and

- Improvements to connectivity through support for superfast broadband.

Previous Decisions

1. The following Council decisions have preceded this Report and provide relevant background to this decision:

   a) On 10 November 2016, the site allocation and proposals for the SVEZ were unanimously approved by Full Council;

   b) On 1 May 2018, the Cabinet Member for Economic and Community Regeneration authorised a £100,000 provisional capital item to the approved Capital Programme to be matched with £300,000 of WECA and section 106 contribution funding to prepare a Business Case for a comprehensive improvement scheme for the A362; this decision was effective from 12 May 2018; and

   c) On 19 January 2023, the LPPU was adopted which ensures that the SVEZ is fully allocated in the Local Plan.

2. Cabinet should note that a business case for improvements to the A362 was prepared but was not submitted to WECA. Following WECA's advice, the highway improvements were subsumed into the main SVEZ Scheme (which now forms the basis of this Report), and officers have agreed with WECA that the Council will submit one business case for both elements. Further information regarding the funding position is provided in **Appendix 1 (Statutory Mechanisms)**.

3. It is also relevant to note that the use of a LDO as the planning mechanism for the SVEZ Scheme was presented to and agreed by the Enterprise Zone Steering Group in 28 November 2018. The LDO is considered further in the following section.

Planning Position

1. Planning permission for the development will be secured via the LDO and this is currently being progressed. The Council is being requested to adopt the LDO by a Cabinet decision in February 2024 (alongside the resolutions requested in this Report). The LDO is a grant of planning permission for the development of the SVEZ that accords with the uses specified and parameters set in the LDO. The LDO is being promoted by the Council in order to encourage investment in the SVEZ and to facilitate delivery of employment development by reducing uncertainty and planning risks for investors and developers.

2. The LDO and the statutory mechanisms which may be required for the acquisition of the land and rights to ensure its delivery are closely linked, as the land is outside of the Council's control. Further information regarding the land required for the SVEZ is provided below. **Appendix 1 (Statutory Mechanisms)** contains an explanation as to the relationship between the LDO and the statutory mechanisms available for land assembly.

Associated Highway Works

1. As part of the SVEZ Scheme, a range of associated active travel and highway improvements are proposed to be delivered along the adjacent A362 highway corridor (the Highway Works), many of which will require the use and development of third-party land.

2. In outline, the Highway Works that are currently being considered include the following:

    - Straightening the A362 to include a new roundabout to provide the necessary access to the SVEZ site;

    - Widening the road at 'Sunnyside' on the A362 to enable vehicles to pass one another easily and without causing delays during busy times;

    - Additional active and sustainable travel provision including new and improved bus stops and a pedestrian and cycle path between the SVEZ and the Norton Radstock Greenway; and

    - Potential junction improvements at Thicketmead Roundabout.

3. To pursue these associated highway improvements, the Council will need to acquire several small parcels of land outside of the existing adopted highway boundary to carry out improvement works (both east and west of the site and along the A362), in particular to ensure the delivery of the active travel provision. The highway improvements will also facilitate the flow of traffic and to create an entrance into the site from the A362.

4. Whilst some early dialogue and background investigations have commenced, detailed negotiations with the owners of Highway Works land parcels have not yet commenced whilst designs are being finalised. It is therefore considered likely that the acquisition of these parcels will need to be facilitated by statutory mechanisms available to the Council.

5. However, as these works will be necessary to deliver the SVEZ (and therefore form part of the SVEZ Scheme) it is recommended that the land required for delivery of the Highway Works be included in the resolution to approve steps up to the making of a CPO. Voluntary acquisition would still be pursued as a primary objective and use of any statutory mechanisms will be treated as a last resort.

Land Assembly and Negotiations

1. At the date of this Report, it is understood that the land required for the SVEZ Scheme is held in ten separate parcels. Five of these parcels are within the proposed boundary for the main SVEZ site. As explained above, there are a further five parcels located outside of the main SVEZ site relating to the Highway Works (where proposed works fall outside the existing public highway).

2. The full extent of the land and rights required will be confirmed once the final LDO boundary is determined following to adoption. However, subject to any changes as part of progressing the LDO, it will in any event be necessary to acquire all of the land and rights required to build out the SVEZ Scheme, including the Highway Works. The Council currently has funding available to enter into option agreements

in respect of the key land parcels. This funding comes from the same source as the enabling works, the WECA Investment Fund (see further below) and **Appendix 1 (Statutory Mechanisms)**.

3. Officers and the Council's instructed land agents have been engaging in negotiations for voluntary acquisition with landowners of the main site area for several years, with some negotiations having commenced in the last quarter of 2019. However, there has been more contact with some landowners than others. Offers to purchase land have been made to 4 of the 10 landowners with interests in the main SVEZ site area. No offers have been made to landowners affected by the Highway Works because the boundary of land required for the Highways Works has been subject to further consideration whilst the designs were finalised prior to the LDO being adopted.

4. Further consideration of the implications of the nature of the negotiations is contained in **Appendix 1 (Statutory Mechanisms)**.

Statutory Mechanisms for the Assembly of Land

1. Please refer to **Appendix 1 (Statutory Mechanisms)**.

STATUTORY CONSIDERATIONS

1. Please refer to **Appendix 1 (Statutory Mechanisms)**.

RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

1. Capital spending to the end of December 2023 for work to develop the business case and design the scheme totals £1.9m. WECA has agreed £1.82m grant funding for this current scheme in the approved capital programme and it is supplemented by B&NES match funding of £665k.

2. An Outline Business Case '+' (OBC+) has been submitted to WECA to request grant funding of £9.3m for project development costs such as land assembly and detailed technical design which are to be funded from the current £14.9m WECA grant allocation already included in the provisional capital programme.

3. In 2025 we plan to submit a Full Business Case (FBC) for project implementation costs of a further £20.6m which includes enabling works and completion of highways work, a new roundabout and perimeter landscaping. We propose to ask WECA to grant fund £19.5m of these costs, using the remaining £5.6m of the current £14.9 allocation plus an additional new grant allocation of £13.9m.

4. In total, costs of £29.9m are estimated for completion of the next stage of the scheme for both OBC+ and FBC costs and to be funded from B&NES match funding of £1.1m together with requests for WECA grant funding of £28.8m.

5. B&NEs match funding of £1.1m will contribute towards FBC project implementation costs. CIL (Community Infrastructure Levy) funding totals £756k. CIL of £375k was allocated to the scheme in 2023/24 to fund the eastern cycle track to lead from the SVEZ development and link in with the Norton Radstock Greenway. The balance of £381k CIL funding is earmarked for allocation in a future financial year. The project also has funds available from developer contributions paid through agreements under s.106 of the Town and Country Planning Act 1990 (TCPA) estimated at £329k.

6. See Appendix 4 for full financial tables being submitted to WECA. Adoption of the LDO will be subject to the confirmation of the OBC+ approval at WECA Committee and a signed Grant Offer Letter.

7. Further information on funding and how it relates to the potential statutory mechanisms is contained within **Appendix 1 (Statutory Mechanisms)**.

RISK MANAGEMENT

1. The SVEZ Scheme offers an important opportunity to deliver employment uses and other benefits, but officers acknowledge that inevitably there will be both legal and financial risks involved.

2. A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making risk management guidance. The Council's risk register has been, and will continue to be, updated accordingly as the project progresses.

3. Appointment of external specialists is a key response to pro-active risk management around land and legal issues associated with the SVEZ Scheme. The Council has appointed a specialist legal team. Land agents have also been appointed to advise on and manage the negotiations for the acquisition of third party interests. Subject to this decision, land referencing agents will also be appointed to review the land interests in contemplation of relying on statutory mechanisms for land assembly.

EQUALITIES

1. In line with its Public Sector Equality Duty (PSED), and the B&NES Council Equality Improvement Plan September 2022, the Council has carried out an Equalities Impact Assessment (EqIA) in order to identify any equalities issues as early as possible prior to a full EqIA when further information is confirmed regarding the scheme proposals and specific landowners.

2. A copy of this EqIA is appended to this report at **Appendix 2**. Given the stage of the proposals, the current EqIA has been undertaken at a high level. Further EqIAs will be undertaken at appropriate stages of the project, reflecting that the PSED is an ongoing duty. Full regard will be paid to the EqIAs in the development of any proposals and in negotiations with those with an interest in the SVEZ Scheme.

3. Please refer to **Appendix 1 (Statutory Mechanisms)** for further information.

CLIMATE CHANGE

1. The Council declared a Climate Emergency in March 2019, committing it to providing the leadership necessary to enable Bath and North East Somerset to achieve carbon neutrality by 2030.

2. The SVEZ Scheme represents an opportunity to address several related issues which will help to address the climate emergency. It will help to reduce out-commuting in the Somer Valley through the provision of new jobs and it will also provide a range of active and sustainable travel improvements, including a new cycle link to the Norton Radstock Greenway, and new and improved bus stops.

3. Biodiversity net gain is also intended to be a key aspect of the SVEZ Scheme, and it is proposed to provide a zero carbon, sustainable development. The SVEZ will help to reduce vehicle-related CO2 emissions, in line with the Council's local transport policies and climate emergency declaration.

OTHER OPTIONS CONSIDERED

1. Please refer to **Appendix 1 (Statutory Mechanisms)**.

CONSULTATION

1. Consultation has been carried out with the Council's Monitoring Officer, Director of Regeneration and Housing, Director of Sustainable Communities and Deputy Council Leader and Cabinet Member for Economic Development and Resources.

2. Informal public engagement for the SVEZ LDO commenced in September 2021, with a presentation to the Somer Valley Forum on 7 September 2021, followed by a presentation to landowners on 27 September 2021. However, following these meetings, the engagement was put on hold whist the proposed masterplan was revised at the recommendation of the Cabinet member for Economic Development Resources.

3. The informal public engagement then recommenced on 19 May 2022 and was open until 30 June 2022. It was advertised widely via Council press releases, direct emails to Ward and Parish Councils, letters to neighbours and landowners, site notices surrounding the site, an advertisement in the Somerset Guardian, social media posts, a post on the Council's newsroom and an interview with the Cabinet member for Economic Development Resources on Somer Valley FM.

4. Engagement consisted of the following displays and events: the public website containing project information and the proposed masterplan, a public webinar which was then uploaded to YouTube, presentation boards and hard copy questionnaires in Midsomer Norton, Paulton and Radstock libraries, presentations to Radstock Town Council, the Somer Valley forum, Westfield Parish Council and Paulton Parish Council as well as a residents meeting at Paulton village hall.

5. Levels of engagement for the above were good, there were 41 attendees of the webinar and 336 subsequent views of it on YouTube, 29 hardcopy questionnaires were completed, 106 online questionnaires were completed, 3,776 unique website views were received, and there were 53 attendees at the residents meeting. There were generally positive comments received from Midsomer Norton Town Council & High Littleton Parish Council. The project team also answered questions from members of the public.

6. The initial SVEZ LDO statutory consultation began on 16 January 2023 and ran to 13 February 2023.

7. After considering feedback from the first statutory consultation, the Council determined that a number of changes should be made to the SVEZ Scheme requiring amendments to the LDO. As a result, it was decided that a second statutory consultation should be held to seek views on those changes. In summary, the changes include:

a) Increased depth of the perimeter buffer zone from 10m to 15m-20m;

b) Changes to the Wildlife (dark) corridors;

c) Removal of the perimeter path; and

d) Indicative location of the primary substation.

8. None of these changes affect the boundary of the SVEZ or the land-take requirements.

9. The second statutory consultation ran from 22 September 2023 to 20 October 2023.

10. As demonstrated by the changes made following the initial statutory consultation, the Council will take all representations into account in preparing the final proposals for the LDO, which will in turn inform the land assembly for the SVEZ.

Contact person	Richard Holden, 01225 477655
Background papers	None
Please contact the report author if you need to access this report in an alternative format	

LPA OFFICER REPORT

Reference No: 23/00076/LDO

Details of location and proposal and Relevant History:

LDOs provide permitted development rights for specified types of development in defined locations. They are flexible and locally determined tools that LPAs can use to help accelerate the delivery of appropriate development in the right places. LDOs can help enable growth by positively and proactively shaping sustainable development in their area. They can play an important role in incentivising development by simplifying the planning process and making investment more attractive.

The Council is proposing to adopt a Local Development Order in accordance with s61A of the Town and Country Planning Act 1990. The purpose of this report is to provide a review of the draft order against the Council's adopted development plan.

The draft order would cover an area of approximately 13.5ha (plus additional land required highways works) at Old Mills on the north-west outskirts of Midsomer Norton.

With regards to the site's context, to the north of the site lies a series of agricultural fields, well defined by hedgerows, slope upwards towards the village of Paulton. There are several internal hedgerows within the site boundary. A mixed use employment / retail development, including the former Focus DIY superstore, adjoins to the east, densely enclosed by planting. The western edge of the site is bound by Old Mills Lane and surrounding farmland, with views out towards the valley base. The A362 road borders the south of the site, with a row of terraced cottages linked to the former railway to the south west. The coal mining past is evident within the surrounding landscape, including the widely visible and distinct conical shape of the Old Mills Batch.

The draft order proposes the development of an employment-led Enterprise Zone with related highways works including a new roundabout on the A362 and associated development. The full description of works to be authorised by the draft order is set out below:

The development of an employment-led Enterprise Zone, including:

- *Commercial buildings within Use Classes E (b, g), B2 and B8 (including ancillary trade counter); and*
- *A range of food, beverage and hotel buildings within Use Classes C1 and Sui Generis, including a public house and hot food takeaways.*
- *Highways related works including a new roundabout and related works to A362, road widening and safety improvements to the A362, new cycle, pedestrian and bus connections.*

Any operations or engineering works necessary to enable the development of the Site, including excavation and earthworks and any other operations or engineering necessary for site mobilisation, office and worker accommodation, communications, drainage, utilities and associated environmental, construction and traffic management, together with associated operational infrastructure including utilities, management infrastructure, associated buildings and infrastructure, car parking, fencing, green infrastructure, access roads and landscaping.

Minor operational development in addition to the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015, or its successor, including changes to external appearance of existing buildings, including recladding, alterations to doors and windows; Changes to access to buildings; Installation of plant or small-scale micro renewable energy development; Reorganisation of vehicle parking; Provision of cycle parking; and Provision of covered bin and cycle stores.

Except for the highways works, the area covered by the draft order covers approximately the same land as covered by northern area of allocation SSV9 in the Local Plan Partial Update.

Environmental Impact Assessment

The draft order was subject to a screening request to the Local Planning Authority in September 2020 (ref: 20/01973/SCREEN). The screening response determined that the development proposed by the LDO is unlikely to have any significant environmental effects in EIA terms. The proposal therefore does not constitute EIA development and an Environmental Statement is not required.

Relevant Planning History

There is no relevant planning history on this site. However, the planning history of several nearby sites should be noted, including:

Old Mills South Area SSV9:

19/03984/OUT
Outline planning application for small scale industrial units with associated works and access from existing Old Mills development.
Refused 6th February 2020
Appeal dismissed

20/01950/OUT
Outline planning application for small scale industrial units with associated works and access from existing Old Mills development. (Resubmission)
Refused 16th October 2020

22/00881/OUT
Outline planning application (with all matters reserved, except for access) for small scale industrial units with associated works and access from existing Old Mills development.
Withdrawn 14th November 2023

Summary of Consultation/Representations
The LDO was subject to a 4 week period of statutory consultation commencing in January 2023 and then a further 4 week consultation period commencing in September 2023. A summary of the consultation responses is provided below. The detailed comments received can be found on the Council's website.

ENVIRONMENTAL MONITORING
Based on the information presented in the Air Quality Assessment and responses to the Air Quality Comments (dated 15th December 2023) the assessment has been accepted and we

have no objections to the development subject to the proposed condition.

HIGHWAYS
The Local Highways Authority offer no objections to the proposed outline application for an employment-led Enterprise Zone with related highways works including a new roundabout on the A362 and associated development subject to conditions.

ECONOMIC DEVELOPMENT
Economic Development is in full support of this application.
The site in question has been allocated for employment for over a decade and offers a once in a generation opportunity to develop the economy within the Somer Valley. No brownfield site in the area is of comparable size.

The development of the SVEZ is crucial to the supply of employment space within the B&NES area. The addition of the proposed 1,300 jobs is important to B&NES as a whole and especially within the local area. The increase in local employment opportunities will reduce the strain on the road network as there is a significant amount of out commuting from the area at present.

The mix of use classes set out in the proposed LDO is beneficial, allowing flexibility to move with the needs of the local business community and the market. We welcome the dominance of high-value employment uses including office, research and development and industrial. Over 30,000sqm of the proposed 35,800sqm of floorspace is committed to these high-value employment uses, with a smaller ancillary amount allowing for a hotel, pub and food outlet should the market dictate. We feel that there is a sufficient allocation to meet the 1,300 FTE employment for the site as a whole.

CONSERVATION
The proposals will negatively impact on the setting of Springfield Buildings and the entire site that was once known as Old Mills Colliery, that contains The Batch. The road works are of particular concern in respect of the setting of the former group of cottages, together with the loss of their rural backdrop by the LDO. The setting of Old Mills Colliery site will be degraded by the LDO from introducing a conspicuous, large-scale development within its green field setting. Views from the west towards the Batch will be obscured and it’s setting radically altered by the development.

In line with Paragraph 203 of the NPPF and HE1 of the PMP, this proposal will substantially harm the setting of these non-designated heritage assets and appears to negatively impact through the demolition of sections of the historic boundary treatment around the Colliery site. The harm identified to local non-designated heritage assets should be weighed against other material considerations in the balanced judgement of the application as a whole, as required by paragraph 203 of the NPPF. Of particular concern will be the impact on the setting and views from the west of the Batch.

URBAN DESIGN AND LANDSCAPE
Object, scope for revision - The inclusion of the strategic perimeter landscape within Phase 1 will be of significant benefit and is strongly supported, although for the avoidance of doubt the key on the Phasing Plan should be amended to make explicit reference to the inclusion of the perimeter planting within Phase 1.

The width of the perimeter planting is still inadequate in width. For the reasons given by the arboricultural officer and in my earlier consultation response (31 January 2023) a minimum width of 20m is required for the whole of the perimeter strategic planting.

ARBORICULTURE
Object, scope for revision - All strategic planting around the perimeter of the development should be 20m to allow for several tree planting rows to contribute towards robust continuous canopy cover as part of the strategic green infrastructure.

I welcome the inclusion of the planting and establishment of part of the strategic landscaping in Phase 1, however, the entire northern boundary and beside Old Mills Lane should be included. The incursions into the root protection areas of T3; T12; T13, T14 and T20 remain an issue irrespective of no-dig proposals. These mature trees are worthy of a Tree Preservation Order (TPO) but a TPO offers no protection from physical changes around the trees resulting from a change of use.

They have developed over time in a field/ pasture system and will be affected by the significant changes to surfacing, hydrology and wind exposure.

ECOLOGY
The scheme does not yet sufficiently demonstrate that it is capable of fully achieving the necessary light level thresholds and avoidance of light spill onto dark corridors, as required to avoid harm to bat activity, including avoiding risk of harm to activity of light-sensitive horseshoe bats associated with local “bat” Special Areas of Conservation (SACs). In line with the comments of Natural England, there is not yet sufficient information to demonstrate this and provide certainty that the scheme is capable of avoiding adverse effects on the integrity of the SAC sites in question. Comments of Natural England will need to be addressed. (Officer note: comments received prior to latest Natural England comments)

Further revisions and clarifications are required regarding the process for BNG and other ecological issues.

PLANNING POLICY
No objection - The submitted masterplan shows the uses falling within use classes E(g),B2and B8 and car show rooms (sui generis).The submitted information indicates a range of uses that will comply with clause 1 of the policy SSV9 as updated through the LPPU.

Clause 7c lists ancillary uses which are allowed on site which are supported provided they do not harm the nearby town centre. The policy states food and drink units use classes E,(b),ancillary retail E,(a)and a hotel (C1)will be supported. The submitted LDO includes a hot food takeaway and public house, which fall under the sui generis use class, which would not be compliant with the use classes listed in the policy SSV9. However the intention of the policy is for a food and drink use to support the employment development. Therefore whilst a public house will not comply with the use classes listed in the policy,it is considered to be in line with the intention of the policy which allows for food and drink uses,as long as the proposed use would not harm the vitality and viability of the town centres.

COAL AUTHORITY
The main part of the LDO lies outside of the defined High Risk Area. On this basis we stated that we did not consider that coal mining legacy is a constraint to the overall development. We did note however that as part the highway works, along the A362 corridor, vigilance should be maintained

by all site operatives during site preparation and excavation works, for any evidence of the recorded mine entry. If the mine entry is found, all works should cease, the area made safe and the feature assessed by an experienced geotechnical / mining engineer.

CONTAMINATED LAND
From review of the mapping records available to the contaminated land department, it is understood that there have been a number of potentially contaminative historical uses in the vicinity of the Site including a number of collieries, spoil heaps, engine house, railway, industrial estate, works and depots.

Taking account of the proposed development and the potentially contaminative historical uses adjacent to and in the vicinity of the Site, contaminated land conditions are recommended.

DRAINAGE AND FLOOD RISK
No objection, subject to conditions

ENVIRONMENT AGENCY
No response provided

WESSEX WATER
No objection

ARCHAEOLOGY
Although parts of the site are unavailable for full archaeological assessment, sufficient information exists to assess the significance of the site (as per NPPF para 195). The list of suggested staged conditions does offer the potential to ensure archaeology is treated in the manner set out in the NPPF (Chapter 16). It is recognised that this phased (or drop down) approach is a sensible way of ensuring the LPA retains a level of control through requiring submission of each strategy.

There is a potential issue with post-excavation and publishing of the results of excavations and so the sitewide Framework Mitigation Strategy is a key document within the process to ensure a single publication of the results of all the archaeological investigations.

NATURAL ENGLAND
Natural England advised your Authority that the applicant should request further information to demonstrate that dark corridors could be maintained as connective and functional habitat for horseshoe bats. Lighting could impact those features via lightspill from buildings, particularly, the hotel adjacent to corridor on the eastern perimeter of the site, and via footpaths should they need to be lit for safety reasons. Maintaining dark corridors around the site perimeter would be essential whereas dark corridors with the site would be desirable.

Having reviewed the additional information we note that the submitted documents state that lighting on the dark corridors will be kept to less than 0.5lux. There are likely to be some challenges with achieving that, particularly next to the hotel, but our advice is that your Authority should satisfy itself that the necessary planning controls are in place to ensure the stated lux levels are achieved at the next stage of detailed design, and indeed delivery of the scheme. Providing that is the case you will be able to conclude that adverse effects on the integrity of the Bath and Bradford Bats SAC can be avoided.

HISTORIC ENGLAND
The proposals will not affect the setting of any designated heritage asset, nor are there any within the site boundary.

However, we draw your attention to the adjacent spoil heap, which though not an asset with any statutory protection, is a very visible reminder of Midsomer Norton's mining heritage. As such we believe it should be considered a Non-Designated Heritage Asset.

Radtock and Midsomer Norton retain significant features relating to their mining heritage, such as Ludlows (engine house, baths, screens, workshop), Middle Pit (engine house, gas plant) and Wellsway (engine house, heapstead, workshops). There are also the tips at Tyning, the powder house at Middle Pit and other remains of inclines, tub runs and colliery rail lines.

Whilst many other former colliery areas retain colliery housing, institutes and associated infrastructure most have lost the key feature (i.e. the mine) or only small vestiges remain. At Radstock and Midsomer Norton much more survives.

We wonder if there a means by which views of the spoil tip can be preserved and enhanced through any consent you are minded to grant on this site. The juxtaposition of modern industry set against this significant reminder of the town’s mining heritage could make a significant contribution to local character and distinctiveness.

NATIONAL GRID
It looks like an HV underground cable will require diverting, and also an LV supply to a BT cabinet.

WALES AND WEST
Based on the information given and the address provided, Wales & West Utilities have no apparatus in the area of your enquiry.

RADSTOCK TOWN COUNCIL
Objection - The impact to Radstock and it’s residents, businesses, and increased traffic on the infrastructure of Radstock has not been considered within the impact assessments.
What is the transport plan to support Radstock?
Increase of traffic on the A367 between MSN and Radstock.
There are no improvements considered for the boΣlenecks already a concern in Radstock.
Concern with deterioration of air quality due to increased traffic.
Increase of pollution
Access to the greenway should be improved to support green routes. The route will also need to be extended. The greenway is not currently lit and would benefit from improvements to enable more people to use this as a suitable means to access the SVEZ.
25% biodiversity net gain achieved off site- why can this not be achieved on site. The concern is that the immediate area would not benefit.
Loss of green field site.

FARRINGTON GURNEY PARISH COUNCIL
The proposed LDO, while intended to streamline development processes, fails adequately to address the concerns and wishes of local residents and we believe there is vast scope for improvement and that this should not be ignored. It is however our community's belief that the site, if approved, will have a negative impact on Farrington Gurney and the local community, be that

increased traffic, loss of farmland, and a negative effect on local businesses. We therefore cannot support this application.

MIDSOMER NORTON TOWN COUNCIL
Overlooking and loss of privacy
Scale and dominance
Highway Safety
Traffic and Parking Issues
Noise, dust, fumes
Flooding

STON EASTON PARISH COUNCIL
Ston Easton parish adjoins the area designated as the Somer Valley Enterprise Zone and the Parish Council has previously expressed concern about the use of the narrow lanes which run from the A362 through the parish being used as rat runs by vehicles accessing or leaving the new zone due to congestion along the A362 and other routes through Midsomer Norton and Paulton. Ston Easton Parish Council recently held a public meeting to discuss the proposed enterprise zone and the implications for the parish, and particularly Clapton, of the greatly increased traffic movements both along narrow parish roads but also in a wider context for parishioners caught up in increased traffic congestion whilst going about their daily business. For instance, the junction of the A362 with the A37 at Farrington Gurney is already congested at peak times and is likely to be more so should the enterprise zone be built.

Many of those who spoke at the meeting noted the narrowness of Langleys Lane, Thickthorn Lane, Hay Street and Strap Lane amongst others and the likelihood of damage to both road surfaces and structure caused by greatly increased traffic flow and also the environmental damage to the hedge rows and ancient trees along these routes. Increased traffic on the single track lanes will also present an increased danger to walkers, cyclists and horse riders all of whom regularly use the lanes in the parish for exercise and their health and well-being.

It is understood that there is the possibility of a new distribution centre on the site bringing greatly increased incoming heavy goods vehicles along roads already too small to accommodate 44 tonne vehicles and an outflow of delivery vans using every possible route to fulfil their delivery schedules. Equally, with a suggested 1300 jobs being created and inadequate public transport in the area, the prospect of even more congestion at peak times is a real concern. All those who have reviewed the proposals for the enterprise zone think that there has been insufficient consideration to these very real issues resulting in superficial proposals to deal with, what will be, a major problem in all areas surrounding the enterprise zone.

Ston Easton Parish Council has concerns that there is no traffic flow metrics/ data for traffic coming from the direction of Langleys Lane and further concerns that there are no proposals in place at either the proposed new roundabout or current access points to parish lanes to prevent rat run/short cut behaviour to access the enterprise zone and adjoining roads other than signage which experience shows will be ineffective. Given the likely problems with traffic through the area, as is evidenced by the recent road closure in Chilcompton which has brought many extra vehicles onto the parish lanes, Ston Easton Parish Council seeks confirmation from B&NES that adequate measures will be put in place to prevent the single track Langleys Lane being used as a bypass/ short cut from both the B3139 Chilcompton/ Thickthorn Lane the and A37 Ston Easton/Hay Street to the proposed new roundabout and road at the bottom of Langleys Lane leading to the A362, the new enterprise zone and existing industrial and retail parks.

In conclusion, Ston Easton Parish Council has great concerns about the Somer Valley Enterprise Zone proposals. It considers that, given the major effect on traffic flows and congestion and hence

on air quality and pollution and the huge environmental impact of the enterprise zone on the local area, B&NES should reconsider the implications of their proposals for the Enterprise Zone in this location

THIRD PARTIES/NEIGHBOURS
A total of 567 representations comments were received across both consultation periods.

17 GENERAL comments were received. The main points raised were

Out of date plans of how people work now following the pandemic
Lack of evidence of demand and the LDO will struggle for office-based businesses and workers
Other eye sores need sorting out first around the area
There should be more shops and leisure facilities
No mention of extending the SVEZ's high speed broadband into surrounding areas.
Need for fully segerated cycle and walking facilities
More difficult for Sunnyside residents to get cars in and out
The road improvements are imperateive regardless of the outcome
Roads not suitable for more HGV traffic

22 SUPPORT comments were received. The main points raised were:

Midsomer Norton needs the investment
Should be seamless with the landscape
Need more work opportunities than housing
Should improve the traffic situation
There are still large amounts of green fields around the site
Could bring much needed jobs to the area and reduce out-commuting
The site has been allocated for a long time and nothing has happened
Imbalance between houses and jobs is growing
The LDO route with Council as facilitator is welcomed
Will bring more businesses to the area
Highways and cycle improvements are welcomed
Will boost the economy

528 OBJECTION comments were received. The main points raised were:

Concerns about noise, dust and pollution
Will damage the countryside/greenfields and surrounding area
Concern about risks to local health from air pollution
Adverse impacts upon air quality
Impacts upon wildlife and ecology
Damage to the environment
Flooding from the the Wellow Brook has not been properly considered
Concerns about impacts upon views of the Batch and impacts upon the area's culture
Damaging to a local landmark
Proposals are contrary to the Climate/Ecological Emergency delcaration
Impacts upon the Green Belt (Officer note: the site is not within or near the Green Belt)
Brownfield sites should be used first before building on green fields.
Concerns about light pollution
Concerns about litter/littering arising from proposed uses
Loss of accessilbilty to open terrain/countryside
Loss of footpaths
Loss of mature hedgerows
Misuse of rural land

Lack of field evidence for survey data
Lack of an Environmental Impact Assessment
Impact on the Batch as a non designated heritage asset
Concerns about pollution into the Wellow Brook
Detrimental impact upon the heritage of the town
Proposals will result in a reduction in biodiversity of the site
Mitigation of biodiveristy should not be off-site
The Council should be improving the roads regardless of the LDO
Proposals will increase danger on the roads and harm highways safety
Increase in HGVs will damage the roads
Current highways infrastructure is not capable to take on any more traffic
Adverse impact on A37/A362 junction
Will creates more in-commuting
Will significantly increase traffic and congestion
Road widening will cause speeding
Langley's Lane has not been included in traffic planning and will be a rat run
The "do nothing" scenarioin the TA may under represent LGV movements which are the vehicles which impact rat runs
Lorries already ignoring weight limit sign for Langley's lane
Measures should be in place to prevent use of Langley's Lane
The narrow road at Temple Cloud is dangerous
There is a need for more speed controls
Land currently has no access to public highways
No public transport/buses serving the area
No cycle path from Farrington Gurney
No guarantee about the delivery of the Somer Valley links cycle lane
No road improvements in Midsomer Norton or Paulton
Not part of a Green Transport Plan
Plans for highways works don’t do enough to mitigate issues
Previously refused a Tesco extension due to impact on roads
The proposed design for the highway infrastructre is not good
Should have sustainable transport from Farrington Gurney guaranteed before approval
Increased traffic during construction phase
Highways Development Management have raised concerns about the traffic data
The traffic modelling completed during lockdown and is unrepresentative
Vibrations/damage to houses due to traffic
There is no up-to-date traffic survey done
Lack of data for construction traffic
Traffic data is too focused on desktop survey works
Issues with access for emergency vehicles due to congestion
The proposed roundabout is too close to houses
Inadequate parking at Sunnyside
No traffic calming measures on A362
Road mitigations will encourage more traffic
Empty sites/brownfield sites that can be used instead, e.g. Welton Bibby Baron site or Radco
It should be kept as agricultural land or green fields
This is not a suitable site location
There are other areas with better infrastructure in place
Too far from the high street
Takes trade from the high street
Waste of money
Concern that it will soon change to houses
Concern that it will become a retail site
No demand for office space and the SVEZ is not needed
Don’t need more employment/unemployment is low

Industrial units were not built at Purnells due to lack of demand
Jobs created won't be for local people
There is no need for a pub
No workforce modelling has been provided
Vacant space already not being let in the area
The scheme not viable
The development will sit empty when built
Flower and Hayes have submitted application for industrial units already
The design is not in keeping with rural area
The proposals would frustrate the public rights of way across the site.
There is no desire for fast food outlets or industrial budilings
The heights of buildings are excess and their appearance poor
The LDO will allow inappropriate businesses
LDO will reduce the planning requirements
Hours of operation should be limited
Noise restrictions only apply to plot 12
Is overlooking houses
Blocking light to houses
It will involve taking a family field
Issue with CPO/land acquistion
Public have been led to believe the land is already purchased
Unfair on the families who own the land
Does nothing to improve peoples lives and is all about makeing a profit
Proposals are contrary to the values of the council
Process is not transparent enough
Goes against lib dem manifesto
Clapton Parish Council have not been engaged with
The proposed businesses will increase the crime rate
Accessibility to planning portal is limited
Benefits of the LDO have expired e.g. business rates
Proposals will devalue local properties
Negative impact on the local high street
Should invest in local businesses
Lack of infrastrucure to accommodate people and cars
Negative impact on mental health
No consideration made for local people
No local schools or amenities
Not good for residents
Impact on local accesses not considered
Only being put forward so developers do the highways works
Will put off visitors and people will avoid the area
Should be showing the height comparison to the batch
Desk based assessments include errors
Interferring with human rights of those who have a vested interest in the land
Concern to prevent chain businesses
Goes against 2007 local plan
Damage to local buildings
Outdated and biased data
Against the Lib Dem Manifesto

Policies/ Legislation:

The Development Plan for Bath and North East Somerset comprises:

Bath & North East Somerset Core Strategy (July 2014)
Bath & North East Somerset Placemaking Plan (July 2017)
Bath & North East Somerset Local Plan Partial Update (2023)
West of England Joint Waste Core Strategy (2011)
Made Neighbourhood Plans

CORE STRATEGY

The Core Strategy for Bath and North East Somerset was formally adopted by the Council on 10th July 2014. The following policies of the Core Strategy are relevant to the draft LDO:

SD1 Presumption in favour of sustainable development
CP5 Flood Risk Management
CP6 Environmental Quality
CP13 Infrastructure provision

PLACEMAKING PLAN

The Placemaking Plan for Bath and North East Somerset was formally adopted by the Council on 13th July 2017. The following policies of the Placemaking Plan are relevant to the draft LDO:

SV1 Somer Valley Spatial strategy
CP12 Centres and Retailing
D1 General urban design principles
D2 Local character and distinctiveness
D3 Urban fabric
D4 Streets and spaces
D5 Building design
D6 Amenity
D9 Advertisement and outdoor street furniture
D10 Public realm
ED1a Office development
HE1 Historic environment
NE2A Landscape setting of settlements
PCS1 Pollution and nuisance
PCS2 Noise and vibration
PCS3 Air quality
PCS7A Foul sewage infrastructure
RE5 Agricultural land
SCR2 Roof-mounted/ building integrated scale solar PV
SU1 Sustainable drainage policy

LOCAL PLAN PARTIAL UPDATE

The Local Plan Partial Update for Bath and North East Somerset Council was adopted on 19th January 2023. The Local Plan Partial Update has introduced new policies and updated some of the policies contained with the Core Strategy and Placemaking Plan. The following policies of the Local Plan Partial Update are relevant to the draft LDO:

SSV9 Old Mills Industrial Estate (Incorporating Somer Valley Enterprise Zone)
DW1 District Wide Spatial Strategy
CP3 Renewable Energy
CP7 Green infrastructure
D8 Lighting
ED2A Strategic and other primary industrial estates

NE1 Development and green infrastructure
NE2 Conserving and enhancing the landscape and landscape character
NE3 Sites, species, and habitats
NE3a Biodiversity Net Gain
NE5 Ecological networks
NE6 Trees and woodland conservation
PCS5 Contamination
RE1 Employment uses in the countryside
SCR7 Sustainable Construction Policy for New Build Non-Residential Buildings
SCR8 Embodied Carbon
SCR9 Electric Vehicles Charging Infrastructure
ST2A Recreational routes
ST3 Transport infrastructure
ST5 Traffic management proposals
ST7 Transport requirements for managing development

SUPPLEMENTARY PLANNING DOCUMENTS
The following Supplementary Planning Documents (SPDs) are relevant to the draft LDO:

Sustainable Construction Checklist Supplementary Planning Document (January 2023)

Transport and Development Supplementary Planning Document (January 2023)

Planning Obligations Supplementary Planning Document (January 2023)

NATIONAL POLICY
The National Planning Policy Framework (NPPF) is a material consideration. Due consideration has been given to the provisions of the National Planning Practice Guidance (NPPG).

LOCAL DEVELOPMENT ORDERS
The legislative procedures that must be followed in order to bring forward and adopt a LDO are set out in sections 61A to 61D and Schedule 4A of the Town and Country Planning Act 1990, as amended, and articles 38 and 41 of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Officer Assessment:

The main issues to consider are:

1. Legal compliance
2. Principle of development
3. Transport and highways
4. Design, character and appearance
5. Landscape
6. Heritage
7. Archaeology
8. Residential amenity
9. Drainage
10. Flooding
11. Contaminated Land

12.Air Quality
13. Trees
14. Ecology
15. Sustainable Construction and renewable energy
16. Planning Obligations/Community Infrastructure Levy
17. Public Sector Equality Duty
18. Public Benefits
19. Planning Balance
20. Conclusion

1. LEGAL COMPLIANCE

The legislative procedures that must be followed in order to bring forward and adopt a LDO are set out in sections 61A to 61D and Schedule 4A of the Town and Country Planning Act 1990, as amended, and articles 38 and 41 of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

A LDO can only relate to land within a Local Planning Authorities area. It cannot straddle boundaries with adjoining Local Planning Authorities. They may relate to all land in the relevant area of an LPA; any part of that land; or a site specified in the LDO.

The draft SVEZ LDO covers a defined area of land which falls wholly within the Bath and North East Somerset Council administrative area and is defined by a red line plan covering an area of approximately 13.5ha (plus additional land required highways works) at Old Mills on the north-west outskirts of Midsomer Norton.

A LDO cannot grant planning permission for development:

a) that affects a listed building;
b) that is within Schedule 1 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017;
c) where following an appropriate assessment it is determined that it would have adverse effects on the integrity of a protected European Site or European Offshore Marine Site (as the case may be) (see the Conservation of Habitats and Species Regulations 2017, amended by the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018)

There are no listed buildings within close proximity to the SVEZ LDO and it would not affect the setting of any listed building or assets. There are non-designated heritage assets near to the site (such as the Batch), but these do not preclude the grant of planning permission via an LDO. The impacts upon these non-designated heritage assets have been considered in the heritage section below.

The development proposed by the LDO does not represent schedule 1 development of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

The LDO has the potential for disturbance to qualifying species of both the Bath and Bradford-on-Avon Bats SAC and the Mells Valley SAC and therefore an appropriate assessment has been undertaken. However, the appropriate assessment has determined that there would be no adverse effects on the integrity of either of these protected European Sites. See ecology section below for more detail.

The draft Order is therefore considered to comply with the relevant legal requirements for LDOs.

2. PRINCIPLE OF DEVELOPMENT

The area covered by the draft order covers approximately the same land as covered by northern area of allocation SSV9 in the Local Plan Partial Update. This permits the development of, inter alia, class E(g), B2 and B8 uses, builders merchants and car show rooms (sui generis) uses. Additional Development Requirements and Design Principles for the Northern area also allows for food and drink units (use class E(b), ancillary retail (use class E(a)) and hotel use (use class C1) provided it does not harm the nearby town centre.

The submitted masterplan shows the uses falling within use classes E(g), B2 and B8 and car show rooms (sui generis). The submitted information indicates a range of uses that will comply with clause 1 of the policy SSV9 as updated through the LPPU.

Clause 7c lists ancillary uses which are allowed on site which are supported provided they do not harm the nearby town centre. The policy states food and drink units use classes E, (b), ancillary retail E, (a) and a hotel (C1) will be supported. The submitted LDO includes a potential hot food takeaway and public house, which fall under the sui generis use class, which would not be compliant with the use classes listed in the policy SSV9. However, the planning policy team have confirmed that the intention of the policy is for a food and drink use to support the employment development. Therefore, whilst a public house will not fully comply with the use classes listed in the policy, it is in line with the intention of the policy which allows for food and drink uses, as long as the proposed use would not harm the harm the vitality and viability of the town centres.

The draft order includes limits on the amount of floorspace associated with each plot and use class. The potential pub use of plot 1 is limited to 650sqm; the potential hotel use of plot 2 is limited to 2,790sqm; and, the potential food and beverage use (either E(b) on-site consumption or sui generis off-site consumption) on plot 4 is limited to 350sqm. The limited scale, type and format of these uses will complement the nearby town centres whilst also benefiting the attractiveness and operation of the Enterprise Zone.

The draft order, in terms of the proposed uses, is therefore considered to align with allocation policy SSV9. Assessment of the draft order against the other criteria of SSV9 is undertaken within the relevant sections below.

3. TRANSPORT AND HIGHWAYS

The draft order is accompanied by detailed highway design for internal and access roads and off-site highway interventions required to mitigate the impact of the new development that would be permitted by the LDO. It has also been accompanied by a Transport Assessment and a Travel Plan the scope of which has been discussed with the Local Highways Authority,

Access and off-site improvements

Criterion 5 of policy SSV9 requires improvements to the A362 and other local roads in order to satisfactorily serve and mitigate the impacts of development, and the provision of suitable vehicular and walking and cycling access to the development. Furthermore, criterion 7b requires the provision of new and enhanced walking and cycling routes linking the Enterprise Zone and extension to Old Mills Industrial Estate to Midsomer Norton and Paulton and the Norton Radstock Greenway.

A comprehensive package of mitigation is proposed as part of the draft order which includes several improvements towards sustainable travel as part of the proposals:

- Proposed SVEZ Roundabout and realignment of the A362;

- Widening of the A362 at Sunnyside to allow two-way traffic flow;
- Farrington Gurney Signals – signal timings;
- A362 Speed Limit Review;
- Eastern Cycle Track between Old Mills and Thicket Mead;
- A362 Bus Stops;
- Thicket Mead Roundabout Capacity and Active Travel Improvements;
- Electric Vehicle Charging;
- Cycle Parking;
- Framework Travel Plan.

In addition, the following off-site improvements are proposed:

- Traffic-free walking and cycling route between the proposed development and the Thicket Mead Roundabout where the Norton Radstock Greenway can be accessed via Sunnymead.

- The Eastern Cycle Track, which routes along the northern side of the A362 between the proposed development at Old Mills and the Thicket Mead Roundabout, generally formed by a segregated cycle track of width 3.0m with a footway of width 2.0m. At pinch points, such as the existing retaining wall on the southern boundary of the Batch, the Eastern Cycle Track would narrow in width or switch to a shared cycle/footway in places.

Several controlled and uncontrolled crossings would be provided along the A362, including:

- Parallel crossing on the northern arm of the Proposed SVEZ Roundabout.
- Zebra crossing on the eastern arm of the Proposed SVEZ Roundabout.
- Uncontrolled crossings on the southern and western arms of the Proposed SVEZ Roundabout.
- Two uncontrolled crossings on the A362 between the Proposed SVEZ Roundabout and Old Mills North (Wickes) access road.
- Parallel crossing on the northern arm of the A362 / Old Mills North (Wickes) access road junction.
- Toucan crossings on the northern and eastern arms of the upgraded Thicket Mead Roundabout.
- Controlled crossing on the western arm of the upgraded Thicket Mead Roundabout.

The existing alignment of the A362 would be partially retained as an access for residential properties and partially retained as a pedestrian and cyclist track.

The SVEZ access road leads north of the proposed roundabout, formed of a 6.0m carriageway with a 3.5m shared footway/cycleway on its eastern side and a 2.0m footway on its western side. At plot accesses, priority would be afforded to active travel users through side road treatment with continuous footways / shared footway/cycleways.

Additional access for pedestrians and cyclists is proposed from Old Mills Lane. This access is proposed to be connected with the proposed shared footway/cycleway on the eastern side of the SVEZ access road via a parallel crossing.

The Somer Valley Links is a committed scheme through the West of England Combined Authority supported by B&NES. It seeks to improve transport opportunities between Midsomer Norton, Westfield, Radstock and Bath/Bristol along the A37, A362 and the A367 to develop options to travel sustainably by bus, walking, wheeling and cycling.

Somer Valley Links represents an investment of £19M with a local contribution of 20%, all schemes that benefit from the proposed improvements are required to make a pro rata contribution. It is accepted that SVEZ would benefit from this project. However, this LDO is proposing extensive sustainable transport mitigation that would have otherwise formed part of the Somer Valley Links scheme.

Highways safety

The Local Highways Authority have reviewed the submit highways designs for the LDO including the proposed SVEZ roundabout and the proposed improvements to the Thicket Mead roundabout alongside swept path analysis for the scheme. A Stage 1 Road Safety Audit has also been undertaken by the applicant to assess the proposed improvements/access in terms of highways safety. The Audit identified several potential issues. However, it is accepted that all issues raised have been addressed and or can be dealt with at the detailed design stage. It is considered that there is no objection based on highways safety.

Traffic Modelling and Trip Generation

The Transport Assessment provides a forecast of the trip generation of the proposed development using TRICS for each proposed land use type within the LDO. Where plots propose flexibility in terms of land use, then a worst-case scenario assessment has been utilised. The data shows that the proposed development is forecast to generate 436 vehicular trips during the AM peak, with 330 of these arrivals. During the PM peak 421 vehicular trips are forecast to be generated, of which two thirds of these would be departures. For both the AM and PM peaks, light vehicles make up the majority of generated trips.

An assessment of the impact of trip generation has been made utilising VISSIM modelling as agreed and scoped with the LHA. The Vissim model contains three main routes, of which the key one is the east-west corridor between Farrington Gurney and the A362 Frome Road to the east of Radstock town centre.

The modelling shows that, with the proposed highways infrastructure and mitigation in place, average journey times would reduce by 141 seconds along this key route for three out of the four periods/directions when compared to the unmitigated scenario accounting for all other committed development in the locality.

During the AM peak, it is forecast that average journey times in the eastbound direction would reduce from 1,053 seconds in Scenario 3 (2027 with Committed Development) to 1,032 seconds in Scenario 5 (2027 with Committed & Proposed Development plus Mitigation). In the westbound direction, it is forecast that there would be a slight increase in journey times from 758 seconds to 856 seconds.

During the PM peak, significant betterment is forecast, with average journey times in the eastbound direction forecast to reduce from 1,903 seconds in Scenario 3 (2027 with Committed Development) to 1,406 seconds in Scenario 5 (2027 with Committed & Proposed Development plus Mitigation). In the westbound direction, journey times are forecast to decrease from 1,179 seconds to 1,036 seconds.

The transport modelling has been subject to the scrutiny of the LHA who have raised no objection to it. Overall, the results show that the impacts of the proposed development on the local transport network, in terms of journey times along the east-west A362 corridor, would be mitigated by the proposed mitigation measures and that the impacts would not be severe.

Framework Travel Plan

The LDO is accompanied by a comprehensive Framework Travel Plan. This has been reviewed and is acceptable. Conditions on the draft Order ensure that each plot that comes forward will have to demonstrate compliance with the Framework Travel Plan. This may require the completion of a s106 agreement to secure either a bond or a payment to B&NES to imply the detailed travel plan for each plot in accordance with the Transport and Development SPD.

Parking

The design codes and conditions ensure that minimum cycle parking and maximum car parking will be provided in line with the adopted car parking standards at the time of each compliance application for each plot. This will be in line with the Transport and Development Supplementary Planning Document.

Car club provision will also be identified via the occupier-specific Travel Plans or Travel Plan Statements that will be secured as a condition of the LDO. This would include dedicated parking spaces for car club vehicles.

Refuse and Recycling

The layout of plots with regards to refuse and recycling storage and collection will be agreed at the time of each compliance application for each plot. Notwithstanding, swept path analysis for all plots has been provided for a 10.65m refuse vehicle which shows each access is accessible for a refuse vehicle entering and existing each plot.

4. DESIGN, CHARACTER AND APPEARANCE

Policy D1, D2, D3 and D5 of the Placemaking Plan have regard to the character and appearance of a development and its impact on the character and appearance of the host building and wider area. Development proposals will be supported, if amongst other things they contribute positively to and do not harm local character and distinctiveness. Development will only be supported where, amongst other things, it responds to the local context in terms of appearance, materials, siting, spacing and layout and the appearance of extensions respect and complement their host building.

The draft Order seeks to ensure that the design, character and appearance of the SVEZ development is controlled through a combination of parameter plans, design codes and planning conditions.

The parameter plans and design codes cover the following matters:

The position and design of the proposed spine road
The maximum floor space for each development plot
The land use classification
Maximum heights
Parking Strategy
Cycling and Pedestrian Strategy
Deliveries and Collections
Landscape Planting Strategy
External colour palette
Architectural Features and Materiality
External Signage and Way-finding

Sustainability Strategy
Lighting Strategy
Phasing Strategy

Any compliance application submitted will need to demonstrate compliance with these parameters and design codes to be acceptable.

The draft Order is also accompanied by an illustrative Masterplan which shows the fixed elements of the development alongside a demonstration of one way in which those parameter plans, design codes and conditions could be applied for to develop the SVEZ.

The combination of parameters, design codes and conditions will ensure that the allocation comes forward in a co-ordinated and coherent manner. The overall structure of the development layout is acceptable providing flexible plots with perimeter and intervening structural landscaping. The on-plot requirements will ensure that the heights of new buildings are appropriate for the nature and scale of the employment uses proposed on the site whilst focusing the highest parts of the development towards the existing built-up area around the A362 and allowing for some variation in the heights across the allocation.

There are several open spaces within the LDO including the Natural Open Space (between plot 10 and plot 11), the Central Open Space (adjacent to plots 3 and 4), the SuDs basins (lying east-west across the site either side of the spine road) and the areas of structural planting around the perimeter of the site. The design codes include landscape strategies for each area.

The codes also provide a flexible approach to building design offering a palette of materials, finishes and architectural features which would be appropriate for the different use categories to be provided within the LDO. This will help to ensure that the SVEZ has a distinct identity of its own and will also help to minimise the impacts of this large-scale intervention on the surrounding character and landscape.

The proposed LDO sets out suitable parameters and design codes to ensure that the SVEZ development will respect the local context and maintain the character and appearance of the surrounding area whilst also creating its own distinct identity. The proposal accords with policy CP6 of the Core Strategy, policies D1, D2, D3, D4 and D5 of the Placemaking Plan and part 12 of the NPPF.

5. LANDSCAPE

Local Plan Partial Update policy NE2 has regard to conserving and enhancing the landscape and landscape character. The policy notes several criteria which should be met in order for the development to be considered acceptable in landscape, including conserving the local landscape character and conserving. The policy also states that development should seek to avoid or should adequately mitigate any adverse impacts on the landscape. Proposals with the potential to impact on the landscape/townscape character of an area or on views should be accompanied by a Landscape and Visual Impact Assessment undertaken by a qualified practitioner to inform the design and location of any new development.

The allocation policy SSV9 includes the following relevant development requirements and design principles:

2. Major landscaping in order to mitigate the impact on the surrounding countryside and nearby residential properties

3. The substantive retention of internal and boundary hedgerows is expected. Where hedgerow sections will be lost or breached, replacement hedgerows to be provided within or at the periphery of the site to enhance habitat connectivity for mobile species. Provision of 10m habitat buffers is expected for retained and created hedgerows. A protective and complimentary habitat buffer of at least 20m is expected adjacent to the SNCI.

10.Careful consideration of the appropriate position and scale of development to ensure impact on the surrounding landscape is minimised

A Landscape and Visual Impact Assessment (LVIA) has been prepared to assess the impacts of the development which falls within the LDO parameters and design codes. This has been separately reviewed by the LPA's appointed Landscape advisor.

The site is currently exists comprises arable and pastoral fields of medium scale bounded by hedgerows with occasional trees. The site is set on gently rising south facing sloping land rising steeply further to the north, forming part of the River Somer Valley. This gently falls towards the A362 and valley bottom.

Outside the south-eastern boundaries are retail and commercial units which form the Wickes Retail / Paulton House Office Buildings. Immediately to the south along the A362 are residential dwellings: Walver House, Dunromin and no.s 1-16 of Springfield Buildings. Royal Oak Farm lies to the southwest boundary of the Site and the north west of the site cuts into the farmland of Fernleigh, comprising of farm units and small-scale pastoral fields. To the west, are residential and farm buildings on the junction of the A362 and Old Mills Lane.

A densely wooded belt on the eastern boundary screens the Site from the Wickes Retail / Paulton House Office Buildings and forms an extension of a large woodland / plantation further east which surrounds Paulton House and Old Mills Batch spoil tip. The Batch is a key visual feature of the current landscape and is one of very few such 'spoil-tip mounds' remaining within this area - which supported several coal mines during the post-medieval period.

The site lies outside of any national/statutory or local/non-statutory landscape designations. Contrary to what some public comments have suggested, the site is not within the Green Belt.

The introduction of a large-scale employment development onto an existing greenfield site will inevitably have some adverse impacts on the landscape. However, the LVIA sets out the primary measures of mitigation that have been embedded into the LDO. These include the following:

- The siting and massing of the proposed units;
- The design of the light-industrial, work space, pub and food drive throughs, hotel and
- office units and use of materials in the design;
- Colour scheme considerations;
- Replacement of trees lost to the development at an agreed ratio; and
- Site layout and landscape design.

The primary structural landscape mitigation is identified in the parameter plans and the design codes accompanying the draft order. Matters such as the building heights, arrangement of the plots is controlled through the various parameter plans where aspects of the building design and colour scheme are controlled through the design codes.

The LVIA concludes that in consideration of the landscape character, the size and scale of the magnitude of change would be medium to high adverse in the short to medium term (0 to 5 years) due to the loss of some landscape features and characteristics and alteration to the baseline and

existing character of moderate to low sensitivity. This would result in a moderate significance of effects.

In terms of the visual impacts, the LVIA considers a total 15 viewpoints. For the majority of the viewpoints (viewpoint numbers 1,2,5,8,9,10,11,12,13,14 and 15) which are over 100m from the site boundary, the significance of effects ranges from Negligible to moderate adverse.

For viewpoints 3, 4, 6 and 7 which are all in closer proximity to the development site (either adjacent or within 65m of the site boundary the significance of effects is assessed as major to moderate adverse although it is noted that these will reduce to moderate once structural landscaping has established over a 15year timeframe.

Whilst the LPA's Landscape advisor has not disagreed with the specific impact assessments within the LVIA, they have raised concerns about the level of impact even after the proposed mitigation. They consider that the proposed perimeter structural landscaping is inadequate and that there is an insufficient planting corridor secured within the parameter plans. They point to the accurate visual representations at viewpoint 2 where, even after 15 years, the tree canopies are still below the perceived building roof heights and the width of the planting is insufficient to provide screening of the employment development behind such that the buildings would remain conspicuous in the landscape.

The Council's Arboricultural and Ecological Officer have also raised concerns about the width of the structural planting corridor.

The parameter plans allow for a 15m buffer of structural planting around the western, northern and eastern boundaries of the LDO site. Along the north-eastern boundary this increased to 20m where the site is adjoins the adjacent SCNI.

Some changes have been made to the draft Order since its original submission in an effort to address the concerns about the width and effectiveness of the structural landscaping. This has included the removal of which previously ran through the structural landscaping area but was not considered to offer much in terms of connectivity or benefit to the scheme. The removal of the footpath gives an opportunity for some additional planting within the perimeter belt which is of benefit to the effectiveness of the structural landscaping. Additionally, the phasing plan has been updated to ensure that the structural landscaping will be part of phase 1 of the development, giving time for the planting to establish and helping to minimise the time for which the greatest level of adverse impact might be expected. However, both of these changes whilst beneficial do not fully overcome the Landscape Officer's concerns about the width of the structural landscaping.

The allocation policy calls for 'major landscaping in order to mitigate the impact on the surrounding countryside' but does not provide a definition of 'major' in this context. Criterion 3 of the allocation policy does talk about the provision of 10m habitat buffers for retained hedgerows and a protective and complimentary habitat buffer of at least 20m adjacent to the SNCI which the LDO does achieve, although both requirements relate to ecological matters rather than landscape.

However, some guidance can be drawn from the appeal decision on application 19/03984/OUT relating to an outline application for industrial units on the southern parcel of allocation SSV9. The appeal showed a development with a structural landscape belt of at least approximately 10m deep. Here the Inspector considered that this would provide a significant density and height of foliage and that it would not therefore, reasonably, fall within a description or amenity planting but would be major landscaping.

It is therefore considered that the LDO's structural landscaping buffer of around 15m can be considered as 'major' landscaping for the purpose of policy SSV9. Furthermore, it will provide some mitigation to the landscape character and visual impacts of the proposed development.

Notwithstanding this mitigation, the proposals will have several moderate negative impacts upon landscape character and views which will need to be weighed in the balance.

6. HERITAGE

There are no designated heritage assets within close proximity of the Somer Valley Enterprise Zone. However, there are several non-designated heritage assets within relatively close range that need to be considered. These include:

1. The Batch/Tip - The tip at Old Mills Colliery represents a prominent symbol of Somerset's coal industry during the 20th century and is recognised as an important and iconic local industrial landmark.
2. The site of Old Mills Colliery, where the Batch is located.
3. Springfield Buildings south side of the A362.
4. Cottages by the A362 at Old Mills
5. Cottages at Old Mills west of the site.

It should be noted that this list should not be treated as finite and other items such as boundary walls that surround some of colliery sites or form part of the curtilage to houses in this list should also be treated as NDHA. Other NDHA may also be close to the development site but due to the derelict nature of adjacent land may not be known about.

Whilst the above NHDA will not be directly impacted by this development, their settings will be altered and, in some cases, harmed by views being interrupted or obscured or by new road alignments and other highway infrastructure being constructed as part of this development.

In addition, to the list of NHDA set out above, another NDHA is the Historic Landscape in which the Enterprise Zone will be constructed. Historic map regression and survey work identified that the main Site forms part of a larger field system of Late Medieval enclosures which preserve the outlines of former strip fields from a Medieval open-field ridge and furrow system. The proposed development would remove a small part of this wider field system, resulting in harm to this asset.

The Heritage Impact Assessment accompanying the LDO concludes that:

“The proposed development would result in the complete destruction of one non-designated heritage asset of medium significance (Prehistoric settlement), moderate harm to one non-designated heritage asset of medium significance (the Batch) as a result of change to its setting, minor harm to four non-designated heritage assets of low significance (Old Mill Colliery and three groups of workers cottages) as a result of change to their setting, and complete removal of one non-designated heritage asset of negligible value (trace ridge and furrow earthworks)”.

This conclusion is supported by the Conservation Officer who states that it is clear that harm to the settings of the building and structures making up the five previously mentioned NDHA will be caused by this development.

In particular, they have highlighted the Old Mills colliery site, as well as The Batch itself, as being of high local significance. This is due to its historic interest, evidential remains; being a rare example that is still relatively intact, its local communal value as a cultural and industrial entity and its visual prominence (in the case of The Batch), both entities reflecting an era of social and economic activity that changed the landscape of this part of Somerset. Furthermore, the significance of the Batch has been previously established through planning appeal;13/04880/OUT, where the Inspector recognised the importance of the coal tip as part of the “legacy of the area’s history of mining in the Somerset Coalfield”.

The submitted assessments show that a building positioned centrally on Plot 10 at circa 13.5m would block many views that are currently obtained of the Batch from the west, through the open fields that form its setting and that this would cause harm to both the immediate setting of the Batch and the wider historic landscape of this part of Paulton.

The views of Historic England are also noted, who have suggested that efforts should be made to preserve and enhance views of the Batch. They have also highlighted that the juxtaposition of modern industry set against this significant reminder of the town's mining heritage could make a significant contribution towards local character and distinctiveness.

Paragraph 209 of the NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining an application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

In this instance, there is clear harm identified to several non-designated heritage assets ranging from high to low local significance. This harm must be weighed against the other material considerations which are set out in the planning balance section below.

7. ARCHAEOLOGY

A Heritage Desk-Based Assessment Report has been submitted with the LDO and contains a section on buried archaeology and reviews the potential of the site based on known archaeology within the study area and the results of a geophysical survey and monitoring of geotechnical trial pits. This has been reviewed by the Council's appointed archaeologists.

The geophysical survey covers approximately 50% of the site in three areas to the east, west and south while the central northern and southern areas have not been surveyed due to issues with land ownership and access.

The Historic Environment Record shows that two Middle Bronze Age axes have been found on the site in 1902. The results of the geophysical survey indicate that features likely to be roundhouses and/or barrows are present on the site associated with enclosures. This evidence indicates that the archaeology on the site is likely to represent a Middle Bronze Age settlement possibly with associated funerary monuments. The report suggests that on available evidence the archaeology is most likely of medium significance.

Excavations of Middle Bronze Age sites of this nature tend to be focused on "negative" features, i.e. ditches and pits rather than standing remains such as walls etc. It is not uncommon for sites to be both places of activity associated with living and agriculture as well as places where the deceased are interred. Within this period cremation is the predominant form of burial both within pottery vessels or in small pits, often located around a small ring-ditch. There have been few modern excavations of sites of the MBA period in BaNES but in a national context these sites are not particularly rare but are significant to understanding the Later Prehistoric period in the local context.

The LDO Statement of Reasons includes a list of suggested conditions to ensure that the archaeology is dealt with appropriately. These conditions are phased and require LPA approval of each phase.

The initial condition (No. 16) is a pre-development (or any other works) and requires the remaining areas of the site to be subject to geophysical survey and the whole site to be evaluated utilising trial trenches (following LPA approval of the scope of works).

The second condition (No. 17) requires the submission of a sitewide Framework Mitigation Strategy based on the results of all previous assessments and is subject to LPA approval.

The third and fourth condition (Nos. 18 & 19) are for area specific mitigation strategies to be submitted and approved by the LPA. Condition 18 covers areas outside of development plots while Condition 19 is concerned with individual development plot areas.

The NPPF requires that sufficient information is submitted to the LPA to enable a description of the significance of any heritage assets on a site (paragraph 194). Unfortunately, at present due to constraints the level of information supplied concerning archaeology is somewhat limited. However, the geophysical survey (which covers half the site) does not indicate any archaeology of national significance, or of such importance that the site should be designated by DCMS. Overall, it is likely that the archaeology is of local significance with potential to inform on the wider context of Middle Bronze activity in the Sommer Valley and environs.

This phased approach does mean that the LPA does have specific trigger points that require agreement before any work can take which ensures archaeology is not undervalued in terms of the Development Management process.

Care will have to be taken with post-excavation and publishing of the results of excavations and so the sitewide Framework Mitigation Strategy is a key document within the process to ensure a single publication of the results of all the archaeological investigations.

The development therefore accords with policy HE1 and Part 16 of the NPPF.

8. RESIDENTIAL AMENITY

Policy D6 sets out to ensure developments provide an appropriate level of amenity space for new and future occupiers, relative to their use and avoiding harm to private amenity in terms of privacy, light and outlook/overlooking.

Fernleigh is a residential property located to the immediate north-west of the LDO site, adjacent to the location of plot 12 which is proposed for a depot use. The structural landscaping which is 15m in depth at this location will provide a good amount of buffer between any potential buildings within plot 12 and the boundary of Fernleigh. The Environmental Health Officer is satisfied that, subject to appropriate mitigation there will not be undue adverse noise impacts upon the residential amenity of this property.

Residential properties immediately to the south of the LDO on the A362, including Springfield Buildings, Dunromin, Walver House and others will be affected by the introduction of a LDO access roundabout and re-routed highway. The proposed route of the new road will not be significantly closer to these existing buildings than the existing highways arrangement. There will be no significant affect upon their privacy or light. The Environmental Health Officer is satisfied that, subject to appropriate mitigation there will not be undue adverse noise impacts upon the residential amenities of these properties.

Royal Oak Farm is situated immediately adjacent to the south-west corner of the LDO and beyond that there are several properties on Old Mills Lane, including Oakleigh Lodge and 1-4 Old Mills Lane. Royal Oak Farm shares a boundary with proposed plots 5 and 6 of the LDO which are proposed for office, research and development or industrial process uses. However, both plots include a ‘no build’ zone within the parameter plans which will prevent any new buildings being erected too close to the boundary with Royal Oak Farm. This restriction, combined with the maximum height parameters will prevent any development on these plots from appearing

overbearing or resulting in any significant loss of light, outlook or privacy. This will also benefit the other properties on Old Mills Lane which will not be significantly affected.

Other properties along the A362, including 1-4 Pillsbridge Cottages, Pillsbridge House, The Firs and properties alongside Sunnyside will be in close proximity to some of the proposed highways works. However, the proposed works will not adversely affect the privacy, light or outlook from these properties. Similarly, no issues have been raised by the Environmental Health Officer in respect of the noise impacts from traffic associated with the LDO.

There are a significant number of properties near the Thicket Mead roundabout which would likely experience disruption during the construction of the roundabout improvements in this location. However, this would be for a temporary period during the construction phase and during the operational phase of the development these properties would retain their current light, privacy and levels of outlook.

An office, Paulton House, and a Wickes store are located immediately to the south-east of the LDO. Whilst there will be some disruption during the construction of various phases of the LDO, the operations of this adjacent estate should remain largely unaffected by LDO in terms of the attractiveness and amenity.

Given the parameters, design codes and conditions, the development of the LDO would not cause significant harm to the amenities of any occupiers or adjacent occupiers through loss of light, overshadowing, overbearing impact, loss of privacy, noise, smell, traffic or other disturbance. The proposal accords with policy D6 of the Placemaking Plan and part 12 of the NPPF.

9. DRAINAGE

Policy CP5 of the Core Strategy has regard to Flood Risk Management. It states that all development will be expected to incorporate sustainable drainage systems to reduce surface water run-off and minimise its contribution to flood risks elsewhere. All development should be informed by the information and recommendations of the B&NES Strategic Flood Risk Assessments and Flood Risk Management Strategy.

The LDO is accompanied by a site wide drainage strategy. The proposed solution for the management of surface water runoff from the planned development is to provide source control treatment solutions. This would be in the form of ponds located in the green landscaped areas and permeable paving structures in the car parks of most individual plot. The discharge would be conveyed via the pipe network before it finally discharges to the public Wessex Surface Water sewer at a controlled rate of 6.73l/s/ha. This rate will have to be agreed with Wessex Water and to see if it will impact the Wessex Water system.

Attenuation will be provided to ensure the system does not flood for rainfall events up to the 1 in 100-year return period storm, including an allowance of 45% for climate change.

Whilst the site wide drainage strategy provides the overall strategy for the drainage of the whole LDO, further detailed drainage designs will be required as individual phases and plots come forward. The draft order proposes a condition which requires the detailed design for surface water for each phase or plot to be approved before development can commence in that phase or plot.

The approach to drainage has been reviewed by the Flood Risk and Drainage Team who have no objections to the approach outlined above.

10.FLOODING

The site falls within flood zone 1 which is considered to be at a low risk of flooding with an annual chance of flooding from rivers and the sea less than 1 in 1,000 (0.1%). A flood risk assessment (FRA) has been submitted as part of the LDO.

In accordance with the NPPF, the proposals are appropriate, on flood risk grounds, for the types of development proposed. The proposed uses are consistent with the allocation policy and therefore there is no requirement to pass the Sequential Test and the application of the Exception Test is not required.

The site is at low to medium risk of surface water flooding. The proposed development would result in an increase in impermeable land cover at the site. Surface water runoff from the proposed development would be managed in line with the site wide drainage strategy (see above). Given the implementation of the Drainage Strategy and suitable connections to the sewer network, no sources of flooding are considered to pose an onerous risk to the site in the context of the proposed development and no mitigation measures are required. The proposed development would not increase flood risk to third parties over its lifetime, including for climate change.

The Environment Agency have been consulted (twice) about the proposed LDO but have chosen to provide no response and are therefore considered not to have any objection to the proposals.

As such, the proposed development is considered to comply with policy CP5 of the Core strategy in regard to flooding and drainage matters, as well as part 14 of the NPPF.

11. CONTAMINATED LAND

No contaminated land investigation or assessment reports have been submitted with the application. From a review of the mapping records available to the contaminated land department, it is understood that there have been several potentially contaminative historical uses in the vicinity of the Site including several collieries, spoil heaps, engine house, railway, industrial estate, works and depots.

Taking account of the proposed development and the potentially contaminative historical uses adjacent to and in the vicinity of the Site, the Contaminated Land Officer recommends that the LDO incorporate conditions requiring investigation and risk assessment, remediation and verification reporting (if required).

The LDO is considered to comply with policy PCS5 of the Local Plan Partial Update.

12. AIR QUALITY

An Air Quality Assessment has been submitted with the draft Order which reviews the impacts of the construction and operational phases of development. This has been reviewed by the Council's Environmental Monitoring Team who have agreed that the overall approach to the assessment is acceptable. Following some queries, additional detail on model inputs were provided to demonstrate that the correct methodology had been used, particularly with regard to queues, gradients and street canyons. Further clarifications were provided over traffic counts and forecast traffic levels and average speeds.

The Environmental Monitoring Team area satisfied with the results of the modelling and have accepted that the development will not result in any breach of the objectives for the nearby Air Quality Monitoring Areas (AQMAs).

Whilst it is not possible to confirm the number of construction vehicle movements during the construction at this time, due to a phase development approach over years. To minimise any impact to air quality CEMP condition is proposed as part of the draft Order.

The proposed LDO is therefore considered to comply with policy PCS3.

13. TREES

Local Plan Partial Update policy NE6 has regard to trees and woodland consecration. Development should seek to avoid adverse impacts on trees and woodlands of wildlife, landscape, historic, amenity and productive or cultural value, as well as appropriately retaining trees and providing new tree planting. Development will only be permitted where it can be demonstrated that adverse impacts on trees are unavoidable to allow for development and that compensatory provision will be made in accordance with guidance within the Planning Obligations Supplementary Planning Document (2023). Development proposals which directly or indirectly affect ancient woodland and ancient or veteran trees will not be permitted.

An arboricultural report has been submitted with the proposals which is subdivided between the main site and highways widening proposals to the west of the site.

A total of 76 arboricultural features were recorded within the study area, these were recorded as 43 individual trees, eight groups of trees, 23 hedgerows and two woodland blocks. None fall within a conservation area or are subject to a Tree Preservation Order.

The report identifies the tree losses required to enable the development to which there is no outright objection from the arboricultural officer. A total of seven individual trees, one group trees and four hedgerows will be removed, as well as the partial removal of sections from 11 hedgerows to facilitate proposals.

The arboricultural report refers to the parameter plans and structural landscaping scheme indicating that the LDO will result in a total of approximately 10,267 new trees being planted across the site. Given that there are no detailed landscaping proposals at this stage, this figure cannot be considered final, but there is considerable scope for replacement planting within the LDO site.

The Council’s Arboriculturalist has identified incursions into the root protection areas of T3, T12, T13, T14 and T20 as an issue. These are mature trees, predominately Oak which are growing amongst hedges with fields surrounding them. They will be affected more keenly by any changes around their rooting environment which affect gaseous exchange and water and nutrient availability. In response, the LDO proposes no-dig construction methods will be used in these areas, although this will not address the issues around changes to the rooting environment. It is therefore likely there will be some adverse impact upon these retained trees.

The proposed tree protection measures, alongside individual arboricultural method statements for each plot, will be secured by conditions on the LDO.

Overall, the proposal is considered to comply with policy NE6 of the Local Plan Partial Update.

14. ECOLOGY:

Policy NE3 of the Local Plan Partial Update has regard to Sites, Species and Habitats and states that development which results in significant harm to biodiversity will not be permitted. For all

developments, any harm to the nature conservation value of the site should be avoided where possible before mitigation and/or compensation is considered.

An ecological habitat and protected species survey and assessment has been submitted with the LDO and reviewed by the Council's Ecologist.

There were three non-statutory designated sites of nature conservation importance located within 200m of the main and Highways Sites. One site, Old Mills Mine Tip Site of Nature Conservation Interest (SNCI) adjacent to the eastern boundary of the Main Site, comprised broadleaved woodland and open mosaic habitats on previously developed land (HPIE). Wellow Brook (SNCI), was situated 30m south of the proposed connection to the Greenway cycleway and comprised a stream with associated wildlife habitat that acts as a wildlife corridor and supported species such as otter (Lutra lutra). A further SNCI, Springfield Colliery, comprising broadleaved woodland, semi-improved neutral grassland, tall ruderal and ephemeral short perennial was 70m south-east of the Main Site. A further ten SNCIs and ten Local Wildlife Sites (LWS) were recorded within 2km of the Main Site boundary.

The Council's Ecologist broadly accepts the findings and recommendations of the ecology assessment, although in their latest comments have sought a number of clarifications. Clarifications on these points have subsequently been provided.

The Ecologist has also questioned the proposed removal of the mature species rich hedgerow in the field at the NW of the site and whether it is necessary to enable the development. The information submitted with the draft Order suggests that the viability of the scheme depends on the removal of this hedgerow. However, whether or not the hedgerow can be retained can be explored further as part of any compliance application and conditions in relations to on-plot BNG.

In addition, Policy NE3a of the Local Plan Partial Update relates to Biodiversity Net Gain (BNG). In the case of major developments, a BNG of a minimum of 10% must be demonstrated using the latest DEFRA metric (or agreed equivalent), by a suitably qualified and/or experienced ecologist. BNG will be secured in perpetuity (at least 30 years) and a management plan will be required detailing how the post-development biodiversity values of the site will be secured, managed and monitored in perpetuity.

In the case of the LDO, the delivery of BNG is secured through the use of conditions. A baseline assessment and metric has been provided and accepted by the Council's Ecologist. The proposed conditions propose a phased approach to the delivery of BNG on the site requiring a strategic BNG delivery and management plan to be submitted prior to the commencement of any development and then a plot specific BNG plan to accompany each compliance application. This approach echoes the recently issued national regulations/guidance in respect of BNG (although note that development orders are currently exempt from mandatory BNG). The condition follows the BNG hierarchy prioritising delivery on-site in the first instance, before moving down the hierarchy to allow the purchase of additional off-site land or units and, finally, the purchase of credits.

The presence of bat species from the Bath and Bradford upon Avon SAC and the Mells Valley SAC has not been ruled out and the potential for significant effects on the bats associated with these SAC could not be ruled out. An appropriate assessment has therefore been undertaken.

The draft order proposes a lighting strategy which will maintain several dark corridors across the site and ensure that lighting within these corridors is limited to less than 0.5lux. This will be controlled through the design codes, parameter plans and compliance applications. Whilst Natural England indicate that there are likely to be some challenges with achieving these lighting parameters, particularly next to the plot containing the hotel use, the LDO is clear that light spill should be restricted and therefore there are the necessary panning controls in place to ensure that

the stated lux levels are achieved at the next stage of detailed design. In light of these mitigations, the appropriate assessment concludes that the Proposed Development would have no Likely Significant Effects on the integrity of the designated sites, their qualifying features or the conservation objectives of the Mells Valley SAC and Bath and Bradford-on-Avon Bats SAC.

The proposed order is considered to comply with policies NE3 and NE3a.

15. SUSTAINABLE CONSTRUCTION AND RENEWABLE ENERGY:

Policy SCR7 of the Local Plan Partial Update has regard to Sustainable Construction for New Build Non-Residential Development. The policy requires sustainable design and construction to be integral to all new development in B&NES and that a sustainable construction checklist (SCC) is submitted with application evidencing that the prescribed standards have been met.

The LDO seeks to ensure compliance with SCR7 via a condition which requires each plot to comply with the submitted Sustainability Statement. The Sustainability Statement echoes the approach in SCR7 which requires SVEZ development is to achieve a 100% regulated operational carbon emissions reduction from Building Regulations Part L 2013 (or future equivalent legislation), following the hierarchy set out below.

Minimise energy use through the use of energy efficient fabric and services

- Residual energy use should be met through connection to a low- or zero-carbon heat network if available.
- Maximise Opportunities for renewable energy to mitigate all regulated operational emissions.
- Residual carbon emission that cannot be mitigated on site should be offset through a financial contribution to the council's carbon offset fund

The Sustainability Statement also sets a construction carbon target of 600 kgCO2e/m2 GIA and that all buildings should calculate whole life-cycle carbon emissions in accordance with current RICS Whole Life Carbon Assessment guidelines and demonstrate actions taken or planned that will reduce life-cycle carbon emissions. This complies with the requirements of SCR8 in relation to embodied carbon.

16. PLANNING OBLIGATIONS/COMMUNITY INFRASTRUCTURE LEVY:

The site would generate additional floor space within several different employment use classes. However, in accordance with the Community Infrastructure Charging Schedule the CIL charge for these uses in this part of the district is nil.

Section 106 planning obligations cannot be required under a Local Development Order. This does not however prevent section 106 agreements being offered by a developer. For example, if a condition attached to a Local Development Order requires mitigation of an impact from development, then a section 106 agreement could be used to secure this.

The main area where s106 agreements may be required in relation to the SVEZ LDO are for bonds or implementation fees for detailed travel plans (see highways section above).

17. PUBLIC SECTOR EQUALITY DUTY:

In reaching its decision on a planning application the Council is required to have regard to the duties contained in section 149 of the Equality Act 2010, known collectively as the public sector equality duty. The proposals do not raise any particularly significant issues in respect of the equalities duty.

18. PUBLIC BENEFITS

The LDO will have several significant public benefits which are considered below:

Economic benefits

The development of the SVEZ is crucial to the supply of employment space within the B&NES area. The addition of the proposed 1,300 jobs is important to B&NES as a whole and especially within the local area. The increase in local employment opportunities will reduce the strain on the road network as there is a significant amount of out commuting from the area at present.

The mix of use classes set out in the proposed LDO is beneficial, allowing flexibility to move with the needs of the local business community and the market. We welcome the dominance of high-value employment uses including office, research and development and industrial. Over 30,000sqm of the proposed 35,800sqm of floorspace is committed to these high-value employment uses, with a smaller ancillary amount allowing for a hotel, pub and food outlet should the market dictate. The Council's Economic Development team consider that there is a sufficient allocation to meet the 1,300 FTE employment for the site as a whole.

Since 2011 over net 44,241 sqm of industrial space has already been lost and a loss of a further 492 sqm of space has planning permission, plus an additional 15,648 sqm is expected to be lost through the Placemaking Plan allocations. The total loss of industrial floorspace is therefore 60,381 sqm. This is significantly in excess of the 40,000 sqm of managed reduction by 2029 set out in Policy B1.1.

These losses are recognised within the Industrial losses study undertaken by Lambert Smith Hampton and Hardisty Jones Associates (LSH/HJA) to inform the B&NES Local Plan review, where 'The rate of losses is far exceeding policy provision and the delivery of new replacement floor space is not taking place at the required rate. This poses significant economic development risks. Thus, it is not only the level of losses suffered within B&NES but also the rate of change which is affecting economic growth within the city.

Within the Alder King Marketing Monitor 2022 states for B&NES that "Demand for good quality space, particularly freehold, remains strong with a number of active requirements. Supply is extremely tight and restricted to second hand stock at The Maltings and Brassmill Estates. With no speculative development expected, occupiers are forced to look outside the city, towards east Bristol or around Chippenham." The current vacancy rate of industrial units is generally accepted to stand at approximately less than 1% of current stock."

B&NES' economic and productivity growth has fallen behind our local and regional comparators in the past 15 years. This has dovetailed with the loss of employment land over the same time period. While commercial agent research has indicated there is strong demand for employment space and a lack of supply (especially of modern units), this development is crucial to the future economic needs of Bath and North East Somerset, and in particular the Somer Valley.

The ancillary uses proposed within the LDO include a hotel, pub and food outlet. The Economic Development team believes these to be important in servicing the new enterprise zone and will have no material harmful impact on the town and local centres within the Somer Valley.

The Bath and North East Somerset Employment Growth and Employment Land Review by Hardisty Jones Associates and Lambert Smith Hampton March 2020 provides useful analysis of the chronic shortage of industrial space within the area and the detrimental impact it is having on the functioning of the economy.

Key points from this report demonstrate the negative impact the loss of industrial space has had within B&NES and Bath in particular. Future impacts in terms of employment growth, the proper functioning of the economy and the loss of future activity to other areas, further compounding these issues, if this trend continues. Key points of relevance are:

- B&NES as a whole, and the Bath City subarea in particular, has failed to capture the level of employment growth that would be anticipated based on existing levels of activity

- It is clearly evident that there is a need to retain and protect all existing employment areas wherever possible

- The most acute issues are within the industrial and warehouse market segment. This is primarily fuelled by a critical lack of supply in the Bath City area. Identifying potential opportunities to deliver new industrial floorspace in Bath should be explored. The need to retain and protect existing industrial sites becomes increasingly important.

- There is virtually no industrial and warehouse supply identified in Bath despite clear evidence of requirements. This is a critical issue and makes the protection of existing industrial sites essential… there is a risk that economic activity will be lost to other locations including Avonmouth/Severnside and Swindon/Chippenham/Wiltshire.

Environmental benefits

Bath and North East Somerset Council have declared a climate and ecological emergency. A large proportion of carbon emissions in the district are linked to transportation and out-commuting from the Somer Valley is part of this issue. The Local Plan Partial Update identifies one of the challenges facing the Somer Valley as the high levels of out-commuting due to the lack of local employment opportunities.

Whilst some have raised concerns that since the pandemic working patterns have changed, figures from the Economic Development team indicate that the percentage of people working from home in wards within Bath is close to 50%, but in Somer Valley wards this number drops to circa 20%. Given this figure, it is vital for more local employment opportunities to be created within the Somer Valley in order to reduce out-commuting and associated carbon emissions.

The jobs created by the LDO will provide more local employment opportunities which can help to reduce the levels of out-commuting and the associated carbon emissions. In this way, the proposed LDO is directly addressing the Council's declaration of a climate emergency.

As discussed in the ecology section above, the proposals will also make provision of 10% biodiversity net gain, helping to address the ecological emergency.

The proposed highways infrastructure mitigations and improvements will also provide greater connectivity and access for pedestrians and cyclists, opening up more active travel opportunities for people and reducing car dependency.

Other benefits

The LDO has a further benefit in helping to unlock and bring forward a long-standing allocation, providing a clear strategy for its development which may not otherwise occur without the intervention of the Council. The site has been allocated since at least the 2007 Local Plan and has not seen any development brought forward in that time. The LDO provides a clear basis for a co-ordinated approach to the development of the allocated site, which is currently in multiple land ownership and sets out clearly the mitigation and infrastructure required to support it. It will provide greater certainty to potential investors and developers alike.

19. PLANNING BALANCE:

When considering whether the draft Order accords with the development plan it is necessary to make this judgement with regard to the development plan as a whole.

Whilst the proposals will have some adverse impacts upon landscape character and views which have not been fully mitigated, the proposals are considered to comply with the relevant parts of the allocation policy SSV9 in relation to the provision of major landscaping. The proposals are otherwise considered to comply with all the Placemaking Principles of B3a and also complies with the other core policies of the development plan.

In addition to compliance with the development plan, the proposals have been found to have the following key benefits:

1. Creation of employment floorspace sufficient to accommodate circa 1,300 FTE jobs and addressing the lack of supply of industrial floorspace in the district.

2. Addressing the imbalance between housing and jobs in the Somer Valley resulting in a reduction in out-commuting.

3. The provision of 10% biodiversity net gain.

4. Provision of new pedestrian and cycle routes as part of the highway's mitigation.

5. Enabling the delivery of a long-standing allocated site and providing greater certainty to investors.

Against these benefits, there are several harms and material considerations arising from the proposed development that weigh against the LDO. The key harms include:

1. Major to moderate adverse visual impacts to the landscape over the short term and moderate adverse visual impacts over the long term which are only partially mitigated.

2. Harm to the setting of several non-designated heritage assets include The Batch, the Old Mills Colliery, Springfield Buildings (south side of the A362), Cottages by the A362 at Old Mills, Cottages at Old Mills west of the site.

3. Harm to the rooting environment of mature trees T3, T12, T13, T14 and T20

It is considered that the above harms have been appropriately minimise whilst still enabling the delivery of the allocation. It is considered that these matters, both individually and cumulative, do not amount to material considerations which outweigh the compliance of the proposals with the development plan as a whole.

20. CONCLUSION:

It is therefore considered that the draft Local Development Order complies with the development plan as outlined above and is recommended for adoption.

Recommendation:

That the draft Local Development Order should be ADOPTED.

Bath & North East Somerset Council

Improving People's Lives

ARCADIS

Somer Valley Enterprise Zone (SVEZ):

Local Development Order 2023 & Statement of Reasons

OCTOBER 2023

Jones Lang LaSalle Incorporated

Local Development Order & Statement of Reasons

Somer Valley Enterprise Zone



Introduction to the SVEZ LDO

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1 Introduction

1.1 The Somer Valley Enterprise Zone Local Development Order 2023 (SVEZ LDO) grants planning permission for the development of the land for commercial, industrial, food, beverage and hotel uses and by doing so removes the need for individual planning applications to be submitted by future developers or occupiers.

1.2 This document sets out the background and context for the SVEZ LDO, it being an integral part of the Council's economic growth ambitions for the Somer Valley. In addition, this document sets out compliance with the legislative framework regarding the preparation of the LDO and provides an overview of the supporting evidence which informs the LDO.

1.3 SVEZ was granted 'Enterprise Zone' (EZ) status by the Government in April 2017, as part of the wider Bath and Somer Valley Enterprise Zone. The EZ status demonstrates support for economic development in the form of new job creation, business space provision and more generally a contribution towards economic growth of the local economy.

1.4 The vast majority of the site has also been allocated for employment development in the Local Plan since 2007.

1.5 The use of LDOs is supported by Government as a means of simplifying and streamlining the planning process for certain sites and types of development, as specified by the Local Planning Authority (LPA). LDOs are a useful tool which can help to attract inward investment and stimulate regeneration and are therefore particularly relevant to Enterprise Zones, such as SVEZ.

1.6 The decision to proceed with the SVEZ LDO was taken by B&NES following a review of various options to promote and facilitate the development of SVEZ as a strategic employment location. An LDO has been progressed for the site because it provides the highest level of planning certainty, which is expected to increase demand from the developer and occupier market. The LDO is therefore the preferred planning delivery mechanism to provide a proactive market-led response to economic renewal, creating a destination for inward investment in the Somer Valley and wider area.

1.7 SVEZ is a proposed new area for commercial development, to create a local hub for new business and employment and help prevent out-commuting. The EZ, once complete, could create approximately 1,300 new jobs for local people.

1.8 The vision for the site is to provide an LDO that strongly grasps sustainability, high quality design, viability, deliverability and complements, rather than threatens, neighbouring town centres.

1.9 In developing the SVEZ LDO the project team and B&NES have worked together to design and deliver an LDO which achieves the stated objectives for the EZ, and which delivers a much needed positive boost for the local economy.

1.10 This document is separated into two parts:

- **Part 1** sets out what the SVEZ LDO permits, the associated conditions and the process for submitting 'Compliance Applications' which must be followed before construction work on individual plots can commence.
- **Part 2** sets out the Statement of Reasons including the background context to the SVEZ LDO and related policy considerations, as well as addressing other legislative matters.

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2 PART 1: SVEZ LDO

The Site

2.1 The principal site extends to approximately 13.5 ha (excluding related land required for highways works) of land located at Old Mills and is made up of nine agricultural fields spread across five landholdings that are defined by hedgerows. Midsomer Norton town centre is located 1.25 miles from the site, which sits on the north-western edge of the settlement.

2.2 To the east of the site is a mixed-use employment/retail development that is enclosed by mature trees. Currently, the site comprises an office building and retail warehouse.

2.3 The A362 lies adjacent to the site which links to the A37, Bristol and the M4/M5 to the north. There is currently no access road to the site from the A362.

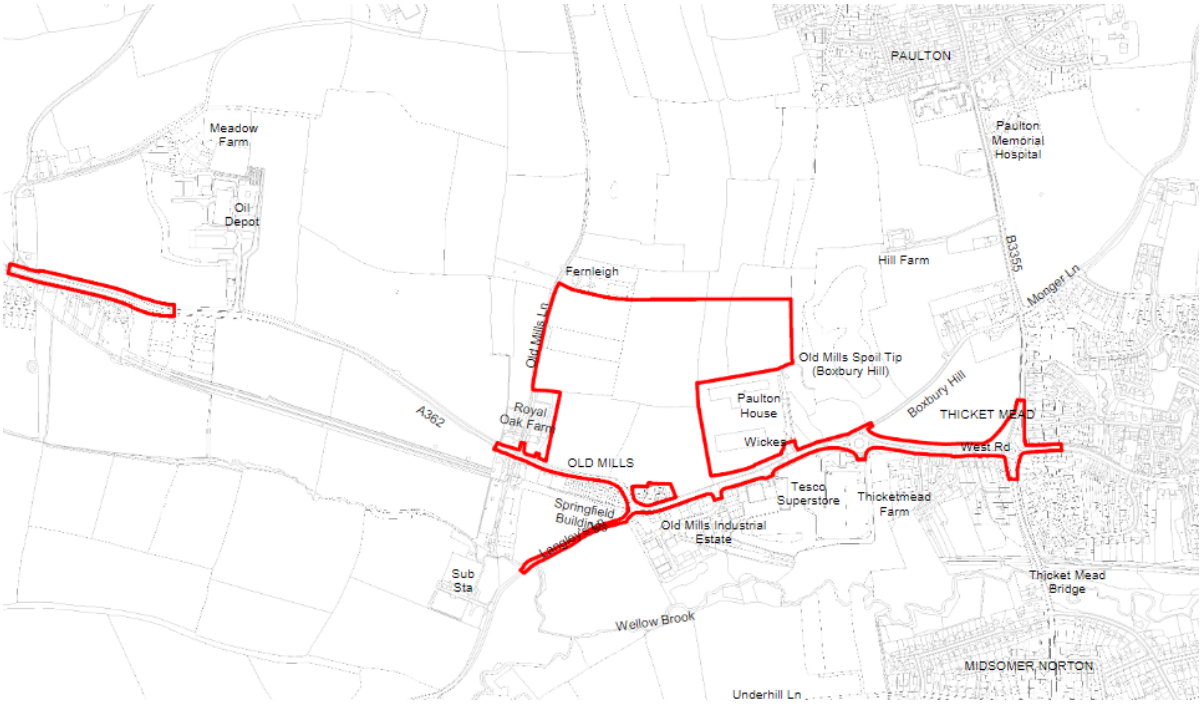
2.4 The village of Paulton lies to the north, the intervening land intersected by agricultural fields that slope upwards away from the site, towards the village.

2.5 To the west of the site is Royal Oak Farm and Old Mills Lane. To the south is the A362, as well as some terraced cottages that have historic links to the former railway located to the southwest.

2.6 The Somerset Coalfield covers Midsomer Norton and Paulton and the site was used for coal mining until 1966. The landscape surrounding the site is indicative of its coal working past, including a visible conical Batch which is located 20m from the east of the site boundary. The Batch is a recolonised spoil heap surrounded by woodland, grassland and scrub habitat.

LDO Boundary

2.7 The LDO covers the land at Old Mills and related land required to deliver the associated highways works, as defined on the boundary plan below, and replicated at Appendix A.



Description of Development

2.8 The description of development is as follows:

The development of an employment-led Enterprise Zone, including:

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- *Commercial buildings within Use Classes E (b, g), B2 and B8 (including ancillary trade counter); and*
- *A range of food, beverage and hotel buildings within Use Classes C1 and Sui Generis, including a public house and hot food takeaways.*
- *Highways related works including a new roundabout and related works to A362, road widening and safety improvements to the A362, new cycle, pedestrian and bus connections.*

Any operations or engineering works necessary to enable the development of the Site, including excavation and earthworks and any other operations or engineering necessary for site mobilisation, office and worker accommodation, communications, drainage, utilities and associated environmental, construction and traffic management, together with associated operational infrastructure including utilities, management infrastructure, associated buildings and infrastructure, car parking, fencing, green infrastructure, access roads and landscaping.

Minor operational development in addition to the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015, or its successor, including changes to external appearance of existing buildings, including recladding, alterations to doors and windows; Changes to access to buildings; Installation of plant or small-scale micro renewable energy development; Reorganisation of vehicle parking; Provision of cycle parking; and Provision of covered bin and cycle stores.

LDO Parameters

2.9 The proposed development is defined by a series of Parameters which are included within the Design Code. The Parameter plans and Design Code set the framework within which future development must fit and cover the following matters.

- Structural landscape
- SuDS drainage strategy
- Ecology buffer zones
- External signage and wayfinding
- Sustainability
- External Lighting
- Cycling and pedestrian strategy
- External colour palette
- Maximum floorspace per plot
- Land use classifications
- Maximum building heights
- Maximum parking spaces
- Deliveries and collections
- Architectural features & materiality
- The access and Spine Road

The Design Code & Illustrative masterplan

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2.10 The Design Code and related Design & Access Statement produced in support of this LDO provide detailed advice and guidance to architects, designers and occupiers/developers who intend to bring forward development of individual plots within the LDO.

2.11 The parameter plans and Design Code also set a series of fixed elements outwith the development plots, including for example the location of the spine road, the delivery of structural landscaping and signage, which when combined set out how SVEZ will look and feel.

2.12 The design documents seek to ensure a high standard of design and continuity are achieved across the site, in line with wider masterplan objectives. They set out design parameters and codes in order to ensure that mandatory requirements for each site are adhered to. This includes factors such as building use, floorspace, maximum heights, structural landscaping, parking and access points.

2.13 The Illustrative masterplan demonstrates one way in which the parameter plans and the Design Code may be applied to develop SVEZ, but is not an approved site layout for the purposes of the LDO. While the parameter plans relating to matters such as the spine road and structural landscaping do define the overall site layout, there remains flexibility as to how each plot may be designed by individual occupiers / developers, such that the overall layout of SVEZ may vary from that shown on the Illustrative scheme

Development Permitted by the LDO

2.14 The SVEZ LDO specifically grants planning permission for the scope of development as set at paragraph 2.8 above, including the erection, extension or alteration of a building within the use classes set out below (Table 1) and subject to the conditions and limitations below.

2.15 Table 1 sets out the permitted uses as described by The Town and Country Planning (Use Classes) (Amendment)(England) Regulations 2020 (or any order revoking and/or re-enacting that order with or without modification) by plot, along with the maximum building GIA that can be delivered on each plot.

Table 1: LDO Permitted Uses

PLOT	PERMITTED USES	PLOT AREA	MAXIMUM BUILDING GIA
P1	Pub (Sui Generis) or Office / Research and development / Industrial processes (E g) or Industrial / Warehousing (B2/B8)	2,880m²	650m²
P2	Hotel (C1) or Office / Research and development / Industrial processes (E g) or Industrial / Warehousing (B2/B8)	3,401m²	2,790m²
P3	Office / Research and development / Industrial processes (E g) or Industrial / Warehousing (B2/ B8) - Includes trade counter as part of B8	4,441m²	1,682m²
P4	Food & Beverage (E b - on premises consumption or Sui Generis - off premises consumption) or Office / Research and development / Industrial processes (E g) or Industrial / Warehousing (B2/B8)	1,327m²	350m²
P5	Office / Research and development (E g)(i)(ii)	10,097m²	7,198m²
P6	Office / Research and development / Industrial processes (E g)	2,250m²	1,287m²
P7	Industrial (B2) or Industrial processes (E g)(iii)	4,214m²	2,880m²

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P8	Office / Research and development / Industrial processes (E g)	4,253m²	2,016m²
P9	Industrial (B2) or Industrial processes (E g)(iii)	5,001m²	3,370m²
P10	Storage and Distribution (B8)	9,827m²	5,639m²
P11	Industrial (B2) or Industrial processes (E g)(iii)	11,232m²	7,250m²
P12	Depot (Sui Generis) or Industrial (B2)	15,369m²	720m²

2.16 The development permitted by the LDO also includes any operations or engineering works necessary to enable the development of the site, including:

- Excavation and earthworks;
- The formation of compounds for the stockpiling, sorting and treatment of excavated materials;
- Import of material where necessary;
- Piling and any other operations or engineering necessary for site mobilization;
- Welfare facilities including site offices;
- Communications, drainage, utilities and associated environmental, construction and traffic management.

2.17 In addition, the development permitted by the LDO also includes associated infrastructure including:

- New road infrastructure, including
- Utilities and associated buildings and infrastructure, including diversion and/or undergrounding cables
- Surface water and foul drainage infrastructure
- Digital and electrical infrastructure
- Car parking
- Associated green infrastructure, access roads and landscaping

Minor Operations

2.18 In addition to the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015, or its successor, the SVEZ LDO permits minor operational developments where it falls within the definition of development under planning legislation and takes effect on completion of the permitted development under the terms outlined in Section 2.8 and Table 1 above.

2.19 Minor operational development permitted by the LDO is:

- Changes to external appearance of existing buildings, including recladding, alterations to doors and windows so long as they remain consistent with the approach set out in the approved Design Code
- Changes to access to building
- Installation of plant or small-scale micro renewable energy development and EV charging facilities
- Reorganisation of vehicle parking

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- Provision of cycle parking
- Provision of covered bin and cycle stores

2.20 There is no requirement to notify, or seek the approval of, the Local Planning Authority before such minor operations are undertaken.

Extensions

2.21 The LDO permits the extension of buildings which have been constructed under the LDO, subject to the submission of a new Compliance Application. As such, extensions are permissible but must accord with the parameters and Design Code and cannot exceed the maximum building GIA for each plot, as set out in Table 1.

Lifespan of the LDO

2.22 LDOs can grant permission for development indefinitely or for a time limited period. In this case the LDO and the terms within it will be active for a period of **20 years** following the day of its adoption.

2.23 A 20-year period has been applied to allow sufficient time to secure the completion of the works approved under the LDO, and to allow subsequent changes to buildings or uses which may be beneficial to the future occupiers.

2.24 At the sole discretion of the LPA a monitoring and evaluation process will be undertaken at years 5, 10 and 15 following adoption. The monitoring and evaluation process may result in decisions to review, modify or revoke the LDO. The review will be completed within 30 days of the relevant anniversary and at the end of the review the LPA will determine whether to:

- Retain the LDO as it stands for the remaining years of its life;
- Retain but revise some elements; or
- Revoke and cancel the LDO

2.25 Notwithstanding the conclusion of the monitoring and evaluation process, development which has commenced under the provisions of the LDO can be completed in the event that the LDO is revoked or revised or expires. This is subject to the LPA's confirmation of compliance issued under the Compliance Application process.

2.26 The development and implementation of the LDO will take place on a phased basis. Where a material operation has been commenced in respect of any development permitted by the LDO at the time it expires, is revoked, or is revised such development may continue to be lawfully completed.

Other Consents

2.27 This LDO removes the requirement to obtain express planning permission (subject to compliance with the procedures outlined herein where applicable) but does not remove the need to obtain other statutory consents such as Building Regulations approval, consents under Highways legislation, environmental licensing and permitting and Health & Safety Executive consents etc.

2.28 It will remain the responsibility of the developer to ensure that all other statutory requirements are followed.

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3 Conditions

Introduction

3.1 The conditions imposed on the SVEZ LDO are necessary to ensure that development is acceptable in planning and procedural terms. Furthermore, the Design Code assists developers / occupiers in shaping development proposals for the LPA to consider during the compliance process.

Conditions

Number	Condition	Reason
1 Term of the LDO	The LDO and the terms within it will be active for a period of 20 years following the day of its adoption and will expire following this period. Development which has lawfully commenced under the provisions of the LDO can be completed in the event that the LDO is revoked or revised or expires.	LDOs can grant permission for development indefinitely or for a time limited period. In this case the LDO and the terms within it will be active for a period of 20 years following the day of its adoption.
2 Submission of compliance application	No development, except for minor operations (as defined in s 2.18 / s2.19 of the LDO) and highways / structural landscaping works, shall commence in relation to any plot until a Compliance Application for the proposed development of that plot has been submitted to and approved by the Local Planning Authority and a Certificate of Compliance has been issued.	To ensure high quality sustainable development, in line with the aspirations for the LDO.
3 Compliance	Development subject to a Compliance Application shall be carried out in accordance with the information provided in the Compliance Application and as specified in the Certificate of Compliance, and any additional conditions imposed by the LPA in the Certificate of Compliance.	To ensure compliance with the LDO.
4 Commencement Notice	Not less than 14 days prior to the commencement of any development approved under this LDO a Commencement Notice shall be submitted to the LPA. For the avoidance of doubt, a Commencement Notice shall be served prior to the commencement of each phase of development or individual plot.	To enable the monitoring of development and the effective implementation of the Order.
5 Supporting documents	The development hereby approved shall be carried out in accordance with the following documents with the exception of any material amendment submitted to and approved in writing by the Local Planning Authority:	For the avoidance of doubt and in the interest of proper planning.

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	• Site Location ref. SVEZ-AHR-MP-ZZ-DR-A-91-000 P08 • Proposed Plot Boundaries ref. SVEZ-AHR-MP-ZZ-DR-A-92-010 P09 • Proposed Masterplan-Fixed Element ref. SVEZ-AHR-MP-ZZ-DR-A-92-011 P13 • Heights Plan ref. SVEZ-AHR-MP-ZZ-DR-A-92-012 P14 • Proposed Land Use ref. SVEZ-AHR-MP-ZZ-DR-A-92-013 P14 • Strategic Landscape Plan ref. SVEZ-AHR-MP-ZZ-DR-A-92-014 P08 • Illustrative Masterplan ref. SVEZ-AHR-MP-ZZ-DR-A-92-015 P33 • Road Layout ref. SVEZ-AHR-MP-ZZ-DR-A-92-016 P05 • Drainage Strategy ref: SVEZ-AHR-MP-ZZ-DR-A-92-017 P03 • Proposed Phasing Plan ref. SVEZ-AHR-MP-ZZ-DR-A-92-018 P07 • South West Fence Plot Layout – ref. SVEZ-AHR-MP-ZZ-DR-A-92-019 P04 • LDO Design Code ref. SVEZ-AHR-MP-ZZ-PR-A-A3-002 P12 • Framework Travel Plan ref. 10042920-ARC-XX-XX-RP-TP-0002-P2 SVEZ FTP	
6 Limit on Class E uses	Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 (as amended) the Class E uses permitted by this order shall be restricted to Class E (b) or E(g) only, and no other use within Class E.	
7 Structural landscaping – phasing	The structural landscaping shall be carried out in accordance with the approved phasing plan (ref: SVEZ-AHR-MP-ZZ-DR-A-92-018 P07) or an updated phasing plan to be submitted to and agreed in writing by the LPA.	To ensure the provision of amenity and a satisfactory quality of environment afforded by appropriate landscape design
8 Structural landscaping – approved details	No works relating to the structural landscaping shall commence until full details of both hard and soft landscape proposals, programme of implementation and a landscape management plan (to include long term design objectives, management responsibilities and maintenance schedules for all landscape areas) have been submitted to and approved by the Local Planning Authority. These details shall include, as appropriate: 1. Proposed finished levels or contours 2. Means of enclosure	To ensure that the external appearance of the structural landscaping is satisfactory, in accordance with quality expectations set out within Design Code.

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	3. Other vehicle and pedestrian access and circulation areas 4. Hard surfacing materials 5. Minor artefacts and structures (eg outdoor furniture, play equipment, refuse or other storage units, signs, lighting) 6. Proposed and existing functional services above and below ground (eg drainage, power, communication cables, pipelines, etc, indicating lines, manholes, supports etc) 7. Retained historic landscape features and proposals for restoration, where relevant 8. Car parking layouts Soft landscape details shall include: 1. Planting plans 2. Written specifications (including cultivation and other operations associated with plant and grass establishment) 3. Schedules of plants, noting species, planting sizes and proposed numbers / densities The development shall be carried out and maintained in accordance with the approved details.	
9 Landscaping details – on plot	Each Compliance Application shall be accompanied by full details of both hard and soft landscaping proposals, a programme of implementation and a landscape management plan (to include long term design objectives, management responsibilities and maintenance schedules for all landscape areas). These details shall include, as appropriate: 1. Proposed finished levels or contours 2. Means of enclosure 3. Other vehicle and pedestrian access and circulation areas 4. Hard surfacing materials 5. Minor artefacts and structures (eg outdoor furniture, play equipment, refuse or other storage units, signs, lighting) 6. Proposed and existing functional services above and below ground (eg drainage, power,	To ensure that the external appearance of the plots is satisfactory, in accordance with quality expectations set out within Design Code.

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	communication cables, pipelines, etc, indicating lines, manholes, supports etc) 7. Retained historic landscape features and proposals for restoration, where relevant 8. Car parking layouts Soft landscape details shall include: 1. Planting plans 2. Written specifications (including cultivation and other operations associated with plant and grass establishment) 3. Schedules of plants, noting species, planting sizes and proposed numbers / densities The development shall be carried out and maintained in accordance with the approved details.	
10 Landscaping implementation - Structural landscaping	All planting, seeding or turfing comprised in the approved details of the structural landscaping shall be carried out in the first planting and seeding seasons following the commencement of the relevant phase of the development as outlined on the approved phasing plan (ref: SVEZ-AHR-MP-ZZ-DR-A-92-018 P07) or an updated phasing plan to be submitted to and agreed in writing by the LPA; and any trees or plants which within a period of 20 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species. All hard and soft landscape works shall be retained in accordance with the approved details for the lifetime of the development.	To ensure that the external appearance of the structural landscaping is satisfactory, in accordance with quality expectations set out within Design Code.
11 Landscaping implementation – on plot	All planting, seeding or turfing comprised in the approved details of landscaping for each plot shall be carried out in the first planting and seeding seasons following the occupation of the buildings or the completion of the development on that plot, whichever is the sooner; and any trees or plants which within a period of 20 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species.	To ensure that the external appearance of the structural landscaping is satisfactory, in accordance with quality expectations set out within Design Code.

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	All hard and soft landscape works shall be retained in accordance with the approved details for the lifetime of the development.	
12 Highways – approved plans	No development on any plot shall commence until the highways infrastructure has been completed in accordance with the following GA plans: • Ref. 10042920-ARC-HGN-ZZ-DR-HR-00002 Rev P02 • Ref. 10042920-ARC-HGN-ZZ-DR-HR-00003 Rev P02 • Ref. 10042920-ARC-HGN-ZZ-DR-HR-00004 Rev P03 • Ref. 10042920-ARC-HGN-ZZ-DR-HR-00005 Rev P03 • Ref. 10042920-ARC-HGN-ZZ-DR-HR-00006 Rev P02.1 • Ref. 10042920-ARC-HGN-ZZ-DR-HR-00007 Rev P02	For the avoidance of doubt and in the interest of proper planning.
13 Drainage	No development shall commence for any phase or plot until a detailed surface water drainage design relevant to that phase or plot has been submitted and approved in writing by the Local Planning Authority. The detailed drainage design shall include pipe sizing and flow controls confirming flow from the site with exceedance routes for surface water, to be prepared in accordance with the sitewide drainage strategy (ref: 10042920-SVEZ-ARC-XX-XX-RP-CE-0001) and calculations demonstrating capacity and performance of Sustainable Drainage features up to and including 1:100 plus cc storm event. The development shall be carried out in full accordance with the approved details.	To ensure that an appropriate method of surface water drainage is installed and in the interests of flood risk management
14 BNG	No development shall commence until a Strategic Biodiversity Net Gain Delivery & Management Plan is submitted to and approved in writing by the Local Planning Authority. The Strategic Biodiversity Net Gain Delivery & Management Plan shall be prepared in accordance with the Habitat Management Plan (10042920-AUK-XX-XX-RP-EC-0019-06) and the Biodiversity Net Gain Report: Final Report (10042920-AUK-XX-XX-RP-EC-20-07) which are included as part of the LDO and shall outline the overall net gain strategy for the LDO site demonstrating how a 10% BNG gain will be delivered using the following sequential approach: • Delivery on-site.	To ensure that the LDO secures at least 10% BNG in accordance with The Environment Act 2021 and Policy NE3a of the LPPU.

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	• The purchasing of additional land to provide space to create new habitat. • Working with 3rd parties such as local authorities, trusts, etc. to deliver biodiversity units on their land. • Purchasing biodiversity units from 3rd party organisations. Each Compliance Application shall be accompanied by a plot specific Biodiversity Net Gain Plan, prepared in accordance with the Strategic Biodiversity Net Gain Delivery & Management Plan Strategy. The development shall be carried out in full accordance with the approved details.	
15 Habitat Management Plan	The development shall be carried out in accordance with the Habitat Management Plan (as applicable to the structural landscaping areas on the main site and habitats within the Highways sites only) which sets out the design strategy and prescriptions for newly created habitats as well as ongoing management and care of retained habitat for the long-term benefit of local biodiversity.	In the interests of safeguarding amenity and ecological interests
16 Noise	Each Compliance Application shall be accompanied by a noise assessment of the heating, ventilation and air conditioning plant (HVAC), undertaken in accordance with BS4142: 2014 Method for Rating and Assessing Industrial and Commercial Sound. The assessment shall demonstrate that noise emissions, with the inclusion of any necessary mitigation measures, shall be at least 5dB below measured background levels at the closest sensitive receptor as outlined in the supporting Noise Assessment (January 2023 Rev P01).	To prevent noise from the premises adversely affecting the residential amenities of occupiers of nearby properties
17 Archaeology - site wide	Prior to submission of the first compliance application and/or the commencement of any works approved under this LDO (to include highways, drainage infrastructure and landscaping) a full archaeological evaluation (consisting of a geophysical survey and trial trench evaluation) shall be undertaken within the LDO red line boundary. The evaluation shall be submitted to and approved in writing by the local planning authority prior to the commencement of any works approved by the LDO.	In the interests of ensuring that the any archaeological remains are identified and managed
18	No development shall commence until a sitewide Framework Mitigation Strategy, to be prepared in consultation with the Council archaeologist has	In the interests of ensuring that the any archaeological

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Archaeology - site wide	been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved framework Mitigation Strategy thereafter.	remains are identified and managed
19 Archaeology - land outside the specific plots	If archaeological remains are identified through the archaeological evaluation process (see condition 17) then prior to the commencement of any works approved under this LDO, an area specific mitigation strategy, to be prepared in accordance with the Framework Mitigation Strategy, shall be submitted to and approved in writing by the Local Planning Authority. The works shall be carried out in accordance with the approved area specific mitigation strategy.	In the interests of ensuring that the any archaeological remains are identified and managed
20 Archaeology – on plot	If archaeological remains are identified through the archaeological evaluation process (see condition 17), each relevant Compliance Application shall then be accompanied by a plot specific mitigation strategy, to be prepared in accordance with the Framework Mitigation Strategy. The works shall be carried out in accordance with the approved area specific mitigation strategy.	In the interests of ensuring that the any archaeological remains are identified and managed
21 Construction Management Plan – highways works	Development of the spine road, highways and access works (as approved within condition 12) shall not commence until a Construction Management Plan for those highways and access works has been submitted to and approved in writing by the Local Planning Authority. This shall include details of the following: 1. Deliveries (including storage arrangements and timings); 2. Contractor parking; 3. Traffic management; 4. Working hours; 5. Site opening times; 6. Wheel wash facilities; 7. Site compound arrangements; 8. Measures for the control of dust; 9. Temporary arrangements for householder refuse and recycling collection during construction. Thereafter the relevant works shall be undertaken in accordance with the approved details.	To ensure the safe operation of the highway and in the interests of protecting residential amenity
22	Each Compliance Application shall be accompanied by plot specific Construction	In the interests of the amenities of surrounding

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Construction Management Plan – on-plot	Management Plan for that plot shall be submitted to and approved in writing by the Local Planning Authority. This shall include details of the following: 1. Deliveries (including storage arrangements and timings); 2. Contractor parking; 3. Traffic management; 4. Working hours; 5. Site opening times; 6. Wheel wash facilities; 7. Site compound arrangements; 8. Measures for the control of dust; 9. Temporary arrangements for householder refuse and recycling collection during construction. The construction of the development shall thereafter be undertaken in accordance with the approved details.	occupiers during the construction of the development.
23 Tree protection	No development activity shall commence until the protective measures as stated in the approved AIA (ref. 10042920-AUK-XX-XX-RP-EC-0027-03) are implemented pursuant to the relevant works. Each Compliance Application shall be accompanied by an Arboricultural method statement in accordance with section 5.5 of the approved AIA (ref. 10042920-AUK-XX-XX-RP-EC-0027-03) and BS 5837:2012. The local planning authority is to be advised two weeks prior to development commencing of the fact that the tree protection measures as required are in place with photographic evidence. The tree protection measures shall remain in place for the duration of the development.	To ensure that the trees are protected from potentially damaging activities
24 Off plot lighting (NB: On-plot covered via compliance app)	No lighting shall be installed as part of the development until a lighting strategy, to be prepared in accordance with the sitewide lighting strategy, has been submitted to and approved in writing by the Local Planning Authority. The strategy shall include the following: 1. The approach and design of the external and internal lighting; 2. Detailed light spill calculations (including lux contour plans);	To avoid harm to bats and wildlife

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	3. Details of light control systems and regimes; 4. A schedule and programme for maintenance of the lighting. The lighting shall be installed, maintained and operated thereafter in accordance with the approved details.	
25 On plot Lighting	Each Compliance Application shall be accompanied by a lighting strategy, to be prepared in accordance with the sitewide lighting strategy. The strategy shall include the following: 1. The approach and design of the external and internal lighting; 2. Detailed light spill calculations (including lux contour plans); 3. Details of light control systems and regimes; 4. A schedule and programme for maintenance of the lighting. The lighting shall be installed, maintained and operated thereafter in accordance with the approved details.	To avoid harm to bats and wildlife
26 Sustainability	Each Compliance Application shall be accompanied by plot specific Sustainability Statement, prepared in accordance with the sitewide Sustainability Strategy (dated January 2023) which demonstrates how the development will achieve a 100% regulated operational carbon emissions reduction from Building Regulations Part L 2021 (or future equivalent legislation), following the hierarchy set out in Policy SCR7 & the B&NES Sustainable Construction Checklist SPD (2023). Thereafter the relevant works shall be undertaken in accordance with the approved details.	To ensure the development incorporates measures to minimise the effects of, and can adapt to, a changing climate.
27 Deliveries and Collection Strategy	Each Compliance Application shall be accompanied by plot specific Deliveries and Collection Strategy. The delivery and collection strategy shall include: - Contact details of a suitably qualified co-ordinator; - Timing of deliveries and collections; - Detail of delivery and collection booking and management systems.	To protect the amenity of nearby residents

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	- How vehicle arrivals and departures, parking, stopping and waiting will be controlled to minimise any impact. Thereafter the relevant works shall be undertaken in accordance with the approved details.	
28 External Signage and Way-finding Strategy	Prior to the occupation of the first building delivered under the LDO an External Signage and Way-finding strategy shall be submitted to and approved in writing by the Local Planning Authority. The submitted strategy shall be consistent with the details set out at section 2.14 of the design code. Thereafter the relevant works shall be undertaken in accordance with the approved details.	To ensure the provision of amenity and a satisfactory quality of environment
29 Construction Noise	Each Compliance Application will be accompanied by an appropriate construction noise and vibration management plan. The plan should set out best practice construction methodologies and approaches which aim to reduce noise and vibration emissions as far as is practicable and take due account of BSBS 5228-1:2019+A1:2014 as appropriate. Thereafter the relevant works shall be undertaken in accordance with the approved details.	To ensure the provision of amenity and a satisfactory quality of environment
30 Noise – Plot 12	The Compliance Application for Plot 12 will be accompanied by a noise assessment based upon the methodology contained in BS4142:2014 Methods for Rating and Assessing Industrial and Commercial Sound taking account of the characteristics of the noise emissions. The assessment would require consideration of noise generation from Plot 12 during both the daytime and night-time periods to cover the working hours of the facility, and demonstrate that noise emission from: • heating and ventilation systems are 5dB below background levels at the nearest noise sensitive receptor present at the time of granting of permission. • on site operational vehicle movements within the plot boundary of plot 12 are no higher than the background levels (LA90 +0dB) at the nearest noise sensitive receptor present at the time of granting of permission. The assessment shall include details of any mitigation measures that will be necessary and provided to achieve the appropriate limit at the nearest noise sensitive receptors.	For the protection of residential amenity

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31 Hours of operation (Use)	Each Compliance Application shall specify the hours of operation of the permitted use for the proposed development. The development shall be carried out in accordance with the approved details.	To protect the amenity of nearby residents
32 Contamination Investigation and Risk Assessment	No development shall commence until an investigation and risk assessment of the nature and extent of contamination on site and its findings has been submitted to and approved in writing by the Local Planning Authority. This assessment must be undertaken by a competent person, and shall assess any contamination on the site, whether or not it originates on the site. The assessment must be conducted in accordance with the Environment Agency's 'Land contamination risk management' (LCRM) and shall include: - A survey of the extent, scale and nature of contamination. - An assessment of the potential risks to: human health; property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes; adjoining land; groundwaters and surface waters; ecological systems, archaeological sites and ancient monuments. - An appraisal of remedial options, and proposal of the preferred option(s).	In order to ensure that the land is suitable for the intended uses and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors and in accordance with the National Planning Policy Framework. This is a condition precedent because the works comprising the development have the potential to uncover harmful contamination. Therefore these details need to be agreed before work commences.
33 Remediation Scheme	No development shall commence for any phase or plot until a detailed remediation scheme relevant to that phase or plot has been submitted and to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment, has been submitted to and approved in writing by the Local Planning Authority, unless the findings of the approved investigation and risk assessment has confirmed that a remediation scheme is not required. The scheme shall include: (i) All works to be undertaken; (ii) Proposed remediation objectives and remediation criteria; (iii) Timetable of works and site management procedures; and, (iv) Where required, a monitoring and maintenance scheme to monitor the long-term effectiveness of the proposed remediation and a timetable for the submission of reports that demonstrate the	In order to ensure that the land is suitable for the intended uses and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors and in accordance with the National Planning Policy Framework. This is a condition precedent because the works comprising the development have the potential to uncover harmful contamination. Therefore these details need to be agreed before work commences.

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	effectiveness of the monitoring and maintenance carried out. The remediation scheme shall ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. The approved remediation scheme shall be carried out prior to the commencement of development, other than that required to carry out remediation, or in accordance with the approved timetable of works.	
34 Verification Report	No occupation of the relevant plot shall commence until a verification report relevant to the plot (that demonstrates the effectiveness of the remediation carried out) has been submitted to and approved in writing by the Local Planning Authority, unless the findings of the approved investigation and risk assessment has confirmed that a remediation scheme is not required.	In order to ensure that the land is suitable for the intended uses and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors and in accordance with section 11 and 15 of the National Planning Policy Framework.
35 Unexpected Contamination	In the event that contamination which was not previously identified is found at any time when carrying out the approved development, it must be reported in writing immediately to the Local Planning Authority. Thereafter an investigation and risk assessment shall be undertaken, and where remediation is necessary, a remediation scheme shall be submitted to and approved in writing by the Local Planning Authority. Following completion of measures identified in the approved remediation scheme, a verification report (that demonstrates the effectiveness of the remediation carried out) must be submitted to and approved in writing by the Local Planning Authority prior to occupation of the development.	In order to ensure that the land is suitable for the intended uses and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors and in accordance with the National Planning Policy Framework.

Table 2: LDO Conditions

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Compliance Applications – guidance for occupiers

Introduction

4.1 This section sets out guidance to assist future developers / occupiers in preparing Compliance Applications, which in turn enables the commencement of development of individual plots under the LDO. It identifies the process that needs to be followed to ensure proposals are suitable and appropriate for SVEZ and can therefore be supported by the LPA.

4.2 It is important to note that the SVEZ LDO alone does not allow development of individual plots to commence. The LDO sets out matters which remain to be approved before development can proceed, through a process called of submitting a Compliance Application. Once a Compliance Application has been approved and related conditions have been discharged, construction work may begin (subject to other statutory approvals such as building regulations).

Compliance Application supporting information

4.3 The following supporting information shall be submitted with each Compliance Application:

- Compliance Application form
- The requisite fee
- On-plot landscaping details (Condition 9)
- BNG Plan (Condition 14)
- Noise Assessment for Plant (Condition 16)
- Archaeological Evaluation Strategy (Condition 20)
- Arboricultural Method Statement (Condition 23)
- Lighting Strategy (Condition 25)
- Delivery and Collection Strategy (Condition 27)
- Construction Noise Mitigation Plan (Condition 29)
- Operational Noise Assessment (Plot 12 Only) (Condition 30)
- Hour of Operation (Permitted Use) (Condition 31)
- Contamination Remediation Scheme and Verification Report (as required) (Condition 33 and 34)
- Details required by the Design Code (see plot summaries and compliance checklists within Design Code)
- Compliance Application Drawings
    - Site Location Plan
    - Plans and Elevations for the LPA to be able to assess the impact of the proposals and determine compliance with the Design Code

Compliance Application fees

4.4 Each Compliance application will be charged at an equivalent of 50% of the Outline fee level, as defined in the Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012, as amended.

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4.5 At the time of writing this equates to the following charges for Compliance Applications under the SVEZ LDO:

- Gross site area of less than 2.5ha – £231 for each 0.1ha
- Gross site area of more than 2.5 hectares – £5,716 + £69 for each additional 0.1 hectare
- Maximum fee £75,000

4.6 The fee for discharge of conditions under the LDO shall match the relevant fee as set out in 'The Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012' (as amended). At the time of writing that fee is £116 per submission.

LDO Conformity Process

4.7 Prior to the commencement of development on individual plots, a Compliance application shall be submitted to B&NES LPA, comprising of the Compliance Form along with the necessary supporting documents / plans and the requisite fee.

4.8 Within 6-weeks of the submission of a Compliance Application, the LPA shall issue a Certificate of Compliance as to whether or not the proposed development is permitted under the LDO, or whether further information is required to determine if the proposed development is in accordance with the Order.

4.9 If further information is required to make an assessment, and a decision cannot be reached within the 6-week period, the LPA will seek to agree a reasonable extension of time with the Applicant up to an additional 4 weeks, to allow additional information to be submitted and/or minor changes made to enable compliance with the LDO. Where feasible, the LPA will endeavour to seek amendments by the Applicant rather than issue a response of non-compliance.

4.10 If the proposal is not considered to be permitted under this Order, the council will provide written response, with reasons and a planning application will be required for the development to progress.

4.11 Any development deemed to comply with this Order, but which is later found to not accord with its terms and conditions, including the standard conditions set out in this Order, may be liable to planning enforcement proceedings.

4.12 The Certificate of Compliance can be amended through resubmission of the Compliance Application. The amended application can be refused if not compliant with the LDO.

4.13 A flow chart setting out an indicative process for the preparation and submission of a Compliance Application is set out below in Figure 1, to support applicants in drafting Compliance Applications.

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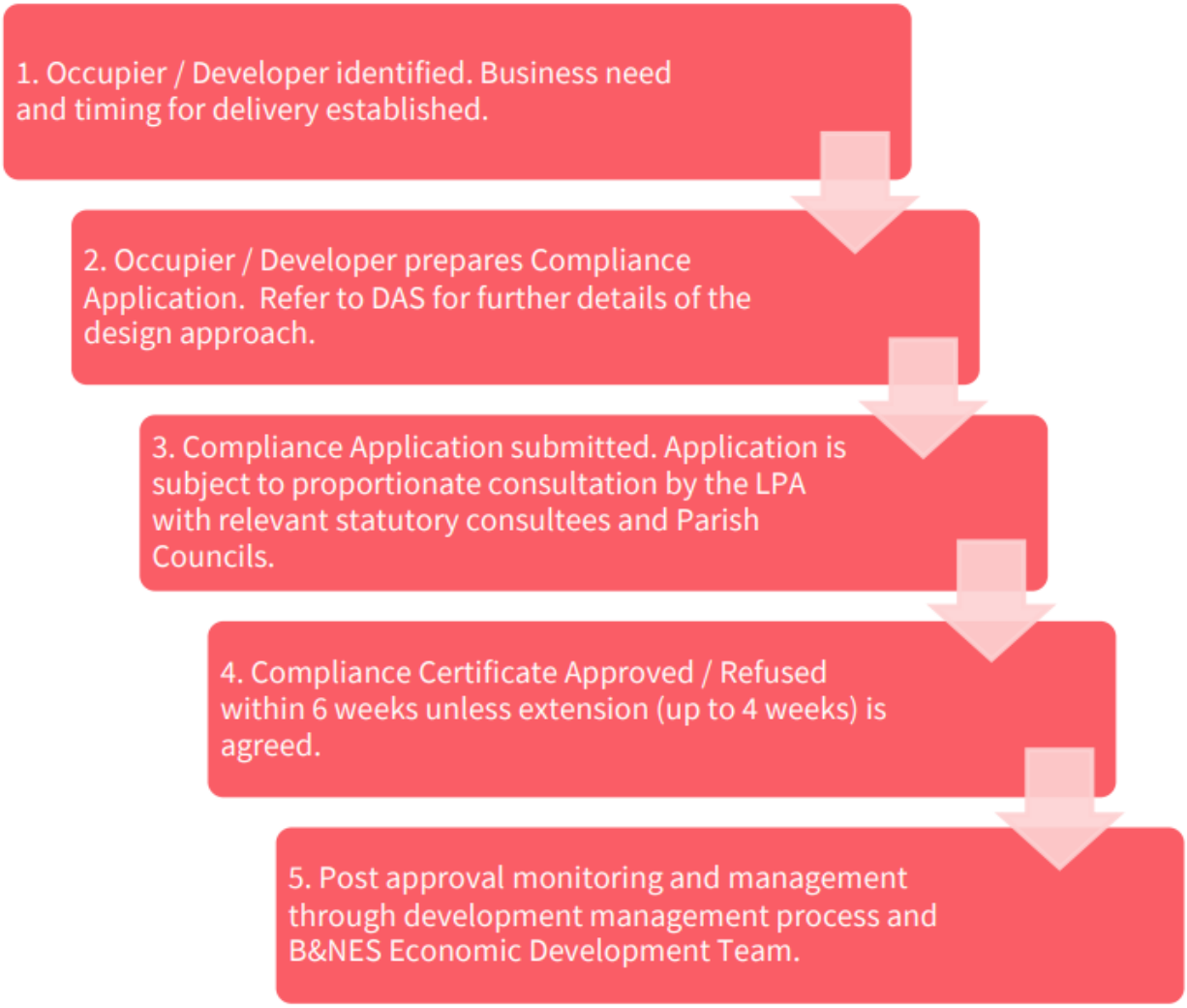


Figure 1: SVEZ LDO Compliance Process Flow Diagram

4.14 It should be noted that the LDO (and related conditions) also include a series of sitewide requirements that need to be addressed / discharged prior to the commencement of development on individual plots. Occupiers / Developers should review those requirements to ensure compliance is achieved and that development can lawfully commence.

Commencement of Development

4.15 Once relevant conditions have been discharged the development may commence (subject to other statutory approvals being in place, for example Building Regulations). Having regard to condition 4 a Commencement Notice (a template of which is provided at Appendix B) shall be served on the Local Planning Authority at least 14 days prior to the commencement of development informing the authority of the intention to commence works in relation to any phase of development or individual plot.

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4 PART 2: Statement of Reasons

Why deliver an LDO at SVEZ?

5.1 SVEZ was granted 'Enterprise Zone' (EZ) status by the Government in April 2017, as part of the wider Bath and Somer Valley Enterprise Zone. The EZ status demonstrates support for economic development in the form of new job creation, business space provision and more generally a contribution towards economic growth of the local economy.

5.2 The decision to bring forward an LDO was taken following a long-term failure in the market to deliver the allocated employment site. To make the Site more attractive for occupiers and developers, this LDO will provide an easier consenting process allowing construction and ultimately occupation of new commercial buildings to be delivered more quickly and cost effectively. An LDO at SVEZ therefore represents a major opportunity for businesses to invest in the area, either relocating from elsewhere, or extending their presence to an attractive new site.

5.3 The LDO is designed with a range of types of business space in mind, aiming to attract a spectrum of small, medium and large-scale employers, as well as complementary uses which serve employment development (hotel, public house etc). It is expected that, once it is up and running, SVEZ will bring around 1,300 new local jobs to the area, covering a range of sectors that may include:

- specialist construction
- construction
- manufacturing and general sales
- land transport
- printing
- warehousing and distribution

5.4 It is likely that a range of roles will be provided including:

- management
- professional
- associate professional/technical
- office and administration
- skilled trades
- customer service and sales
- process
- elementary

5.5 The plans for the SVEZ specify a mix of uses, with the aim of generating jobs across the wide range of skills and experience held by the local population.

5.6 In the Somer Valley there is a low vacancy rate in commercial buildings, and this lack of available business space is constraining business and employment growth. The B&NES Economic Strategy Review (2014 to 2030) recognises the 'urgent need' to encourage new employment land development in the Somer Valley. The SVEZ project presents an exciting new local employment offer, with a variety of jobs matching the varied skills and experience of the local labour market.

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5.7 B&NES has taken a proactive approach to encouraging investment through supporting the production of the SVEZ LDO. There is a clear rationale for this project in that the LDO creates certainty for developers / occupiers which in turn enables the proactive delivery of new employment opportunities.

5.8 One of the key issues that B&NES is trying to address is an imbalance between jobs available and homes built in the Somer Valley area. Recent incremental housing development and a decline in the manufacturing sector has led to this imbalance. Core Strategy Somer Valley Spatial Strategy Policy SV1 sets out the overachieving spatial requirements for economic development and the Old Mills (Policy SSV9) is one of key areas to achieve this economic objective.

5.9 In addition, SVEZ can help to reduce out-commuting from the Somer Valley. Currently a large number of skilled local people need to travel towards Bristol, Bath and other urban centres to find suitable employment. The new jobs offered by the SVEZ development will reduce the need for this out-commuting, offering a wide range of benefits, including:

- reducing carbon emissions
- providing a complimentary range of uses including services for the local economy
- reducing congestion on the region's roads
- promoting active travel for the shorter journey to work
- increasing leisure time previously spent commuting
- increasing workday lunchtime and leisure spend with local businesses

5.10 The LDO will deliver a long-term legacy of new and enhanced job opportunities, helping to reprofile the economy to create opportunities for good quality employment in B&NES, and across the region.

The Economic Case for SVEZ

5.11 B&NES commissioned an Employment and Skills Analysis Report (April 2022) to evaluate the likely impact that the LDO development proposals will have on employment and skills and the type of users who may occupy the units.

5.12 The Employment and Skills Analysis Report identifies that the Somer Valley has strengths in growing sectors of specialist construction, construction and food manufacturing. There are also strengths in printing (and packaging), chemical manufacturing and machinery and equipment.

5.13 Despite warehousing and distribution growing in the UK, it is under-represented within the Somer Valley. Automation and e-commerce are accelerating demand for warehouse space, although this is causing such uses to have less significant employment figures.

5.14 Warehousing and distribution within the Somer Valley is likely to be in support of existing industry and will therefore fulfil an important economic function.

5.15 An Economic Strategy Evidence Base (June 2022) was also commissioned by B&NES to assess economic strategy as the last assessment took place in 2014, pre-covid. It sets out business demography, employment land losses, economic forecasts and scenarios and economy carbon emissions. Notably the Somer Valley has lost 3,100 sqm of office employment floorspace from 2011-2020, which equates to around 200 FTE jobs and -£13.3m GVA per annum. For industrial floorspace the loss between 2011-2020 is 6,400 sqm, which equates to the loss of 200 jobs and a per annum GVA loss of -£6.4m.

Development Vision

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5.16 As set out in the Design Code the vision for the SVEZ LDO is to:

- Create a successful modern business park that attracts a range of employment to ensure a mix of jobs and skills sets.
- Deliver a scheme that successfully contributes and compliments the wider Enterprise Zones in Bristol and Bath.
- Ensure the scheme is of the highest quality design. This will differentiate it from the existing provision in the area.
- Future proof the commercial offer, providing space that allows businesses to effectively grow without the need to locate elsewhere as they expand.
- Deliver a range of complimentary amenity spaces to enhance workers experience. It is becoming increasingly important for business parks to provide opportunities for employees on site.
- The offer should support the nature of the commercial market, which is predominantly light industrial/manufacturing whilst taking account of possible future employment trends.
- Deliver a wider variety of flexible space including workshops and studio space to meet the needs of the market.

5.17 In addition, the vision for the site is to provide an LDO that strongly grasps sustainability, high quality design, viability, deliverability and complements, rather than threatens, neighbouring town centres.

LDO Informal Consultation

5.18 Engagement with the local community, businesses, landowners and other stakeholders has taken place in advance of and during the LDO process. The engagement has used a range of methods to involve as many people as possible. The detail of the informal engagement process is set out in the Statement of Community Engagement.

LDO Statutory Consultation

5.19 It is a requirement that LDOs are the subject of statutory consultation by the LPA. LDO consultation procedures are set out in article 38 of the Town and Country Planning (Development Management Procedure) Order 2015.

5.20 Consultation must include statutory consultees whose interests would be affected by the LDO and any person with whom the LPA would have been required to consult on an application for planning permission for the development proposed to be permitted by the LDO.

5.21 Statutory consultation took place from 16 January 2023 to 23 February 2023. The SVEZ LDO, Design Guide, Design and Access Statement and accompanying technical studies and assessment were available on the B&NES website.

5.22 Over 400 responses from individuals and organisations were received along with comments from statutory consultees including:

a. B&NES and C S (Environmental Monitoring) – Air Quality
b. Arboriculture
c. Archaeology
d. The Coal Authority
e. Conservation Officer

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f. B&NES Drainage and Flooding Team (LLFA)
g. Ecology
h. Environmental Protection
i. Natural England
j. B&NES Transportation and Highways
k. Historic England
l. National Grid
m. Paulton Parish Council
n. Ston Easton Parish Council
o. Farrington Gurney Parish Council
p. B&NES Planning Policy
q. B&NES Public Rights of Way (PRoW) Team
r. Urban Design and Landscape – Neil Williamson Associates
s. Wales and West
t. Wessex Water.

5.23 The primary concerns relating to the LDO were linked to highways, flooding, visual impact, ecological impact and the LDO process itself.

5.24 In response to the feedback received during the statutory consultation, a number of the accompanying technical studies and assessments were updated to respond to comments and or provide clarifications where necessary. In addition, a Statement of Clarification was prepared by the Council to respond to comments from the general public.

5.25 In terms of revisions to the LDO in response to the Statutory consultation, the following amendments were made:

a. Structural boundary planting enhanced through increased density of planting and removal of part of the perimeter footpath
b. Update to the phasing plan to enable the delivery of structural boundary landscaping as part of Phase 1 of the development.

Environmental Impact Assessment - Screening Opinion

5.26 A screening request was made to the Local Planning Authority (LPA) in September 2020 which sought a decision as to whether an Environmental Impact Assessment would be required for the proposed development as set out in the screening request. The LPA duly assessed whether there are likely to be any significant environmental impacts as a result of the proposed development.

5.27 In a screening response provided on 28th October 2020, the LPA determined that the proposed development does not fall within Schedule 1 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations). However, as the proposal relates to an ‘Industrial Estate Development Project’, it falls within category 10(a) of the first column of Schedule 2 of the EIA Regulations and exceeds the threshold of 0.5 hectares. The proposed development was therefore screened using the criteria set out in the EIA Regulations.

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5.28 Having considered the potential environmental effects arising from the LDO the LPA concluded *"It is considered that the development is unlikely to have any significant environmental effects in EIA terms. Whilst there are a number of important issues and potential impacts to consider, none of these are likely to be significant as defined by the EIA Regulations. All noticeable impacts are likely to be localised to the site itself or the local vicinity. These issues are not of more than local importance. The developments' expected impacts will not be unusually complex nor potentially hazardous".* A copy of the LPA Screening response is provided at Appendix C.

5.29 The development therefore does not constitute EIA development and an Environmental Statement is not required to support the LDO or any future Compliance Application.

Legislative Context and Process

5.30 LDOs were introduced through the Planning and Compulsory Purchase Act 2004 and, in effect, grant planning permission for the specific form/type of development detailed in the adopted Order. These primary powers were amended by the commencement of section 188 of the Planning Act 2008 in June 2009 and more detailed legal provisions on LDOs are contained in sections 61A to 61D and Schedule 4A of the Town and Country Planning Act 1990 and articles 38 and 41 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 ("DMPO 2015"). The DMPO 2015 came into force in 15th April 2015.

5.31 The Growth and Infrastructure Act 2013 removed the requirement to formally consult the Secretary of State prior to adoption enabling local authorities to approve an LDO immediately after reviewing the results of local consultations. This was replaced by a requirement to notify the Secretary of State, via the National Planning Casework Unit, as soon as practicable after adoption. The Act also removed the requirement for LDO's to be reported on as part of Authorities' Monitoring Reports.

Local Planning Policy Context

5.32 The production of the LDO is included in the B&NES Local Development Scheme (LDS). The LDS sets out a timetable for the production of the Local Plan, Development Plan Documents and Supplementary Planning Documents that the Council is preparing or intends to prepare. The LDO is being prepared in order to encourage investment in the SVEZ and to facilitate delivery of employment development by creating a more certain planning environment and thereby making investment more attractive.

5.33 Originally, the majority of the LDO area (except circa 2.5ha of the south eastern area) was allocated for employment use in the B&NES Local Plan (2007) and reallocated in the current adopted Placemaking Plan (2017) under Policy SSV9: Old Mills Industrial Estate Development Requirements and Design Principles. The Plan sets out the following parameters and characteristics of that development on the Site should meet:

- Development of light industrial, heavy industrial, warehousing (classes B1c, B2, B8), builders' merchants and car show rooms (sui generis);
- Major landscaping in order to mitigate the impact on the surrounding countryside and nearby residential properties;
- Protection, diversion or undergrounding of overhead electricity lines;
- Improvements to the transport network to mitigate the impact of the scheme;
- Provision of community facilities to meet the needs of workers; and
- Access from the A362 (west of Langley's Lane) and Paulton House / former Focus DIY access road.

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5.34 The LPA are due to prepare then adopt a New Local Plan in 2025 and in the meantime has progressed with a partial update (LPPU) which proposes a series of priority policy changes to the Core Strategy and Placemaking Plan.

5.35 The changes proposed through the LPPU have been subject to public engagement and consultation and have been examined by a Planning Inspector. The Inspectors recommended changes (known as main modifications) have been incorporated and these main modifications were subject to public consultation. The LPPU is due to be adopted in January 2023.

5.36 The LPPU includes a revision of the SVEZ site boundary to include the south-east section that was omitted from the allocation in the 2017 Local Plan. It also broadens the mix of uses to include *"food & drink units (use class E(b), ancillary retail (use class E(a)) and a hotel (use class C1)"* if of a scale, type and format that does not harm, but complements, nearby town centres and that benefits the attractiveness and operation of the Enterprise Zone.

5.37 The LDO is judged to be consistent with, and will help deliver, a number of policies within the LPPU and existing adopted policy. These include policies in relation to design, energy efficiency and landscape.

5.38 The following are considered to be principal policy considerations:

- Employment allocation – (Placemaking Policy SSV9) – the site forms part of the adopted allocation to deliver light industrial, heavy industrial, warehousing (classes B1c, B2, B8), builders merchants and car show rooms (sui generis), as now updated by the LPPU. The delivery of the LDO will contribute to the policy aspiration to deliver net additional jobs within the wider Somer Valley.
- Green Infrastructure Network (Placemaking Policy NE1) – the land to the south of the subject site is identified as part of a green infrastructure network, where development would need to ensure it does not detract but instead makes a positive contribution.
- Minerals Safeguarding Area (Placemaking Policy M1) – outlines that development cannot affect the ability to mine the land for minerals; however, this covers a large proportion of Somer Valley, including land where development has come forward. This, coupled with the fact that SVEZ is an allocated site, demonstrates that policy M1 is not a constraint to development.
- Landscape Impact (PMP Policy NE2) requires the conservation and enhancement of local landscape character and that development should seek to avoid or mitigate any adverse landscape impact. The Landscape and Visual Impact Assessment has demonstrated that there will initially be major to moderate adverse effects, but that subject to appropriate mitigation these can be reduced to moderate after 5-15 years.

5.39 Furthermore, it is recognised that the adjacent 'Batch' is designated a regionally important geological site (NE3A), a site of nature conservation (NE3), and an ecological network (NE5). Furthermore, the land to the north (separated by a thin strip of field) is a protected landscape setting (NE2a). These designations have been taken into consideration as part of the design process, and are addressed in the relevant technical reports which inform the LDO.

5.40 In addition to the employment allocation described above, the Site has been granted EZ status and as a result, the principle of economic development of the site is considered acceptable. The granting of a LDO will further define the acceptable principles for development to come forward promptly and viably.

National Planning Policy Framework

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5.41 The National Planning Policy Framework (NPPF) (July 2021) sets out that to create high quality, beautiful and sustainable buildings and places, effective engagement between applicants, communities, local planning authorities and other interested parties is imperative throughout the process (para 126).

5.42 The NPPF states, at paragraph 81, that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. This is particularly important where the UK can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential. Para 81 also recognises that the approach taken should allow *"each area to build on its strengths, counter any weaknesses and address the challenges of the future"*

5.43 At paragraph 83 the NPPF also states that planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative, or high technology industries, and for storage and distribution operations at a variety of scales and in suitably accessible locations.

5.44 It explains that these objectives should be delivered through the preparation and implementation of plans and the application of the policies in the NPPF and that planning policies and decisions should play an active role in guiding development towards sustainable solutions.

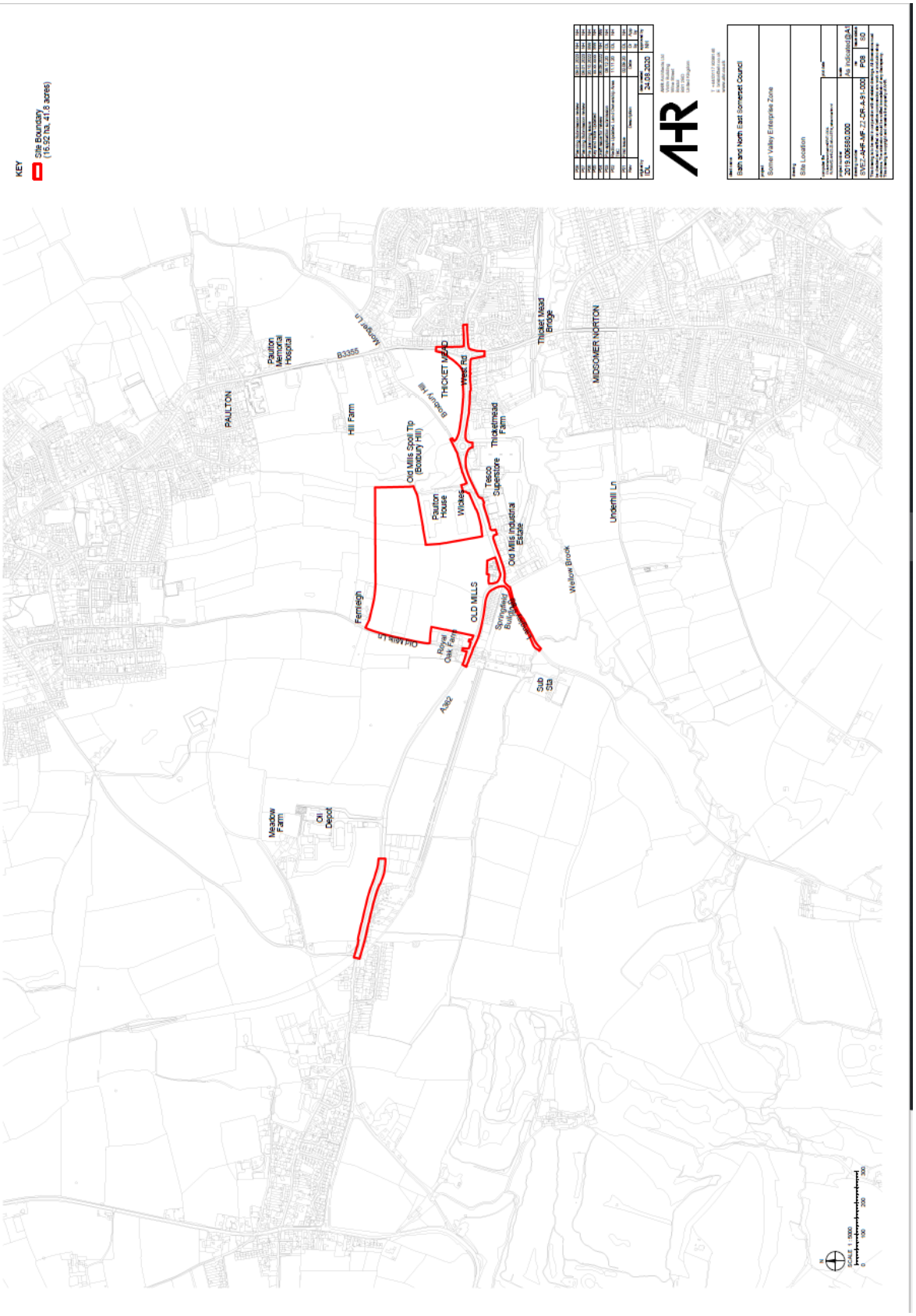
5.45 Under the heading of 'tailoring planning controls to local circumstances' at paragraph 51, the NPPF explains that LPAs are encouraged to use LDOs to set the planning framework for particular areas or categories of development where the impacts would be acceptable, and in particular where this would promote economic, social or environmental gains for the area.

5.46 The LDO has been prepared in the light of the NPPF as well as local policy, and seeks to deliver a high quality, commercially focussed development. The aims of the SVEZ LDO clearly align with the expectation as set out in the NPPF that policies and decisions *"should help create the conditions in which businesses can invest, expand and adapt".*

5.47 It is considered that the LDO will facilitate a sustainable pattern of development which meets the commercial development needs of the Somer Valley while facilitating growth and infrastructure, protecting the local environment and mitigating against the risk of climate change.

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Appendix A – Red Line Plan


KEY
Site Boundary
(15.52 ha, 41.6 acres)
Sedgemoor
Sedgemoor
Sedgemoor

APPENDIX B – LDO Commencement Notice

LDO Commencement Notice

Notice to Bath and North East Somerset Council (B&NES) of Commencement of Development within the Somer Valley Enterprise Zone LDO area.

Please complete using block capitals and black text

Development site:	
Brief description of development:	
Notice is hereby given that works to implement the above LDO Compliant Scheme will commence on:	
Signed:	
For and on behalf of: (name and address of developer)	
Date:	
Contact Name:	
Telephone Number:	
Email Address:	

Please send the completed form via email to: Planning_Registration@BATHNES.GOV.UK

Or by post to: Development Management
Bath and North East Somerset Council
Lewis House
Manvers Street
Bath
BA1 1JG

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APPENDIX C – LPA Screening response

Bath & North East Somerset Council

Bath & North East Somerset Council
Directorate of Place – Development
Lewis House, Manvers Street

Bath BA1 1JG

Email:Tessa_hampden@bathnes.gov.uk

Direct Line: 01225 477695

28th October 2020

Kevin Hunt

JLL

31 Great George Street

Bristol

BS1 5QD

Our Ref: 20/01973/SCREEN

Dear Kevin

Town and Country Planning (Environmental Impact Assessment) Regulations 2017 - Local Development Order (LDO) for proposed Somer Valley Enterprise Zone (SVEZ),

The Local Planning Authority (LPA) has assessed whether there are likely to be significant environmental impacts as a result of this proposal. You will be aware that in cases where significant effects are likely to occur, the subsequent planning application will need to be accompanied by an Environmental Statement.

The LPA is of the opinion that the proposed development does not fall within Schedule 1 of the above Regulations. The proposed development is however 'Industrial Estate Development Project' which falls under category 10(a) of first column of Schedule 2 to the EIA Regulations and exceeds the threshold of 0.5 hectares.

Waste

The proposed development will result in construction and demolition waste produced for

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The place to live, work and visit

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The development has therefore been screened for EIA, using the selection criteria set out in Schedule 3 as a guide. The fundamental test to be applied in each case is whether the development and its specific impacts are likely in that location to result in direct or indirect significant effects on the environment.

The existing site comprises nine arable fields spread across five landholdings bound by hedgerows. It is located adjacent to the A362, on the north western edge of Midsomer Norton located approximately 1.25 miles from the town centre.

The submission explains the nature and composition of the proposed development is yet to be explicitly defined and will depend on the LDO design process. The indicative mix demonstrates primarily B1b, B1c, B2 and B8 (E/B2), with complimentary A1 (E), A4 (Sui generis), A3 (E), C1 (C1) B1a (E) and B1/B1c (E).

Population and Human Health

The site is on the edge of an urban area which is relatively densely populated. However, the site is separated from the main areas of nearby residential development and the risk of accidents, having regards to substances or technologies used, will be low. The risk to human health associated with contaminated land are not considered to be significant and remedial works can be carried out where necessary.

a limited period. The operation of the completed development will not give rise to any unusual production of waste beyond that typically associated with a small-scale industrial/commercial use. Given the scale and nature of the proposed development, significant environmental effects in respect of the production of waste are not considered likely.

Pollution and Nuisance

The uses proposed are typically considered to be those which could result in noise emissions and nuisance. A planning noise assessment would accompany any submission and there is no reason to conclude that the noise from fixed external plant and break out noise associated with the commercial units could be mitigated via scheme design and control through the imposition of planning conditions.

The site is relativity close to the of the Farrington Gurney Air Quality Management Area (AQMA) designated for mean annual Nitrogen Dioxide (NO_2) levels. The submission confirms that the diffusion tube monitoring in Farrington Gurney reduced in 2018 and results were just below the objective of 40 µg/m3 at the residential façade at 39.6 µg/m3 along the A37.

The screening report has identified that the proposed development may have an impact on air quality. The baseline conditions have been considered close to the development site. As part of the proposal junction improvements have been proposed at the A362 and A37 junction which is within the AQMA.

The report highlights that an air quality assessment will be submitted with the LDO to consider the impact of the proposed development and junction improvements on air quality. Increasing capacity and traffic flows at the junction of A37/A362 could lead to increasing nitrogen dioxide concentrations in an area where concentrations are currently close to the Government's air quality objective.

The submission anticipates that there would be no receptors where NO_2 and PM10 objectives would be exceeded. The scheme will be considered to have a significant impact if the predicted concentrations of nitrogen dioxide with the development/junction improvements are above 40 µg/m3 at any location. However, this is impact would be localised and would not have a significant impact on the environment in EIA terms. Overall the impact on pollution and noise will not be significant in EIA terms

Natural Resources

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The principal natural resource expended by the development will be the land itself, which is previously undeveloped in nature. Other natural resources used are likely to be limited to those used in the construction process. There will not be any unusual use of natural resources in the construction and future operation of the site. The impact on natural resources will not be significant in EIA terms.

Biodiversity

The site comprises predominately arable habitats with semi-improved grassland, improved grassland, ruderal and scattered scrub. There are also boundary hedgerows, some of which are species-rich and all native hedgerows are likely to be of some ecological value. There are also occasional buildings and hardstanding. The site is approximately 3.5km from the nearest Site of Special Scientific Interest (SSSI) and 7.8km from the closest SSSI component unit of the Mells Valley Special Area of Conservation (SAC). The proposals do not meet Natural England's SSSI Impact Risk Zone criteria.

The site is immediately adjacent to the Old Mills Mine Tip Site of Nature Conservation Interest (SNCI) which is designated due to the occurrence of mosaic habitats including semi-natural woodland and grassland which support notable plant species. There are other SNCIs in close proximity. The site may also support protected and notable species.

The proposals are not likely to impact on an ecologically-sensitive area. There will not be significant ecological impacts which would trigger inclusion in an Environmental Impact Assessment. This does not negate the need for comprehensive ecological surveys to be completed and an ecological avoidance, mitigation, compensation and enhancement scheme to be developed.

.

Landscape/Cultural Heritage and Archaeology

The landscape and visual impacts would be permanent and would result in a marked change to the character of the immediate area. However, the direct impacts of the proposed development are likely to be limited to the site itself and its immediate surroundings.

A Landscape and Visual Impact Assessment (LVIA) can be used to inform the creation of a landscape framework that incorporates, retains and augments existing hedgerows, trees and Public Rights of Way and integrates these features with a SuDs network to form a landscape framework within which future development takes place and by which the landscape and visual impact of development is avoided or adequately mitigated.

The Site is at a sufficient distance from designated heritage assets such that there is no potential for significant adverse effects on their setting. Any works to enable the development such as road improvements, is not considered to have any significant impact upon the setting of designated heritage assets. Overall, any impacts upon the above areas, is not considered to be significant in EIA terms.

Transport and Access

Traffic levels on the surrounding road network are high and the route is congested and peak times. The proposed development will create a change in the highway network. This site is allocated, and as part of the evidence base it was recognised that some mitigation may be required.

The submission explains that the vehicular access will be gained from the A362 via the site access which is currently proposed to be located immediately west of the two residential properties at the southern boundary of the site. A number of highways improvements are required to enable delivery of the proposed development. These improvements are along the A362 corridor between the A37 junction and Midsomer Norton

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Whilst the development may give rise to localised traffic impacts, there is no reason to conclude that the development and the change itself will have a significant environmental impact. The submission of a Transport Statement and Travel Plan is anticipated, and this will limit the impact of the development further. Overall, any impact is not considered to be significant in EIA terms.

Land Stability and Climate

The site is not known to suffer from land stability issues nor be susceptible to significant impacts from climate effects. Full details of sustainable construction methods and design would be considered at detailed design stage.

Due to the size of the site, the proposed development has the potential to alter and affect drainage patterns, with the possibility of increased run-off rates and levels of overland flow. However, these effects would be localised and would be likely to be able to be mitigated within the site itself. The site falls within Flood Zone 1 and therefore any drainage problems are unlikely to be critical.

Land Use

The proposed land uses are considered compatible with those uses surrounding the site and vice versa. Whilst there is some potential for noise and disturbance, this can be controlled through mitigation and conditions. It is not considered any conflict will amount to significant environmental effects.

Socio/economic impacts

In terms of potential socio-economic effects, the development will result in a change in the local economy and a change in the characteristics of level of the employment in the local area. In addition the site is close to the local centres of Midsomer Norton and Paulton, and, if not correctly managed, any non-industrial employment uses (including retail, hotel etc.) have the potential to have social and economic impacts upon these areas and the local population using these centres. They are not however considered to result in any impacts on the environment that are significant in EIA terms.

Transboundary Effects

There will be limited transboundary effects. Impacts will most likely be limited to (but not exclusively) the site's immediate surroundings.

Cumulative Effects

The area to the south of the site which forms part of the planning application must be considered as part of this EIA screening. It is not however considered that the cumulative impacts of these developments will be significant in EIA terms. Notwithstanding the above considerations, the total areas of the sites is approximately 13.5 hectares, which falls below the Indicative criteria and threshold which is more than 20 hectares. Indicative criteria and threshold. Potential increase in traffic, emissions and noise.

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Conclusion

It is considered that the development is unlikely to have any significant environmental effects in EIA terms. Whilst there are a number of important issues and potential impacts to consider, none of these are likely to be significant as defined by the EIA Regulations. All noticeable impacts are likely to be localised to the site itself or the local vicinity. These issues are not of more than local importance. The developments' expected impacts will not be unusually complex nor potentially hazardous.

It is concluded, for the reasons set out above, that the development does not constitute EIA development. It is not necessary therefore for a future planning application (for the development described) to be accompanied by an Environmental Statement.

Please note that the adoption of a negative screening opinion is not an assessment of the planning merits of your proposal rather it is purely an assessment of whether significant environmental impacts, under the terms of the EIA regulations, would be likely to occur.

Yours sincerely

Tessa Hampden
Senior Planning Officer

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JLL

31 Great George Street
Bristol
BS1 5QD

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Appendix 4 - SVEZ Project Financials

This appendix sets out the costs for the next stage of the capital scheme and details of the funding.

Costs for the Next Stage

Description	2024/25 £'000	2025/26 £'000	2026/27 £'000	2027/28 £'000	Total £'000
Project Development (OBC+)	553	8,724			9,277
Project Implementation (FBC)			9,559	11,041	20,601
Total	**553**	**8,724**	**9,559**	**11,041**	**29,878**

Funding

Description	2024/25 £'000	2025/26 £'000	2026/27 £'000	2027/28 £'000	Total £'000
WECA Investment Fund Grant "Tail"	553	8,724	5,616		14,893
CIL				756	756
S106				329	329
WECA Investment Fund Grant New			3,943	9,957	13,890
Total	**553**	**8,724**	**9,559**	**11,042**	**29,878**

WECA Investment Fund Grant "Tail"
£14.89m is the remainder of WECA funding currently allocated to the SVEZ and referred to as the 'tail'. It is currently included in the provisional Capital programme together with the CIL detailed in the section below.

CIL
CIL of £375k was allocated to the scheme in 2023/24 to fund the eastern cycle track to lead from the SVEZ development and link in with the Norton Radstock Greenway. The balance of £381k CIL funding is earmarked for allocation in a future financial year.

S106
This amount represents contracted S106 from committed development for funding towards the highway's mitigations.

WECA Investment Fund Grant New
Due to inflationary pressure on costs approved via the original OBC (2019) to the current position in 2024, alongside establishing the full scope of highway mitigations, there is a requirement for additional WECA Investment Fund grant allocation. Further grant is being sought by submission to WECA Committee in Spring 2024. The Council has designed the highways mitigations and understands the overall scale of

the network improvements and has costed the mitigations accordingly. The SVEZ design also accounts for the Council's LPPU (Local Plan Partial Update) policy position (adopted Jan 2023) which has resulted in additional cost and funding pressure.

Jones Lang LaSalle Incorporated

Somer Valley Enterprise Zone

Statement of Community Involvement



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1 Introduction

1.1 This Statement of Community Involvement has been prepared by JLL on behalf of Bath and North East Somerset Council (BANES) in relation to a proposed Local Development Order (LDO) within the Somer Valley Enterprise Zone (SVEZ). The SVEZ is located at Old Mills and comprises a 13.5-hectare site on the north-western edge of Midsomer Norton.

1.2 SVEZ was granted 'Enterprise Zone' (EZ) status by the Government in April 2017, as part of the wider Bath and Somer Valley Enterprise Zone. The EZ status demonstrates support for economic development in the form of new job creation, business space provision and more generally a contribution towards economic growth of the local economy.

1.3 The site has been allocated for employment development since 2007. The Council have intervened as a result of limited interest in bringing the site forward through the private sector.

1.4 LDOs are a planning mechanism promoted by national planning guidance as a flexible tool to simplify and streamline the planning process, creating certainty for new development and saving time and money for those involved. In short, an LDO grants a general planning permission for certain forms and types of development to proceed without the need for a separate and specific planning application, so long as the proposed development aligns with the details approved by the LDO. Historically LDOs have primarily been focused on Enterprise Zones, where they are deployed as a tool to enable development to come forward with ease.

1.5 SVEZ is a proposed new area for commercial development, to create a local hub for new business and employment and help prevent out-commuting. The Enterprise Zone, once complete, could create approximately 1,300 new jobs for local people and around 40,000 sqm of new commercial floorspace.

1.6 The aim is to provide new employment opportunities to support local economic growth in the Somer Valley. To help tackle climate and ecological emergencies, the LDO will reduce out-commuting, achieve biodiversity net gain and target net-zero carbon in operation.

1.7 In advance of the formal submission of the LDO to the Local Planning Authority, our team has sought to share the emerging proposals and invite feedback from the local community and relevant stakeholders. The aim of this process has been to inform and engage with groups and individuals with an interest in the site and/or those that may be impacted by its development, to identify levels of support for the emerging proposals and to understand any areas of concern, to help inform and shape the final plans prior to submission.

1.8 This Statement sets out details of the public engagement exercises undertaken, the feedback received, and how the design team has responded to that feedback.

1.9 In addition to these public engagement activities, the team has had dialogue with officers at BANES, including formal pre-application advice.

1.10 To reiterate, this engagement process was informal, and the Local Planning Authority will undertake a formal consultation process upon submission of the LDO. The formal consultation procedure will not only invite the views of residents, landowners, and the like, but also key prescribed bodies as would be the case for an application for planning permission.

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2 Review of Policy/Best Practice

2.1 The National Planning Policy Framework (NPPF) (July 2021) sets out that to create high quality, beautiful and sustainable buildings and places, effective engagement between applicants, communities, local planning authorities and other interested parties is imperative throughout the process (para 126).

2.2 Paragraph 39 outlines that early engagement has the potential to improve the efficiency and effectiveness of the planning application system for all parties. It is not mandatory for an LDO preparation process to undergo an informal consultation process prior to submission, but in order to take the views of interested parties on board at a logical point in the process, it was felt that early engagement was preferable. In line with this, pre-application advice was sought prior to the public engagement process which will ultimately allow for better co-ordination of resources and improved outcomes for the community.

2.3 The more issues that can be resolved early in the process, including the need to deliver improvements, the greater the benefit. An early, pro-active approach is advocated (para. 41).

2.4 Paragraph 132 states that design quality should be considered throughout the evolution of proposals. Early discussion with the local community about design and style of schemes can clarify expectations and reconcile local and commercial interests. Design evolution should be undertaken in conjunction with those affected by the proposals to take account of views. Further, it states '*Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.'*

2.5 The use of LDO's is covered in Section 4 of the NPPF, in which it states that an LDO should set the planning framework for a particular area or category of development where the impacts would be acceptable, and promote economic, social, or environmental gains for the area.

2.6 LDO guidance sets out that early engagement is a fundamental component of developing and delivering an LDO, to ensure that there is effective engagement with all relevant stakeholders. This includes landowners, the local community, and other interested parties.

2.7 Early engagement with the community to explain objectives and ensure that there is input on ideas/aspirations is important. As this LDO is site specific, rather than covering a wider area, the degree of consultation is proportionate to the local area, including all those surrounding the site and/or likely to be impacted by it.

2.8 The Planning Advisory Service (PAS) have published LDO case study research and analysis which sets out lessons learnt from previous LDOs. Generally speaking, any early engagement is welcomed with key stakeholders prior to formal consultation.

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3 Public Engagement Process

3.1 Below is a summary of the public engagement that has been undertaken to inform the development of the LDO.

3.2 Letters / emails were sent to landowners, neighbours and Parish and Ward Councillors on 25th August 2021, informing them that a presentation to the Somer Valley Key Stakeholder Group would take place on 7th September 2021. There was also a public webinar scheduled for 27th September 2021, which would have launched a 28-day public engagement process. However, for reasons beyond the control of the project team the launch of this engagement had to be postponed.

3.3 On the 27th of September 2021 a presentation was given by the project team to landowners explaining the rationale behind the LDO, the development of the illustrative masterplan, transportation/highways activities and how the process of public engagement was to proceed.

3.4 Thereafter, on 6th May 2022 the project team wrote to landowners, neighbours and Parish and Ward Councillors to briefly explain the background to the LDO and inform them of the forthcoming community engagement. The letter set out that a live public webinar would take place on Thursday 19th May 2022 from 19:00 to 20:30 which also marked the start of a 6-week consultation process.

3.5 Other methods of consultation included site notices located around the site and an advert placed in the Somerset Guardian (advertising the consultation period) on 26th May. There were also social media posts on Facebook, Twitter, Instagram and Journal and a post in the Council's newsletter (e-connect). The Cabinet Member, Councillor Richard Samuel, was also interviewed on Somer Valley FM on 27th May.

3.6 An example of the letters sent is included at Appendix 1 of this Statement.

3.7 Information boards (see Appendix 3) providing details of the engagement process were also provided at Midsomer Norton Library from 19th May 2022 and Radstock Library from 24th May. Hard copy information about the project was available at Paulton Library from 19th May, with information boards displayed at this location from 27th May. Hard copies of the questionnaires were also made available in this location, along with a box to post completed questionnaires in.

3.8 The engagement events were also advertised via press releases which were widely circulated in the local area, including on the following websites:

- BANES Newsroom
- Midsomer Norton Nub News
- Radstock Nub News
- Visit West
- Insider Media

Public Webinar

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3.9 A public webinar on the Somer Valley Enterprise Zone (SVEZ) was held on the 19th of May 2022 as part of the informal public engagement on the proposed scheme. A recording of the webinar can be viewed here:

https://www.youtube.com/watch?v=tKUgAcBME9c

3.10 Questions were asked by attendees of the webinar via the chat function. The project team gave verbal responses to some of the questions during the webinar, however, for completeness all questions asked are outlined within the Questions and Responses document at Appendix 4. For ease of review, the questions and answers are arranged by topic area.

3.11 After the webinar was concluded, it was made available to view on the Council's 'Have your say' webpage.

Webbook

3.12 Details of the proposal were also made available online, on the BANES Council Website Consultation section. The public engagement webpages consisted of:

- Introduction and Policy Background;
- Scheme Overview;
- The purpose of this public engagement;
- Businesses: what this means for you;
- Local Residents: what this means for you;
- View project documentation;
- View our launch webinar;
- Have your say; and
- Project timeline.

3.13 The webbook can be found here:

https://beta.bathnes.gov.uk/somer-valley-enterprise-zone-first-public-engagement

3.14 The purpose of the webbook was to provide the opportunity for interested parties to examine the basic aims, approach, and design principles in the indicative masterplan in their own time. Responses received allow the scheme to be shaped into something befitting for local area aspirations.

3.15 The 'Have your say' webpage linked through to an online survey, details of which are provided below.

3.16 A copy of the 'End of Consultation Website Analytics' is provided at Appendix 5 of this Statement. It confirms that there was a total of 4,945 pageviews and provides a further breakdown of pageviews per individual page (e.g. project documentation or highways and transport issues).

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Survey

3.17 A survey was run from 19 May – 30 June 2022 to seek opinions from interested parties who live near the Somer Valley Enterprise Zone or have businesses in the Somer Valley. The survey questions sought to find out views of the proposal, to understand whether the proposals are viewed positively or what may need to change and why.

3.18 The survey questions centred around design, layout and materials, green infrastructure, proposed land uses and transport improvements.

3.19 Those interested in responding had the option of doing so either online or in hard copy format. The quantifiable responses received are demonstrated within the next section, together with a general summary of free-form question responses and the project team's response. A total of 29 hard copy questionnaires were received, and 106 online questionnaires.

3.20 The hard copy and online survey feedback can be found at Appendix 2 of this document.

Residents Meeting

3.21 A meeting with local residents was held at Paulton Village Hall on 24th June 2022 from 7pm to 9pm. The sign on sheet had 44 signatures, but 53 attendees were present for the meeting. Further individuals joined the meeting part way through, so the actual number present was likely higher.

3.22 The meeting was attended by representatives of the project team including the Enterprise Zone Operations Manager, the scheme architect, and the lead transport and planning experts. The project team gave a short presentation which was followed by questions from residents of Springfield Buildings and other attendees.

Landowner meetings

3.23 In addition to the engagement exercises set out above, separate in-person discussions have been held with a number of individual neighbours and landowners that will be affected by the proposed development.

Somer Valley Forum

3.24 Regular presentations have been given to the Somer Valley Forum, with presentations on 7th September 2021 and 6th June 2022. The Somer Valley Forum is the Connecting Communities forum for the parishes of Farmborough, Farrington Gurney, High Littleton, Midsomer Norton, Paulton, Peasedown St John, Radstock and Westfield. The Forum was presented with a condensed version of the webinar presentation and given the opportunity to ask questions directly to the project team. The full meeting can be viewed here:

https://www.youtube.com/watch?v=xrxVk0oMX0g

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Somer Valley Key Stakeholder Group

3.25 Regular presentations have been given to the Somer Valley Key Stakeholder Group, which is formed of local ward and parish councillors. Meetings take place regularly, with recent meetings being held on 27th April 2022, 7th July 2022, 27th September 2022, and 15th December 2022. The KSG have been updated throughout the project as it has developed and provided their input and ideas into the LDO itself as well as the consultation practices.

Parish Council Meetings

3.26 In addition to the above meetings, in person presentations were made to Radstock Town Council (Neighbourhood Development Planning group) on 8th June 2022, Westfield Parish Council on 11th July 2022 and Paulton Parish Council on 13th July 2022. This provided opportunity for the town and parish council members to ask direct questions to the Councils project lead.

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4 Comments and our Team response

4.1 The table below sets out a summary of the issues/themes raised throughout the consultation process and the project team's response.

Issue/Theme Raised	Raised By	Response
The Town Council is in favour of the Enterprise Zone as part of the endeavour to redress the imbalance of housing development and employment in Midsomer Norton, which currently results in an undesirable level of out-commuting. The cycle access to the new Enterprise Zone is now included in phase one but we'd like to highlight its development, and the continuation of the Norton-Radstock Greenway, as a priority. Suggestion for an A37 – A367 link road for lorries. At present the main A road through Midsomer Norton is through Station Road. This road is not built for larger vehicles as the pavements are mounted to navigate the bends in the road. North Road must not be considered as an alternative to Station Road. North road is a "B class" which is extremely dangerous as it is with the very high volume of traffic. There is a concern there will be too much of a retail centre which will threaten Midsomer Norton High Street even though we are aware the retail is restricted.	MSN Town Council	We welcome a positive response with concern to the appreciation of re-addressing the balance between housing and employment. As part of the SVEZ, a cycle track would be delivered on the A362 between the SVEZ and Old Mills Lane. This has been designed to enable future connections towards Farrington Gurney and Hallatrow that are being developed by the West of England Combined Authority. The impacts of the SVEZ on the A362 have been modelled in agreement with the Local Highway Authority and mitigation is proposed at the Thicket Mead Roundabout to improve traffic flow. Strategic transport infrastructure, such as a new link road bypassing Midsomer Norton and Radstock is beyond the scope of which that could be delivered by the SVEZ. The SVEZ includes mitigation measures, such as the cycle track connecting with the Norton Radstock Greenway, to minimise impacts on the B3355 North Road, with most trips towards the A367 forecast to use the A362 corridor. It is not expected that North Road would be used as an HGV route to the SVEZ. There is no longer any retail proposed as part of the LDO.
There should be signage to ensure traffic flows smoothly through the town centre and local road network. The lack of bus routes/provision. Road junctions in Radstock Town Centre are a blocked to traffic flows	Radstock Town Council	Suitable highways signage will be input to serve the new development and surrounds. There are options to create active links from surrounding villages to the A367 to pick up buses.

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Air quality (linked to SVEZ and in general).		The application will need to ensure that there is no negative impact on air quality as a result of the proposal. An Air Quality Assessment will be submitted as part of the supporting application pack.
Skills developed within SVEZ and Radstock/Somer Valley.		Referenced CRSTS, active travel shifts and a general move to more hybrid and electric vehicles over medium term. Discussed how the Council can work with local employers to support skills development, apprenticeships, and employer links with schools.
Is it known whether businesses will want to set up show in this area? Have any businesses expressed specific interest in having premises on the site? Have you considered the viability of office space post COVID? Has any consideration been given to redeveloping existing brownfield sites? Plans mention improvements to some parts of the local road systems, what will they consist of? Will people still be able to access the fields to the North e.g. dog walking. Will the public right of way be retained? Has thought been given to redevelopment of Midsomer Norton high street?	Marcus West	An Economic report was undertaken in order to establish demand prior to embarking on the LDO process. Existing, available sites were reviewed and are not of a sufficient size or suitability to occupy the type of development proposed. Improvements to the local road system will be set out in detail upon submission of the LDO to the BANES Planning Department. The PROW will be retained/redirected. The High Street would not be a suitable location for the type of development proposed.
How will the cottages be protected from increase of industrial traffic?	Tracey Bevans (Bridge Buildings)	As part of the mitigation package for the A362, a review of traffic speeds and limits along the road is being undertaken. Design parameters for the A362 are being agreed with B&NES Highways with the aim of minimising traffic lane widths and therefore managing traffic speeds along the A362. Alongside this, the feasibility of the implementation of a consistent 30 mph speed limit along the A362 is being explored. Together with the nearby improvement works at

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		Sunnyside that will be designed to minimise traffic speeds, the package of works seeks to achieve slower and smoother vehicle speeds on the A362.
Proposal will be detrimental to Westfield Industrial Estates, which will see organisations moving to the EZ where rents will be roughly half. The adverse impact this will have on the economy of Westfield, which does not benefit from the same kind of subsides, is huge. The impact on the high street, MSN should also be taken into account. Environmentally this will be a disaster in terms of pollution on our already overcrowded road network. A distribution centre requires sound supporting infrastructure- the road links of the A362 to the A37 are not adequate for this purpose.	Westfield PC	An Economic report was prepared to establish the economic climate of the local and wider area. In order for the development to be considered acceptable, the Transport Assessment accompanying the application will need to demonstrate that the proposed development will not have an adverse impact on the road network. The SVEZ includes a package of mitigation measures on the A362 to enable the development, including widening of the carriageway at Sunnyside; the realignment of the A362 to remove the S-bend at Langley's Lane; and upgrades to the Thicket Mead Roundabout. These measures have been developed in collaboration with the Local Highway Authority. [pollution]
What is the potential impact on traffic for East/West traffic from Radstock to MSN? You say that you are looking to encourage local residents to take up jobs at SVEZ but unless bus services are improved I feel it will increase east-west traffic. The NR Greenway is poorly lit and not satisfactory for use outside daylight hours. What mitigation is there for potential business migrating from existing outdated premises to SVEZ?	SVF-Adrain Dodgson	The impacts of the SVEZ on the A362 have been assessed in detail, including microsimulation modelling. The SVEZ includes a package of mitigation measures that have been developed in collaboration with the Local Highway Authority, these include new or upgraded bus stops on the A362 / B3355. The Norton Radstock Greenway is a strategic cycle route. Any proposals for new or upgraded infrastructure along this route are beyond the scope of the SVEZ and would be subject to a separate assessment and business case.

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What level of engagement with the consultation process so far?	SVF-Richard Burgess	There has been a high level of response to the engagement process, as detailed in this SCI. This engagement is a non-statutory but best practise informal public engagement. Following from this, the statutory public consultation period will commence upon submission of the application which will be undertaken by the BANES Planning Department.
Please explain south junction off the roundabout.	SVF-Peter Morgan	The proposed SVEZ Roundabout incorporates Langley's Lane on the southern arm. This will provide existing residential properties at Springfield Buildings with improved access to the A362 through a new junction on Langley's Lane. This will avoid the need for residents of Springfield Buildings to directly access the A362. During the development of the highway improvements, the project team met with Mr Morgan to gain further insight of existing issues in the area, including the difficulty of crossing the A362 which will be relieved through both the realignment of the A362 and new crossings at the proposed SVEZ roundabout.
The bus services are rubbish and getting worse. So if you live outside walking/cycling area you have no alternative but use a car.	SVF-Josie	Active travel improvements will result from the proposed development, which will also make the area safer for travel by pedestrians and cyclists.
I have serious concerns that the aim to increase the number of people walking and cycling	SVF-Lavinia	
Can you explain more about the LDO and development rights? The largest building is 2 metres higher than Paulton house and is the largest building on the EZ. This appears to be too high and will dominate the EZ and surrounding landscape.	SVF-Cllr Hardman	Put simply, LDOs grant automatic planning permission for specific development within a defined area. The LDO route improves certainty for landowners, the community, and developers, as well as reducing perceived bureaucracy and allowing for swift decision-making. It is a pro-active process that demonstrates the desire of the LPA to bring forward necessary development.

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		A Landscape and Visual Impact Assessment will be submitted in support of the LDO application. This will assess the proposed buildings in terms of landscape harm, but we must also remember that this is also a balance of practicality for the uses proposed.
Dear Sir/Madam, Please see the attached photo showing the proposed Somer Valley Enterprise Zone. During consultations that have happened I have noticed that proposals to widen the road by Sunnyside Cottages have been put forward. Could you please advise me as to how the 200 year old cottages, namely Bridge Buildings, will be protected with the vast increase of industrial traffic if plans go ahead. The cottages are closer to the road than Sunnyside but currently have no protection from: large lorries, pollution, salt spreading, speeding traffic (which therefore hinders pedestrian safety) and protection of the cottages themselves. Currently the houses shake and vibrate quite vigorously due to not only the size of the vehicles using the A362 but because of the proximately of the cottages to the road. This unfortunately will only get worse if no traffic calming and widening of the pavement happens. I welcome people coming and assessing my concerns and look forward to your quick response.	Tracey Bevan	Thank you for your email and for your interest in the Somer Valley Enterprise Zone. Many apologies for the delay in responding to your query. As part of our mitigation package for the A362, a review of traffic speeds and limits along the road is being undertaken. Design parameters for the A362 are being agreed with the B&NES Highways Development Management with the aim of minimising traffic lane widths and therefore managing traffic speeds along the A362. Alongside this, the feasibility of the implementation of a consistent 30 mph speed limit along the A362 is being explored. Together with the nearby improvement works at Sunnyside that will be designed to minimise traffic speeds, the package of works seeks to achieve slower and smoother vehicle speeds along the A362. I hope you find the above information helpful. Please feel free to contact us either via email or through our engagement website: https://beta.bathnes.gov.uk/somer-valley-enterprise-zone-first-public-engagement if you have any further queries or wish to provide feedback.
Please comment on the impossible current traffic situation from Tesco to Thicket Mead round about. Severe delays and hold ups exist. Living at No 75 it is often impossible to exit into the road sometimes having to take risks. If any cars are parked on the main road this creates a standstill. The proposals will hugely increase the problem. BEFORE any construction the road needs to be sorted. Currently my vote is against the	Colin Tincknell	As part of our transport assessment for the SVEZ LDO, we are undertaking detailed traffic modelling of the A362 corridor, including the Thicket Mead Roundabout. Any mitigation scheme for the Thicket Mead Roundabout will seek to reduce delays and provide a smoother flow of traffic. Mitigation at the Thicket Mead Roundabout may include traffic signals which would create gaps in traffic for those seeking to join the A362 from private accesses. The need for any waiting restrictions to prevent parking on

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application. What is the process for appealing to the relevant government department.	the A362 will be explored as part of the traffic modelling. The timing of any mitigation works will be agreed with B&NES Highways and will take account of other committed development in the local area. Works along the A362, such as the proposed SVEZ roundabout at Old Mills, would be phased to minimise impacts on traffic along the corridor. A package of measures to enable other modes of travel, and reduce traffic flows on the A362, would also be delivered. This includes a new cycleway between the SVEZ and the Norton Radstock Greenway, and improvements to local bus stops. In addition, the West of England Combined Authority is currently appraising a package of additional transport improvements as part of its Somer Valley to Bristol and Bath scheme.
I've just been made aware of the development of the Somer Valley Enterprise Zone in the Old Mills area (Paulton). I live in Midsomer Norton, and while the proposed zone appears to fall within the Paulton parish boundary it's arguably closer to Midsomer Norton in terms of straight line distance. First of all can I ask if it is known whether businesses will want to set up shop in this area? Have any businesses expressed specific interest in having premises on the proposed site? The last few years has seen a huge shift in office work due to remote working as a result of the COVID-19 pandemic. Many companies have stated they will never return to a full-time office environment, and some have gone as far as saying they will allow their employees to work from home on a full-time basis. I notice from one of the plans that some of the intended use is for office space. Have you considered the viability of new physical office buildings in the area post-COVID, and whether businesses will be able to attract employees who are required to	Thank you for your interest in the Somer Valley Enterprise Zone. We are constantly monitoring market demand in this area, and we are confident that there would be demand for the units proposed. Between 2011 and 2020 there has been a progressive reduction in both office and industrial space in the Somer Valley, which has resulted in some existing employers relocating to other counties where suitable commercial space is available. The Somer Valley Enterprise Zone would help to address this shortfall, and we have been approached by businesses who would be interested in occupying a unit on the site. Whilst we appreciate that the Covid-19 pandemic has changed the way that businesses operate and that working from home trends are likely to continue, demand for office space to support a new, blended way of working has endured. We are proposing to create a ‘business park in a park’ and aim to enhance the site as an environment for work and leisure. The existing public rights of way on site would be retained and remain available for public use, as well as

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work from a physical office building? I think I understand your aim is for the development to be a business hub for the area. However has any consideration been given to redeveloping existing brownfield sites around the area? One example which springs readily to mind is the old Welton Bibby site (Station Road) which is fairly large and has been vacant for a number of years. I think a decision was reached back in 2018 to develop the Welton Bibby site but we're 4 years on and nothing has happened. Would it be better to wait for this brownfield site to be redeveloped and judge how it affects the local economy before developing a greenfield site? I don't think the consultation paperwork has answered enough questions about the road infrastructure, and particularly some pinch points around the area which already cause a lot of traffic. Plans mention improvements to some parts of the local road system but it's not clear what these improvements would consist of. I don't think you are able to guarantee that businesses setting up on the site would mostly employ people who live in the local area, so there is possibility that the small country lanes could become used as rat runs by commuters which has happened with enterprise developments in other areas for many years. I own two dogs and enjoy walking them around the area of the proposed development, but looking at the plans it's not clear whether we would still be able to access the fields to the North which offer scenic views and a brief moment of peace. The map here recognises existing public right of way from Wickes car park through to the fields but it's not clear if this would be cut off with the new development. I know there

being enhanced through the creation of a new circular path around the outer edge of the entire site, to maximize public access. We will carefully consider how all phases of construction can be undertaken, whilst maintaining safe public access to the existing rights of way on site.

The Somer Valley Enterprise Zone site has been allocated for employment uses since 2007 and it is needed to boost prosperity within the Somer Valley through the provision of new industrial and commercial floor space, as well as new jobs. The brownfield sites within the locality are limited in number and have either already been allocated for alternative uses or would not be suitable for the scale required for this project. The Welton Bibby site for instance is not suitable for continued employment use and the Local Plan has allowed for it to be redeveloped into a mix of uses. Both the Somer Valley Enterprise Zone, and these other allocations on brownfield land are required to bring forward the new employment space and jobs required to support the economic prosperity of the Somer Valley.

The scope of the transport assessment, including potential pinch points for mitigation, has been developed closely with B&NES Highways Development Control. We are undertaking detailed traffic modelling that will establish any parts of the local road network that need to be improved to accommodate the development. Full details of proposed mitigation will be included with the draft Local Development Order, which will be subject to public consultation. The impact on country lanes is being considered as part of the transport assessment and any road improvements will be focused on providing reliable journey times on the A362 to encourage traffic to use suitable routes to the site.

The commercial and industrial uses proposed at the Somer Valley Enterprise Zone could not be accommodated on the high street due to their

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are a number of other people from the area who would be similarly disadvantaged and who could be resentful of the development as a result. Will the public right of way be retained? Finally has any thought been given to any redevelopment of Midsomer Norton high street? Including occupation/redevelopment of the old Argos site which has been empty for a few years as well as a number of other vacant shops on the main street. It's obvious the high street hasn't had much love in at least the last 10 years due to its very tired appearance and maybe a bit of a facelift might be enough to tempt people and businesses to the area and restore some pride for those of us who already live here.		scale and nature. However, the Somer Valley Enterprise Zone is just one of a range of projects that the Council is currently pursuing in the Somer Valley. The Midsomer Norton High Street Renewal Programme and Heritage Action Zone projects seek to revitalize the high street and address vacant retail spaces. We hope that you find the above information helpful.
I would like to raise the following points; The proposal appears very outdated, considering the changes brought about by the COVID epidemic, as we find the offices are being phased out by many employers to save costs since realising that many of their employees can work from home. Therefore, large office blocks are not a likely requirement in future. As there is Environmental emergency, and therefore the need for a development of a 13.5-hectare Greenfield site for industry is highly questionable, when there are Brownfield sites lying vacant in the area, indeed some industrial units lie empty opposite the proposed development. Many businesses have failed recently due to the rising cost of living, COVID, rising petrol prices, etc. The inclusion of a small portion of landscaping does not offset the disturbance caused by the construction &	Jackie Simpson	The LDO and Statement of Reasons and supporting technical assessments address these points.

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use of the site, which adjoins the woodland of the 'Batch'.

The A362 is already very congested. Widening the road will not reduce the extra noise, congestion & pollution raised by adding more industrial units leading to more heavy vehicles using the route.

Cycle paths & walkways do not offset this pollution, the site is on the edge of town and will mainly be accessed by car users and lorries. Indeed, I think it highly unlikely that someone working in an office, spending a night in a hotel or restaurant would arrive on bike or on foot!!

Residents in this area already suffer from high levels of pollution & adding to this would be unjustifiable.

The proposed height of the buildings, which is not specified to the ridge of the roofs, is far too intrusive, being above the height of the residential properties which are opposite and slightly downhill from the site.

The development is highly unlikely to reduce the need for commuting as many of the jobs it may provide will be in warehousing as this makes up 56%of the development. The quoted percentage figures for Managerial & Professional jobs on the proposal of 45% appear to be much higher than the layout of the site would provide & I would be interested to find out how those figures were arrived at.

If the proposed hotel, restaurant & pub were built here, they would detract from the current move to regenerate the town centre, which is a more suitable area for them. As pubs are no longer a viable business, even in the town centre, this seems highly questionable.

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The inclusion of 'characterful' architecture is unlikely to be successful in making the site fit in with the surrounding miners cottages. It would still be an intrusive development.

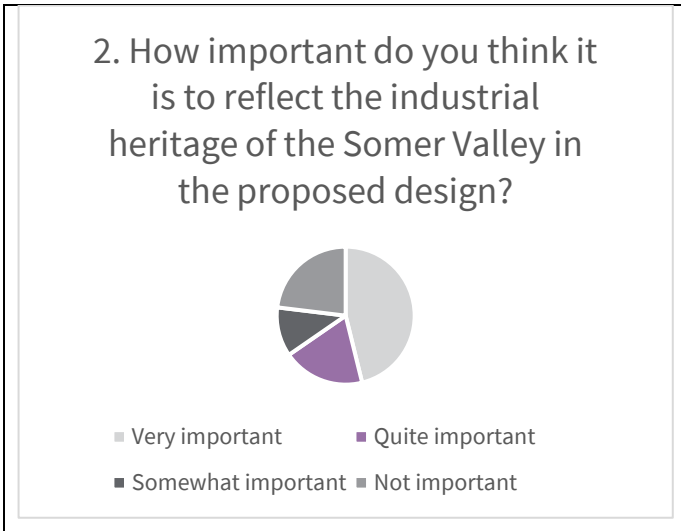
There is no evidence that a site of this nature could attract the desired kind of businesses; with no direct access to motorways, it is a fact that the site could not possibly compete with its nearby cities for big business leading to highly paid professions.

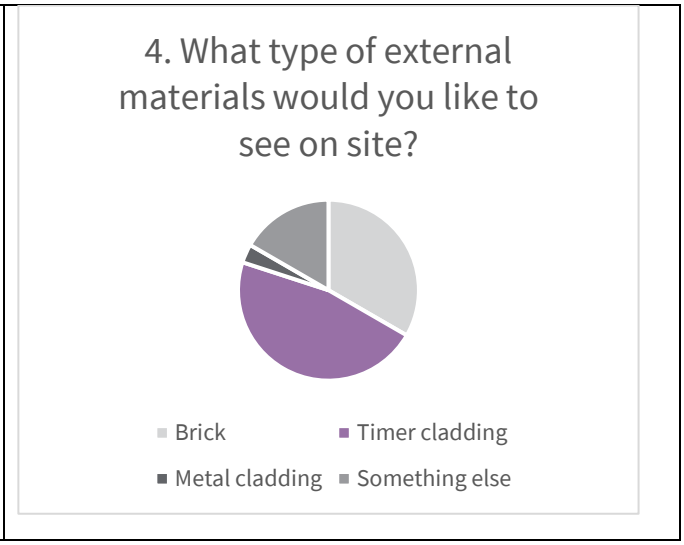
To finish, I would like to say that the whole proposal need a serious re-think, as I believe it is unsuitable for current circumstances and would not benefit the town in the manner intended.

Thank you for your kind attention!

Survey Responses

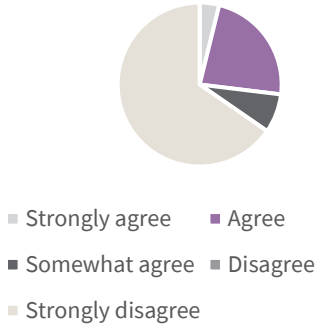
The quantifiable responses are demonstrated below in pie chart format. A summary of the free-form responses is also covered below, together with the project team's response.



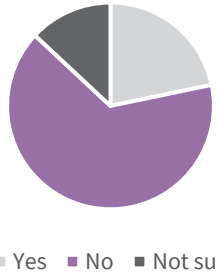


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5. Do you agree that the layout of the site is appropriate?



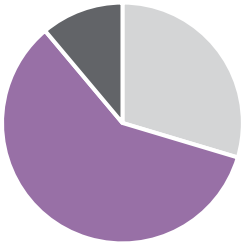
6. Do you feel the building height is appropriate in the local context?



9. How do you think green infrastructure should be represented within this proposal?



11. Do you feel that the proposed mix of uses is appropriate?



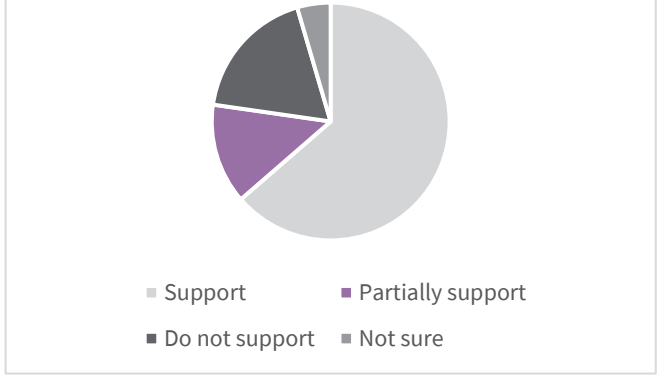
14. Provide a cycle track between the SVEZ and Norton Radstock Gateway

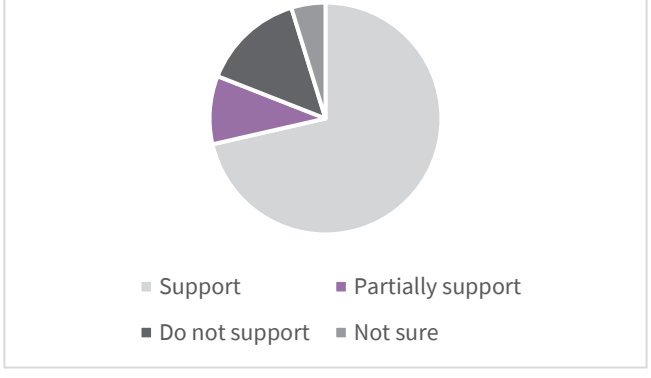


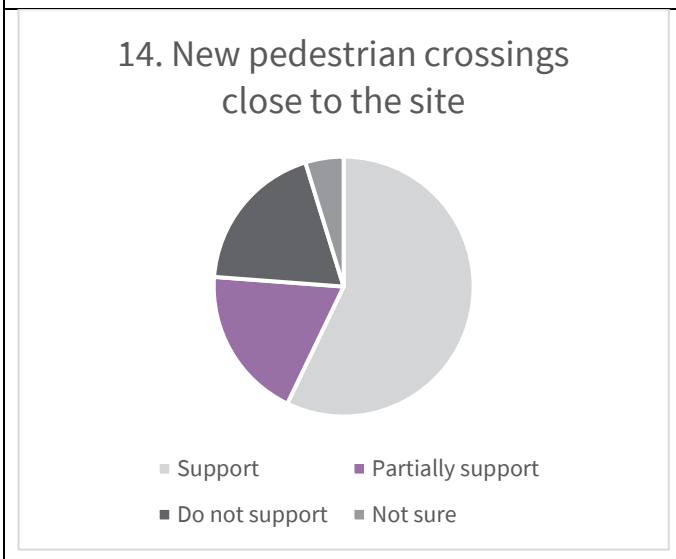
14. Provide a walking and cycling link to Old Mills Lane

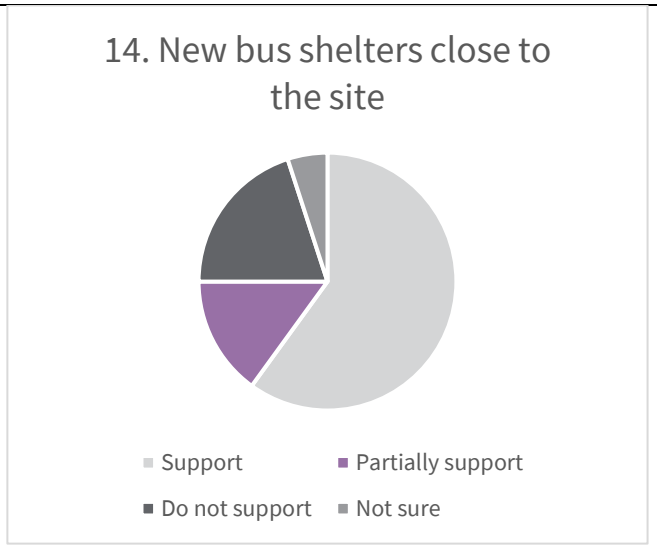


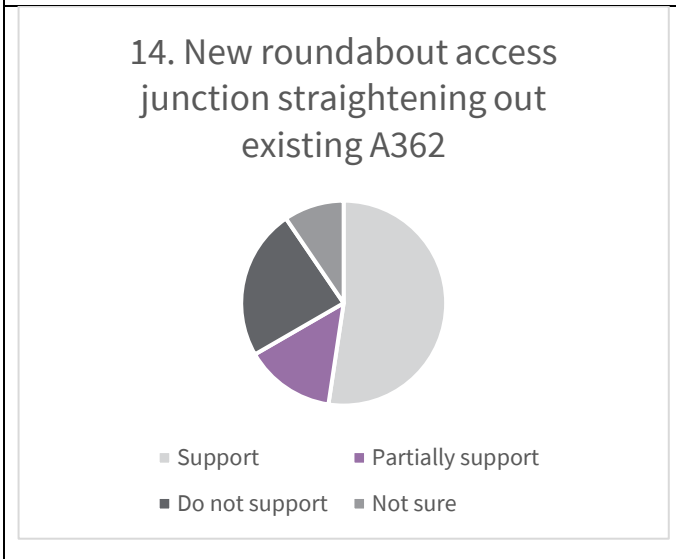
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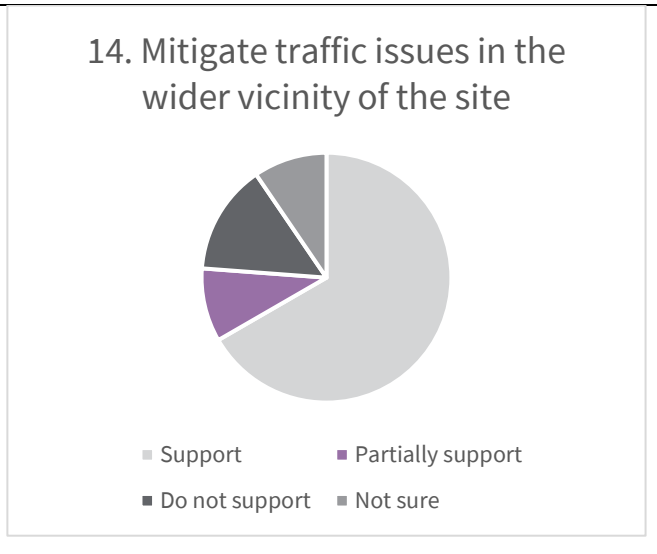












4.2 The free form/qualitative responses have also been analysed. The questions and a summary of the responses received are set out below.

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Question	Response Summary
3. Please tell us how you think the industrial heritage of the area could be reflected in the proposed design.	Desire for character/heritage style design/heritage street names/public art/site name to reflect heritage
4. Do you have any comments on the green infrastructure proposals, or suggestions for additional landscaping and biodiversity features?	Wildflowers/distaste for greenfield development/don't want further wildlife destruction
5. Further comments on the site layout.	Proposed development is too large
7. Comments of proposed building heights	Too high/non area appropriate/will block countryside views
11. Further comments on proposed mix of uses	Recent consultation for nearby industrial development proposals found that there was no demand/Manufacturing should be prioritised over retail/social/small proportion of responders like the proposed uses.
12. What else would you like to see on site not covered in the proposals?	No development/homes/shops/renewable energy/school/doctors' surgery
13. Reasons for wanting/not wanting to work on the site	Vast majority of responders are retired/would ruin the countryside
15. Other comments	Other brownfield sites for development would be preferred/increased traffic/inadequate location/remain agricultural/will attract workers from elsewhere/pedestrian crossings should be considered in line with desire lines/not attractive development/concern for lack of demand/increased litter concerns/nearby resident disruption/not what should be sought in a climate emergency

Of the qualitative responses received, the following are ranked in order of most commonly raised (highest to lowest), together with the project team's response.

Concern	Response
The proposed buildings heights are too high, inappropriate for the area and would block countryside views	The Landscape and Visual Assessment submitted in support of the LDO sets out the appropriateness of the building heights proposed in the context of the wider area.
We are in a climate emergency. Development would negatively impact wildlife habitats on the site. Green fields should not be built on. Established trees and hedgerows should not be removed and ecology should be protected	The site area is currently of limited ecological value. The proposed development will provide 10% biodiversity net gain.

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There won't be enough demand for the proposed uses and the site will become housing instead or become a white elephant	The Economic Report undertaken for SVEZ demonstrates that there is demand for the uses proposed.
Nearby brownfield sites/vacant land are more appropriate and should be used instead. The fields are nice as they currently are and should be left alone	The land has been allocated for commercial development since 2007. We appreciate the desire to focus development on brownfield (previously developed sites in preference to green fields) but there is not sufficient previously developed land available in the right locations to meet the identified need for commercial floorspace.
The roads won't be able to cope with the traffic that development would bring	A Transport Assessment will be submitted in support of the application which will set out the transport measures in order to ensure that there is no detrimental impact on the highway network.
Development would cause disruption for nearby residents	Development sites inevitable cause some disruption, however, this disruption is short-term and a construction management plan will ensure that it is kept to a minimum.
The area is used for walking and dog walking and should remain that way	All public rights of way will be retained as part of the development proposals
Food use will encourage rats and litter	
Local jobs are already not being filled so do not see how this development would increase jobs	An Employment Report was undertaken which concludes that there is demand for the type of jobs that SVEZ would create.
Area should be left alone due to danger related to previous mining use	The Ground Condition Report and Coal Mining Risk Assessment demonstrate that there is no danger due to previous mining uses in the area.
A pub and hotel alongside industrial units would not be attractive	The proposed units will be of a high-quality design, integrated into the area as far as practicable.
Concerned that new upkeep of green infrastructure would not be maintained	A Management Plan will be in place upon completion to ensure that the green infrastructure is kept to an appropriate standard.

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5 Scheme Revisions

5.1 The predominant changes to the scheme following from the public engagement process relate to boundary alterations. These include:

- Changes to plots P6 and P5, Plot P5 moved 16.5m and plot p6 moved 8.25m away from a landowner boundary.
- Alterations to periphery areas of open space.
- Removal of the attenuation areas neighbouring a landowner boundary.
- Removal of the footpath between the south plot and a landowner boundary.
- Acoustic fencing provided between plots P6 and P5 with traditional low level timber fence either side.
- Visibility splays added to the existing entrance and no structural landscape or high fence lines allowed within visibility spay zone.

5.2 The second pre-application process and ongoing work/engagement has led to a multitude of positive changes to the scheme. The scheme evolution is summarised in the Design and Access Statement.

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6 Summary and Conclusions

6.1 The project team is grateful for the input provided by everybody that that participated in the engagement process for the SVEZ LDO.

6.2 Residents, landowners, Parish Council's and other stakeholders were notified via differing means to seek feedback on the proposals. Extensive feedback was received and has been considered within this statement and the wider proposals.

6.3 The public engagement process has been carried out in accordance with good practice, with the events being well advertised and face to face events being held in close proximity to the site, with representatives of the project team available throughout the consultation process to answer questions and discuss any concerns with the local community.

6.4 Our team has considered the feedback provided and has given a response to that feedback within this report. The public engagement process has fully complied with national policy and local policy in respect of the Council's Community Involvement Statement.

6.5 The project team has sought to engage effectively with residents, their representatives and other stakeholders using a variety of consultation methods, in line with best practice.

6.6 For further information on the public engagement process, please contact JLL.

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Appendix 1 – Public Engagement Invitation Neighbour Letter

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6th May 2022

Jones Lang LaSalle Ltd
31 Great George Street, Bristol, BS1 5QD
+44 (0)117 927 6691

jll.co.uk

Dear Sir/Madam,

Somer Valley Enterprise Zone - Local Development Order

On behalf of Bath and North East Somerset Council I am pleased to update you on our emerging plans for a Local Development Order (LDO) on land at the Somer Valley Enterprise Zone (SVEZ).

I set out below some background information and details of our planned engagement events over the coming weeks.

Background
SVEZ is located at Old Mills, a greenfield site extending 13.5 hectares on the western edge of Midsomer Norton. It has been allocated in the B&NES Core Strategy and Placemaking Plan for employment uses and once developed could create 1,300 new jobs for local people and 54,000 square metres of commercial floorspace. A plan showing the location of the proposed LDO is attached.

SVEZ was granted 'Enterprise Zone' (EZ) status by the Government in April 2017, as part of the wider Bath and Somer Valley Enterprise Zone. The EZ status demonstrates support for economic development in the form of new job creation, business space provision and more generally a contribution towards economic growth of the local economy.

To help deliver the aims of the EZ, the Council has decided to bring forward a Local Development Order (LDO). An LDO is made by the Local Planning Authority under the Town and Country Planning Act 1990 and effectively grants planning permission for specific classes of development. It is designed to help streamline the planning process by removing the need for developers to make individual planning applications, which in turn will facilitate the wider objectives to support job creation and economic growth in the Somer Valley.

Forthcoming community engagement
The Council has commissioned a specialist design team to prepare the draft LDO documents. The forthcoming public engagement will provide an opportunity for the community to hear from the design team, to review the plans and to provide your comments and feedback.

We will host a live public 'webinar' on Thursday 19th May from 19:00 to 20:30 which will be the start of a 6-week public consultation process. You can register for the Webinar here:
https://bathnes.zoom.us/webinar/register/WN_D9LnG3QvQGeJMjFGNrZ1Nw

Alternatively, please call 07815 641062 and we will register you directly.

Information boards giving details of the consultation will also be displayed at Radstock Library and Midsomer Norton library from 19th May.

As an immediate neighbour of SVEZ, we wanted to write to you personally to let you know about this upcoming process. If you have specific queries or would like to discuss the plans in more detail with our team, we would be happy to make arrangements for a call. Please contact me using the details below.

Yours faithfully



Nicola Lovell
Associate – Planning & Development
JLL
31 Great George Street | Bristol BS1 5QD

ConsultationEvents.southwest@eu.jll.com

Appendix 2 – Online and Hard Copy Survey Feedback

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Interest

Resident	112
Councillor (or ex)	4
Developer	1
Business Owner	3
Other	3

1. How important do you think it is to reflect the industrial heritage of the Somer Valley in the proposed design?

Very important	50
Quite important	29
Somewhat important	26
Not important	24
No answer	6

2. What type of external materials would you like to see on the site?

Brick	41
Timber	60
Metal	9
Other	23
No answer	11

3. Do you agree that the layout of the site is appropriate?

Strongly agree	7
Agree	23
Neither agree or disagree	21
Disagree	9
Strongly disgree	72
No answer	5

4. Do you feel this is appropriate in the local context?

Yes	31
Not sure	18
No	79
No answer	7

5. How important do you think green spaces and landscaping are in new developments?

Very important	114
Quite important	7
Somewhat important	5
Not important	3
No answer	6

6. How do you think green infrastructure should be represented within this proposal?

Trees	107
Plants and shrubs	92
Open spaces	95
Benches	60
Other	9

7. Do you feel that the proposed mix of uses proposed is appropriate?

Yes	30
Not sure	21
No	78
No answer	6

8. Would you be interested in working at the site?

Yes	4
Not sure	20
No	106
No answer	5

9. A cycle track between the SVEZ and Norton Radstock Greenway

Support	78
Partially support	5
Not sure	9
Do not support	25
No answer	11

10. A walking and cycling link to Old Mills Lane

Support	79
Partially support	11
Not sure	5
Do not support	29
No answer	11

11. A consistent speed limit in Farrington Gurney

Support	76
Partially support	14
Not sure	10
Do not support	25
No answer	10

12. Widening of the A362 as it passes on-street parking at Sunnyside

Support	70
Partially support	9
Not sure	10
Do not support	33
No answer	13

13. New pedestrian crossings close to the site

Support	70
Partially support	12
Not sure	8
Do not support	29
No answer	16

14. New bus shelters close to the site

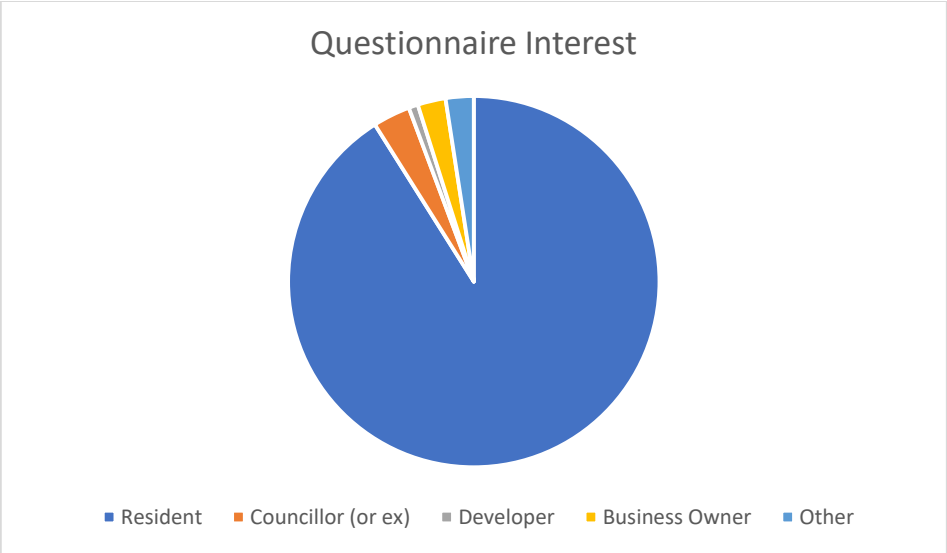
Support	65
Partially support	13
Not sure	10
Do not support	31
No answer	16

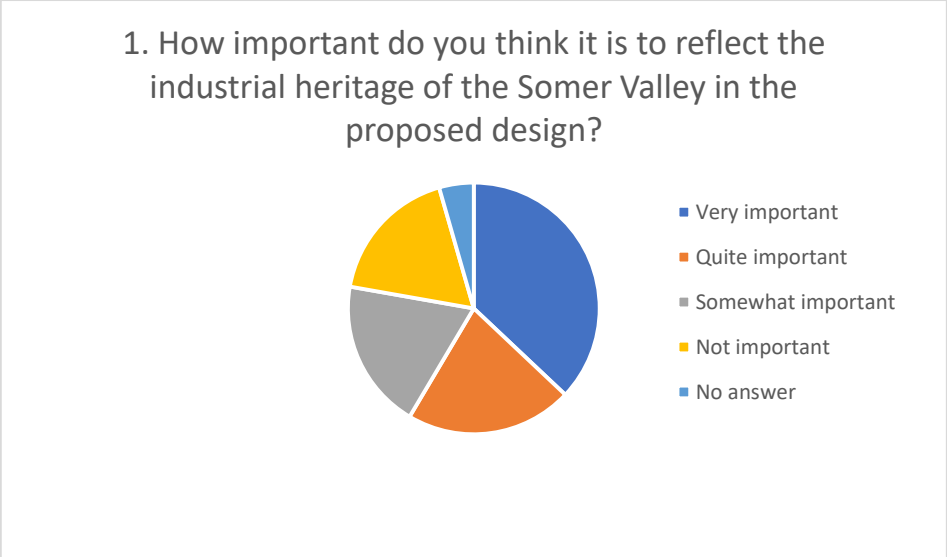
15. New roundabout access junction, straightening out existing A362 alignment

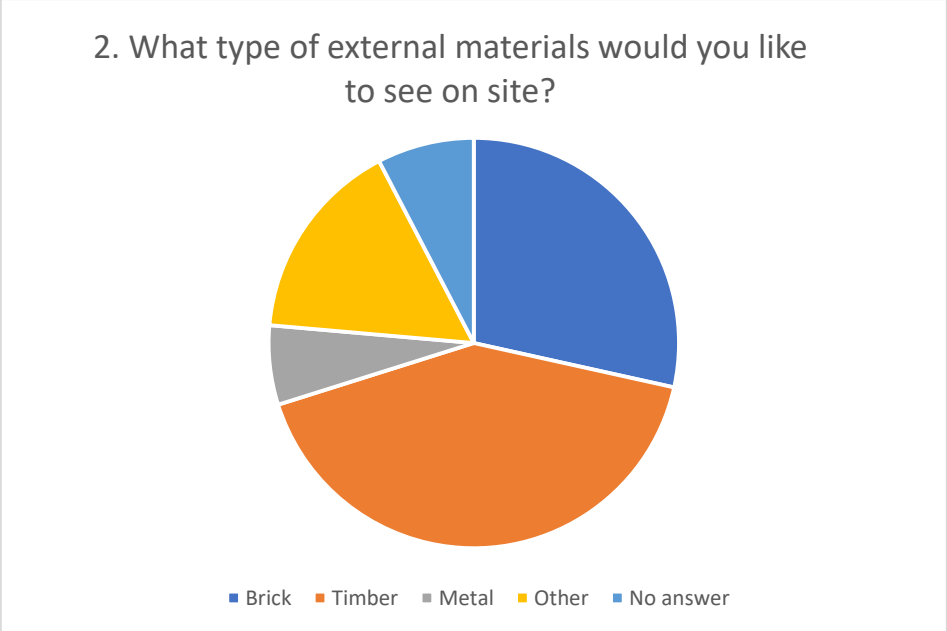
Support	52
Partially support	13
Not sure	15
Do not support	40
No answer	14

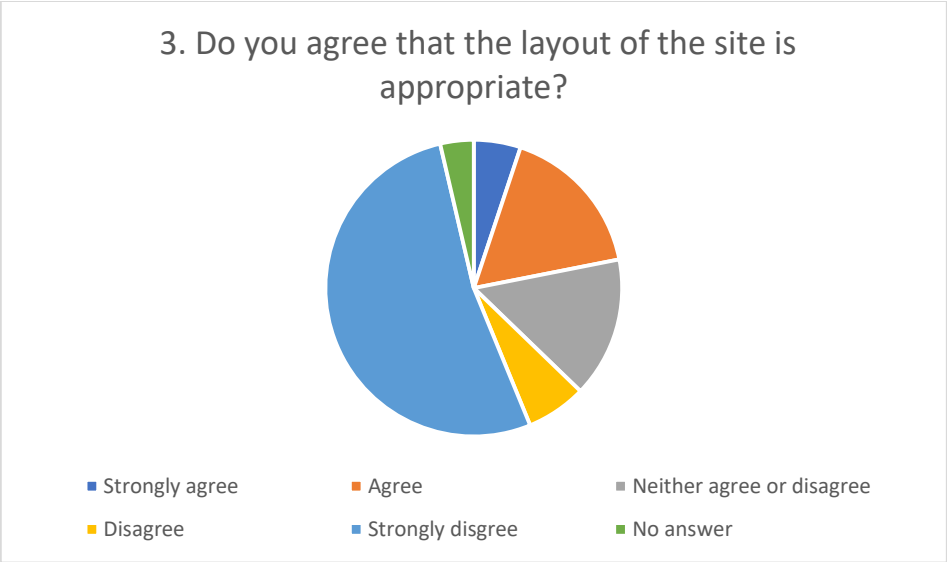
16. Mitigatation of traffic issues in the wider vicinity of the site

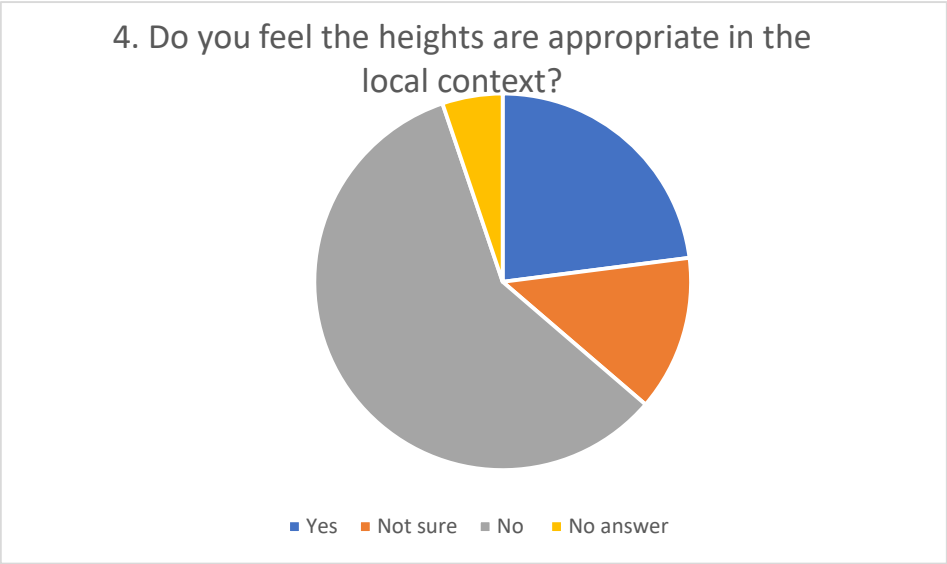
Support	72
Partially support	8
Not sure	15
Do not support	24
No answer	14

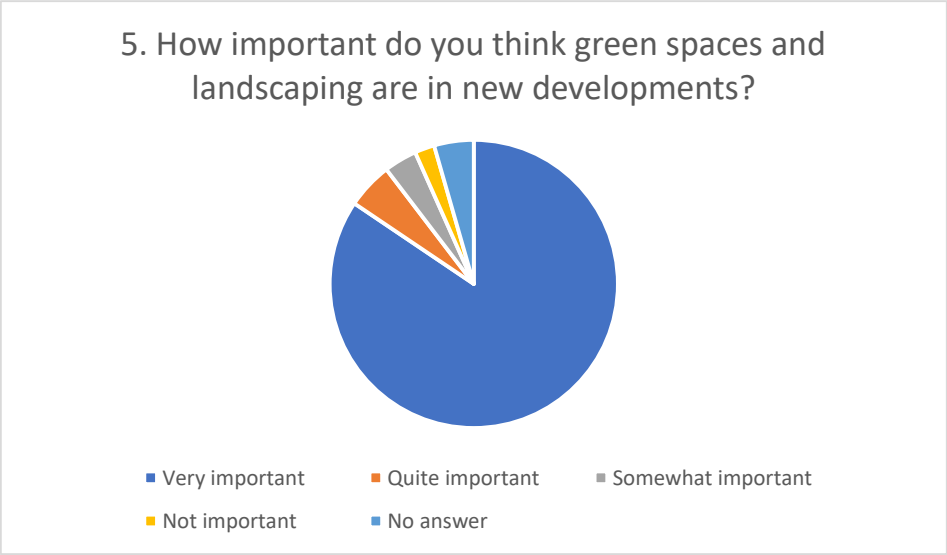

Questionnaire Interest
Resident
Councillor (or ex)
Developer
Business Owner
Other

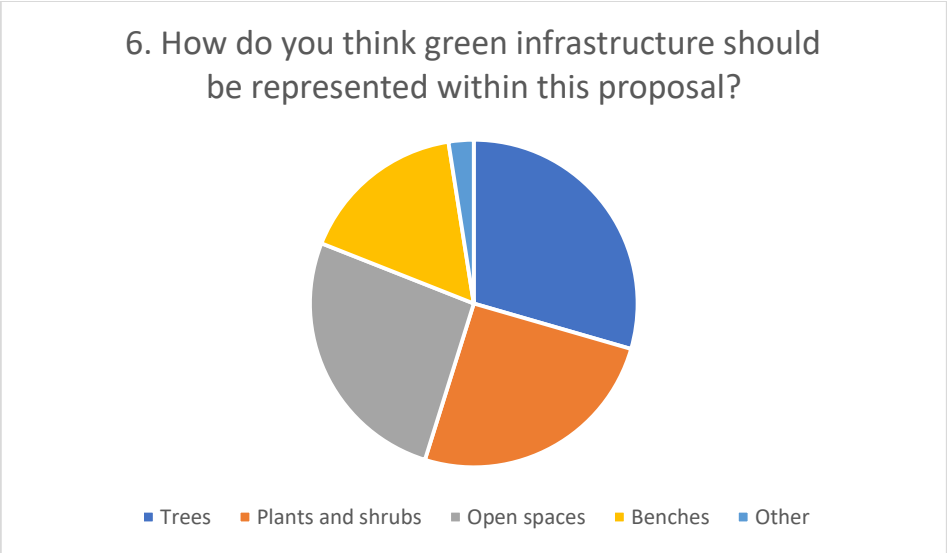

1. How important do you think it is to reflect the industrial heritage of the Somer Valley in the proposed design?
Very important
Quite important
Somewhat important
Not important
No answer

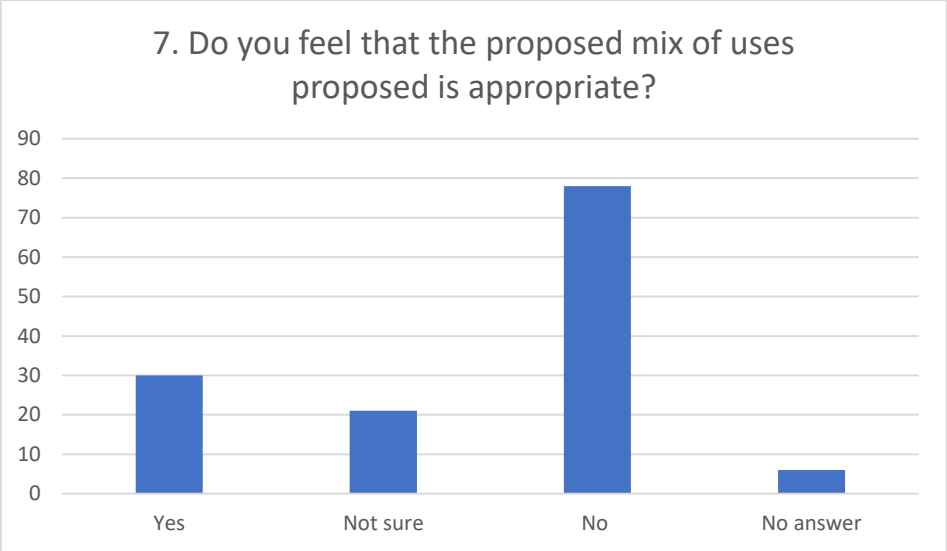

2. What type of external materials would you like to see on site?
Brick
Timber
Metal
Other
No answer

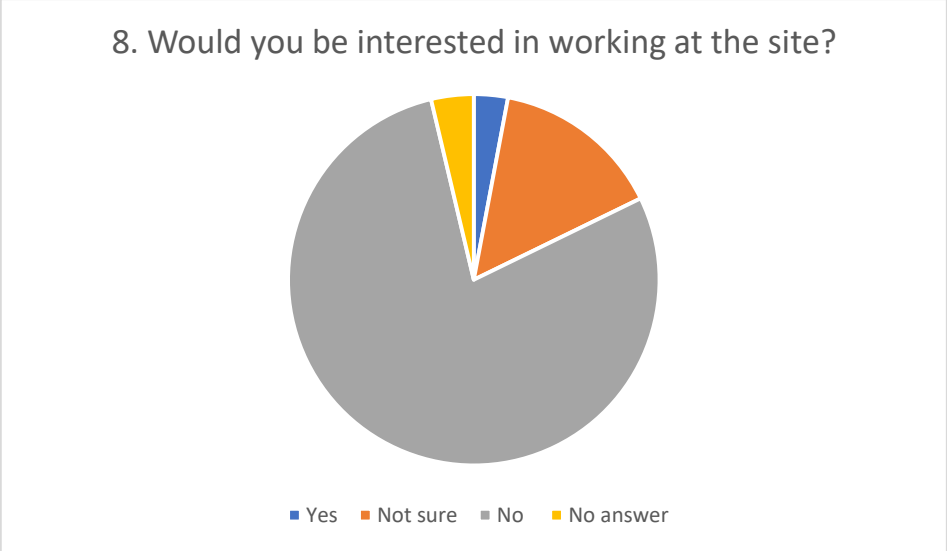

3. Do you agree that the layout of the site is appropriate?
Strongly agree
Agree
Neither agree or disagree
Disagree
Strongly disgree
No answer

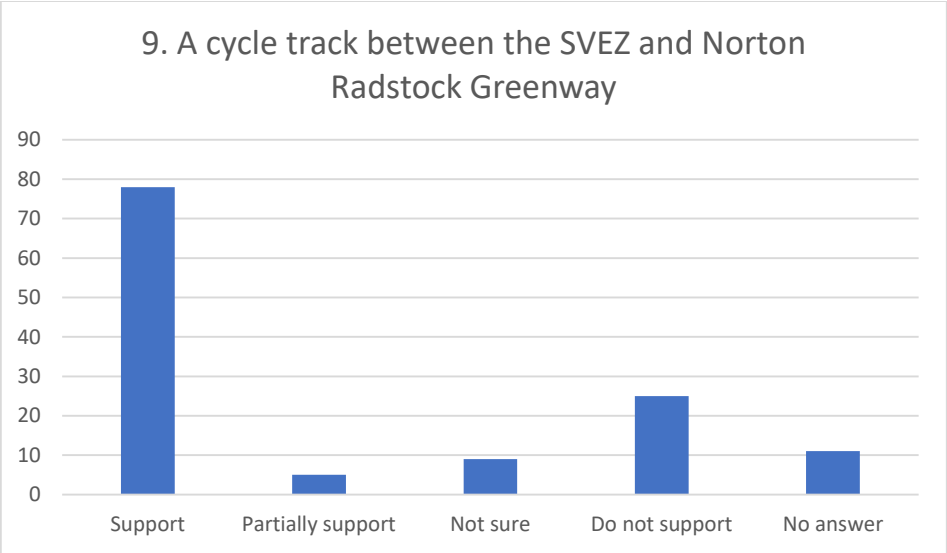

4. Do you feel the heights are appropriate in the local context?
Yes
Not sure
No
No answer

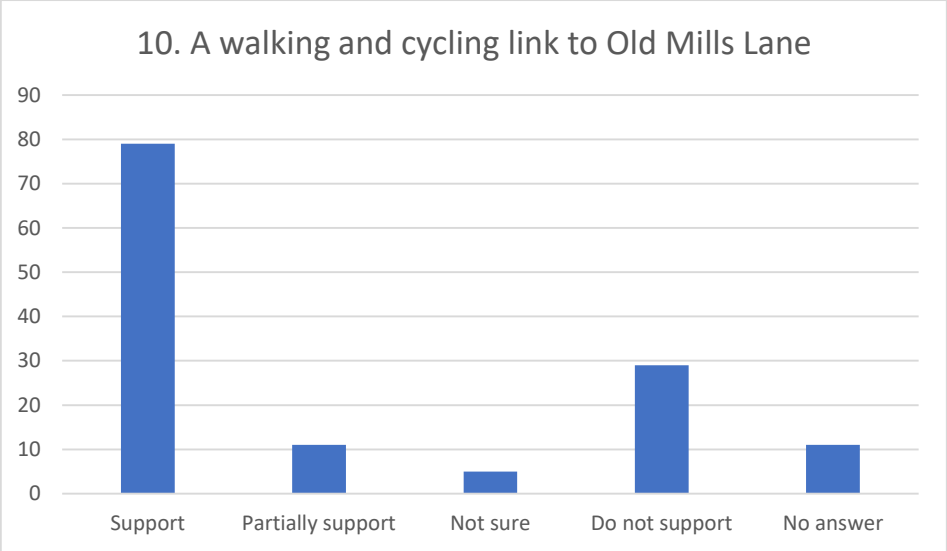

5. How important do you think green spaces and landscaping are in new developments?
Very important
Quite important
Somewhat important
Not important
No answer

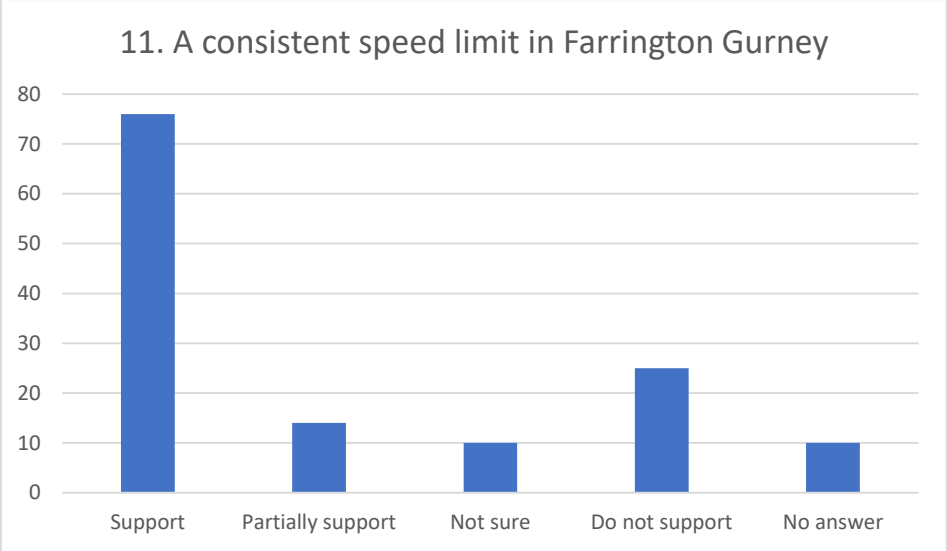

6. How do you think green infrastructure should be represented within this proposal?
Trees
Plants and shrubs
Open spaces
Benches
Other

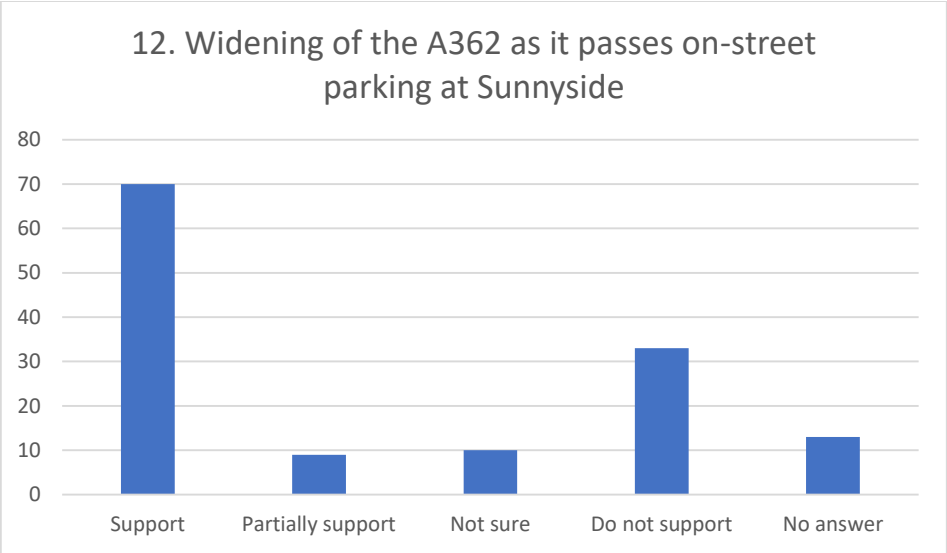

7. Do you feel that the proposed mix of uses proposed is appropriate?
90
80
70
60
50
40
30
20
10
0
Yes
Not sure
No
No answer

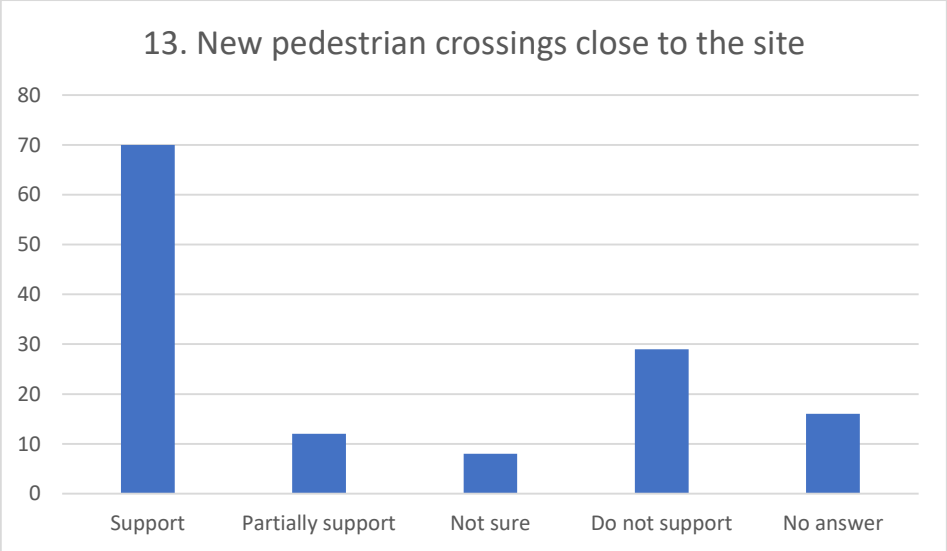

8. Would you be interested in working at the site?
Yes
Not sure
No
No answer

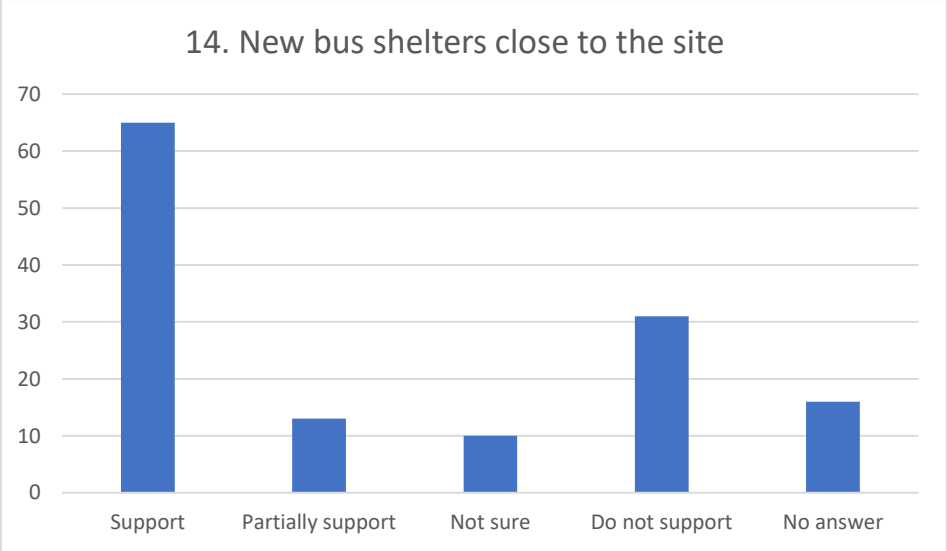

9. A cycle track between the SVEZ and Norton Radstock Greenway
90
80
70
60
50
40
30
20
10
0
Support
Partially support
Not sure
Do not support
No answer

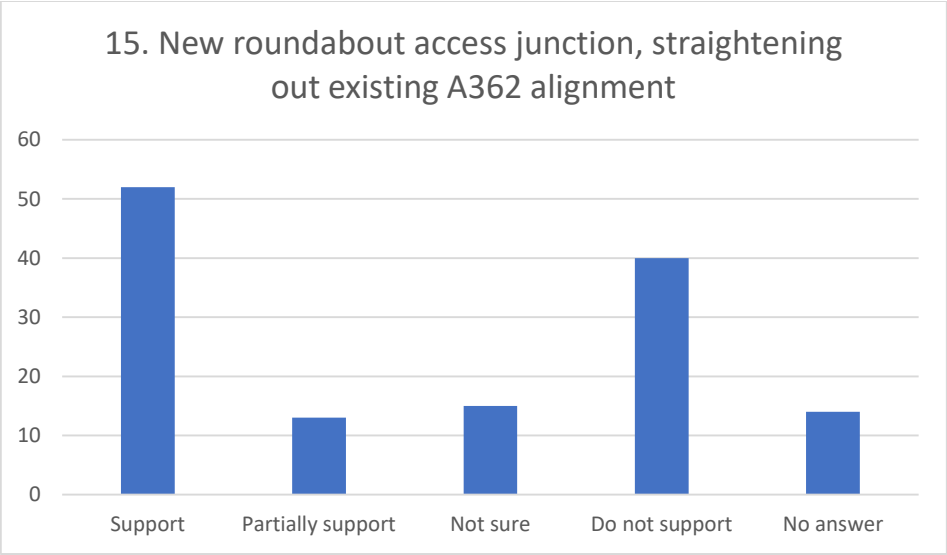

10. A walking and cycling link to Old Mills Lane
90
80
70
60
50
40
30
20
10
0
Support
Partially support
Not sure
Do not support
No answer

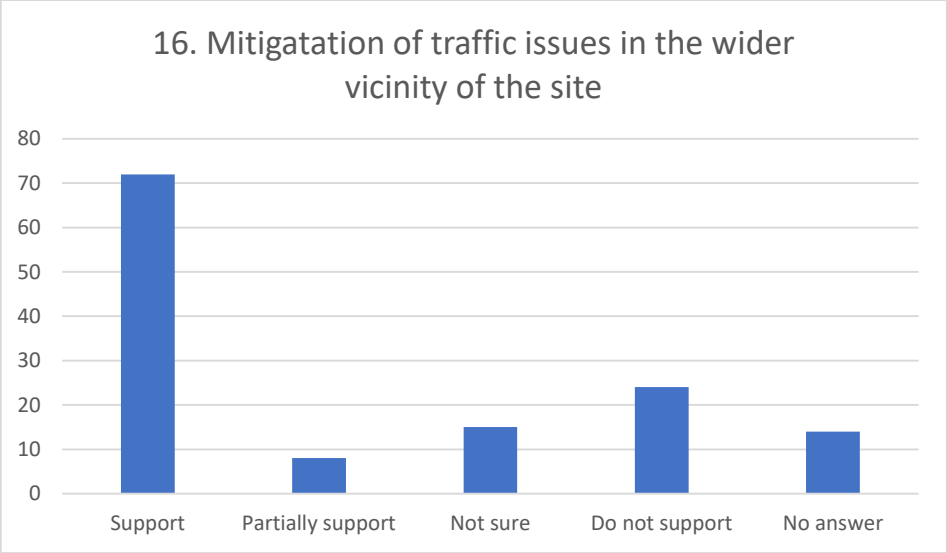

11. A consistent speed limit in Farrington Gurney
80
70
60
50
40
30
20
10
0
Support
Partially support
Not sure
Do not support
No answer

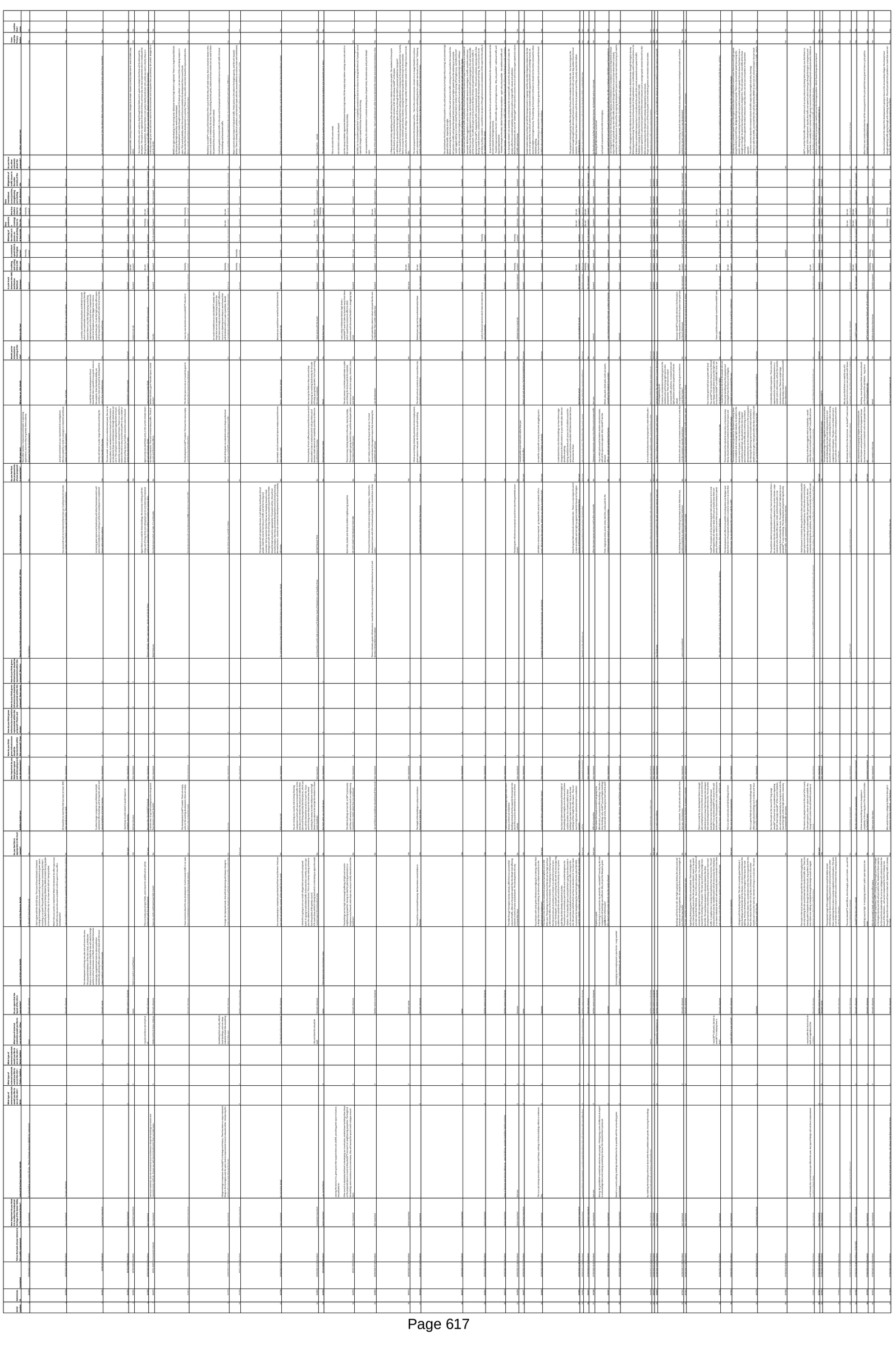

12. Widening of the A362 as it passes on-street parking at Sunnyside
80
70
60
50
40
30
20
10
0
Support
Partially support
Not sure
Do not support
No answer

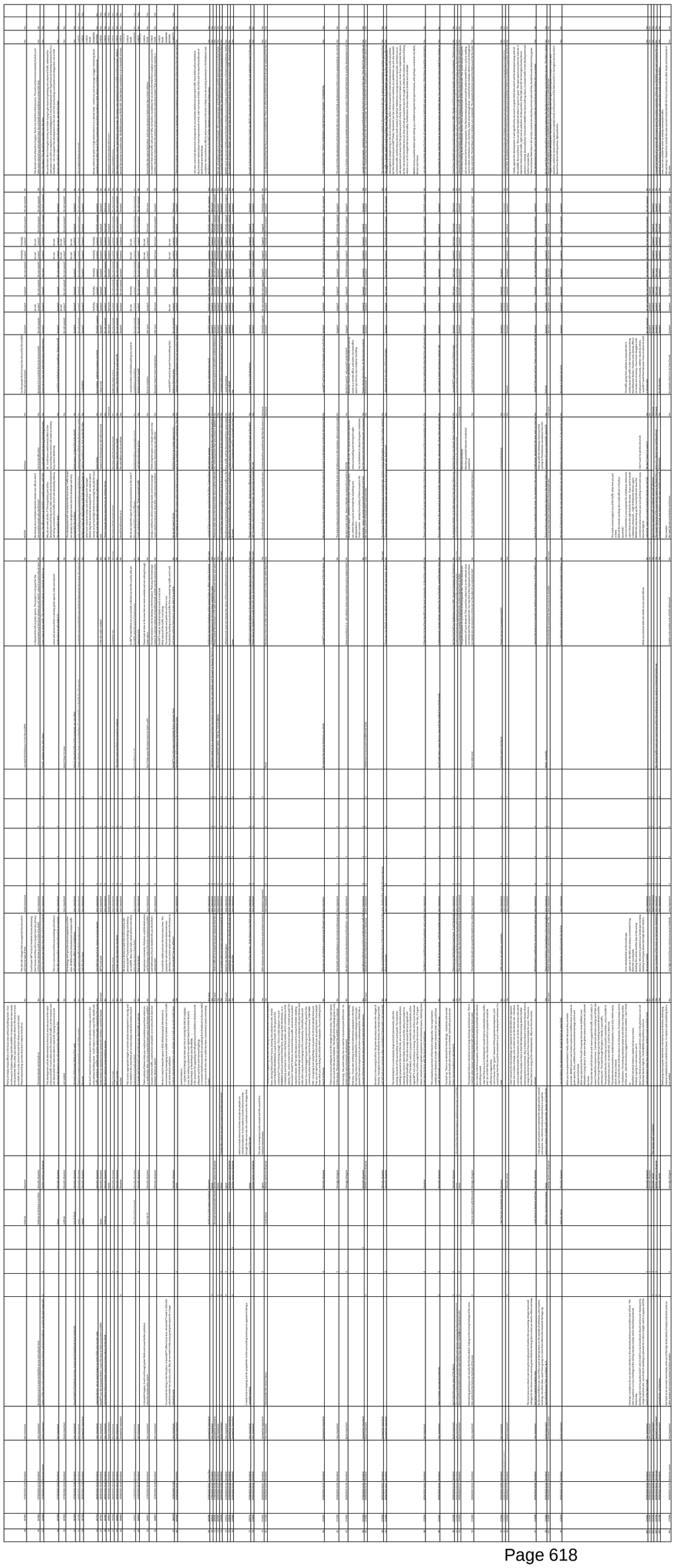

13. New pedestrian crossings close to the site
80
70
60
50
40
30
20
10
0
Support
Partially support
Not sure
Do not support
No answer


14. New bus shelters close to the site
70
60
50
40
30
20
10
0
Support
Partially support
Not sure
Do not support
No answer


15. New roundabout access junction, straightening out existing A362 alignment
60
50
40
30
20
10
0
Support
Partially support
Not sure
Do not support
No answer


16. Mitigatation of traffic issues in the wider vicinity of the site
80
70
60
50
40
30
20
10
0
Support
Partially support
Not sure
Do not support
No answer





Location	Tell us the basis of your interest in this public engagement	How important do you think it is to reflect the industrial heritage of the Somer Valley in the proposed design?	Industrial heritage important details	How important of external materials would you like to see on the site?	How important of external materials would you like to see on the site?	How important of external materials would you like to see on the site?	What type of external materials would you like to see on the site? - Other	Do you agree that the layout of the site is appropriate?	Layout of site some details	Layout of site disagree details	Do you feel this is appropriate to the local context?	Building height text	How important do you think green spaces and landscaping are in new developments?	you think green infrastructure should be represented within the site?	you think green infrastructure should be represented within the site?	you think green infrastructure should be represented within the site?	How do you think green infrastructure should be represented within this proposal?: Other	Green infrastructure comments details	Feel that the proposed mix of uses proposed is	Mix of uses text	What else on site details	Would you be interested in working at the site?	Work on site text	A cycle track between the SWLT and Norton Radstock Greenway	A walking and cycling link to Old Mills Lane	A consistent speed limit in Farrington Gurney	Widening of the A362 as it passes ex-street parking at Sunnyside	New pedestrian crossings close to the site	New bus shelters close to the site	New roundabout access junction, straightening out existing A362 alignment	Mitigation of traffic issues in the wider vicinity of the site	Do you have any other comments about the proposals?	Any other comments text
WSN	Resident	Very important	Art installations such as the coal trucks already in existence would soften the overall appearance and ethose of the development	4							Not sure	No more than 2 storeys would be preferable unless taller ones would not be prominent		Very important	4	4	4		Grass with all round greenery and also autumn colour (2nd preference) and also good examples. Would be beneficial to the development, wildlife access to the surrounding areas must be maintained		Not just warehousing/large industrial units		No												
WSN	Resident	Very important	reference should be made/represented by installation showing heritage of Mk5/Paulton/Radstock miners lamp as a prominent design style, layout and materials. Street names would reflect historic employers. Artifacts could be included on site	4							Not sure	Cant think of another 3 storey building locally. Hotel might be acceptable with 3 storeys as long as tucked away		Very important	4	4	4				outdoor gym	No												
Radstock	Resident	Very important				4	Local stone	Strongly Agree	like the park within a park concept, lots of landscaping planting of trees and shrubs to green the site and blend with the countryside				Yes	Appropriate to the locale		Very important	4	4	4		Water features/ponds	wildflower meadow	Yes	Good balance of requirements		No											
Radstock	Resident	Somewhat important	name of the site			4					Yes			Very important	4	4	4				Yes	Site should be flexible to accommodate changing needs - jacks are closing, hotels are underused. Ample cafes around already		No											
WSN	Resident	Not important		4				Strongly disagree			Not sure			Very important	4	4	4				No			No		N/a		N/a		N/a				Yes	
WSN	Resident & FG Parish Councillor	Very important	I am not an architect				Mature	Agree	As this is an undesirable development, it should be very low rise and not include any retail		Yes	we are in a rural area- lower the better		Very important	4	4	4				No	Hotel- why when we have under/used/scrubed in the area. Cafe/restaurant pub - these will attract new traffic after work hours		No		Partially support- why not extend to A37		Partially support- how low will consistent be. We can get it to 30mph now	Partially support- please. when will this happen should be now	Support	Partially support	Partially support- must be 1st enough			Yes	
WSN	Resident	Very important	By promoting live heritage in as much of the modern design throughout the proposed new site, and not desecrating anything related to it.	4			Any brickwork to be of a similar colour to bath stone/work	Somewhat agree	heigh of buildings is of an very important factor		Yes			Very important	4	4	4		In every way possible but the more I am writing about this proposed new side the more I think it should not be built	It would be all too easy to sell the site with all these 'fancy waitrosum' only to later discover that they have been encroached upon in the future to provide more build- or extensions to existing build	No	Us 'local residents; do not want lots of employers/employees going out in their cars to the pub, restaurants, snack bars etc in order to get lunch everyday. The coming and going of every day traffic associated with the diversity of jobs will be constant as it is!		No		Partially support- but only if it has been solved to improve traffic flo on A 362	Partially support	Support	Support	Support	Support	Support	Support	Support	No	I think that the frightening thought of increased traffic on A362 is by far the most important factor in deciding whether to support the proposed plan- at all. The A362 from A37 has become increasingly busy over the years as it provides a favourable link road from Wells as well as bristol area for commuter traffic on a daily basis. this proposal will increase its traffic flow way beyond an acceptable level, not just during rush hour but for most of the day, when an (unknown) amount of large goods vehicles will want to enter and leave the site- I like on a road that leads on to the A362 and unless I am let out by kindness I can wait frustratingly to filter onto this road for ages at the best of times. unless away is found to re-direct the increase traffic away from the A362 I will do everything in my power to stop this proposed development! p.s. can anybody provide proof that this site is really needed for the purpose it is being suggested- where are all these people looking for jobs? I suggest that the majority of people that will fill the vacancies should this go ahead, will come from places far and wide, not from around here	
Paulton	Resident	Somewhat important	By leaving good views of the batch. Best way would be not to obscure it by ugly warehouses that are not needed	4	4	4	trees and hedges	Strongly disagree	Grounds disarree		No	too high. Will block countryside views. Not appropriate for this area at all		Very important	4	4	4		By not ruining it. It is beautiful as it is and a great habitat for wild life which will be pushed further and further away	anything you plant will probably be neglected and die. This happened on purnells side. Replacement hedge planted in heigh of summer and not watered. It will just be a rubbish trap	No	a lot of this was proposed on old print works Paulton. Recent consultation and research said no demand for industrial units or pub. Why do you think it will be different here?	everything that is there already. Well established native hedges and trees. Agricultural lands used for farmine	No	I would feel guilding that the countryside had been wrecked unnecessarily where I was working	Support	Support	Not sure	not sure	support	support	not sure	not sure	yes	new pubs are not a thing. People don't support the old pubs- a pub on an industrial estate does not sound attractive- likewise hotel. There is a massive brownfield site in midsomer norton- wotton bibby and barnes site has been empty for years. Please try there. Paulton is always targeted. we have sacrificed enough, research says light industry units and pub not needed or wanted in the purnells site. It will not be wanted here either and so you'll building another load of exor housing	
WSN	Resident	Quite important	the design should not just be another metal clad box	4				Strongly disagree			No			Very important	4	4					No			No		the majority of the jobs will be low paid		partially support	Partially support	partially support	partially support	partially support	Partially support	partially support	partially support	partially support	yes	If we are to be subject of this type of development a brownfield site such as wotton, bibby and barnes site should be considered	
WSN	Resident	Very important	The new road will make it more faster and not improve it for residents	4	4			Strongly disagree			Farm land	No		Farm land	Farm land	Farm land				No	This is farm land and not building land		No		Not sure		support	support	Partially support		not sure	not sure	support	yes	This is not the site for more building. The roads in the area are not fit for more traffic. There needs to be more improvement	
WSN	Resident	not important	Leave the land as it is. Agricultural	4			Earth, grass, crops	Strongly disagree	Grounds disarree		not needed, not necessary	No	Totally unnecessary development	Very important				drop the proposal, not needed	Fields are just fine as they are	No	the layout and mix of fields and hedgerows are fine as they are		No	there is no need whatsoever for this development. Rather than provide jobs for locals it is more likely to bring commuters in. the whole surrounding road infrastructure cannot cope with the increased traffic from this development. The hotel and pub are smoke and mirrors. there will never be either on this site. Whatever walking and cycling option is shit is a death trap. Cars passing on the wrong side of the road and exceeding the speed limit BEFORE they get to the national speed limit sign. Trying to get out of your entrance in a	
WSN	Resident	Not important					Leave the fields as they are	Strongly disagree			Totally inappropriate for the area	No		No important						No	no road infrastructure and none		No	crops especially grapes	No		Not sure	No	do not support	Support	Support	not sure	not sure	do not support	not sure	yes		
Paulton	Resident	very important									yes	buildings should be pitched not flat roofs and their height of units given must refer to ridge heights, not eaves		Very important	4	4	4				yes				currently self employed and approaching retirement age	not sure	Support	Support	Support	Support	Support	Support	Support	Support	yes	Design of roundabout etc. must allow for cyclists using (unreadable) carriageway. Cycle lanes that chop (unreadable) loads and (unreadable) frequent stops/slowdowns are not an acceptable alternative. Is there any evidence to support that a pub/hotel on the site are either required by the local community or would be viable businesses?	
Paulton	Re-councillor for Paulton	Quite important					close	Agree						Very important	4	4	4										Support	Support	Support	Support	Support	Support	No		
Paulton	Resident	very important						Strongly disagree			no	too much building here already		Very important	4	4	4				not sure	we don't need it		No									yes	we don't need anymore units. The fields are lovely as they are. Our roads will not cope with all the new traffic this would bring!	
Paulton	Resident and business owner									leave the fields. Think of the wildlife already living there				Very important	4		4		just as it is!	there already is rabbits, foxes badger and lots of other wildlife there	no		I would like it to be left alone so I can walk my dogs in the field	no	I already work in old mills								yes		
Paulton	resident	very important						Strongly disagree			why build on green fields - there are plenty of old mills that could be turned into housing. We are not living in 2007 times			Very important	4	4	4		as is	already there	no		left along as it's lovely to walk	no	retired								yes	why build more units when wetton is an industrial place. Why is Eagle hire place been empty? Why not use this. Don't need another food place, this will encourage rats from the rubbish people leave. Jobs not being filled, so can't see this will bring employment. this is a mining area, fields should be left along because of the danger with the mineshafts/tunnels. WOULD YOU LIKE IT IF THIS WAS PROPOSED ON YOUR DOORSTEP?	
Paulton	other - come to area most	very important						Strongly disagree						Very important	4	4	4				not sure			no									yes		
Paulton	resident	very important	this design whatever it may be will effect the area	5				Strongly disagree		making away green spaces. Wildlife diasplacem - more traffic	not sure	this should'nt go ahead whatever he/she		Very important	4	4	4				no	too much traffic		no		do not support		do not support	do not support	do not support	do not support	do not support	do not support	do not support	yes	this should not go ahead as it would cause too much distruction to the area.	
Paulton	resident	very important	I do not think this area should be built on	4			It should not be developed	Strongly disagree		there are green fields. You had the opportunity to build industrial units and provide employment on the Purnell site - this was initially in the Purnell proposal but has never happened.	no	because it is not appropriate to build here at all		Very important				we have a climate emergency so you wish to build on green fields - makes no sense at all! Why not develop the old Welton Bibby and Baron site?		no	not an appropriate place for development		no	not as appropriate place for this development	do not support	do not support	do not support	do not support	do not support	do not support	do not support	do not support	no		
Paulton	resident	Not important	as there is no need to build there	4				Strongly disagree			no	as there is no need to build there		Very important							no												yes	some of these proposals would be welcome but should be carried out anyway. Why can't you look to utilise areas/buildings which are no longer in use rather than building on green fields and disrupting the lives of those living here?	
Paulton	resident	Quite important	Quite important	4			Quite mostly - earth as per	Strongly disagree		too built up. Where is up to date evidence that there is demand for these things? We are not living in 2007 times	no	too high. People don't want high buildings - will block the countryside		Very important	4	4	4		do not remove any established trees or hedgerows	anything which is removed should be replaced properly, and maybe a wide, wide	no	no evidence that this is needed now and post 2022- more people happy to work from home, we have been told that there is no demand for industrial units on old Purnells site - so one of these is not wellcome here		left as semi-ideural land	no											yes	you've stated that this was allocated for employment in 2001 - in those 21 years things have changed a lot about the way people live and work. Brexit and a covid pandemic have changed things hugely. More up to date research done regarding old print works in Paulton showed no demand for light industrial units in this area in 2022. the same for the pub. pubs are closing everywhere. If you go ahead with this i think it will be a white elephant, full of 'to let' signs and used as an example in other areas of what not to do. let the farmers carry on farming and the wildlife carry on being wild. there will be huge disruption for something that nobody wants. please think again. if you think some of these things are needed there is a huge vacancie site in Midsomer Norton at the Welton, Bibby and Baron site that has no acc	
Paulton	resident	Not important		4				Strongly disagree		not necessary to have this site, leave it as a green site	no			Very important	4	4	4				no	traffic congestion. Promises made about the Purnell site were not kept, why not continue work there		no	doctors surgery, school	no	no	do not support	do not support	do not support	do not support	do not support	do not support	do not support	yes	please cancel this proposal	
Paulton	resident	Somewhat important						Strongly disagree			no	Concerned about the height of some buildings here as not		Quite important	4	4	4				yes	there is certain		no		I am retired		I don't work anymore as I am retired	Support	Support	Support	Support	Support	support	Support	Support	Support	no		
Paulton	resident	Quite important						Strongly disagree			no	would be too tall 12-14 metres. taller than Paulton House and would dominate the landscape		Very important	4	4	4				yes	numerous of different local uses		no		I am retired		I don't work anymore as I am retired	Support	Support	Support	Support	Support	support	Support	Support	Support	no		
Paulton	resident		no more local development needed								not needed										the site at Purnells has been developed for years, and is still undeveloped			all sorts of proposals were made at the time - light industry, more doctors surgeries, some shops. This has not happened											yes	We have a site at Welton which could be developed and hasn't. Absolutely no need for any sort of building whatsoever at Farrington. Scrap it. Money is better spent on the upkeep of the roads that we have. Maintaining white lines, filling in pot-holes and replacing drain covers that have been stolen. Fix what needs fixing before spending on schemes that are not needed. we need no more KFCs or McDonalds in the area. Litter from these outlets	
Paulton	resident	Quite important						Strongly disagree			no	the surrounding area has no high level buildings		Very important	4	4	4				not sure			no									yes	I don't think that it is in the best interests of the local people or environment to create this enterprise zone on beautiful green fields. Surely the opposite, in these times of environmental fragility, must be on conserving ecology, rewilding areas to increase biodiversity and planting trees in an attempt to reduce the impact of global warming and climate change. There are plenting of brownfield sites which could be developed in a far more sustainable way, such as the wetton bibby site. we have land in Paulton for over two decades and have been repeatedly told through the development of the Purnells printing factory site, that the reason that they did not develop light industrial units and a pub was	

Who	Points Raised	Response (if required)	Response date
	The Town Council is in favour of the Enterprise Zone as part of the endeavour to redress the imbalance of housing development and employment in Midsomer Norton, which currently results in an undesirable level of out-commuting. The cycle access to the new Enterprise Zone is now included in phase one but we'd like to highlight its development, and the continuation of the Norton-Radstock Greenway, as a priority. Suggestion for an A37 – A367 link road for lorries. At present the main A road through Midsomer Norton is through Station Road. This road is not built for larger vehicles as the pavements are mounted to navigate the bends in the road. North Road must not be considered as an alternative to Station road. North road is a "B class" which is extremely dangerous as it is with the very high volume of traffic.		
MSN Town Council	There is a concern there will be too much of a retail centre which will threaten Midsomer Norton High Street even though we are aware the retail is restricted.	N/A	
Radstock Town Council	signage to ensure traffic flows smoothly through the town centre and local road network		
	The lack of bus routes/provision.	Referenced CRSTS and options to create active links from surrounding billages to the A367 to puck up buses	
	Road junctions in Radstock Twon Centre are a blocker to traffic flows	N/A	
	Air quality (linked to SVEZ and in general)	Referenced CRSTS, active travel shifts and a general move to more hybrid and electric vehicles over medium term	
	Skills developed within SVEZ and Radstock/Somer Valley	Discussed how thCouncil can work with local employers to support skills development, apprenticeships and employer links with schools	
Marcus West	Is it known whether businesses will want to set up show in this area? Have any businesses expressed specific interest in having premises on the site?	BANES to formulate response	
	Have you considered the viability of office space post COVID?	BANES to formulate response	
	Has any consideration been given to redeveloping exisiting brownfield sites?	BANES to formulate response	
	Plans mention improvements to some parts of the local road systems, what will they consist of?	Ed/Dom	
	Will people still be able to access the fields to the North e.g. dog walking. Will the public right of way be retained?	AHR	
	Has thought been given to redevelopment of Midsomer Norton high street?	BANES to formulate response	
		As part of the mitigation package for the A362, a review of traffic speeds and limits along the road is being undertaken. Design parameters for the A362 are being agreed with B&NES Highways with the aim of minimising traffic lane widths and therefore managing traffic speeds along the A362. Alongside this, the feasibility of the implementation of a consistent 30 mph speed limit along the A362 is being explored. Together with the nearby improvement works at Sunnyside that will be designed to minimise traffic speeds, the package of works seeks to achieve slower and smoother vehicle speeds on the A362.	
Tracey Bevans (Bridge Buildings)	How will the cottages be protected from increase of industrial traffic?		
	Proposal will be detrimental to Westfield Industrial Estates, which will see organisations moving to the EZ where rents will be roughtly half. The adverse impace this will have on the economy of Westfield, which does not benefit from the same kind of subsides, is huge. The impact on the high street, MSN		
Westfield PC	should also be taken into account	N/A	
	environmentally this will be a disaster in terms of pollution on our already overcrowded road network	N/A	
	A distribution centre requires sound supporting infrastructure- the road links of the A362 to the A37 are not adequate for this purpose	N/A	
	What is the potential impact on traffic for East/West traffice from Radstock to MSN? You say that you are looking to encourage local residents to take up jobs at SVEZ but unless bus services are improved I feel it will increase east-west traffic		
SVF- Adrain Dodgson	The NR Greenway is poorly lit and not satisfactory for use outside daylight hours		
SVF- Adrain Dodgson	What mitigation is there for potential business migrating from exisiting outdated premsises to SVEZ?		
SVF- Adrain Dodgson	What level of engagement with the consultation process so far?		
SVF- Richard Burgess	Please explain south junction off the roundabout		
SVF- Peter Morgan	The bus services are rubbish and getting worse. So if you live outside walking/cycling area you have no alternative but use a car		
SVF-Josie	I have serious concens that the aim to increase the number of people walking and cycling		
SVF- Lavinia	Can you explain more about the LDO and development rights?		
SVF- Cllr Hardman	the largest building is 2 metres higher than paulton house and is the largest building on the EZ. This appears to be too high and will dominate the EZ and surrounding landscape		
	is the land to the north of the site that is currently farmland - has this dispute been resolved		
Tracey Bevan	Dear Sir/Madam, Please see the attached photo showing the proposed Somer Valley Enterprise Zone. During consultations that have happened I have noticed that propsals to widen the road by Sunnyside Cottages have been put forward. Could you please advise me as to how the 200 year old cottages, namely Bridge Buildings, will be protected with the vast increase of industrial traffic if plans go ahead. The cottages are closer to the road than Sunnyside but currently have no protection from: large lorries, polution, salt spreading, speeding traffic (which therefore hinders pedestrian safety) and protection of the cottages themselves. Currently the houses shake and vibrate quite vigorously due to not only the size of the vehicles using the A362 but because of the proximately of the cottages to the road. This unfortunately will only get worse if no traffic calming and widening of the pavement happens. I welcome people coming and assessing my concerns and look forward to your quick response.	Thank you for your email and for your interest in the Somer Valley Enterprise Zone. Many apologies for the delay in responding to your query. As part of our mitigation package for the A362, a review of traffic speeds and limits along the road is being undertaken. Design parameters for the A362 are being agreed with the B&NES Highways Development Management with the aim of minimising traffic lane widths and therefore managing traffic speeds along the A362. Alongside this, the feasibility of the implementation of a consistent 30 mph speed limit along the A362 is being explored. Together with the nearby improvement works at Sunnyside that will be designed to minimise traffic speeds, the package of works seeks to achieve slower and smoother vehicle speeds along the A362. I hope you find the above information helpful. Please feel free to contact us either via email or through our engagement website: https://beta.bathnes.gov.uk/somer-valley-enterprise-zone-first-public-engagement if you have any further queries or wish to provide feedback.	23/06/2022 - sent from regen inbox
Colin Tincknell OBE	Please comment on the impossible current traffic situation from Tesco to Thicket Mead round about. Severe delays and hold ups exist. Living at No 75 it is often impossible to exit into the road sometimes having to take risks. If any cars are parked on the main road this creates a standstill. The proposals will hugely increase the problem. BEFORE any construction the road needs to be sorted. Currently my vote is against the application. What is the process for appealing to the relevant government department.	As part of our transport assessment for the SVEZ LDO, we are undertaking detailed traffic modelling of the A362 corridor, including the Thicket Mead Roundabout. Any mitigation scheme for the Thicket Mead Roundabout will seek to reduce delays and provide a smoother flow of traffic. Mitigation at the Thicket Mead Roundabout may include traffic signals which would create gaps in traffic for those seeking to join the A362 from private accesses. The need for any waiting restrictions to prevent parking on the A362 will be explored as part of the traffic modelling. The timing of any mitigation works will be agreed with B&NES Highways and will take account of other committed development in the local area. Works along the A362, such as the proposed SVEZ roundabout at Old Mills, would be phased to minimise impacts on traffic along the corridor. A package of measures to enable other modes of travel, and reduce traffic flows on the A362, would also be delivered. This includes a new cycleway between the SVEZ and the Norton Radstock Greenway, and improvements to local bus stops. In addition, the West of England Combined Authority is currently appraising a package of additional transport improvements as part of its Somer Valley to Bristol and Bath scheme.	Sent by JLL
Marcus West	I've just been made aware of the development of the Somer Valley Enterprise Zone in the Old Mills area (Paulton). I live in Midsomer Norton, and while the proposed zone appears to fall within the Paulton parish boundary it's arguably closer to Midsomer Norton in terms of straight line distance. First of all can I ask if it is known whether businesses will want to set up shop in this area? Have any businesses expressed specific interest in having premises on the proposed site? The last few years has seen a huge shift in office work due to remote working as a result of the COVID-19 pandemic. Many companies have stated they will never return to a full-time office environment, and some have gone as far as saying they will allow their employees to work from home on a full-time basis. I notice from one of the plans that some of the intended use is for office space. Have you considered the viability of new physical office buildings in the area post-COVID, and whether businesses will be able to attract employees who are required to work from a physical office building? I think I understand your aim is for the development to be a business hub for the area. However has any consideration been given to redeveloping existing brownfield sites around the area? One example which springs readily to mind is the old Welton Bibby site (Station Road) which is fairly large and has been vacant for a number of years. I think a decision was reached back in 2018 to develop the Welton Bibby site but we're 4 years on and nothing has happened. Would it be better to wait for this brownfield site to be redeveloped and judge how it affects the local economy before developing a greenfield site? I don't think the consultation paperwork has answered enough questions about the road infrastructure, and particularly some pinch points around the area which already cause a lot of traffic. Plans mention improvements to some parts of the local road system but it's not clear what these improvements would consist of. I don't think you are able to guarantee that businesses setting up on the site would mostly employ people who live in the local area, so there is possibility that the small country lanes could become used as rat runs by commuters which has happened with enterprise developments in other areas for many years. I own two dogs and enjoy walking them around the area of the proposed development, but looking at the plans it's not clear whether we would still be able to access the fields to the North which offer scenic views and a brief moment of peace. The map here recognises existing public right of way from Wickes car park through to the fields but it's not clear if this would be cut off with the new development. I know there are a number of other people from the area who would be similarly disadvantaged and who could be resentful of the development as a result. Will the public right of way be retained? Finally has any thought been given to any redevelopment of Midsomer Norton high street? Including occupation/redevelopment of the old Argos site which has been empty for a few years as well as a number of other vacant shops on the main street. It's obvious the high street hasn't had much love in at least the last 10 years due to it's very tired appearance and maybe a bit of a facelift might be enough to tempt people and businesses to the area and restore some pride for those of us who already live here.	**RESPONSE STILL NEEDS TO BE AGREED**	

Who	Points Raised	Response (if required)
High Littleton Parish Council	1. The High Littleton Parish Council welcomes plans to generate new jobs in the Somer Valley and supports the SVEZ project. 2. The A39 through the High Littleton Parish suffers significant traffic issues, notably congestion and regular reports of vehicles mounting narrow pavements around the High Littleton School at the beginning and end of each school day. 3. The SVEZ project needs to address wider traffic and transport issues, particularly on the A39, to avoid making risks to public safety even worse.	N/A
Midsomer Norton Town Council	The Town Council is in favour of the Enterprise Zone as part of the endeavour to redress the imbalance of housing development and employment in Midsomer Norton, which currently results in an undesirable level of out-commuting. The cycle access to the new Enterprise Zone is now included in phase one but we'd like to highlight its development, and the continuation of the Norton-Radstock Greenway, as a priority. Suggestion for an A37 – A367 link road for lorries. At present the main A road through Midsomer Norton is through Station Road. This road is not built for larger vehicles as the pavements are mounted to navigate the bends in the road. North Road must not be considered as an alternative to Station road.	N/A

Appendix 3 – Public Consultation Board

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SOMER VALLEY ENTERPRISE ZONE

Public Consultation - MAY 2022

PROJECT OVERVIEW

The Somer Valley Enterprise Zone (SVEZ) is located at Old Mills, a 13.5-hectare greenfield site on the north-western edge of Midsomer Norton, adjoining woodland around the mining spoil heap (The Batch) and the A362.

SVEZ is a proposed new area for commercial development, where the Council is aiming to create a local hub for new business and employment. Once developed, the Enterprise Zone could create around 1,300 new jobs for local people, and in the region of 40,000 square metres of commercial floorspace. A range of commercial buildings will be provided including general industrial, warehousing and distribution space, along with office accommodation and complimentary amenities including a hotel and food and beverage offer.



LDO application boundary

WHY IS SVEZ NEEDED?

SVEZ will provide new jobs for local people, encouraging sustainable economic growth in the Somer Valley.

New local jobs will help to reduce out-commuting, lowering carbon emissions and congestion. It will encourage business and employment growth, by providing new commercial and industrial floor space in the Somer Valley.

The site has been allocated for employment development since 2007. The Council's intervention is needed as the development has not been brought forward by the private sector.

WHAT IS A LOCAL DEVELOPMENT ORDER ?

We are proposing to deliver SVEZ via a Local Development Order (LDO). LDOs are made by Local Planning Authorities (LPAs) and set the planning framework for a specific area. They are essentially a type of Planning Policy 'zoning', which grants planning permission for specific development proposals or classes of development within a defined area.
LDOs are flexible tools, covering a range of uses, scales of projects, and size of buildings. The SVEZ LDO will include a design code, setting out what buildings and spaces should look like, and how they should function in the final development.

LDOs streamline the planning process by removing the need for developers to make a planning application to the LPA, because developers have to work within the framework of the LDO. Creating an LDO for the SVEZ project will help provide greater confidence for the Council and potential developers, and greater certainty for local people.

Once the application for the LDO is submitted, the LPA will run a formal public consultation process. This allows for local input, guiding development in the right direction, in terms of demand and local aspirations.



3D View of Site

HOW WILL SVEZ BENEFIT YOU?

We expect that once it is up and running, SVEZ will bring around 1,300 new local jobs to the area, covering a range of sectors that may include:

- Specialist construction.
- Construction.
- Manufacturing and general sales.
- Land transport.
- Printing.
- Warehousing and distribution.

It is likely that a range of roles will be provided including:

- Management.
- Professional.
- Associate professional/technical.
- Administration.
- Skilled trades.
- Customer service and sales.
- Process.
- Elementary.
- Office and administration roles.

Bath & North East Somerset Council

ARCADIS Design & Consultancy for natural and built assets

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AHR

SOMER VALLEY ENTERPRISE ZONE

Public Consultation - MAY 2022

2



Illustrative Master Plan

/ OUTLINE OF HIGHWAYS INTERVENTIONS

- Our site plan encourages a connected network for walking and cycling which will integrate into existing rights of way.
- The proposal includes dedicated walking and cycling links to the Norton Radstock Greenway.
- Within the site we will prioritise sustainable forms of transport with walking and cycling provision as well as electric charging points.
- We will upgrade bus stops on the A362, including shelters and real-time information serving buses towards Paulton and Bath.
- We are proposing a balanced car parking approach, catering to the uses on site, whilst also enhancing sustainable transport options.
- We are proposing highway improvements which will benefit all users of the A362, such as the removal of the current S-bend moving the access to SVEZ away from the current alignment, and widening the road at Sunnyside, where two vehicles cannot currently pass safely.
- We are preparing a comprehensive transport assessment which will consider the impacts of the development at key locations, in particular, the A362 between Farrington Gurney and Radstock and some of the larger roads which join it.



3D View of Site

Bath & North East Somerset Council

ARCADIS Design & Consultancy for natural and built assets

JLL

SOMER VALLEY ENTERPRISE ZONE

Public Consultation - MAY 2022

/ TIME LINE

Project Start	**Masterplan development & Environmental Scoping**	Ecology Surveys starts	Pre-app, Design Review Panel & Refining Masterplan	VISSIM Transport modelling	Highway Design work starts	Public Engagement	LDO submitted to LPA and formal public consultation	LDO determined
2020 Q2/Q3	2020 Q3/Q4	2020 Q4	2021 Q1	2021 Q3	2021 Q4	Today - 2022 Q2	2022 Q3	2022 Q3/Q4

/ HAVE YOUR SAY

WHAT ARE WE ASKING YOU?

As part of the consultation process, We are inviting residents and any other interested parties to have their say on our proposals. In particular, we would be keen to understand your views on;

Design, Materials and Layout

- The importance of the reflection of industrial heritage at SVEZ.
- Types of external materials to be used.
- Opinions on the current masterplan layout.
- Building heights and visibility.

Green Infrastructure

- The importance of green spaces and landscaping
- Landscaping recommendations.

Proposed Land Uses

- The current mix of land use proposed in the masterplan.

Transport Improvements

- The level of support for a variety of transport improvement proposals around SVEZ.



Aerial View of Site

HOW CAN YOU GET INVOLVED?

Questionnaires have been provided at this location, to be completed and submitted in the box provided.

Alternatively, you can complete this online by visiting the Bath and North East Somerset Council ‘have your say’ webpage.’

The engagement webinar delivered on 19th May can also be viewed on the Council’s ‘have your say’ webpage.

To request another format, or for an advocate to assist you with accessing this information, please contact us by emailing Consultationevents.southwest@eu.jll.com or by calling us on 0117 927 6691

Appendix 4 – SVEZ Webinar 19 May Questions and Response

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Somer Valley Enterprise Zone Webinar – 19th May 2022

Questions and responses

A public webinar on the Somer Valley Enterprise Zone (SVEZ) was held on the 19th May 2022 as part of the informal public engagement on the proposed scheme. A recording of the webinar can be viewed here: https://www.youtube.com/watch?v=tKUgAcBME9c

The following questions were asked by attendees of the webinar via the chat function. The project team gave verbal responses to some of the questions during the webinar, however for completeness all questions asked are outlined below.

For ease of review, the questions and answers have been arranged by topic area.

Highways and active travel

1. **The A362 at Old Mills has an S bend which is a traffic pinch-point, narrowing and without a pavement, regularly causing large vehicles to stop-and-crawl to pass. Can you confirm that re-routing the A362 to bypass this is a major part of the planning application?**

   The proposals are not yet at the planning application stage, and we are informally consulting residents and members of the public so that we can ensure their views feed into the final site masterplan. However, the rerouting of the A362 to remove the S-bend and provide the proposed roundabout are integral parts of the masterplan to achieve access to the SVEZ. This will enable large vehicles to pass one another with ease.

2. **Will public transport (buses) run through and stop at the site for employees, to reduce car usage?**

   Upgraded bus stops will be delivered on the A362 immediately to the east of the SVEZ. These will be provided with shelters and real time information to provide convenient access to bus services towards Paulton and Bath. Additionally, services towards Bristol and Frome are available from the nearby Tesco forecourt. It is not the intention to divert buses into the SVEZ as this would add delay to bus journeys. However, measures will be included within the Travel Plan to encourage and enable employees and visitors to the site to travel by bus.

3. **What will be done to prevent disruption from traffic to our house which fronts onto the main road?**

   The impacts of traffic on residential properties fronting the A362 will be mitigated in several ways. Firstly, the A362 will be realigned next to the SVEZ, moving the road away from Springfield Buildings with the original A362 route being closed to general traffic. Secondly, the A362 will be widened at Sunnyside, with the widened footway moving traffic away from the properties on the southern side of the road. Should you require further information regarding the impact on your property, please get in touch with the project team.

4. **Will there be a pedestrian crossing near Sunnyside?**

As part of the A362 widening works at Sunnyside, uncontrolled crossings (including dropped kerbs and tactile paving) will be provided to connect the widened southern footway with the existing northern footways. The placement of crossings will be identified following a review of visibility, and further detailed information will be available as part of the formal public consultation which is expected to take place once the Local Development Order (LDO) is submitted to the Local Planning Authority later this year.

5. **What about the little lanes that could be used as 'rat runs' even more so?**

   As part of our traffic modelling of the impacts of the SVEZ, we are analysing local traffic routing and the impacts on the local highway network. We are not expecting a significant impact on minor roads in the vicinity of the SVEZ and our mitigation will be focused on providing reliable journey times on the A362. Nevertheless, as part of our work we will review the impact on minor roads in the local area to ensure that the traffic model we build reflects the existing situation and behaviours as well as how vehicles from the proposed development will impact these.

6. **Where does the road to the south of the roundabout go? What is the purpose of the south facing junction from the proposed enormous roundabout?**

   At the current s-bend, we are proposing to stop-up the old route of the A362 and this will no longer be used by traffic. The A362 will be moved to the North, away from Springfield Buildings.

   The purpose of the junction south of the roundabout is to retain access to Langley's Lane. Access to Springfield Buildings will be off Langley's Lane, instead of the A362 at present, and will therefore be from a road with significantly less traffic. As part of our ongoing assessment work, we are actively seeking to reduce the required size of the roundabout and revisiting the proposed arrangements for Langley's Lane and access to Springfield Buildings.

   We are not able to comment directly on development proposals for third party land, such as the proposed Phase 2 extension to Old Mills Industrial Estate. However, the Old Mills Phase 2 proposals which have been publicly presented through the current planning application indicate that the access to Old Mills Phase 2 is through the existing Old Mills estate road onto the A362. To provide feedback on the Old Mills proposals interested members of the public would need to respond to the consultation on that third party planning application.

7. **Houses along Sunnyside already shake when articulated lorries pass. Will the road widening be enough to protect the houses from the increase in traffic, especially thinking about lorries causing wear and tear on our properties?**

   The proposed widening of the A362 will include a widened footway on the southern side of the road which will move vehicles away from properties. In addition, we are assessing the pavement (structure) of the road. If this is found to be defective or substandard, the widening would include reconstruction of the road. Through the widening, there will be less acceleration and deceleration which contribute to traffic noise.

8. **How will the traffic for the industrial units arride of the A362? The A37 has pinch points at both Pensford and Temple Cloud, as well as Ston Easton to the south. The majority of villages along this route are suffering with extraordinary high levels of pollution**

We are expecting that vehicular trips to the SVEZ will take a number of routes to and from the A362, including the A37 to the north and south of Farrington Gurney; the B3355 towards Paulton; the A362 towards Bath; and the A367 towards Frome. The impacts on Air Quality Management Areas will be assessed in detail as part of the Local Development Order (LDO) submission.

9. **It looked as if the offside highway improvements were still undefined so how can you consult without clarity on how you will mitigate traffic impacts particularly on an AQMA?**

   The SVEZ is being delivered to reduce out-commuting from the Somer Valley and therefore make it easier to commute to jobs on foot, by cycle, and by bus. The impacts on Air Quality Management Areas will be considered by an Air Quality Assessment that will be submitted with the LDO. The LDO will be subject to public consultation and will include full details of proposed traffic mitigation.

10. **Old Mills Lane is awful now, any improvements here?**

    To encourage traffic to use suitable routes to the SVEZ, we will be mitigating as necessary to provide reliable journey times along the A362. This will reduce the relative attractiveness of routes that are less suitable for through-traffic, such as Old Mills Lane.

11. **Will the road improvements at Sunnyside include a pavement which links all the way through to SVEZ?**

    The improvements at Sunnyside will be localised to target the existing issue of delays due to on-street parking. The West of England Combined Authority (WECA) is currently assessing the feasibility of improved walking and cycling routes along the A362 as part of the Somer Valley to Bristol and Bath package. We are working closely with WECA to ensure that improvements delivered by the SVEZ will be complementary to any possible future works delivered by WECA.

12. **Will the footpaths continue to the village of Farrington Gurney?**

    The West of England Combined Authority (WECA) is currently assessing the feasibility of walking and cycling routes to Farrington Gurney as part of its Somer Valley to Bristol and Bath Package. We are working closely with WECA to ensure that improvements delivered by the SVEZ will be complementary to any possible future works delivered by WECA.

13. **Will a cycle/walking route be provided to the west? To Farrington Gurney?**

    We are working with the WECA, who are looking to provide a pedestrian and cycle link to Farrington Gurney through their Somer Valley to Bristol and Bath programme. This is not currently part of the SVEZ project, however the SVEZ project does include a pedestrian and cycle link to the Norton Radstock Greenway.

14. **One of the slides mentioned a cycle path/walkway on 'old railway lines'. Does this refer to the back of Sunnyside which is owned by Sunnyside residents?**

    The former railway line refers to safeguarded former railway land as per the Core Strategy Policy ST2. This includes the former railway alignment between Old Mills and Farrington Gurney, and the former railway alignment between Farrington Gurney and Hallatrow. The development of this walking and cycling route is not proposed as part of the SVEZ however it is being considered by WECA as part of its Somer Valley to Bristol

and Bath Package. WECA is aware of existing land ownership along the former railway alignment and will be considering this as part of its appraisal of the feasibility of the route.

Visual impact and building heights

15. **What steps will be taken to reduce the visual impact of the development from local houses? E.g. strategically sited trees, hedges, grass mounds, minimal site lighting focusses towards the ground, sound barriers etc?**

    A Landscape and Visual Impact Assessment (LVIA) is being undertaken and has informed the design process so far. The LVIA is an effective design tool that informs the planning process since it helps identify the effects of new developments on views and on the landscape character itself. The LVIA has two aspects, firstly, the Landscape assessment considers the effects of the proposed development on the landscape as a resource. And secondly, the Visual assessment which considers the effects of the proposed development on specific views and on the general visual amenity experienced by people.

    An in-depth analysis and understanding of these two interrelated aspects is required to produce a successful LVIA which further informs mitigation measures to reduce impact from the proposed scheme. The LVIA and details of any associated mitigations will be made available during the formal public consultation on the Local Development Order (LDO) which will follow later this year.

16. **Will units be restricted to single-storey construction?**

    The anticipated heights of buildings can be found on the webinar recording as well as the project website. We are seeking to limit the maximum building envelopes within the parameter plan to as low as possible especially around the perimeter of the site where there are existing residential properties. We need to secure the right building scale and specification as well as deliver the project outcomes within the site. The maximum height will be 3 storeys which will either be contained within the centre of the site or adjacent to non-residential uses.

17. **Can you confirm the height of the tallest proposed building on the site and its position on the development?**

    The maximum height will be 3 storeys and approximately 12-14m to eaves height.

18. **We live in Dunromin House and our garden backs directly onto where the enterprise zone will be. Can you please reassure us as a family as to what will be built directly behind our house and what will be done to prevent disruption to our family life?**

    The proposed masterplan which was shown during the webinar and is available on our website here: https://beta.bathnes.gov.uk/somer-valley-enterprise-zone-first-public-engagement/view-our-launch-webinar sets out the proposed uses and their locations within the site.

We hope that the presented masterplan has demonstrated that much of the development will be to the north of the residents fronting the A362. Dunromin House would be approximately 65m to the nearest building on the masterplan, which is the proposed Pub. Immediately behind your property there will be a landscaped buffer zone in front of the re-aligned A362.

The project team will be in touch with you in due course to discuss the potential impact of the proposal on your property.

19. **Why not develop the batch rather than force landowners to give up their own land?**

    It is not possible to develop this area as it has a restrictive planning designation as a site of nature conservation interest/Ecology Network (NE3/NE5).

20. **My house is right on the boundary on old mills, I will be looking at hotels or units. Which of you councillors would like that next to your house?**

    We are aiming to provide landscaped buffer zones between residential properties and the buildings to the perimeter of the SVEZ. The hotel is due to be developed at the front of the site by the A362, adjacent to the Wickes store, which will be circa 300m away from Old Mills Lane. The project team would be happy to discuss any specific concerns you have.

<u>Development Uses</u>

21. **I understand this development has been discussed for a few years. We are now in a very different environment since Brexit, pandemic, and the war in Ukraine. What current research has been carried out to see what demand there is for large industrial unites and large office spaces? The UK is currently experiencing a situation where there are more job vacancies than people looking for jobs and working from home has now become the norm for a lot of people, so the argument for generating jobs appears outdated.**

    Occupational demand is something we are continually testing within the team. Pre-pandemic figures demonstrated there was only 3-4% vacancy rates in industrial space in the Somer Valley, demonstrating a very limited supply. We have anecdotal evidence of 3 year waits to secure some types of business units in this locality. Generally, industrial and distribution demand remains very strong and looks to be moving towards more specialist manufacturing. The site will be delivered over the medium term and the creation of circa 1300 new jobs in the Somer Valley will provide local employment opportunities and help reduce out commuting to other locations.

22. **What type of business premises are planned? Will there be retail as well as industrial units?**

    A mix of commercial business space is proposed including industrial, distribution, office, trade counter distribution, as well as ancillary uses including a pub, hotel and food and beverage units. There is no retail space proposed at the site. Please look at our plot uses page on our website for further information.

23. Sui generis pub? What does that look like in reality?

It is a pub. The term Sui Generis is the Use Class type that a public house falls within as per the Town and Country Planning (Use Classes) Order 1987 (as amended).

24. 1,300 potential new jobs but 2/3 of those jobs will be low skill/low pay roles?

The Council has had a skills report prepared which indicates from the mix of uses proposed there will be a strong mix of employment, with 28% of roles requiring higher skills levels, and a further 48% of positions being considered skilled roles.

25. Will there be any retail at all now?

There is no retail proposed on site.

26. Why B2- demand is B1 light industrial (E) and B8?

Use class B2 is general industrial, Class E (formerly B1) is offices and B8 is storage and distribution. The proposed masterplan includes a range of uses including B2, Class E and B8. The SVEZ will be delivered over the medium term, over which time demand cycles may change. However we are continually testing market demand within the team, and we are confident that there is likely to be demand for the mix of uses proposed.

<u>Why develop this site?</u>

27. Why are the council keen to build on green field sites when there are large areas of industrial space that would benefit from redevelopment?

The allocation of the land for employment use in the Local Plan is a critical part of the spatial strategy for the Somer Valley which was subject to extensive consultation and a public examination at the time of allocation. Some of the area's older industrial sites are no longer suitable or feasible for continued employment purposes so the Local Plan has allowed for them to be redeveloped into a mix of uses. There are a limited number of brownfield sites in the locality, however they would not be suitable for the scale required for this project, and the brownfield sites which are available have already been allocated in the Local Plan for other uses.

28. Was there not a second smaller area on the Tesco side of the road?

We believe this relates to a separately allocated plot adjacent to the Old Mills, this is a separate allocation from SVEZ and is reliant on third party planning applications.

29. Why don't you fill all the old mills industrial estate before building more units? Also there is still empty shops in Paulton.

Old Mills Industrial Estate is in third party ownership; however, we understand that there is only 4,000 sq ft available on Phase 1 of Old Mills at present. Pre-pandemic figures demonstrated there was only 3-4% vacancy rates in industrial space in the Somer

Valley, demonstrating a very limited supply. This lack of supply is constraining economic prosperity in the Somer Valley and the SVEZ seeks to address this.

The units at Old Mills are also relatively small in scale, and therefore appeal to different businesses than those which are likely to occupy the SVEZ.

Whilst we appreciate that there are empty units in high streets within the Somer Valley, the SVEZ does not propose any retail uses and the commercial and industrial uses proposed could not be accommodated on the high street due to their scale and nature. However, the Council is pursuing other projects to address vacant retail spaces within the Somer Valley, such as the Midsomer Norton High Street Renewal Programme.

30. Welton Bag Co site has been unoccupied for years, why not develop it?

This site has already been allocated in the Local Plan for a mixed-use development and would not have been large enough to accommodate the employment uses we are looking to bring into the SVEZ.

31. I am aware of your budget as I was informed in previous meeting you held that you said the budget would be lost if you didn't use it. Is this the only reason the project is being pushed as it is not required in the area.

The site has been allocated for employment uses since 2007 and the project is being brought forward by the Council as the site has not been developed by the private sector. The allocation of the land for employment use in the Local Plan is a critical part of the spatial strategy for the Somer Valley and is needed to provide new industrial and commercial floorspace, to provide new jobs, to boost economic prosperity within the Somer Valley, and to help reduce out-commuting and the associated issues which this creates. The project is being funded from a number of sources, predominantly by the West of England Combined Authority.

Sustainability

32. Has any consideration been given to using the coal mine heat as a zero-carbon energy solution? What are the plans for maximising green build opportunities?

We are early in the delivery phase of the SVEZ project, but we will be looking at opportunities to boost the sustainability of the site, and we will be targeting net zero delivery in the construction and operational phases. We are not at this level of detail yet, but the Council is dedicated to addressing the declared climate and ecological emergencies, and this site will form part of its response.

Other questions

33. What are the plans for internet connectivity?

We will be looking to bring in superfast broadband

34. How does this project affect planning application Parcel 9176 Old Mills Ind Estate expansion which has just surfaced once more?

SVEZ is not linked to the Old Mills scheme, which is in separate ownership. There is demand for industrial space within the Somer Valley and demand specifically for that scale and type of unit separate to the proposed spaces on SVEZ.

35. What compensation will the Council be giving to the residents of the surrounding area?

The Council is not offering compensation as part of the scheme, however there are several broader benefits associated with the development including active travel improvements, green infrastructure creation, biodiversity net gain and job creation.

Appendix 5 – End of Engagement Website Analytics

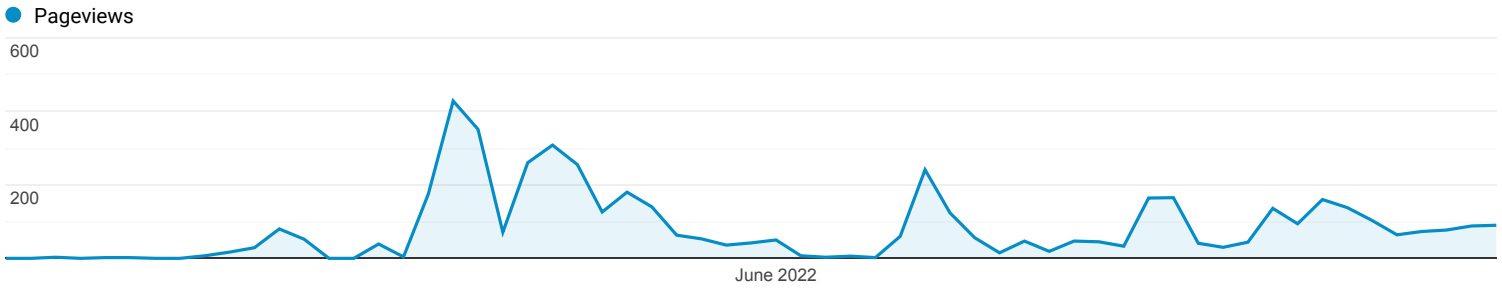
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Page	Pageviews	Unique Pageviews	Avg. Time on Page	Entrances	Bounce Rate	% Exit	Page Value
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2. /somer-valley-enterprise-zone-first-public-engagement/scheme-overview-0	**537** (10.86%)	418 (11.07%)	00:01:14	40 (3.64%)	64.10%	24.95%	$0.00 (0.00%)
3. /somer-valley-enterprise-zone-first-public-engagement/introduction-and-policy-background-0	**405** (8.19%)	315 (8.34%)	00:00:32	10 (0.91%)	60.00%	10.37%	$0.00 (0.00%)
4. /somer-valley-enterprise-zone-first-public-engagement/view-project-documentation-0	**395** (7.99%)	267 (7.07%)	00:01:48	14 (1.27%)	50.00%	32.15%	$0.00 (0.00%)
5. /somer-valley-enterprise-zone-first-public-engagement/have-your-say-0	**393** (7.95%)	287 (7.60%)	00:00:47	140 (12.73%)	46.43%	32.06%	$0.00 (0.00%)
6. /somer-valley-enterprise-zone-first-public-engagement/local-residents-what-means-you-0	**289** (5.84%)	237 (6.28%)	00:01:47	9 (0.82%)	77.78%	19.03%	$0.00 (0.00%)
7. /somer-valley-enterprise-zone-first-public-engagement/purpose-public-engagement-0	**243** (4.91%)	204 (5.40%)	00:00:17	6 (0.55%)	66.67%	9.47%	$0.00 (0.00%)
8. /somer-valley-enterprise-zone-first-public-engagement/businesses-what-means-you-0	**207** (4.19%)	178 (4.71%)	00:00:35	3 (0.27%)	66.67%	8.70%	$0.00 (0.00%)
9. /somer-valley-enterprise-zone/introduction	**142** (2.87%)	101 (2.67%)	00:01:49	14 (1.27%)	28.57%	18.31%	$0.00 (0.00%)
10. /somer-valley-enterprise-zone-overview-sept-2021/somer-valley-enterprise-zone-overview-sept-2021	**80** (1.62%)	66 (1.75%)	00:00:20	7 (0.64%)	85.71%	25.00%	$0.00 (0.00%)
11. /somer-valley-enterprise-zone-first-public-engagement/introduction-and-policy-background	**77** (1.56%)	42 (1.11%)	00:01:15	16 (1.45%)	25.00%	19.48%	$0.00 (0.00%)
12. /somer-valley-enterprise-zone-first-public-engagement/project-timeline-0	**77** (1.56%)	67 (1.77%)	00:01:41	2 (0.18%)	50.00%	22.08%	$0.00 (0.00%)
13. /somer-valley-enterprise-zone-first-public-engagement/view-our-launch-webinar	**70** (1.42%)	52 (1.38%)	00:00:30	12 (1.09%)	75.00%	25.71%	$0.00 (0.00%)
14. /somer-valley-enterprise-zone-first-public-engagement/project-timeline	**63** (1.27%)	45 (1.19%)	00:01:08	6 (0.55%)	66.67%	23.81%	$0.00 (0.00%)
15. /somer-valley-enterprise-zone/technical-assessments	**57** (1.15%)	34 (0.90%)	00:00:26	1 (0.09%)	0.00%	5.26%	$0.00 (0.00%)
16. /somer-valley-enterprise-zone-overview-sept-2021/highways-and-transport-issues	**56** (1.13%)	43 (1.14%)	00:00:22	6 (0.55%)	16.67%	5.36%	$0.00 (0.00%)
17. /somer-valley-enterprise-zone/transport-related-issues	**54** (1.09%)	44 (1.17%)	00:01:37	1 (0.09%)	0.00%	11.11%	$0.00 (0.00%)
18. /somer-valley-enterprise-zone/masterplan-principles	**51** (1.03%)	32 (0.85%)	00:01:35	4 (0.36%)	75.00%	15.69%	$0.00 (0.00%)
19. /somer-valley-enterprise-zone/scheme-masterplan	**49** (0.99%)	35 (0.93%)	00:00:30	3 (0.27%)	33.33%	6.12%	$0.00 (0.00%)

20.	/somer-valley-enterprise-zone/project-timeline	**47** (0.95%)	36 (0.95%)	00:01:41	3 (0.27%)	0.00%	12.77%	$0.00 (0.00%)
21.	/somer-valley-enterprise-zone	**46** (0.93%)	29 (0.77%)	00:00:35	1 (0.09%)	0.00%	2.17%	$0.00 (0.00%)
22.	/somer-valley-enterprise-zone/scheme-evolution	**42** (0.85%)	38 (1.01%)	00:00:37	1 (0.09%)	100.00%	2.38%	$0.00 (0.00%)
23.	/webinar/somer-valley-enterprise-zone	**38** (0.77%)	26 (0.69%)	00:00:55	16 (1.45%)	68.75%	60.53%	$0.00 (0.00%)
24.	/somer-valley-enterprise-zone-overview-sept-2021/introduction	**33** (0.67%)	28 (0.74%)	00:01:39	1 (0.09%)	0.00%	30.30%	$0.00 (0.00%)
25.	/somer-valley-enterprise-zone/our-ongoing-transport-research	**33** (0.67%)	26 (0.69%)	00:00:38	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
26.	/somer-valley-enterprise-zone/setting-and-structural-landscape	**32** (0.65%)	27 (0.72%)	00:01:25	2 (0.18%)	50.00%	18.75%	$0.00 (0.00%)
27.	/somer-valley-enterprise-zone/highways-and-transport-issues	**30** (0.61%)	19 (0.50%)	00:00:23	1 (0.09%)	0.00%	6.67%	$0.00 (0.00%)
28.	/somer-valley-enterprise-zone/summary-masterplan-and-ldo-impacts-and-benefits	**29** (0.59%)	24 (0.64%)	00:00:40	0 (0.00%)	0.00%	3.45%	$0.00 (0.00%)
29.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0nO2Bnq_hiQxidt6Cz_BJs-QocUG3aalLDEcPzq40OADFOOrZAJn6R8jI	**28** (0.57%)	20 (0.53%)	00:00:39	20 (1.82%)	40.00%	39.29%	$0.00 (0.00%)
30.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0Po27GU3agKfHmZXxewKssXvj2051Ju3NA9xD7t6AlBbkKBU59Zxytj-0	**26** (0.53%)	15 (0.40%)	00:01:39	15 (1.36%)	26.67%	34.62%	$0.00 (0.00%)
31.	/somer-valley-enterprise-zone-first-public-engagement/view-project-documentation	**25** (0.51%)	11 (0.29%)	00:00:54	0 (0.00%)	0.00%	8.00%	$0.00 (0.00%)
32.	/somer-valley-enterprise-zone-overview-sept-2021/transport-related-issues-we-have-identified	**25** (0.51%)	19 (0.50%)	00:00:28	5 (0.45%)	20.00%	8.00%	$0.00 (0.00%)
33.	/somer-valley-enterprise-zone-local-development-order-public-consultation/scheme-overview	**19** (0.38%)	18 (0.48%)	00:00:16	0 (0.00%)	0.00%	0.00%	$0.00 (0.00%)
34.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say	**18** (0.36%)	14 (0.37%)	00:01:47	0 (0.00%)	0.00%	11.11%	$0.00 (0.00%)
35.	/somer-valley-enterprise-zone-first-public-engagement/local-residents-what-means-you	**18** (0.36%)	11 (0.29%)	00:02:26	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
36.	/somer-valley-enterprise-zone-overview-sept-2021/our-ongoing-transport-research	**18** (0.36%)	16 (0.42%)	00:00:41	3 (0.27%)	66.67%	27.78%	$0.00 (0.00%)
37.	/somer-valley-enterprise-zone-overview-sept-2021/scheme-masterplan	**17** (0.34%)	12 (0.32%)	00:00:27	0 (0.00%)	0.00%	11.76%	$0.00 (0.00%)
38.	/somer-valley-enterprise-zone/scale-development	**17** (0.34%)	14 (0.37%)	00:00:17	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
39.	/somer-valley-enterprise-zone-overview-sept-2021/scale-development	**16** (0.32%)	15 (0.40%)	00:00:26	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
40.	/somer-valley-enterprise-zone-first-public-engagement/purpose-public-engagement	**15** (0.30%)	7 (0.19%)	00:01:07	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
41.	/somer-valley-enterprise-zone-first-public-engagement/scheme-overview	**15** (0.30%)	7 (0.19%)	00:01:02	0 (0.00%)	0.00%	0.00%	$0.00 (0.00%)
42.	/somer-valley-enterprise-zone-first-public-engagement/businesses-what-means-you	**11** (0.22%)	7 (0.19%)	00:01:04	0 (0.00%)	0.00%	0.00%	$0.00 (0.00%)
43.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR2zZaqb8NlOUGO8P6xicvg4KYp6fASDlcSrpD6u0EflPw4qEV28RuW8Rak	**9** (0.18%)	7 (0.19%)	00:00:07	7 (0.64%)	0.00%	22.22%	$0.00 (0.00%)
44.	/somer-valley-enterprise-zone-overview-sept-2021/technical-assessments	**7** (0.14%)	4 (0.11%)	00:01:39	0 (0.00%)	0.00%	14.29%	$0.00 (0.00%)
45.	/somer-valley-enterprise-zone-first-public-engagement?ct=t(EMAIL_CAMPAIGN_4_28_2022_12_25_COPY_01)	**6** (0.12%)	6 (0.16%)	00:00:32	5 (0.45%)	20.00%	16.67%	$0.00 (0.00%)
46.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0SHG0OnvHWOA8Of-oh2MeCyM4M-suHtitxCNqNdz6omU1KiJ7g4HxrlUc	**5** (0.10%)	4 (0.11%)	00:00:22	4 (0.36%)	75.00%	80.00%	$0.00 (0.00%)
47.	/somer-valley-enterprise-zone-first-public-engagement/somer-valley-enterprise-zone-first-public	**5** (0.10%)	2 (0.05%)	00:00:22	0 (0.00%)	0.00%	0.00%	$0.00 (0.00%)
48.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0n0QsgOfB2nHUhxMWRD3z_4mv_Utlvj-KJLjuaHqZH2tNksPC585LrNzQ	**4** (0.08%)	1 (0.03%)	00:00:24	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
49.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2UBIPYVd3Vk4ylhkon1uPBi5KDBvUSqa9GOGxxBdjteWkr-_mIQEbQD68&fs=e&s=cl	**4** (0.08%)	4 (0.11%)	00:00:24	3 (0.27%)	33.33%	25.00%	$0.00 (0.00%)
50.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR3F5N7os8ACBKxMhajGGUV-lg-x93z1Ja2SFzXsidOqFSWyBHsEldskDQA	**4** (0.08%)	1 (0.03%)	00:00:15	1 (0.09%)	0.00%	25.00%	$0.00 (0.00%)
51.	/somer-valley-enterprise-zone-overview-sept-2021/setting-and-structural-landscape	**4** (0.08%)	4 (0.11%)	00:02:23	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
52.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR1DrFsZtkJQ5ISkFvh49n1RRznGIlBQuJcqvIt38AJlgcer2M2lU4-ln2M	**3** (0.06%)	3 (0.08%)	00:00:15	3 (0.27%)	0.00%	0.00%	$0.00 (0.00%)
53.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=Iw	**3**	1	00:00:09	1	0.00%	0.00%	$0.00

	AR1biBsSNI9O2RQCxMYBMHIOxhHgy8oGMV96aOMdgTklfnTDoUc6X2BzvmA	(0.06%)	(0.03%)		(0.09%)			(0.00%)
54.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fs=e&s=cl	**3** (0.06%)	1 (0.03%)	00:00:19	1 (0.09%)	0.00%	33.33%	$0.00 (0.00%)
55.	/somer-valley-enterprise-zone-first-public-	**2** (0.04%)	1 (0.03%)	00:07:26	0 (0.00%)	0.00%	50.00%	$0.00 (0.00%)
56.	/somer-valley-enterprise-zone-first-public-engagement?embedded_webview=true	**2** (0.04%)	2 (0.05%)	00:00:04	2 (0.18%)	0.00%	0.00%	$0.00 (0.00%)
57.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR00wennS_vxaqynb7bC_iqUyNwAkKaGY9tnYkE_kkTWc6tHtbue0cOk5NY	**2** (0.04%)	1 (0.03%)	00:00:13	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
58.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR04HtGC2StPDRmHbnVOLiXu6rMugPdvtiwcUgtAzeWHjfJ2fEVBqWRInhs	**2** (0.04%)	1 (0.03%)	00:00:07	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
59.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR0mnvVtztvkTEU5Vkz4wLKQvpq2aSvS5H3lYoQ9QtI-heYaA6nqt0io2CM	**2** (0.04%)	2 (0.05%)	00:18:10	2 (0.18%)	50.00%	50.00%	$0.00 (0.00%)
60.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR16DC4BQgpSlUFNlClom2j-3wTlX40hAz4RTJP97TkCvtQfmnMyaXsLSus	**2** (0.04%)	1 (0.03%)	00:00:29	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
61.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR18nYGwxjU6Ey9LFRx1al9LmKugaXGBg9Sp5jXKJbNed_-6lztiDzByibs	**2** (0.04%)	1 (0.03%)	00:00:07	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
62.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR1bV4WNwSFTvENa5spqEVx316RFZt0LOIwxujcjL9K1VgzLOrxFLx-wqfw	**2** (0.04%)	1 (0.03%)	00:00:10	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
63.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR1m7EAgqth3o4ZhM04SMfzvr-j8oxMK89WLueKAKntoCEzfFWdSykNkunE	**2** (0.04%)	1 (0.03%)	00:00:08	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
64.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR1RKXnJOVqzgybisXRg1klBrnnkiJiCV2pCTcANSvVu29wqhoe5Un56oTI	**2** (0.04%)	1 (0.03%)	00:00:11	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
65.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR1TLWLSsYbPp1iK4pLljLq_HP6cx-Fs1prVTpgxoWAWK4pjvFmEq9A5KIs	**2** (0.04%)	1 (0.03%)	00:00:06	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
66.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR2wOie5G-JXtC__RJVn6Fu30gtQmXD6OT513GNpni5_cZR_w16disDUODY	**2** (0.04%)	1 (0.03%)	00:13:03	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
67.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR32XKBw5KiB39jfdRVlyr4NuEnQqDTVqsWI5CORxF1lqKHP4CiSs6upH40	**2** (0.04%)	1 (0.03%)	00:00:09	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
68.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0iup7rPodX4OZ9LJJaFOMw9lbjfrEcAOJ2ZmFnFBN2iS7mTLXIQwzYrdM	**2** (0.04%)	1 (0.03%)	00:01:18	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
69.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0WvcUSkhOZl-7PqtjCyQ1wnSCQMJp5-atd1hu968bWrAhcVJw5fpy_-F0	**2** (0.04%)	1 (0.03%)	00:00:45	1 (0.09%)	0.00%	50.00%	$0.00 (0.00%)
70.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR11xOmHwgROXh4zq4UsWB4Pt0-3CCc4g7KldMZXuL8Zsz47dgcQhmljUNc	**2** (0.04%)	1 (0.03%)	00:00:08	1 (0.09%)	0.00%	50.00%	$0.00 (0.00%)
71.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1rSz8PYg3NOxEeyLvSF1xotphkhaXErMYfDVhY0t3Fo9_4P77YBd-EckM	**2** (0.04%)	1 (0.03%)	00:00:45	1 (0.09%)	0.00%	50.00%	$0.00 (0.00%)
72.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR220cTXIkeeJeGAWKGbNU4FhwYNa5NfLFD50JT-JDrEncduOEA1rr84pzA	**2** (0.04%)	2 (0.05%)	00:01:14	2 (0.18%)	0.00%	0.00%	$0.00 (0.00%)
73.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR29mu1DHtzn4mK_muCW48IVimVoKUZx7IyOnS8Ixq8yDKkCjsVu3OcvdrM	**2** (0.04%)	1 (0.03%)	00:00:12	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
74.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2TwnYYgEWZuLSgY9Rp7hS6nzEtHe4qNnbCzXciQBQpMRajr0Mvrzp7s_0	**2** (0.04%)	1 (0.03%)	00:01:11	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
75.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR32A_kWAH7ejYhg7qof6RubXPh02wCkBWgP5nW2FXQRViph1elScNovJa8	**2** (0.04%)	1 (0.03%)	00:00:05	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
76.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR32tpreu2f8BL6bfZaScd8j8FVqi_-xRtraEupqzj6SRfyKwhPDboPY1CM	**2** (0.04%)	1 (0.03%)	00:00:20	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
77.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR3AvCI4Htz1P-xf9vB2EsU6F8eBfXtLhzmASjgm8vThWSIJjj6s9kKTVxI	**2** (0.04%)	1 (0.03%)	00:00:21	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
78.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR3bBatOnNDB6JLh6dvbGTBTFWuq7ojyhn2Iv0mK1V_F9GKsUZ34QoJkPxc	**2** (0.04%)	1 (0.03%)	00:00:13	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
79.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR3h6VFNstNBILmq13beyU3ZX4Cg35UOuGh7iKGNcC-Mt4QXTxqIulkkTxA	**2** (0.04%)	1 (0.03%)	00:00:11	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
80.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR3K-fO_rLgXhvywqKWtVDyZp-FI82qbk2uQsbXTNNYTjJjjeVBMdtb4vXI	**2** (0.04%)	2 (0.05%)	00:00:10	2 (0.18%)	50.00%	50.00%	$0.00 (0.00%)
81.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR3LZ4OXeqRG5zFFQDgtQ74rQf8ByBkjZ5aoo3aiwHpCyGIDQOQHr9xt7U0	**2** (0.04%)	1 (0.03%)	00:00:23	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
82.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR3r1YtfPPtzxKrB3xtjb8JS_YGMzgLb1dvX5ovZaqZ96rv6kyiYFNCz1tE	**2** (0.04%)	1 (0.03%)	00:00:04	1 (0.09%)	0.00%	50.00%	$0.00 (0.00%)
83.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR3RyWZSdxYohYMdX_00arppW1-zutTez1b7CmiLlcnaq6x6H-CkJtw_uIs	**2** (0.04%)	1 (0.03%)	00:00:16	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
84.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR3udwbfb-VS6_sQb6d3KrP-t9eP1AHtdCskApF038X_Xli72g6-PPnDbrk	**2** (0.04%)	2 (0.05%)	00:01:04	2 (0.18%)	50.00%	50.00%	$0.00 (0.00%)
85.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR3yNfgdGxXtT9CuV06YCQhGNTGUnzfEoANMVw5L3kLEGD2WfDd-ekBkToY	**2** (0.04%)	1 (0.03%)	00:00:41	1 (0.09%)	0.00%	50.00%	$0.00 (0.00%)
86.	/somer-valley-enterprise-zone-overview-sept-2021/project-timeline	**2**	2	00:00:14	0	0.00%	0.00%	$0.00

		(0.04%)	(0.05%)		(0.00%)			(0.00%)
87.	/somer-valley-enterprise-zone-overview-sept-2021/transport-related-issues	**2** (0.04%)	2 (0.05%)	00:13:06	0 (0.00%)	0.00%	0.00%	$0.00 (0.00%)
88.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR01fiOt5FrrMfRB8B-agXXp3fudaIIVyc6sGVwZRdrq7dBjLDdCgpiJaS0	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
89.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR03BrzqqcDiTwnHTKwb-H0P_8Wv2HaGqtn9F7GUP_KqYYXJ0NVziAk3TdM	**1** (0.02%)	1 (0.03%)	00:00:00	0 (0.00%)	0.00%	100.00%	$0.00 (0.00%)
90.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR0461h_7HyhmQgGMSqW6oR0OLdTQBVYXcrwfars3ZmoXMhWqpF_KGkAO6g	**1** (0.02%)	1 (0.03%)	00:00:07	0 (0.00%)	0.00%	0.00%	$0.00 (0.00%)
91.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR08YBpjEXKgO3RRVpBfFkUSnSSw-oMOhOU0HHlmgLgRxAtTpCMVICehIPQ	**1** (0.02%)	1 (0.03%)	00:00:06	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
92.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR09S-PO0GiLheOV4fIPDunfaTxqrY2mn8p3Yj-6rHf2VZLq0Szq-t1RfP0	**1** (0.02%)	1 (0.03%)	00:00:31	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
93.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR0aZbRPDLCpRXKwY2aE5Ho_F1kv1B1V7UG5r7BdALs6kMttqINO1Rfoyy8	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
94.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR0B24ERwmcukpLKrHS02KwIq45vGzPq4UBjVyKD__yWt5uQgrcqozTfbvE	**1** (0.02%)	1 (0.03%)	00:00:08	0 (0.00%)	0.00%	0.00%	$0.00 (0.00%)
95.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR0bSaSaxbHqwOu0Ot_gce-3tav9QXOkNACMJsorNkrHTUqoD9JxaLgS_pw	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
96.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR0c73d6j4HfgtkoRj5mMERP9L6psruqEodfzZtlnzeCx1mQN8OlLXTcmJ0	**1** (0.02%)	1 (0.03%)	00:00:15	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
97.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR0cqv7jO2fkLuT1_yxEFM2b0DeBexIR97OixTgt8ZdoTmqZF6dSp2rSI9c	**1** (0.02%)	1 (0.03%)	00:00:20	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
98.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR0e6QHKh7jvwrNt19IhM4BPgsPn4ddEWz-ieCdwvCSz5qmIE07HphS5vE8	**1** (0.02%)	1 (0.03%)	00:00:16	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
99.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR0f7_ODqaPKKQmFd45SMJMR2yVMvZePWqnsCymw_6x0LxWxSQORF9EDN5c	**1** (0.02%)	1 (0.03%)	00:00:13	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
100.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR0FpuR4V64S1CpTqLr6xeUM1BxvQhKU_lLBH0MVin-egVnfcjpgcruI-iU	**1** (0.02%)	1 (0.03%)	00:00:03	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
101.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR0gDEKb-MV0Myy8d5JYnLCGNwIL7w2EOoMKdKb0dpLvUA5r45XG6yDpIB4	**1** (0.02%)	1 (0.03%)	00:00:11	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
102.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR0gKHJOIvKw1KhND1I8VBadVnYpvkII4uXKi6xq7bcxwBNzsWLYoMyM5qs	**1** (0.02%)	1 (0.03%)	00:00:05	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
103.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR0J3m_V2tgl-U4tQ8LdWbEBvStDDQLRP5fqY1kjG0ZaznXlIS8czcBVCvU	**1** (0.02%)	1 (0.03%)	00:00:06	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
104.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR0JwDsJLtB_SB9QxYHZNompPOdhMRUsDW8iOjltPS3VnJdlzRVYbenxoTY	**1** (0.02%)	1 (0.03%)	00:00:10	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
105.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR0n7p9-R7ZbQhf34igy83ezP4lkXEAt-a933W85FLDRA4nk1TtPq_VDvxM	**1** (0.02%)	1 (0.03%)	00:00:07	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
106.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR0NLfqrFADy0Q5jMNcS6Ni7bd8tn82OOrHfW8tI5CeGlObeCtoAC5ESjEo	**1** (0.02%)	1 (0.03%)	00:00:08	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
107.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR0qjqtaYPEDkAvk4vvrTFBvhGDFejBeuFLSQJ8KaLAAZiSINY6uE0QLGeE	**1** (0.02%)	1 (0.03%)	00:00:10	0 (0.00%)	0.00%	0.00%	$0.00 (0.00%)
108.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR0Rj6oHioO1BkH_jUJuPf1en8ES8RTTaFibKM7bpDeV_hTf9Y20QLAxUDU	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
109.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR0va_XvgPiLvgUviVWjFc3onW0GzvjfZq2VZ7cSYCG8AXyo7hTHtxZhpvU	**1** (0.02%)	1 (0.03%)	00:00:10	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
110.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR0y7cQivGn0RWo42y-o5phQyw_Nhr6ZTy8h8jwJQkD_R1sVS9v_ddNdQiM	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
111.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR0YDcFTafl3TyYyAMrxGmC5vlX-BpNlQ9CAjxgOW6dq3n_9C0a4SUqo9Dk	**1** (0.02%)	1 (0.03%)	00:00:05	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
112.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR0yyxIImFOZt684NmVyxLbFGS9wX7NgWPRPkeWLM7Iydc8xTgb1_x8L30Y	**1** (0.02%)	1 (0.03%)	00:00:04	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
113.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR0z-6fXUxNnTV_OajP-rQ0cTC2vZ13hPZr42t6hBHvAR7xusKJEX4u3wcc	**1** (0.02%)	1 (0.03%)	00:00:08	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
114.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR0zKJG4Ylz5XQNr-GEFB7iym6fzo6F7wKLLa-biS7OlNqtdPtdNrsTbbHo	**1** (0.02%)	1 (0.03%)	00:00:07	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
115.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR1_2yyFAGkusmXZ95N4ODcAyF7kjkWb9FrKUPSpC_u-VPPdZN9chnYFfo0	**1** (0.02%)	1 (0.03%)	00:00:08	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
116.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR1_LbGiwSnoQOdgwp-n6ygM3NFtuYf8foRipOoOgrhj-nQGVq2rnIoKpoQ	**1** (0.02%)	1 (0.03%)	00:00:08	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
117.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR109IN6wt_EWVJ5-iYHoNOcnIR5_u5BymVFUXjcnBpy7dQfJiE4Q4bTzAU	**1** (0.02%)	1 (0.03%)	00:00:13	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
118.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR10yG8BBXLCEc8ds85jmAHI_70fMj6AOWEZG4NnywDbQrlzawG7rfPX_Kg	**1** (0.02%)	1 (0.03%)	00:00:07	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
119.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR11E9Yf-APx3	**1**	1	00:00:10	1	0.00%	0.00%	$0.00

	P3L1TXpU_IohfC6VWGD5k1tI2IpxdhIDt0skd49LLPKS2k	(0.02%)	(0.03%)		(0.09%)			(0.00%)
120.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR12Wtx11IbqW6UW5btabCDCtx6QzDS9bSA49_PS8UFHMNh0nkK9VfDPRf0	**1** (0.02%)	1 (0.03%)	00:00:09	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
121.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR1aiCYevqNsM9FkaDMjKH5phaJqmx-pNWEaQU18GdGCtZi_so-tRKRg0go	**1** (0.02%)	1 (0.03%)	00:00:08	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
122.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR1Bgd5uMuanKdnizv5_-XPntPal_Oat-A9eg4rwkygwN7vYfRuqSsJkMhU	**1** (0.02%)	1 (0.03%)	00:00:09	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
123.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR1d1i18TZQWfEbfkgaN_sGb-eelAaP7LKF1FoUHOssDeVjIPMj0RQr4PqA	**1** (0.02%)	1 (0.03%)	00:00:05	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
124.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR1ezGJnNu91nl22Eqq6LKwLXjf0yRq78W7OWzMfMR1wufo6E06V0tx18Wk	**1** (0.02%)	1 (0.03%)	00:00:04	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
125.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR1fQWUDSAXsD1othGOS7G9VJ9ALfF4Y8piMPWRD5nRZAFIiVjIZLFhPi6w	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
126.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR1gfawH3sYZ8ygANVVZpE15BeXQ-DfN0PK1tTFnLy7tNRj8rZQ77QmBHeY	**1** (0.02%)	1 (0.03%)	00:00:04	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
127.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR1Iu5Ja1P8bXXQwRip2kBtGQKxPaZxF8QUMEqqd3lq5-9FLSVHupscBNxk	**1** (0.02%)	1 (0.03%)	00:00:03	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
128.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR1jK4hw7I0Uvmgn_8nyswfjdbQdFrfEhtmMgigL6t94Op-eWgR8_3JFFPQ	**1** (0.02%)	1 (0.03%)	00:00:10	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
129.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR1KXcTM__oJtS5sKftBuICgTAKrSh4G_eld_CxO2BCk6JZ3Q83D2qhjIjc	**1** (0.02%)	1 (0.03%)	00:00:06	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
130.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR1LG7vDyJwOrVp_uSlv5vHt3lUb1qKxKjryEOOMgO3BabZuk0obbM2EvWA	**1** (0.02%)	1 (0.03%)	00:00:15	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
131.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR1PxvLwlu3NKeKXS4bA4eyk07TAhpkVkAAzaQ_J1IE-P5kdCT7kw-Eczk0	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
132.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR1q8h_dFgasVY87DDXExo92LA3j7z4AKJsSVIY1ZqPhYrWGtNG5TAIKgCc	**1** (0.02%)	1 (0.03%)	00:00:10	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
133.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR1RF-c-vUBfOlM7T_DMB-SBsMEW0u6zU7Fd4rEBGNvYyUW91BpKDwCwsfk	**1** (0.02%)	1 (0.03%)	00:00:16	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
134.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR1rX-kR17qmY7zvJ9R848LRq5-Ptcvi6JcaHjuuowaPzbt1IuovwZzkkUI	**1** (0.02%)	1 (0.03%)	00:00:05	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
135.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR1tndC5qYGWyIOXt3CnKYJrqvXu416aUEp6WKqdFFCnERipz5GK6MxkBjg	**1** (0.02%)	1 (0.03%)	00:00:07	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
136.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR1wdLK2lQt1UD_-yMJBikiJfiU-hL1dknnu9Cdt2SCesB27c7Pr9Ivr3s8	**1** (0.02%)	1 (0.03%)	00:00:07	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
137.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR1XKwgAXBgqNbjFweYxueoaFIHkzW5JGLykdnFnGCIPy_Q4OruTByOhrxE	**1** (0.02%)	1 (0.03%)	00:00:11	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
138.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR1y98LHkp6g2R2NAwg4cYoCx7gxaEOdAFSZZ1-eqL-xe-4iUQXc-fM8-YM	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
139.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR22BnJpVttHCKDkJ5hwsdQRGpuIJ1Db-mxlkhyCeFiJA9FTU3uR8BedsXk	**1** (0.02%)	1 (0.03%)	00:00:11	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
140.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR24i5s3uuXVzkVRafdHoC4_Kxy8Os2WiX_6yAKWc0ftfWS6mSmpd001czw	**1** (0.02%)	1 (0.03%)	00:00:10	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
141.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR24IRtlbkVWb0OZITPUKX-ttFI4x8t5BzBjXjVMf8-t-Jnop9-3gsyw7ac	**1** (0.02%)	1 (0.03%)	00:00:13	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
142.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR26cXk2H1y5Fq7U-1dExIHEQQTvljRHlUE8RpUQiKjnnqUWiAHekzPXKEU	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
143.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR26jiaWOuJbFbgtKXdEL2Li00SPqTaE0ybpcMeMZlkXnHLsBqHMkAStjxU	**1** (0.02%)	1 (0.03%)	00:00:14	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
144.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR287DAvGe81kVXF4msY5R0Hhdm2k31AJIljxFGnx7cRnneb0xm_ZgVZhOM	**1** (0.02%)	1 (0.03%)	00:00:04	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
145.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR2bgW_Yl5fXjobM65mPZVe8_TSkasHBmpaYouJXsbcTtHc3XNfqxqlnCt0	**1** (0.02%)	1 (0.03%)	00:00:07	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
146.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR2bPD5b0f328HElC6zf_ZfUCyKOqfs6Hf91nFBlliaL7XZM_cPMyVTcZpg	**1** (0.02%)	1 (0.03%)	00:00:04	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
147.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR2BrUIJpcvPUKDsK_giAzdsDIQTKNuN8tshHVYU70D9Tjg4rSHRGqsSvVg	**1** (0.02%)	1 (0.03%)	00:00:18	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
148.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR2g74Oj6_AHLVD_QaLMk3NDxqQLi_ySZ9I-0ClbgS-Pe9dw-vR9wQXo0eY	**1** (0.02%)	1 (0.03%)	00:00:08	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
149.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR2H8teDpNYe4g9rWzOXkqFCnTIV1ecsMlik1O9xQ5DbMOuDDLb3Ax1MGOU	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
150.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR2i5OqLNDqrQ_62-o9qT7DyPwGXSd11JghdorC6wypqwYxvhBIK-HzjNXc	**1** (0.02%)	1 (0.03%)	00:00:08	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
151.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR2JdF7pghMh9ggec4XOLJt2AeuqpsLFv41YUUYtBsWtWTgI9dJN1FGOYWM	**1** (0.02%)	1 (0.03%)	00:00:04	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
152.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR2JjTGoYB02t	**1**	1	00:00:12	1	0.00%	0.00%	$0.00

	Nuzc5VMDmHCilA2MAf6EZ5YpyM5ODI0OwRn48biZq8YfNo	(0.02%)	(0.03%)	00:00:12	(0.09%)	0.00%	(0.00%)
153.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR2kY_ENrzc5AvVqieWdjPbTtrrDD1hdg946Dfk7GxrzJ07tONm1GBFKMKY	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
154.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR2m7Zc67fPiLg8NTdtfhIRbYJskqYs0Yk8NEop-VD4RsLiyrK_EzTR2AgQ	**1** (0.02%)	1 (0.03%)	00:00:11	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
155.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR2m8WbAGDfYHMUK0HG8lwOE00bn4T1rf0N4oeItLKaLFPh2Nw5opPWoYGQ	**1** (0.02%)	1 (0.03%)	00:00:12	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
156.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR2mdKQ2u8s5Er1jqM64EU0VKO-F7yUZjn7B-anzE6dI9cU-GhT1b-eYePY	**1** (0.02%)	1 (0.03%)	00:00:14	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
157.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR2NAAjDEGZBCRJugq9wn-Bh-I1C1oEKlLI3Xj64-93L-mQB08eXb01JJ7o	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
158.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR2p-ABUBcCF79yDb-HySFDY-53dIKKtNAqavoMlRz3ZYfqM8apj7HS9I84	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
159.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR2Qw-oXBnKw7RORKptZH611LOeD53O9BwoWD3agFyw617n-1VedHiKe17k	**1** (0.02%)	1 (0.03%)	00:00:04	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
160.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR2rO_R-YWAN_mEagegARg6eb9wIK2XWWJB2c39YU6UfbZXu1Cf0s6JA9Vc	**1** (0.02%)	1 (0.03%)	00:00:10	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
161.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR2tC6Bu9t_a0VDp-kVGJwi-1-0Sg9yurfroIi8Fx64lMDCiR2kbpmSGoFY	**1** (0.02%)	1 (0.03%)	00:00:03	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
162.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR2UCiCGI9-q77oNUNZLUi0NAhBV0INdJduzcLONNeQP8-rCwIEG83B-3EM	**1** (0.02%)	1 (0.03%)	00:00:07	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
163.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR2x5FwGS0UtAzT062YZOkBdFXB8qDh41oz6jAazFc07YqN_lePMI1fRByY	**1** (0.02%)	1 (0.03%)	00:00:09	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
164.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR2Xr_jxC9MaBOh4EJTicu7aHq83nTIfWqKXO6CgYEMzbxSupa1pjPX_rKU	**1** (0.02%)	1 (0.03%)	00:00:08	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
165.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR2YIII5gLBXbYK2yTRZjMNU6djpaulrefSa-0c-4s21G0mJ4Hp8P_vbZDc	**1** (0.02%)	1 (0.03%)	00:00:05	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
166.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR2yvnr_dEZm0COoPf8of26iBzqXgQUYh924TncCn8kiXXW_eU05jpYjvfk	**1** (0.02%)	1 (0.03%)	00:00:10	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
167.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR3-giNkzxofVcahID17xLiCNQcQ6dWOOwNpbLuR69vM9j6BwyCo7WWoi94	**1** (0.02%)	1 (0.03%)	00:00:10	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
168.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR39bxBxvd6NY-0ATtznLi7kl4zQ8WIMftPc0GX4uBhuHCjFzvvYi46mIe4	**1** (0.02%)	1 (0.03%)	00:00:09	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
169.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR3BaEP1HERpRjHKyk_ZKdyPxRmNmspOusJa3BxGM_wHxAbHL_K5fDo-LMY	**1** (0.02%)	1 (0.03%)	00:00:03	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
170.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR3cWeeElmZrnIxfVSFBaFsniL7DOUIUSmDL8RgPR9Vb3Ua75kDYkkmaLao	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
171.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR3eb4ucU9O6YAfCUkfXbBExl8F_r4nrz_84lEM0kAf9XZ8xnPM-qyAw57I	**1** (0.02%)	1 (0.03%)	00:00:12	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
172.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR3eBP7syopXZR_tDh938DscUfcixi4qHClSbef4Drdxhmnq1PrWRU1P-2w	**1** (0.02%)	1 (0.03%)	00:02:13	0 (0.00%)	0.00%	0.00%	$0.00 (0.00%)
173.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR3F-16cf1ebE_kZfAbu6eAtVxHDk4zE0Qc9dMLCM8tHGTT-qu_F-GoWnfI	**1** (0.02%)	1 (0.03%)	00:00:06	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
174.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR3G-My1jwvSi5YxvVjifXj77QU6U4iJwYL0DMf4iyrBfyjxMsEK5jGFq1U	**1** (0.02%)	1 (0.03%)	00:00:03	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
175.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR3g2TOaOraP3NYWzQCHkYc8TIZgQQzah1imsdecp2mbtLAk19y6Oe8Nz2E	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
176.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR3H_KULdmIdOCfzLAl31Yw7FvUe_SQaHOCRaYNLmuWrGFVBB63UI-1Ri4E	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
177.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR3hgaReyIF7PxyregVWz3XzRFvUR8WkxLqSTNeTDMD4b-ZZl-zgvTkrZwM	**1** (0.02%)	1 (0.03%)	00:00:12	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
178.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR3KgCl2ePboXpjtZz6hQZcBbK6L0i6Jceyz89PQdpH5X6LKWBZ9mjrPrTc	**1** (0.02%)	1 (0.03%)	00:00:23	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
179.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR3laKThSqUdsNkHPQHUTOahhqPCHT-YzEiwqKpC4anh2w0rX1d489FZPUQ	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
180.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR3Mr3BQK5KnifeB0yEM1fA377CQbl4LKCOGw0o8uIWLCpMeoQEE441M5Ak	**1** (0.02%)	1 (0.03%)	00:00:08	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
181.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR3N9xP9ZPXc6TYU4ACfaw-5y0hswU97ciB61I353dfhOiNdD5se5NPSgAw	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
182.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR3NgtJ6rAdA2q25Ylt2qmKWAlJ96ZJcLmV-zrmZDkroLZOJwLWi3La4h5s	**1** (0.02%)	1 (0.03%)	00:00:05	0 (0.00%)	0.00%	0.00%	$0.00 (0.00%)
183.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR3QADax5uK9ySSAdbGjN_nDGZUCFQDb2JE1klQs3VSPqo3C_vpFJvqOd0w	**1** (0.02%)	1 (0.03%)	00:00:00	0 (0.00%)	0.00%	100.00%	$0.00 (0.00%)
184.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR3swY8rPVyxcY15NwbXJAicUF98xIIYSdlipq5zgdXLQ-NOO6sOwitnSD4	**1** (0.02%)	1 (0.03%)	00:00:08	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
185.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR3sXE48-VAtw	**1**	1		0			$0.00

185.	1lxn4k0SJplJOiRuTYrAsurkhWSYuBVG23c6XGXgTM8Kvs	1 (0.02%)	1 (0.03%)	00:00:00	0 (0.00%)	0.00%	100.00%	$0.00 (0.00%)
186.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR3T_mgUyB81UcHAKpUtncVZZ_e6cjTvgmayt4MGZ5XX5Ydo5RGMsYAKtrg	1 (0.02%)	1 (0.03%)	00:00:14	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
187.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR3T_NCgszhd1ThuUV93OfnY9vGOKi-tryVS4ux1Ug8JMy69cgy5tDqxdkA	1 (0.02%)	1 (0.03%)	00:00:10	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
188.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR3T-g4OJIT1RsgH_3Tkck0xAc-QHnHOA2c3t-sf-u-edkHt75yVYyXlNPc	1 (0.02%)	1 (0.03%)	00:00:10	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
189.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR3UlMUvyAI1CRzNjtDITWP-9BFdoiD3CHOnUdaSGXvQE9p4ZPiyVcdMfIY	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
190.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR3vEZXvk91Pk-Eq3Q-ku3aHuhhG3JZ1nHTTU6Jq8clc4dPLzXo6sqm0H_k	1 (0.02%)	1 (0.03%)	00:00:09	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
191.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR3xUeyiYNGJmZar7aElF2YoRIpzLuuph6JH9cHSU4AOBqDwWDuVcaZ9M-8	1 (0.02%)	1 (0.03%)	00:00:05	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
192.	/somer-valley-enterprise-zone-first-public-engagement?fbclid=IwAR3zsRPDIsgHi5YAOqZ0GZ0GbgGTdRmRK-oOIXi1a_QorOZtkV_ZYdLcZ9s	1 (0.02%)	1 (0.03%)	00:00:04	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
193.	/somer-valley-enterprise-zone-first-public-engagement.	1 (0.02%)	1 (0.03%)	00:00:45	0 (0.00%)	0.00%	0.00%	$0.00 (0.00%)
194.	/somer-valley-enterprise-zone-first-public-engagement/	1 (0.02%)	1 (0.03%)	00:00:04	0 (0.00%)	0.00%	0.00%	$0.00 (0.00%)
195.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0-wbXUBJ70_mOPcKQjebh3aBVBp_irO2vdiAYe6SD5BAYzXjknsjtTPLY	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
196.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR01difc99EYI53y7jelun6Vedaear60d3KBwHozwxbu8cw7W0erEGo-J-A	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
197.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR01Kc0jk8_zNvtuZ4Qnpo2_QnVbsjP-mW1QmXqMyFOL3IAXrOOYAxVs-L8	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
198.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR01LED9OMv1YKnlAE4NBVMoBJU8ML31WasR-q5iWaXc1t8363J1mUxVDL8	1 (0.02%)	1 (0.03%)	00:00:40	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
199.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR02lkbBZOYrZBb1vlr2c2kg-6dKL34g9UnGZzii4V48adJERJZB3cOuQpI	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
200.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR03DfP4S25H29DRiS6XN-GEmVGRuUVxqjD4C8GUx_5wbhJ5phMnZXj74v0	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
201.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR03g6VHyd6GrsbzveUlhyVn4Y1uzz53ZjXTfIX2zlQSZKxvbdhsKyVI_kE	1 (0.02%)	1 (0.03%)	00:00:26	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
202.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR05jRVXbkdvG__VzixdKL1h-pwT9yE9wbIFZg85Q2MFYCO7Mp7bq_lUfIA	1 (0.02%)	1 (0.03%)	00:00:19	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
203.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR05Yuu1L2KNICI9lUDht0Y2QCqguJwMYchvs_b1Ng6EDe_lQhsCv0uRjTk	1 (0.02%)	1 (0.03%)	00:00:25	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
204.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0aRR22nEmKELpyRfre83uNHEn3AjTQr7LgdRH7HPfpwzB8ZfVyMJeCyKU	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
205.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0ayHF4yzhiXzFQSHtHoH3mS2vrWdItiNVEr5_Oxn4dVkhF_igIz3mb8To	1 (0.02%)	1 (0.03%)	00:00:05	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
206.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0bdNkGc88RYvu4kVXL07bzpCBMX6RZvObLUb007gNjwOYTDI6anCaMO4Q	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
207.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0BVOLsE2TxJtWnlNq_V0suW1hrDyzpDLetcDnZ8U95nvof9JAbnXt1Uiw	1 (0.02%)	1 (0.03%)	00:00:36	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
208.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0Ct89KvB2t3pDppEF1CfsRMn1hk4o34lAZecDYHxA2YuXcgviQS0rHx_c	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
209.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0CYiWySfewLVCnobGG5_Dok7-sA55pOHXtEa4UpXc7LErzx1UmRzv_bzA	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
210.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0DCrYG71Vvut1201mWnBplwtiAWL8sRPcsCP2g3T7LBewstSigOqrJIkI	1 (0.02%)	1 (0.03%)	00:00:21	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
211.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0EYwTZW7c2T03LW8axnzatnUVUqd5AL1uBYZInNHqei2BHjSi-XducGME	1 (0.02%)	1 (0.03%)	00:00:40	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
212.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0FNiYQJVUlP9y4ZXxp3FpsUW04L371aRa3LQGgxqZTFJHGcNfaaVOn0vE	1 (0.02%)	1 (0.03%)	00:00:09	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
213.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0gmTrg8aTmTG2hLCDGZSspNeHVeX3B1zpPyhw8jNN_2W4-mqrW0drOvDc	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
214.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0HYwc34FU9rRfE7ren566mye1Wv4ueREj5edRM1DxQx-0rCe4k0jlECOA	1 (0.02%)	1 (0.03%)	00:00:29	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
215.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0i57fUH1ypzRl2ZvzP4eZdFTwT3r_avC-2sZLoAcIk7diJE8tyxLzACCc	1 (0.02%)	1 (0.03%)	00:00:26	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
216.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0KnzABQKCrNUbLGv_HjyVVx_vhfFa6zE5AZXZjdk6queS-Waelfr3D6hg	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
217.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0LuDQfU9VhYehQXr723XetGGdGHf9HhfzPAW8x0AvKVXY8FZ-pk_TLHJE	1 (0.02%)	1 (0.03%)	00:00:06	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
218.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=Iw	1	1	00:00:00	1	100.00%	100.00%	$0.00

218.	AR0mcWGHzDJEzwtGsMTbNXm5_4P-zMpfgC7RQ0DQv_PrsISlnmNT7myfoTI	(0.02%)	(0.03%)	00:00:00	(0.09%)	100.00%	(0.00%)
219.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0N0nArCTrjei4pfvmibPLCeHsDh3QDWmNDH83ZAjx3XVIXjibOJVZAy3c	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
220.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0PFTw2O42VImwApSC_QHmem0HSrXzF62RFhY29mzIm_h0PvrBCG4qRypM	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
221.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0s_x-DwLX5saYHDN-UN7aC2aDjRgwzbNpj_Q4e7tz795Uo4q8a0BcYmyk	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
222.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0t5JuKOtUMXMpLGWFSbk15LoHCsEK6KFzRmjpWvV7nD3pd8rXWrOI1TVA	**1** (0.02%)	1 (0.03%)	00:00:11	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
223.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0tv7a3qwObRzw1VPHMiN6zgYCMQmTig_q0Xk36MQLrt0LpgkV6HYlT3a8	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
224.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0w_XVFEOWz0u6kfhPgLQZDyGFSM30yeH8KdjeBiWi--nS8TuDQD7I1gwc	**1** (0.02%)	1 (0.03%)	00:00:15	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
225.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0w1Bu2PPYJV1RiTals0YPxm4owfiOlx1uEOtlbI1RZ7J_dK_iGKGCgxGc	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
226.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0W7E_YZ6J3_gD686x701trWzcw_QRRFuCK-6HKPWufsXdlCzX4GcKgdRA	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
227.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0WBRLa1t9dkksbRD8lXau7CT6mc9_xsgHvk0AEDV7K_XE64eNXMG9VdEM	**1** (0.02%)	1 (0.03%)	00:00:38	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
228.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0wRqF1H3HmkFTZW3e9nlf1u38dDyvD4EvCddKqEX1eWa9jMlVYsfR3RcM	**1** (0.02%)	1 (0.03%)	00:00:08	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
229.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0XFD6bDEoDtiy6PgYNu9jdqO5SC-taPudvCBmQMLsxhF5Ya7faWP1Cu9E	**1** (0.02%)	1 (0.03%)	00:00:04	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
230.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0xGi3bVej2zqHtaWphHTHv9za8SRiC0uJbBJVts3TWsUWLJmX34yR_-VQ	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
231.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0XOdFlKO-rgVeDC5Sdp_lzNriBRX39gLyxebdv4bVXwaM7c_jY5vUcJ3U	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
232.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0xu1USPMkVnzNvHtuv7ue1lSYPoFBo_JuXPb8LIoU5ec0JFWCaKBIUbnc	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
233.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR0yOgeOUYTdOb_7ZnbbPSRvdgtG1Hn36UKMq7swLdMMES0wx72LwvV3z1o	**1** (0.02%)	1 (0.03%)	00:00:08	0 (0.00%)	0.00%	0.00%	$0.00 (0.00%)
234.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1_Du7b5ot5WTGsBm5bvynjO7ADn46_erGCcmr8ByzuZStwKbVWDcyxApg	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
235.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR11ieHU-d0ebURhXqtBrTI03SB9T9k9yFmhwWtKV-V6Q6QunMEdY3yTETM	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	0.00%	100.00%	$0.00 (0.00%)
236.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR11lG5cAAD0O9mw_1S-AEw8hoEdjv541H03Q_f33u8ShiF_g86FivNuUbA	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
237.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR11YYmbl-9sSOX5RJHSjLLavvFbNAAex6cr50lU3FkmMMXFnXQ3_DAxFss	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
238.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR138g7_FkCNzd0pHbVrq7_bj2HZEhTJQWI2lBmnkkeGjEDUPaq1f9xUSQQ	**1** (0.02%)	1 (0.03%)	00:00:10	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
239.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR140XIDcKmjtslaFWrvlBw4uhqY5HtWQImC-dgBXtMRDSFpDR2O2XPpD-0	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
240.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR15AIkcV_2URwdS7VSAeb2-m8a1i02ZUZ_xZx7-kRs9zWXVwXLGMYCq3fI	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
241.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR19o_iuglwKlZUbz18zAtuFe3FXbO0OGnzzlj39dTTITj5d0E2epFMtfQ8	**1** (0.02%)	1 (0.03%)	00:00:14	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
242.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1alp8VrfdySEJ-7W-zH_c9MtGdHpabzenRc8K_LGaHu11MBYtoq1Rw0Lc	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
243.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1AoGkI7dGdd5pTWH5AnsJJg3p2mKZVJzauoqwR__A4La6EPabVEJe1fjs	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
244.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1B4VhXZCppQ7O4p56dq_Mat1W7jUVWd471v-mBKaAxyNgGoh0NXm_0fyo	**1** (0.02%)	1 (0.03%)	00:00:15	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
245.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1BYGbOMHYn3ewK79cwST_CCmokBOhqyHlrzrUTGNNTZ3-fr_ncV80FwI8	**1** (0.02%)	1 (0.03%)	00:00:06	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
246.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1DaWB24m4ZhOe47Dv-Bf2n1qc6O8GaImQPP0skK6s0JtgipLnXRYcsLzU	**1** (0.02%)	1 (0.03%)	00:00:17	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
247.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1e9fiINyiJ7D0LQWVId4XDmg-gL1mW4rlk1FJCSUvJv70FtNXE-NmM9_A	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
248.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1FjhbGx7Mjeey3hwipdmUMjLaKDyoNzSgCU7CQlUivn79-PgV4wZgLGjw	**1** (0.02%)	1 (0.03%)	00:00:00	0 (0.00%)	0.00%	100.00%	$0.00 (0.00%)
249.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1g5wbHlxgooxrGdv-VdApC9B5kKRUabOTs8gi9FnJ7sgtHDvitvsiOVvY	**1** (0.02%)	1 (0.03%)	00:00:00	0 (0.00%)	0.00%	100.00%	$0.00 (0.00%)
250.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1GgnzlUYYvc3Y79VDZ5cfB1FgwlTNK2IpayLEtS3vSShVwon_OuV0nnBk	**1** (0.02%)	1 (0.03%)	00:02:33	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)

251.	AR1gkk4CESGfB9uD_1qUizW8174qMl4u2Y21cNv7pk44AdwY8Mh9LPNGnyg	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
252.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1gZ_nQwMCKHigkjRfCbYsyy5Axs8saIO_rZUMd5vQElzpz09v_FFB6-TY	1 (0.02%)	1 (0.03%)	00:00:12	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
253.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1hB1_Ln_IqjvsKvv7gJsv0RvxJ828_SdO-ROYyCicinvAn76YdUVRZ658	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
254.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1HblLeHX2fkogr8jZz10E6_LDcv653zuyoO-K3kl-jC-BZri58ORwEv4g	1 (0.02%)	1 (0.03%)	00:00:07	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
255.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1HHlSKUx-zi41PZN_u2-Eo2vGPQCcax7ECcajJmuv_24GiCp9VIDQVsaw	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
256.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1HW-SKOlnGZWizyC3_DJFNOvWVbNwiQKMY7ThrUBkqS6yTNi9imDYgNhE	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
257.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1knjGMQlSXkp7m6kdGCe0rHpLiAcRondWvvttkqObVdL0yXct8wYt3dnE	1 (0.02%)	1 (0.03%)	00:00:00	0 (0.00%)	0.00%	100.00%	$0.00 (0.00%)
258.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1LmlvS8JSXiBg3nFgjgfUwPK1jwfwSZWEOsquYV6pP1Tynr3VR2dxCKf4	1 (0.02%)	1 (0.03%)	00:25:13	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
259.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1MnXSztuO7r2pXdmkQNW8QL4kATu1XJPUKocel46yz5-otiVKNNujrYEk	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
260.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1Ofehpncxuq LJS6_owp3xVRI-FcuDYpOhRBrSTLVHZzlYxpcWq1fzL1Iw	1 (0.02%)	1 (0.03%)	00:00:09	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
261.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1ohoFQoX7NPW-yRz_ritg3bu-2_h1NkyqYAZflL5WREkAvmD8V9QQsTcw	1 (0.02%)	1 (0.03%)	00:00:08	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
262.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1Pkof5AIC3K2EQb-2f9YNcNdKCZPAl9aW2Bb27QYiFJNPZz7lacGve65k	1 (0.02%)	1 (0.03%)	00:00:31	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
263.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1sKTPov9msMXWfLQ44MCszDE1JKw5hNyOedIcHKbwJS7lsO8-mo3vcR5Q	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
264.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1sr8t_Q1-40FXtCI7z24b9rwce0G0OE3vEApaQ9C5L84jPkeTD2miWVMk	1 (0.02%)	1 (0.03%)	00:00:47	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
265.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1UCpwMXkiYzvfF1FkxzjdRAm4Jm8V2CU_pc8bmEGmiER7XRtcJODyk4bg	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
266.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1VECR2SeqLUSps7h68h4cqsFulXTjJNOkcxcT1oz6d3LxhyIH6UOcHHPw	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
267.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1w2fwXmeXvS03Q-7eZwOiWr9Zp0eS63k0KBYPZoI4OHNNOgU8CXVR1Msw	1 (0.02%)	1 (0.03%)	00:00:17	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
268.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1X9xklabZq5J_CSHV_d5heNDJ-hnacfdBbiDftH-QvlOvgMVdPau5fmU8	1 (0.02%)	1 (0.03%)	00:00:07	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
269.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1xfuxFknkgGbbnBfqQDij1wNOpYUliCUb2xOC-axeL-cZVxovxsIm4e_8	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
270.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1xVgf3KkHSzZ4dW7_pHlhjT2YpEGGfN5f2Q4Qmgjqvg0OQ7w9MxKCqVZA	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
271.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1YvTwG0F1YILBbOAqgCI82zIKnHxxkfAdnWYDYQog6sS5VAuTijAnJLWc	1 (0.02%)	1 (0.03%)	00:00:04	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
272.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1Zn9rYPnCbj1y0Vnqje3e3m0MGHiDFxo3XY3bXCN3sWhaThQTBJ6Two3U	1 (0.02%)	1 (0.03%)	00:00:50	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
273.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR1ZXHiXrYa9K6BK2OfuRmJPapE2pbvfmhOPRR7gg0FxoKju3GYVEAfXeWk	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
274.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2-oA7CfmJjwlPT0gIpqe-9YbKmNLR47-ANt6B9-hxXxJz0w5G5oyjbcDU	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
275.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR20SNamTw-3OZ3MyMuIGPN0CsTTZ1kLREC3smbj33bvWivKYpICEZCAkYI	1 (0.02%)	1 (0.03%)	00:00:08	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
276.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR21e9-_r7fgbYZGHR5FQt8uBtZ0d6OYsAHzXvYUf0ogsnghjE5x8tJFvqk	1 (0.02%)	1 (0.03%)	00:00:10	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
277.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR21iEhf_unZ5mM4um5O6eVQCIzcrxAQ0RC1Y2-BZPyBCggqPCPx1pLSfgQ	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
278.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR25lsOei6QYWXH5ntEAwOSyR9UnbM83kz-7EPZuNhDQEUalooL5tgGW1NM	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
279.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR28qSBOW2_D6PGdWt3-CtVtMqfrPScPYs1rRdgQ381eKn_M1EzcZXSTR_Y	1 (0.02%)	1 (0.03%)	00:02:24	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
280.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR29pKtETC2j-X2PvYqAO42ohVzrVfJCVx_snbztmpMiaRKI7B2qos2LXJc	1 (0.02%)	1 (0.03%)	00:00:12	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
281.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR29VCbDzVHat6w2KsntAO_DtG_kjwm3uRXxw6Jmhf9K8lntAI4MuDn3Rzw	1 (0.02%)	1 (0.03%)	00:00:04	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
282.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2a4VnVd_zuHPlDVPBd51WVj3WdiiorqvEG2fbg2Ab14eRnyVUnly80pI	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
283.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2A61JaP2DiLqc_cmK51n8M-CB2sld9Ni4nYXFMUDDcCNA_4T__iQlUBj0	1 (0.02%)	1 (0.03%)	00:00:27	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)

284.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2acl17mE6-cHL6iCRYVPwHJ8-OHXw6nraxoRRsklQBsneC2VLkenGshCE	1 (0.02%)	1 (0.03%)	00:00:32	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
285.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2At63jRMrVZ_RRnl4wzoMGjUU3dcovNrDVK9PisQo4jbdVSimq-4uUp4k	1 (0.02%)	1 (0.03%)	00:00:09	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
286.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2bDVrpZW3BwgrggmCzU9R7S8jbliKGIsqeCBiy0_fKsIvPhXnJort1zLI	1 (0.02%)	1 (0.03%)	00:00:11	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
287.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2BjSI8QOwc4ar8ixWcwCKaXiIT7_PudqNRMHH78qF3KvNmbh5ZLJFaiaM	1 (0.02%)	1 (0.03%)	00:00:07	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
288.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2CWdQyJmEVxnETHGw4ovkfXNYn0WHIivY02VZsS9gfhp5qjbveJyOsMYw	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
289.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2EreGS9k0gNSf9md24y-R5IfB_0JprdgvkM8u4dVBvFVyFa0Kha7siHUk	1 (0.02%)	1 (0.03%)	00:00:09	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
290.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2EV-QygqZ00B0hVQ0cFNBBvs4PvsKKC7PtIUO0pYNLGPNi-cI7gXFfkxA	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	0.00%	100.00%	$0.00 (0.00%)
291.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2fALAGsp8fdzYBT5IJLwUR7bA-7Dmb9XcShsIfdxFTCuP1ki6CFImEH_w	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
292.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2FbFPYRctyglosLiYAHf7VxYKL3b-LcS6OausJECf4XGTDPG5kGAwZfFo	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
293.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2GgqkldTJfLZKjk4XAx-cS6zbnjGtHYQ3NUsryj93zUvbwfmAUnSsiFm8	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
294.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2H0eEfp-gVgqzWYEZ0jM2PrQwLZadFDEBnGoI8uKvYzDG9pGvpOVA1j88	1 (0.02%)	1 (0.03%)	00:00:12	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
295.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2HSZq9BYqYkMOvT00QraBoF5ZQSuGG108MxrCjCtrGY6QF42CLghYqF4U	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
296.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2iOOlozvRIq4Vnb-Qf6upvltxUb9OEOv7dId05OyEs55940A9sZBafM-c	1 (0.02%)	1 (0.03%)	00:01:49	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
297.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2iT7vsFnEd5X0fDgPHqfSFsGUfl245kezw_HNjymjwOukvmmrcZN8wsuY	1 (0.02%)	1 (0.03%)	00:00:03	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
298.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2joOUqRS8k3ylFRxGGfQW2UcV8wwzt8UDRn7_2acFFrY-4oY3k2Pw2P6s	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
299.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2jSU7Z8BgqNaUzGRArUiIsg4951ZK_D91CqJb0O4RsXpTPTvPBA6ju50Y	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
300.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2jyw4x4Qq1_zUk0A4SGlxKWn9llaJaI-mT3B8iKv-B_KBmGqLHzVB_g6k	1 (0.02%)	1 (0.03%)	00:00:19	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
301.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2KMYCaDmIIB-e4ANNoaFKsfdcFKi48OEXzmJA7v107M3y6bhM6mOTL3No	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
302.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2kQBX6-GNYa7qyTy0_UWsSUJdseZvFyBTuy9FlZI6q1TuZjp2bvpmUdSs	1 (0.02%)	1 (0.03%)	00:00:07	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
303.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2M1VQ0udOhsmra9IEJQxy3LwrQHTyQdkN5nNHAGcKHAA_VSi30YMBEd3M	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
304.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2MqGx4alV5wG1t7rp3exsY3fUE2fM3-dTghow2GhsmSBiS7IZINNEDiEs	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
305.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2mYIWrAsnVxk-DaRm9_sKxv7CYvoevMssxv1N2-LUeH7g1PHsD7uUWJhU	1 (0.02%)	1 (0.03%)	00:00:26	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
306.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2OZJls0kvhi8XWXeHX6ZLbIqDSiY8DZmVu50ySr_Y7speQ9wPMgg4IShE	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
307.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2p-oACM4XQ_ShGoBRAjdLifovmZ2PKP9NcjJpY6UoFtD4kfjxLIdkNL7s	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
308.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2pbyFTeWZx_yxERWo_7mjPZQdmq_xNa9gi5pdRFdIysixGdOY3ejCJTEI	1 (0.02%)	1 (0.03%)	00:00:09	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
309.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2PplVOEn7roJKiWOlGt4LW-7-NrdcNOYRJwd8OC8PTcjTMDeCuubbDSkI	1 (0.02%)	1 (0.03%)	00:02:26	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
310.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2slvVf0ci0mmG3uoXaVsJpBY2N36ghk9peeRr2TgURun-wtoCVW1bWaGA	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
311.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2SrmEuwYv7z1ORCaimNXEf6E4DUvGcCgxtq4OpQ0nQ9ovokKKZGxjyd4A	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
312.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2UBIPYVd3Vk4ylhkon1uPBi5KDBvUSqa9GOGxxBdjteWkr-_mIQEbQD68	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
313.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2V1G0NvaZs0tk7Nbj3fSm9g0_zAiT9VnymI2HqtnrRoYNjl7vdv-CcYJg	1 (0.02%)	1 (0.03%)	00:00:07	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
314.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2Vlm_cMVxYSNCPfhCvgsgJaUbg-CzkE8zsUqsv3rnyaxC94apRlnMsEe8	1 (0.02%)	1 (0.03%)	00:00:20	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
315.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2vvQKwtDAyrmTe3EL2SGIr-o2emPQ3PUWLDXaSoKV-refARXjc4LJsvWg	1 (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
316.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2vYH8ZuJGPOELwthzyCe9k88gOu_YCkHYTfShPulZk38bM2_hyUuAEnX0	1 (0.02%)	1 (0.03%)	00:00:08	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)

317.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2xAJR54yptgxB1hxokq9laa_qOc_kvujFm6ymmOyBzWzRVXfPOTxn3KJQ	**1** (0.02%)	1 (0.03%)	00:02:55	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
318.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR2yUhlEuLQV0L4qLZ2yQmi0BMBEy1CNjcHKTaTi8zEJyPoBcehaOhZ6-I4	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
319.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR32oaKnyuJgBFycJ84BmkUROHIkzKV8yaQoUNQz5M3dQSwPysKiPPtf4TU	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
320.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR33U4KaEHGejfTLo6hwuYlq3FvKEpBQpfTWWlrr3xg5FSK7K-TWetVzrIA	**1** (0.02%)	1 (0.03%)	00:00:17	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
321.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR39jcc6KjntwT2hU8GuLQazwjIxjR9LdDVeMWCb4LUCMMGo0gpxkZ-5Coc	**1** (0.02%)	1 (0.03%)	00:00:08	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
322.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR3BRGhcZznl3GFODCbnr6FA9qZ-JfNfRhfpZb9ZN7ucUCMin9TlXiENgYc	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
323.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR3fxGi-OkR3ZGofI_id7zptYKFLJxmH_f-TEhxZ3aRc-VCCvCDnlVmBoX4	**1** (0.02%)	1 (0.03%)	00:02:01	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
324.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR3g969bq1z7GCelgK8MvGbmMirlovqotg2l0qjl41awSwrNSti77LmVwVU	**1** (0.02%)	1 (0.03%)	00:00:37	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
325.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR3gBaom5nJwhG7xYVR2_WgtPbfni-JtTQxz15eRE-9Z154rO0DFufzwik0	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
326.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR3HF5G6U33y87nI1xL1JFakgXNgpcGAn5ShBFN9KiohOcf9Jb2D0ExCg0Y	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
327.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR3HgaSo8DHBZL8S8XK11GWShwnyNAXsNC9o2cFID2yWBZv7jbELVWgGTEQ	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
328.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR3HNL6ecdM-Il7w3k2MAdSY1DW5TX9IArawzdu7XzL3gV1K9gcXw7mKP3g	**1** (0.02%)	1 (0.03%)	00:00:19	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
329.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR3iy77auQ338XaAHPcnaI60P3riZmd7vqeYqI4RZTaOJwIZhCqZ3hoctpQ	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
330.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR3JMLTauqtmXKzUiu9WHzoLZS5bJI85OIwFtp8Ex4V9NYeVADi5dWlKpPc	**1** (0.02%)	1 (0.03%)	00:00:24	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
331.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR3lAePMBLPH__ck8qVA0SgWfCFzHslt7O6KkiCeKF8Nb5CA4wgJlWsbXsI	**1** (0.02%)	1 (0.03%)	00:01:29	1 (0.09%)	0.00%	0.00%	$0.00 (0.00%)
332.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR3LDdegjwFt1uPEnWriiCX7O9FxaR_spOq68fH-VVIDUdHRxa34O9ZsM2Q	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
333.	/somer-valley-enterprise-zone-first-public-engagement/have-your-say-0?fbclid=IwAR3M7KvGMJgkBgI_aL5L6_H-jDHqMlyWPgRMbUtdqE05rfo9KmFj-LB_4uY	**1** (0.02%)	1 (0.03%)	00:00:00	1 (0.09%)	100.00%	100.00%	$0.00 (0.00%)
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JLL

31 Great George Street
Bristol
BS1 5QD

Nicola Lovell
Associate - Planning & Development

0117 930 5647
nicola.lovell@eu.jll.com

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Bath & North East Somerset Council		
MEETING	**Cabinet**	
MEETING	**1st February 2024**	EXECUTIVE FORWARD PLAN REFERENCE: E 3487
TITLE:	**Somer Valley Enterprise Zone – In Principle Statutory Mechanisms**	
WARD:	Paulton	
OPEN PUBLIC ITEM - CONTAINS EXEMPT APPENDICES		
List of attachments to this report: • Appendix 1 (Exempt): Statutory Mechanisms • Appendix 2 (Exempt): Equalities Impact Assessment		

THE ISSUE

1. The Council is promoting the Somer Valley Enterprise Zone (SVEZ), a mixed use commercial development at Old Mills north-west of Midsomer Norton with associated highway works (the SVEZ Scheme). The land required to deliver the SVEZ Scheme is currently held in multiple ownerships, as outlined in further detail below.

2. In order to construct the SVEZ Scheme, it is necessary to acquire the land and rights required for the commercial development, together with several small parcels of land outside of the existing highway boundary required for the associated highway improvements (such as cycle and pedestrian path connectivity). Negotiations for the acquisition of the land and rights needed for the delivery of the SVEZ Scheme have commenced. However, to ensure certainty of delivery and timescales for delivery officers are now contemplating the use of additional statutory mechanisms to support land assembly.

3. This Report provides Cabinet with an overview of the current progress of negotiations with landowners. A separate appendix (**Appendix 1 (Statutory Mechanisms)**) provides commentary on the statutory mechanisms and powers available to the Council to enable land acquisition by compulsory purchase should this be necessary as a last resort. The Council is considering all available mechanisms to deliver the land, including the making of a compulsory purchase order (CPO) for the Scheme, in order to protect its position and ensure the deliverability of the development. Any such mechanisms would run in parallel to ongoing negotiations for voluntary land acquisition. This Report seeks authority for an 'in principle' decision to progress these statutory mechanisms, and authority to proceed now with related early activities.

Should the use of CPO or any other statutory mechanisms be determined to be required, further Cabinet approval would be secured to authorise the next stages of the process.

RECOMMENDATIONS

The Cabinet is asked to:

1. Note the ongoing progress which has been made towards the acquisition of land required to develop the SVEZ Scheme.

2. Authorise the carrying out of formal land referencing (including the procurement of a land referencing agent and the issue requisitions for information under the Acquisition of Land Act 1981 and/or any relevant or associated statutes) across the area being considered for the SVEZ Scheme in order to identify landowners, their interests and to gather as much information as possible about the land. This will include full due diligence and financial evaluation to ensure value for money.

3. Authorise the entry into negotiations by the Council (and on behalf of the Council) with landowners and others with an interest in the relevant land required for the delivery of the SVEZ Scheme in order to acquire land and rights by agreement where possible.

4. Authorise the acquisition of land or rights required for the SVEZ Scheme subject to relevant financial limits, whereby the decision to proceed with any purchase in excess of the SVEZ Scheme budget would be referred to [Cabinet /Single Member Decision] for authorisation;

5. Delegate to the Director of Regeneration and Housing and the Director of Sustainable Communities (or [the Monitoring Officer / Executive Member] for payments of over £500,000), in consultation with the S151 Officer, authority to take all necessary steps to acquire by agreement land and/or rights required for the SVEZ Scheme and to negotiate and settle all necessary compensation and professional fees (including interim payments) as agreed with landowners, where compensation is within the SVEZ Scheme budget. This will be subject to full due diligence and financial evaluation to ensure value for money and that commitments are in line with approved scheme budgets.

6. Authorise the taking of all steps (including the drafting of a CPO and related documentation) necessary to prepare for a subsequent report to Cabinet to determine the use of compulsory purchase powers to acquire the land and rights in land required for the SVEZ Scheme.

THE REPORT

BACKGROUND

1. In December 2016, the Council entered into a Memorandum of Understanding (MoU) with the Secretary of State for Communities and Local Government, now the Secretary of State for Levelling Up Housing and Communities. The MoU governed the provision of business incentives in the Enterprise Zone (EZ) and included provisions in relation to the delivery and marketing of an EZ.

2. Subsequently, the SVEZ was established in April 2017 to support local businesses and to attract new businesses and growth to the area, following its inclusion in the wider Bath & Somer Valley Enterprise Zone. EZs were designated areas across England which may offer business rate discounts or enhanced capital allowance for new businesses locating on the sites. EZs were designated on sites which would ordinarily not be expected to generate significant business growth or to generate any business rates without incentives and/or dedicated local stakeholder support. EZs also benefit from opportunities presented by simplified planning regimes, such as the use of Local Development Orders (LDO), as is proposed for the SVEZ Scheme.

3. The MoU was a statement of serious intent that was entered into voluntarily by the respective parties, and had moral force rather than creating legal obligations. The MoU covered the period up to March 2020.

4. The Enterprise Zone status was granted for a period of 5 years, which has now expired. The MoU is also no longer in effect. Without that formal status, some associated benefits for prospective occupier (such as business rates discounts and enhanced capital allowance) will not be available. However, the establishment of the SVEZ has still been instrumental in the promotion of the project. It has allowed for the promotion of the LDO and has been central to securing programme entry with WECA. The need for the SVEZ Scheme, and the demand that it is anticipated to generate, is still clearly demonstrated.

5. The SVEZ comprises greenfield land extending to approximately 13.5 hectares / 33 acres. It is located at Old Mills to the north west of Midsomer Norton and is fully allocated in the adopted Local Plan for new employment space following the adoption of the Local Plan Partial Update (LPPU) in January 2023.

6. The SVEZ site has not been brought forward to date for a number of reasons, including because it has not been possible to secure all of the land and rights required by negotiation. The other key issue is the high costs of delivering the enabling infrastructure, which means the SVEZ Scheme is not viable for the private sector. It is these issues which have led to the need for public sector intervention to assemble the land and deliver the SVEZ.

7. In line with its obligations under the (now expired) MoU, the Council remains committed to the delivery of the SVEZ Scheme to secure a number of important economic, transport and environmental benefits. These include:

Economic benefits

- Supporting the Somer Valley to thrive and become more self-reliant by enabling economic growth through the creation of 1,300 new jobs increasing prosperity for the area;

- Diversifying the type of employment available in the area, offering flexible space to accommodate new and expanding local businesses and creating circa 35,800sqm of new commercial space;

- Delivering new highly sustainable and attractive new commercial and industrial space, helping to address business demand and employment land losses experienced in the Somer Valley;

- Offering opportunities for expanding local companies and businesses relocating to the area that are attracted by the skilled local workforce;

- Delivering important jobs to the local area and to assist with achieving the Local Plan aspirations for at least 900 new jobs by 2029;

- Generating business rates income. The potential business rates income (estimated to be in the region of £10,500,000 by 2040 / 2041) that would at least partially be retained by the Council; and

- Contributing circa £51,000,000 pa of net additional GVA to the West of England economy, and raising employment in this area by approximately 0.2%.

Transport improvements

- Helping to address the patterns of out-commuting by offering new local job opportunities that are more accessible through improvements to specific local transport links;

- Improvements to traffic flows on the A362 between Old Mills and Farrington Gurney through speed limit regularisation and widening of the Sunnyside pinch-point;

- Supporting a sustainable travel modal shift through the provision of improved bus infrastructure and through the provision of a pedestrian and cycle track between the SVEZ and the Norton Radstock Greenway to the East; and

- Improvements to traffic flows through upgrades to the Thicketmead roundabout.

Environmental

- Delivering a sustainable, Net Zero mixed-used commercial development which will achieve 10% biodiversity net gain; and

- Reduce out commuting in the Somer Valley through the provision of new jobs and providing a range of active and sustainable travel improvements.

- The development will achieve a 100% regulated operational carbon emissions reduction from Building Regulations Pat L 2021 (or future equivalent legislation), in line with the hierarchy set out in Policy SCR7 and the B&NES Sustainable Construction Checklist SPD (2023). The SVEZ will help to reduce vehicle-related CO2 emissions through the provision of EV charging on site, in line with the Council's local transport policies and climate emergency declaration

Wider benefits

- Securing external funding through the West of England Combined Authority (WECA) to deliver infrastructure improvements that will benefit the Somer Valley; and

- Improvements to connectivity through support for superfast broadband.

Previous Decisions

1. The following Council decisions have preceded this Report and provide relevant background to this decision:

   a) On 10 November 2016, the site allocation and proposals for the SVEZ were unanimously approved by Full Council;

   b) On 1 May 2018, the Cabinet Member for Economic and Community Regeneration authorised a £100,000 provisional capital item to the approved Capital Programme to be matched with £300,000 of WECA and section 106 contribution funding to prepare a Business Case for a comprehensive improvement scheme for the A362; this decision was effective from 12 May 2018; and

   c) On 19 January 2023, the LPPU was adopted which ensures that the SVEZ is fully allocated in the Local Plan.

2. Cabinet should note that a business case for improvements to the A362 was prepared but was not submitted to WECA. Following WECA's advice, the highway improvements were subsumed into the main SVEZ Scheme (which now forms the basis of this Report), and officers have agreed with WECA that the Council will submit one business case for both elements. Further information regarding the funding position is provided in **Appendix 1 (Statutory Mechanisms)**.

3. It is also relevant to note that the use of a LDO as the planning mechanism for the SVEZ Scheme was presented to and agreed by the Enterprise Zone Steering Group in 28 November 2018. The LDO is considered further in the following section.

Planning Position

1. Planning permission for the development will be secured via the LDO and this is currently being progressed. The Council is being requested to adopt the LDO by a Cabinet decision in February 2024 (alongside the resolutions requested in this Report). The LDO is a grant of planning permission for the development of the SVEZ that accords with the uses specified and parameters set in the LDO. The LDO is being promoted by the Council in order to encourage investment in the SVEZ and to facilitate delivery of employment development by reducing uncertainty and planning risks for investors and developers.

2. The LDO and the statutory mechanisms which may be required for the acquisition of the land and rights to ensure its delivery are closely linked, as the land is outside of the Council's control. Further information regarding the land required for the SVEZ is provided below. **Appendix 1 (Statutory Mechanisms)** contains an explanation as to the relationship between the LDO and the statutory mechanisms available for land assembly.

Associated Highway Works

1. As part of the SVEZ Scheme, a range of associated active travel and highway improvements are proposed to be delivered along the adjacent A362 highway corridor (the Highway Works), many of which will require the use and development of third-party land.

2. In outline, the Highway Works that are currently being considered include the following:

    - Straightening the A362 to include a new roundabout to provide the necessary access to the SVEZ site;

    - Widening the road at 'Sunnyside' on the A362 to enable vehicles to pass one another easily and without causing delays during busy times;

    - Additional active and sustainable travel provision including new and improved bus stops and a pedestrian and cycle path between the SVEZ and the Norton Radstock Greenway; and

    - Potential junction improvements at Thicketmead Roundabout.

3. To pursue these associated highway improvements, the Council will need to acquire several small parcels of land outside of the existing adopted highway boundary to carry out improvement works (both east and west of the site and along the A362), in particular to ensure the delivery of the active travel provision. The highway improvements will also facilitate the flow of traffic and to create an entrance into the site from the A362.

4. Whilst some early dialogue and background investigations have commenced, detailed negotiations with the owners of Highway Works land parcels have not yet commenced whilst designs are being finalised. It is therefore considered likely that the acquisition of these parcels will need to be facilitated by statutory mechanisms available to the Council.

5. However, as these works will be necessary to deliver the SVEZ (and therefore form part of the SVEZ Scheme) it is recommended that the land required for delivery of the Highway Works be included in the resolution to approve steps up to the making of a CPO. Voluntary acquisition would still be pursued as a primary objective and use of any statutory mechanisms will be treated as a last resort.

Land Assembly and Negotiations

1. At the date of this Report, it is understood that the land required for the SVEZ Scheme is held in ten separate parcels. Five of these parcels are within the proposed boundary for the main SVEZ site. As explained above, there are a further five parcels located outside of the main SVEZ site relating to the Highway Works (where proposed works fall outside the existing public highway).

2. The full extent of the land and rights required will be confirmed once the final LDO boundary is determined following to adoption. However, subject to any changes as part of progressing the LDO, it will in any event be necessary to acquire all of the land and rights required to build out the SVEZ Scheme, including the Highway Works. The Council currently has funding available to enter into option agreements

in respect of the key land parcels. This funding comes from the same source as the enabling works, the WECA Investment Fund (see further below) and **Appendix 1 (Statutory Mechanisms)**.

3. Officers and the Council's instructed land agents have been engaging in negotiations for voluntary acquisition with landowners of the main site area for several years, with some negotiations having commenced in the last quarter of 2019. However, there has been more contact with some landowners than others. Offers to purchase land have been made to 4 of the 10 landowners with interests in the main SVEZ site area. No offers have been made to landowners affected by the Highway Works because the boundary of land required for the Highways Works has been subject to further consideration whilst the designs were finalised prior to the LDO being adopted.

4. Further consideration of the implications of the nature of the negotiations is contained in **Appendix 1 (Statutory Mechanisms)**.

Statutory Mechanisms for the Assembly of Land

1. Please refer to **Appendix 1 (Statutory Mechanisms)**.

STATUTORY CONSIDERATIONS

1. Please refer to **Appendix 1 (Statutory Mechanisms)**.

RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

1. Capital spending to the end of December 2023 for work to develop the business case and design the scheme totals £1.9m. WECA has agreed £1.82m grant funding for this current scheme in the approved capital programme and it is supplemented by B&NES match funding of £665k.

2. An Outline Business Case '+' (OBC+) has been submitted to WECA to request grant funding of £9.3m for project development costs such as land assembly and detailed technical design which are to be funded from the current £14.9m WECA grant allocation already included in the provisional capital programme.

3. In 2025 we plan to submit a Full Business Case (FBC) for project implementation costs of a further £20.6m which includes enabling works and completion of highways work, a new roundabout and perimeter landscaping. We propose to ask WECA to grant fund £19.5m of these costs, using the remaining £5.6m of the current £14.9 allocation plus an additional new grant allocation of £13.9m.

4. In total, costs of £29.9m are estimated for completion of the next stage of the scheme for both OBC+ and FBC costs and to be funded from B&NES match funding of £1.1m together with requests for WECA grant funding of £28.8m.

5. B&NEs match funding of £1.1m will contribute towards FBC project implementation costs. CIL (Community Infrastructure Levy) funding totals £756k. CIL of £375k was allocated to the scheme in 2023/24 to fund the eastern cycle track to lead from the SVEZ development and link in with the Norton Radstock Greenway. The balance of £381k CIL funding is earmarked for allocation in a future financial year. The project also has funds available from developer contributions paid through agreements under s.106 of the Town and Country Planning Act 1990 (TCPA) estimated at £329k.

6. See Appendix 4 for full financial tables being submitted to WECA. Adoption of the LDO will be subject to the confirmation of the OBC+ approval at WECA Committee and a signed Grant Offer Letter.

7. Further information on funding and how it relates to the potential statutory mechanisms is contained within **Appendix 1 (Statutory Mechanisms)**.

RISK MANAGEMENT

1. The SVEZ Scheme offers an important opportunity to deliver employment uses and other benefits, but officers acknowledge that inevitably there will be both legal and financial risks involved.

2. A risk assessment related to the issue and recommendations has been undertaken, in compliance with the Council's decision making risk management guidance. The Council's risk register has been, and will continue to be, updated accordingly as the project progresses.

3. Appointment of external specialists is a key response to pro-active risk management around land and legal issues associated with the SVEZ Scheme. The Council has appointed a specialist legal team. Land agents have also been appointed to advise on and manage the negotiations for the acquisition of third party interests. Subject to this decision, land referencing agents will also be appointed to review the land interests in contemplation of relying on statutory mechanisms for land assembly.

EQUALITIES

1. In line with its Public Sector Equality Duty (PSED), and the B&NES Council Equality Improvement Plan September 2022, the Council has carried out an Equalities Impact Assessment (EqIA) in order to identify any equalities issues as early as possible prior to a full EqIA when further information is confirmed regarding the scheme proposals and specific landowners.

2. A copy of this EqIA is appended to this report at **Appendix 2**. Given the stage of the proposals, the current EqIA has been undertaken at a high level. Further EqIAs will be undertaken at appropriate stages of the project, reflecting that the PSED is an ongoing duty. Full regard will be paid to the EqIAs in the development of any proposals and in negotiations with those with an interest in the SVEZ Scheme.

3. Please refer to **Appendix 1 (Statutory Mechanisms)** for further information.

CLIMATE CHANGE

1. The Council declared a Climate Emergency in March 2019, committing it to providing the leadership necessary to enable Bath and North East Somerset to achieve carbon neutrality by 2030.

2. The SVEZ Scheme represents an opportunity to address several related issues which will help to address the climate emergency. It will help to reduce out-commuting in the Somer Valley through the provision of new jobs and it will also provide a range of active and sustainable travel improvements, including a new cycle link to the Norton Radstock Greenway, and new and improved bus stops.

3. Biodiversity net gain is also intended to be a key aspect of the SVEZ Scheme, and it is proposed to provide a zero carbon, sustainable development. The SVEZ will help to reduce vehicle-related CO2 emissions, in line with the Council's local transport policies and climate emergency declaration.

OTHER OPTIONS CONSIDERED

1. Please refer to **Appendix 1 (Statutory Mechanisms)**.

CONSULTATION

1. Consultation has been carried out with the Council's Monitoring Officer, Director of Regeneration and Housing, Director of Sustainable Communities and Deputy Council Leader and Cabinet Member for Economic Development and Resources.

2. Informal public engagement for the SVEZ LDO commenced in September 2021, with a presentation to the Somer Valley Forum on 7 September 2021, followed by a presentation to landowners on 27 September 2021. However, following these meetings, the engagement was put on hold whist the proposed masterplan was revised at the recommendation of the Cabinet member for Economic Development Resources.

3. The informal public engagement then recommenced on 19 May 2022 and was open until 30 June 2022. It was advertised widely via Council press releases, direct emails to Ward and Parish Councils, letters to neighbours and landowners, site notices surrounding the site, an advertisement in the Somerset Guardian, social media posts, a post on the Council's newsroom and an interview with the Cabinet member for Economic Development Resources on Somer Valley FM.

4. Engagement consisted of the following displays and events: the public website containing project information and the proposed masterplan, a public webinar which was then uploaded to YouTube, presentation boards and hard copy questionnaires in Midsomer Norton, Paulton and Radstock libraries, presentations to Radstock Town Council, the Somer Valley forum, Westfield Parish Council and Paulton Parish Council as well as a residents meeting at Paulton village hall.

5. Levels of engagement for the above were good, there were 41 attendees of the webinar and 336 subsequent views of it on YouTube, 29 hardcopy questionnaires were completed, 106 online questionnaires were completed, 3,776 unique website views were received, and there were 53 attendees at the residents meeting. There were generally positive comments received from Midsomer Norton Town Council & High Littleton Parish Council. The project team also answered questions from members of the public.

6. The initial SVEZ LDO statutory consultation began on 16 January 2023 and ran to 13 February 2023.

7. After considering feedback from the first statutory consultation, the Council determined that a number of changes should be made to the SVEZ Scheme requiring amendments to the LDO. As a result, it was decided that a second statutory consultation should be held to seek views on those changes. In summary, the changes include:

a) Increased depth of the perimeter buffer zone from 10m to 15m-20m;

b) Changes to the Wildlife (dark) corridors;

c) Removal of the perimeter path; and

d) Indicative location of the primary substation.

8. None of these changes affect the boundary of the SVEZ or the land-take requirements.

9. The second statutory consultation ran from 22 September 2023 to 20 October 2023.

10. As demonstrated by the changes made following the initial statutory consultation, the Council will take all representations into account in preparing the final proposals for the LDO, which will in turn inform the land assembly for the SVEZ.

Contact person	Richard Holden, 01225 477655
Background papers	None
Please contact the report author if you need to access this report in an alternative format	

Bath & North East Somerset Council

Access to Information Arrangements

Exclusion of access by the public to Council meetings

Information Compliance Ref: LGA-1572993
Meeting / Decision: Cabinet
Date: 9th November 2023
Author: Richard Holden
Report Title: Somer Valley Enterprise Zone – In Principle Statutory Mechanisms **Exempt Appendix Title(s):** **Exempt Appendix 1**: Statutory Mechanisms Appendix 2: Equalities Impact Assessment

The exempt appendices contain exempt information, according to the categories set out in the Local Government Act 1972 (amended Schedule 12A). The relevant exemption is set out below.

Stating the exemptions: 3. *Information relating to the financial or business affairs of any particular person (including the authority holding that information).*

The public interest test has been applied, and it is concluded that the public interest in maintaining the exemption outweighs the public interest in disclosure at this time. It is therefore recommended that the exempt appendix be withheld from publication on the Council website. The paragraphs below set out the relevant public interest issues in this case.

PUBLIC INTEREST TEST

If the Cabinet wishes to consider a matter with press and public excluded, it must be satisfied on two matters.

Firstly, it must be satisfied that the information likely to be disclosed falls within one of the accepted categories of exempt information under the Local Government Act 1972. Paragraph 3 of the revised Schedule 12A of the 1972

Act exempts information which relates to the financial or business affairs of the organisations which is commercially sensitive. The officer responsible for this item believes that this information falls within the exemption under paragraph 3, and this has been confirmed by the Council's Information Compliance Manager.

It is necessary to weigh up the arguments for and against disclosure on public interest grounds. The main factor in favour of disclosure is that all possible Council information should be public and that increased openness about Council business allows the public and others affected by any decision the opportunity to participate in debates on important issues in their local area. Another factor in favour of disclosure is that the public and those affected by decisions should be entitled to see the basis on which decisions are reached. Other factors in favour of disclosure include:

• furthering public understanding of the issues involved.
• furthering public participation in the public debate of issues, in that disclosure would allow a more informed debate.
• promoting accountability and transparency by the Council for the decisions it takes.

Weighed against this is the fact that the exempt appendix contains strategic/financial information which could prejudice the commercial interests of the Council if disclosed at this time. It is in the public interest that the Council is able to deliver cost-effective solutions and achieve best value. This depends partly on the Council being able to protect its commercial position while the detailed terms of relevant schemes are agreed. It is also important that the Cabinet should be able to retain some degree of private thinking space while decisions are being made, in order to discuss openly and frankly the issues under discussion relating to any negotiations.

The Council considers that the public interest has been served by the fact that a significant amount of information regarding the report has been made available – by way of the main report. Therefore, it is recommended that exemptions set out above apply. The Council considers that the public interest is in favour of not holding this matter in open session at this time and that any reporting on the meeting is prevented in accordance with Section 100A(5A).

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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