

Special Cabinet

Date: Thursday 25th September 2025
Time: 4.30 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 Alison Born (Cabinet Member for Adult Services), Councillor Mark Elliott (Deputy Council Leader (non-statutory) and Cabinet Member for Resources), Councillor Joel Hirst (Cabinet Member for Sustainable Transport Strategy), Councillor Lucy Hodge (Cabinet Member for Sustainable Transport Delivery), Councillor Paul May (Cabinet Member for Children's Services), Councillor Matt McCabe (Cabinet Member for Built Environment, Housing and Sustainable Development), Councillor Manda Rigby (Cabinet Member for Communications and Community), Councillor Paul Roper (Cabinet Member for Economic and Cultural Sustainable Development) and Councillor Sarah Warren (Deputy Council Leader (statutory) and Cabinet Member for Sustainable Bath and North East Somerset)

Chief Executive and other appropriate officers
Press and Public

The agenda is set out overleaf.



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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. For Special Meetings statements must relate to the items on the agenda. 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

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Special Cabinet - Thursday 25th September 2025

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. For Special Meetings questions must relate to the items on the agenda. 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. For Special Meetings statements must relate to the items on the agenda. 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. RESET LOCAL PLAN OPTIONS DOCUMENT (Pages 5 - 488)

The report seeks approval of a reset Local Plan options document for consultation commencing in October.

10. THE MOVEMENT STRATEGY (Pages 489 - 514)

The Movement Strategy proposes a shift away from car dependency by improving alternatives such as walking, wheeling, cycling and public transport. The Cabinet is asked to approve the development of a Movement Strategy and to agree the proposed arrangements for public consultation.

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

Bath & North East Somerset Council		
MEETING	Cabinet	
MEETING	25 th September 2025	EXECUTIVE FORWARD PLAN REFERENCE:
		E 3636
TITLE:	Reset Local Plan Options document	
WARD:	All	
AN OPEN PUBLIC ITEM		
List of attachments to this report: Attachment 1: Reset Local Plan Options document Attachment 2: Reset Local Plan Options communications and engagement plan Attachment 3: Equalities Impact Assessment of Reset Local Plan Options		

1 THE ISSUE

- 1.1 In 2024 government issued significant changes to national planning policy and a revised standard method figure of housing need. The revised housing need figure for Bath & North East Somerset is more than double that of the previous government. As a result the council decided in 2024 to reset preparation of its Local Plan in order to consider the implications of changed policy and to enable progression towards a sound Local Plan. Resetting the Local Plan requires the council to prepare and consult on a further set of options for meeting the substantially increased level of housing need, associated job growth and some new policy approaches. This report seeks approval of a reset Local Plan options document for consultation commencing in October this year.

2 RECOMMENDATION

The Cabinet is asked to;

- 2.1 approve the Reset Local Plan Options document (Attachment 1) for public consultation for a period of six weeks from 3rd October to 14th November 2025**
- 2.2 agree and authorise the Executive Director for Sustainable Communities, in consultation with the Cabinet Members for Built Environment, Housing and Sustainable Development and Communications and Community, to issue communications relating to the reset Local Plan Options and to undertake consultation as summarised in section 10 of this report and outlined in the communications and engagement plan (Attachment 2)**
- 2.3 delegate authority to the Executive Director for Sustainable Communities, in consultation with the Cabinet Member for Built Environment, Housing and Sustainable Development, to agree textual changes to the Options document (Attachment 1) prior to its publication for consultation**

3 THE REPORT

Local Plan 2025-2043

- 3.1 The preparation of a Local Plan is a key means of shaping the future of places within Bath and North East Somerset (B&NES) primarily by facilitating the delivery of high-quality development in a planned and co-ordinated way that will help the council meet its priorities e.g. providing the right homes in the right places and specifically more affordable housing, moving towards zero carbon and 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 as well as investment from the West of England Mayoral Combined Authority (MCA).
- 3.2 Development of housing that is more affordable, as well as additional economic space is crucial in improving people's lives and maintaining sustainable economic prosperity. Substantial investment in infrastructure, including transport, is necessary to unlock and support delivery of this development. The Local Plan is central to achieving this, as well as ensuring that change and development helps us to address the climate emergency, is resilient and adapts to climate change and facilitates nature recovery. The spatial priorities that underpin the Local Plan reflect these key objectives (see para 3.15 below).
- 3.3 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. This was followed by preparation of and consultation on a Local Plan Options document in spring 2024. The Options document outlined both policy approach and development location options for accommodating the then assessed need for additional homes and jobs. Following consultation on the Options document the council then intended to prepare a Draft Local Plan, setting out its proposed policies and site allocations, for formal consultation under Reg 19 (of The Town and Country Planning (Local Planning) (England) Regulations 2012) prior to it being submitted for Examination.
- 3.4 In December 2024 government issued significant changes to national policy and practice guidance and a revised standard method figure of housing need. The key changes to national policy include:

- Increased expectation that Local Plans will plan for a level of housing that meets the government's standard method figure of housing need and re-instatement of the need to demonstrate a five-year housing land supply
- Standard method figure of housing need increased nationally and more than doubled for B&NES – from around 720 per annum under the previous government to around 1,500 per annum
- Requirement that council's review their Green Belt if housing need cannot be met in any other way and introduction of the concept of 'grey belt' to help ensure the strategic release of land for development
- Introduction of 'golden rules' relating to the development of land released from the Green Belt requiring increased affordable housing provision; necessary improvements to local or national infrastructure; and provision of improved or new accessible green space
- Increased focus on delivering economic growth, including in specific sectors
- Greater focus on addressing the affordability of housing and specifically meeting the needs of those on lower incomes
- Commitment to regional/strategic planning and emphasis on its role in delivering the housing and economic growth needed

3.5 The changes to the National Planning Policy Framework (NPPF) and revised standard method figure of housing need have very significant implications for B&NES. As a result of these changes (trailed in consultation by the government in summer 2024) the council's Cabinet resolved in September last year to reset preparation of the Local Plan in order to ensure that it reflects revised national policy, to undertake further necessary evidence work, assess options for additional development and to enable a sound Local Plan to be prepared.

3.6 Resetting preparation of the Local Plan means that consultation on a further set of Options is necessary before progressing towards a Draft Local Plan. The council is required to test and consult on all 'reasonable alternatives' to meet the increased level of housing need.

3.7 As a result of government changes to the NPPF and the standard method figure of housing need Local Plan preparation and adoption has been delayed by around twelve months. The amended programme for Local Plan preparation has been agreed under delegated authority by the Executive Director for Sustainable Communities, in consultation with the Cabinet Member for Built Environment, Housing and Sustainable Development and is set out in the council's published [Local Development Scheme](#). In summary it is now as follows:

- Subject to approval by Cabinet as recommended in this Report, Reset Local Plan Options consultation: October/November 2026
- Preparation and consultation on the Draft Local Plan: spring/summer 2026
- Submission of the Local Plan for Examination: autumn 2026

- Examination hearings and receipt of Inspector's Report: winter 2026 – summer 2027
 - Adoption of the Local Plan by council: summer 2027
- 3.8 The NPPF requires that a Local Plan should cover a plan period of at least fifteen years from the anticipated date of adoption. As a result of the delays in preparation the plan-period will now be from April 2025 to April 2043. The NPPF also requires that a council's Development Plan (primarily the Local Plan) must include strategic policies to address its priorities for the development and use of land in its area. Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for housing (including affordable housing), employment, retail, leisure and other commercial development; infrastructure; community facilities; and the conservation and enhancement of the natural, built and historic environment. Non-strategic policies should be used to set out more detailed policies for specific areas, neighbourhoods or types of development.
- 3.9 As referenced above the government has set out its commitment to strategic planning at a regional level, especially in areas where powers have been devolved to a Mayoral Combined Authority (MCA). Such authorities (including the West of England MCA) are required to prepare a Spatial Development Strategy (SDS) covering their area. Local Plans need to be in general conformity with an adopted SDS.
- 3.10 In 2021 the West of England Combined Authority Mayor halted work on the Mayoral SDS. As a result, the B&NES Local Plan (and the Local Plans of the other two MCA constituent local authorities i.e. Bristol City Council and South Gloucestershire Council) will address the strategic issues that would have been addressed by the SDS. The three UAs have worked and continue to work 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.
- 3.11 The B&NES Local Plan 2025-2043 will therefore cover all strategic and non-strategic policies relating to the development and use of land across the district. Upon its adoption it will replace the B&NES Core Strategy, Placemaking Plan and Local Plan Partial Update (LPPU).
- 3.12 Given the government's requirement for MCAs to prepare a SDS the West of England MCA has recently confirmed that it will re-commence work on the SDS. Further details on the scope of the SDS and programme for its preparation are awaited. The development strategy, site allocations and policies in the B&NES Local Plan 2025-2043 (as well as the other constituent UAs Local Plans) will contribute to the SDS. Local Plans are required to be reviewed at least every five years. Therefore, following adoption of the SDS it is likely that the B&NES Local Plan 2025-2043 will be reviewed.
- 3.13 In response to the government's ambition to secure sustained economic growth and increased productivity the MCA is also required to prepare a Local Growth Strategy. The Local Growth Strategy is currently being prepared and is intended

to provide the broad strategic direction for other relevant strategies and plans including the SDS. The Local Growth Strategy will outline how the MCA will help to drive growth in the region, building on the area's unique strengths and opportunities to support key growth-driving sectors. B&NES Council (along with the other constituent local authorities) is working in partnership with the MCA to ensure the Local Growth Strategy reflects this council's priorities and objectives for the local economy. The emerging Local Growth Strategy will also form an important part of the context for the B&NES Local Plan 2025-2043 and our planning policy framework and site opportunities will need to help deliver sustainable economic growth.

- 3.14 In addition to working with the MCA on the Local Growth Strategy and the SDS (once work re-commences) the council is also focussing on ensuring MCA infrastructure funding and investment will help to unlock and support delivery of development within B&NES.
- 3.15 As set out above the B&NES Local Plan 2025-2043 is an important mechanism in shaping the future of our places and delivering the council's priorities primarily through facilitating high-quality and sustainable planned development.
- 3.16 In the spring 2024 options document the council outlined the spatial priorities for the Local Plan. These spatial priorities will underpin and be delivered through the spatial strategy, policy framework and site allocations. The spatial priorities are proposed to remain the same 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:

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

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*

- 3.17 As set out in paras 3.1 and 3.2 above the council is committed to planning for the delivery of additional housing, especially affordable housing, in the right places, as well as more economic space to facilitate sustainable economic prosperity. The scale of growth set by the government through the revised standard method housing need figure of around 1,500 homes per annum is likely to be very

challenging to deliver. Options are outlined in the Reset Local Plan Options document to achieve this. However, it should be noted that the cumulative impacts of the options and this level of development have not yet been assessed. This testing will be undertaken in working towards the Draft Local Plan.

- 3.18 Evidence work that will be published alongside the Reset Options document shows that the need for affordable housing is significant (around 50% of total housing need) and that the government's increased figure of housing need requires a greater amount of job growth in order to maintain a balance between homes and jobs within B&NES (estimated to be around 25,000 additional jobs during the Local Plan period).
- 3.19 Given the increased levels of housing and employment space to be planned for a range of options for additional development have been considered and are outlined in the Local Plan Reset Options document. The previous options that were subject to consultation in spring last year remain valid and are presented in the Reset Options document alongside new or extended options to accommodate the greater level of growth. This ensures that a comprehensive picture of options in places across the district is presented. Comments submitted in response to the spring 2024 consultation also remain valid and will continue to be carefully considered by the council in preparing the Draft Local Plan.
- 3.20 Within the context of the spatial priorities of the Local Plan and in particular the need to minimise carbon impacts arising from new development the approach to assessing and identifying options for development remains broadly the same as undertaken in 2024. This means focussing development options on sub-areas or places within the district which are, or can be, comparatively well connected to jobs, services and facilities through sustainable means of transport. Strategic growth options therefore continue to be focussed at Bath; within the Bath to Bristol corridor; and the Somer Valley. These areas are also those proposed to be the focus for economic growth through the emerging MCA Local Growth Strategy. In addition, options are presented for some local or non-strategic development in some the comparatively more sustainable villages.
- 3.21 As the main economic centre in the district and where a substantial proportion of the need for affordable housing is derived it is crucial that an appropriate level of growth is focussed at Bath. A central element of the proposed strategy is optimising the capacity of brownfield sites within the city both for additional housing and employment space. However, in order to sustainably deliver development required to meet the government's standard method figure of housing need the council considers that growth of the city needs to be considered. As such options for development primarily on the western edge of Bath are presented for consultation. As Bath is a double inscribed World Heritage Site (WHS) this makes planning and delivering strategic growth very difficult given the WHS inscription itself and associated attributes. Assessment shows that such development would give rise to substantial harm to the WHS and would be contrary to national policy. The council remains in dialogue with government on this issue and is keen to demonstrate that Bath can be an exemplar for sustainable development which protects and enhances the city's heritage.
- 3.22 Options for strategic and non-strategic development are set out in other parts of the district as summarised above. The main focus of development is proposed to be on strategic sites as development at a larger scale is more capable of being supported by and delivering necessary infrastructure improvements and achieving

the council's priorities. As set out above investment in supporting infrastructure, especially transport, is a pre-requisite for and will unlock development.

- 3.23 Whilst the main focus is proposed to be on strategic sites it should be noted that to maintain a five-year housing land supply a diverse supply of sites will be needed. This will include some smaller, non-strategic sites which are capable of delivering housing more quickly. In addition, some development in villages is necessary in order to help maintain vibrant villages, population levels and local services and facilities.
- 3.24 The development options outlined in the Local Plan Reset Options document are not solely focussed on housing and also include options for commercial/employment uses, necessary to help maintain or create more balanced communities and to help deliver job growth.
- 3.25 In addition to place-based site options to deliver growth the council is also presenting a limited range of new Development Management policy approach options. Development Management policies apply district-wide and are used in the determination of planning applications. The government is proposing to introduce a set of National Development Management Policies (NDMPs). However, there remains uncertainty as to the scope, coverage and status of the NDMPs, as well as the timing of their introduction. Therefore, at this stage it is proposed the B&NES Local Plan 2024-2043 will include a full suite of Development Management policies, but this will be kept under review as we progress towards the Draft Local Plan.
- 3.26 A broad range of Development Management policy approach options were consulted on in spring 2024. These options are not presented again in the Reset Options document and the comments submitted in response to the 2024 consultation are still valid and continue to be carefully considered by the council in preparing the draft Local Plan. In this Local Plan Reset Options document only policy approach options are presented either for new policy areas or where new/revised approach options are required as a result of revisions to national policy or other changed circumstances such as new or updated evidence. In summary these are options relating to:
- Affordable housing (updated text)
 - Co-living accommodation
 - Houses in Multiple Occupation
 - Purpose Built Student Accommodation
 - Gypsies and Travellers Accommodation
 - Housing Development Boundaries review
 - Climate change: adaptation & resilience, retrofit first and District Heating
 - Renewable energy
 - Low impact farming
 - Green Belt
 - Protection of industrial sites
 - Local Green Spaces
 - Somersetshire Coal Canal
 - Waste

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 NPPF 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. Work commenced on the full update of the Local Plan and an Options consultation took place earlier this year. The revised NPPF and standard method figure of housing need required the Local Plan to be re-set and further engagement on reasonable alternatives or options to be undertaken.
- 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 previous Government 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. Under the revised NPPF the submission deadline has been extended to December 2026 to enable local authorities to undertake significant further work on their Local Plans. 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 details of which are still emerging from government. The council's Local Plan is being prepared under the current system and as set out above it is anticipated it will be submitted before the December 2026 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. Following consultation on the Options document last year further options engagement and consultation under Regulation 18 needs to be undertaken in respect of the re-set Local Plan.
- 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. The current version of the LDS is up-to date and is published on the council's [website](#).

5 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

- 5.1 The Local Plan has been and continues to be prepared utilising existing staff resources, led by the Planning Policy team and involving various other teams across the council, as well both council and MCA funding (see 5.2 below). Preparing a Local Plan requires significant resources. With regards to this Local Plan the need to reset it in light of the government's revisions to national policy and the standard method figure of housing need means substantial additional work needs to be undertaken. In recognition of this additional work central government made two funding grants available for application i.e. Green Belt review funding and Local Plans Delivery funding. This council applied for and received funding from both pots, and these are being used to help cover the cost of preparing the Local Plan.

As identified above the costs of preparing this Local Plan are covered by government grants, council and MCA funding. Council funding has been primarily from the existing Local Development Framework (LDF) budget. The council also successfully bid for strategic masterplanning funding from the MCA and this has been and will be utilised in preparing the Reset Local Plan. Given the magnitude of the costs of preparing a Local Plan the funding identified above is not sufficient to cover the full costs. Therefore, a facility to draw down a total of up to £850,000 from the council's central reserves during the financial years 2025/26 and 2026/27 has been agreed. It is anticipated that drawing down the agreed £850,000 from central reserves will be sufficient to enable the Local Plan to be progressed to adoption.

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 Preparation of the Local Plan to date, including the Reset Options document has been subject to an Equalities Impact Assessment (EqIA) which ensures that the council understands the implications for people with protected characteristics of each of the options presented for consultation (see Attachment 3). The impacts recorded through the EqIA will be taken into account in the next stages of plan-making. An EqIA of the Draft Local Plan will also be undertaken at the relevant time. The Local Plan is also subject to a Sustainability Appraisal (statutory requirement) throughout its preparation that also considers, at a more general level, equalities issues.

8 CLIMATE CHANGE

- 8.1 Helping to address the climate and ecological emergencies through contributing to becoming zero carbon 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 were set out previously in the Options document published earlier this year for consultation and also in this Reset Options document. The reset Local Plan will continue to be underpinned by addressing the climate and ecological emergencies, 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
- Options to ensure that future development is resilient to and adaptable to the impacts of climate change.
- Setting out policies that are aimed at better enabling the delivery of renewable energy installations in the most appropriate locations
- Looking at how 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 In progressing the Local Plan, the other option which was considered was accelerating preparation of the Local Plan in order that the transitional arrangements published by the government alongside the revised NPPF could be met. However, it was concluded that this would be impossible in a way that ensured the Local Plan would have been found sound at examination. Therefore, progressing the reset Local Plan to the programme set out in the LDS (and summarised in para 3.7 of this report) is the only appropriate course of action.

10 CONSULTATION

- 10.1 In preparing this Report the Cabinet Member for Built Environment, Housing and Sustainable Development, the Executive Director for Sustainable Development, the S151 Officer and Monitoring Officer have been consulted. It has been cleared for publication by the S151 and Monitoring Officer.
- 10.2 As part of preparing the Local Plan Reset Options document the council has engaged with residents and other stakeholders in explaining what a Local Plan is, the implications of the revised NPPF and increased figure of housing need, the need to reset the Local Plan, test and consult on additional options and the next steps. The aim of this engagement prior to consultation on the Local Plan Reset Options document has been to increase understanding of local plan-making and to raise awareness of the issues to be addressed. It is hoped that this will help to increase the reach of consultation and engagement moving forward.
- 10.3 Broadening the reach of engagement and consultation on the Local Plan is crucial. In particular, the council is seeking to better involve younger people and families including those that don't own their own home. Engagement and consultation will also target seldom heard groups and ensure equality of

opportunity to comment. In broadening engagement, the council is using innovative methods and has set a target of engaging 10% of the population in the preparation of the Local Plan.

10.4 Consultation on the Local Plan Reset options document will take place between 3rd October and 14th November. Consultation will be undertaken in accordance with the council's published Statement of Community Involvement, and a range of innovative engagement/consultation methods will be used. These are set out in more detail in the Communications and Engagement Plan (Attachment 2) and include:

- New tailored and user-friendly Local Plan web platform
- In-person consultation events/exhibitions and on-line briefings
- Roadshow going to various places across B&NES
- Meetings with community representatives, including parish & town councils, stakeholders and ward councillors
- Meetings and workshops with other stakeholders, including landowners and developers and Duty to Co-operate prescribed bodies
- Tailored engagement with a number of seldom heard groups/networks
- Publication of documents for consultation and comment including via the web platform above

10.5 The council will clearly communicate consultation on the Reset Local Plan Options document and is also aligning it with other relevant consultations, including the Movement Strategy for Bath and the Somer Valley Draft Design Guidance Supplementary Planning Document.

10.6 Following consultation stakeholder engagement will continue in both preparing the Draft Local Plan and through formal consultation on the Draft Local Plan under Regulation 19. The programme for the next stages of Local Plan preparation is set out in the Local Development Scheme which will be updated as necessary.

Contact person	Richard Daone, Deputy Head of Planning - 01225 477546
Background papers	Local Plan 2022-2042 Options document (February 2024): https://beta.bathnes.gov.uk/sites/default/files/Options%20Document.pdf
Please contact the report author if you need to access this report in an alternative format	

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Local Plan Options Document 2025

Cabinet Dispatch - September 2025

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Formatting Note:

The text within this document is based on the 2024 Options Document. New text and sections are added shaded in blue.

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 communities and 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 required up-front to support them. It provides strong guidance to developers and the council on 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 are preparing a local plan so that we can shape the location and form of future development and 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 natural, built and historic environment.

1.3 This local plan covers the whole of Bath and North East Somerset and will establish the planning framework for the district from 2025 to 2043. 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.

1.4 We launched the preparation of our new local plan in 2022 based on planning for around 700 homes per year. In 2024 the government imposed a new mandatory housing target (known as the standard method figure of housing need) on the council of more than double that amount at around 1,500 homes per year. Alongside doubling the housing target for Bath and North East Somerset the government also published some important changes to national policy. As a result of the increased housing target and national policy changes, the council decided to reset the local plan so that it could undertake further evidence work and assess further options for providing increased levels of development. This Options Document primarily focusses on options for providing the additional development now required.

How do we prepare the Local Plan?

1.5 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. Following the resetting of the local plan, the diagram 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 the previous Options Document.
Stage 3A. Reset Options Document Consultation	October 2025 – November 2025	Consultation on this reset Options Document
Stage 4: Preparation of Draft Plan and Targeted Engagement	October 2025 – May 2026	Having taken account of responses received from consultations, 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	May 2026 – July 2026	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	Autumn 2026	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	Early 2027	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	Summer 2027	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	Autumn 2027	The council will adopt the Plan at a full council meeting.

1.6 This document sets out options or all reasonable alternatives for addressing the increased identified needs and policy approaches to help deliver healthy and sustainable places. Not all of these options will be taken forward for allocation for development in the Draft Local Plan. Its purpose is to elicit comment and discussion around the options presented. We previously presented options for development to meet a lower level of identified need and policy approaches in spring 2024. The comments received in response to the 2024 consultation are still valid and will continue to be carefully considered by the council in preparing the Draft Local Plan. Therefore, we are not responding to the issues raised at this stage. The comments received during this reset options consultation, as well as the comments on the spring 2024 options plus 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.

1.7 Once approved by the council, the Draft Local Plan will also be subject to formal consultation. Both the Draft Local Plan and comments received on it will be 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**

1.8 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. As the local plan progresses through its stages of preparation it will start to carry greater weight in determining planning applications. However, only limited weight can be given to it in at the Draft Local Plan stage and more significant weight given to it once it has been examined by an Inspector.

What opportunities are there to be involved?

1.9 The council is committed to giving people a bigger say and we have engaged with community representatives in preparing the reset Options document. This reset Options document is published for **consultation** (INSERT HYPERLINK) over a six week period, from 2nd October to 13th November. We are encouraging all residents and stakeholders to comment 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 13th November.

1.10 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 in spring next year (2026), 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

1.11 The Options Document 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 which 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 a limited range of policies that would apply across the whole of Bath and North East Somerset in determining planning applications. This document only outlines new policy options that were not presented for consultation in the previous [Options Document \(Spring 2024\)](#)

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, built and historic 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. The spatial priorities for the local plan were outlined in the spring 2024 Options Document. It is not proposed that these should be changed at this stage and they are outlined again at the end of this chapter. The 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 Through research and engagement with community representatives and stakeholders, the identified key issues and challenges facing the district are summarised 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 around twelve times the average workplace earnings and in Bath it is nineteen. The lack of housing that is affordable for residents and workers not only affects people's quality of life, but it also directly impacts our economy. The provision of additional affordable housing in B&NES is a major factor influencing the overall level of additional homes needed, caused by a combination of high market prices (both purchase and rental) and insufficient supply in recent decades.

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 zero carbon 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 resilience to the expected future impacts of climate change. 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 Plan. The Nature Positive ambition requires innovation in planning, including the use of new decision-making tools and new, more joined up and integrated planning policy that delivers for people and nature. Evidence may be used to identify areas suitable for the development as strategic nature parks to deliver multiple benefits

2.12 The district has outstanding landscape character, including the Cotswolds National Landscape and Mendip Hills National Landscape. It also supports nationally and internationally important heritage assets including Bath, which is a double inscribed UNESCO World Heritage Site comprising two World Heritage Sites: the City of Bath (1987) and the Great Spa Towns of Europe (2021). The district contains 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 health and well-being, including physical and mental health.

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. 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. Residents also self-report higher rates of anxiety and loneliness compared to the England average. We also have an aging population with a relatively high proportion of people aged over 55 that is projected to increase during the local plan period.

Transport and Connectivity

2.15 Communities have made it clear that being able to access attractive walking, wheeling 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 better connect some villages to their surrounding villages as well as to the cities and towns in Bath and North East Somerset. Through WECA as the Strategic Transport Authority further investment and improvement across the district is needed in public transport and active travel infrastructure to make them more reliable, safer and more attractive, thereby enabling greater use. The availability and frequency of public transport services, particularly bus services in rural areas and the main growth corridors, is currently dependent on external funding, which is subject to ongoing review and cannot be guaranteed over the plan period. This uncertainty and potential impacts for sustainability of development should be taken into account when considering options for allocation in the Draft Local Plan

Culture and Community Identity

2.16 Cultural activity plays a vital role in people's health and well-being, with ample evidence of the benefits it brings. It is also an important tool to tackle issues related to educational attainment. Culture contributes to community identity and creating vibrant, attractive places in which to live. It also plays an integral role in promoting and encouraging community cohesion. Culture is extremely relevant to the economy in Bath and North East Somerset, most notably in relation to its role in the vibrant visitor economy, but also via the creative industries for which the West of England is justifiably famed. Across Bath and North East Somerset issues highlighted by stakeholders that need to be addressed include protecting existing cultural and community facilities, providing new and enhanced facilities and workspaces where needed, and considering the important role of different public spaces.

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. Building and maintaining community identity and local distinctiveness are challenges that the planning system has an important role in addressing by encouraging connectivity to creative venues and workspaces, protecting landscape character, encouraging cultural activity, 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. The core policies and principles which will shape our local plan are outlined below.

- Two core policies of tackling the climate and nature emergencies and giving people a bigger say

Three principles 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

2.20 The spatial priorities of the local plan reflect the council's Corporate Priorities and seek to address 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 B&NES 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. 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
Climate and Nature Strategy	In development	B&NES
Health and Wellbeing Strategy and Implementation Plan	Adopted	Health and wellbeing Board
West of England Local Growth Strategy	In development	West of England Mayoral Combined Authority
Economic Strategy	Adopted	Future Ambition Board
Business and Skills Plan	In development	B&NES
Greener Places Plan (incorporating 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
Cultural Development Plan	In development	B&NES
School Organisation Plan	Adopted	B&NES
Childcare Sufficiency Assessment	Adopted	B&NES
Ecological Emergency Action Plan	Adopted	B&NES
Climate Emergency Action Plan	Adopted	B&NES
Joint Local Transport Plan 4 (JLTP4)	Adopted	West of England Mayoral Combined Authority
West of England Transport Vision	In development	West of England Mayoral Combined Authority
Journey to Net Zero Transport Plan	Adopted	B&NES
Movement Strategy for Bath	In development	B&NES
Housing Delivery Plan	Adopted	B&NES
Transport Delivery Plan	In development	B&NES
Creating Sustainable Communities in North East Somerset	Adopted	B&NES
Active Travel Masterplan	Adopted	B&NES
Tree and Woodland Strategy & Action Plan	In development	B&NES
Contaminated Land Strategy	Adopted	B&NES
Bath Air Quality Action Plan	Adopted	B&NES
Farrington Gurney & Temple Cloud Air Quality Action Plan	Adopted	B&NES
Air Quality Strategy	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 done 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.

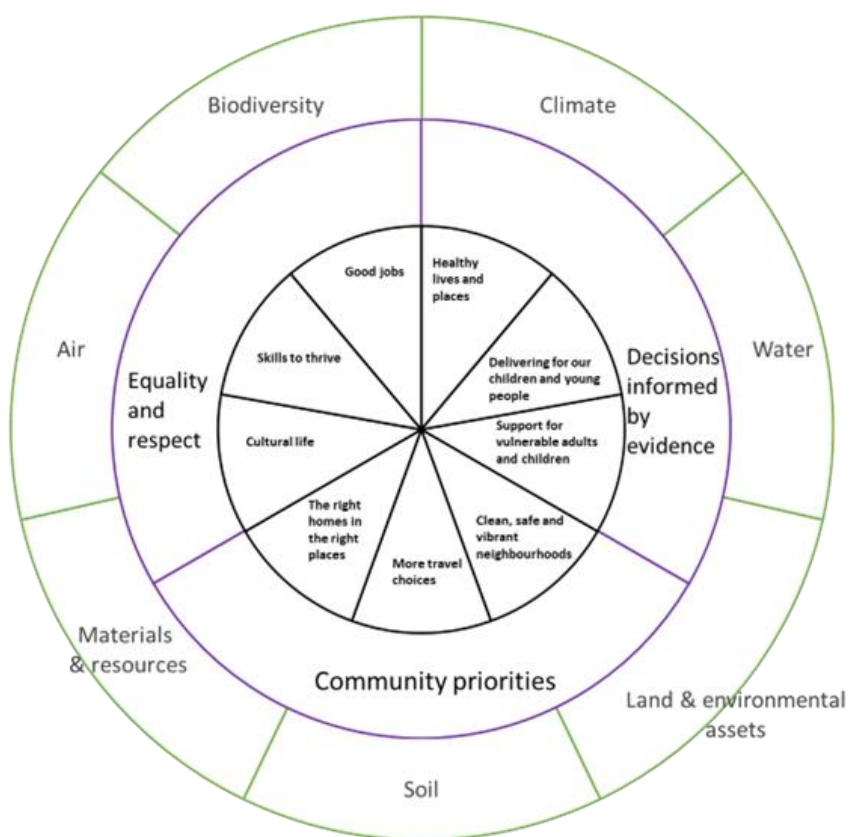


Figure 1: Bath and North East Somerset decision making wheel

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 the Sustainability Appraisal of the Local Plan. Local Plans are statutorily required to be subject to a 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 a 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. Preparation of the local plan is also informed by assessment and tools that enable us to understand the comparative carbon emissions impact of different options. This is important in helping to ensure the local plan tackles 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 B&NES 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 Sites 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 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.

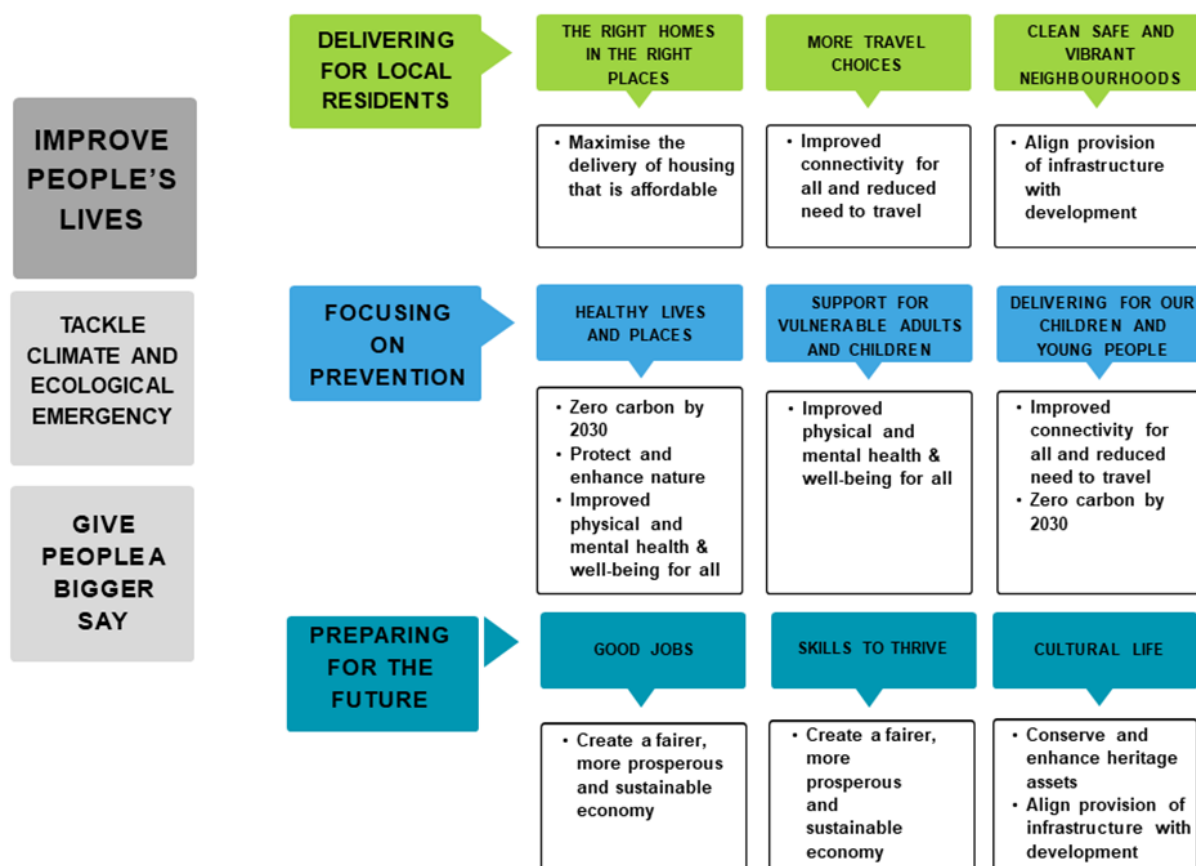


Figure 2: Diagram showing relationship between local plan spatial priorities and the Corporate Strategy

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 this Options Document and in the evidence base, including through Transport Vision and Objectives. The approach to transport is set out in greater detail in each place section. It is fundamentally aimed at improving connectivity by sustainable transport modes within and between existing places, and supporting additional development - by setting a transport vision with and for our district, then planning for delivering the necessary components to realise the vision. Investment to secure the up-front delivery of infrastructure including that to improve sustainable transport connectivity is necessary to unlock new housing and employment 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 be set out in the Draft Local Plan. The local plan is a key means to delivering successful place-shaping, enabled by early infrastructure investment and delivery. Where necessary the council will also look to use its Compulsory Purchase Order powers to help shape places and achieve both our and communities' objectives.

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 B&NES 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 as established by the government 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 (walking, cycling and wheeling)

3.2 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.

West of England Growth Strategy

3.3 In addition to the council's Economic Strategy, the West of England Mayoral Combined Authority (WECA) is also preparing a Growth Strategy which is responding to the government's ambition to secure sustained growth and increased productivity in all areas of the country. WECA is working in partnership with the four local authorities, including B&NES Council. The Growth Strategy will outline how WECA will help to drive growth in the region, building on the area's unique strengths and opportunities to support key growth-driving sectors. It focuses on four geographical areas, with two zones within B&NES that reflect the areas of focus in our Economic Strategy i.e. the Somer Valley Growth Zone and the Bristol and Bath Growth Zone. The emerging Growth Strategy will also set an important part of the context for our local plan and we will need to align our planning policy framework and site opportunities to help deliver sustainable economic growth.

Bristol and Bath Growth Zone

3.4 Encompassing the urban core of the region, the Central Bristol & Bath growth zone has three distinct areas with strong investment potential:

- Central Bristol
- Bristol to Bath Corridor
- Bath City Centre

3.5 While each investment opportunity is distinct, cumulatively they will play a crucial role in transforming our region, delivering a significant proportion of the economic growth and development that will shape a bright future for our cities.

3.6 The Central Bristol and Bath Growth Zone is at the heart of the regional economy and is the powerhouse that drives growth across the West of England by attracting people, business, and investment. Encompassing two globally recognised cities within a 15-minute travel corridor, this growth zone attracts millions of business and leisure visitors each year, drawn by its rich history, iconic landmarks, and internationally renowned festival scene.

The Bristol to Bath Corridor

3.7 Bath and Bristol are currently two separate and distinct economic areas, and yet they are only 15 minutes apart by rail. If these economies were combined to one integrated conurbation, they would become the 7th largest in England. The Corridor between these two thriving centres provides and better joins the economies of our two cities. It will have exceptional connectivity by public transport and active travel into Bath, Bristol and beyond, offering sustainable and affordable access to work, education and recreation for both new and existing communities.

3.8 The Bristol to Bath Corridor offers an opportunity to do things differently, building a network of connected communities within the valley landscape. The River Avon valley and its tributaries provide the environmental capital for a new way of living and can drive forward a thriving nature-positive optimum density place.

3.9 Exemplar net zero and landscape-led sustainable housing developments and vibrant local businesses will create the standard for climate resilient placemaking and design. This will increase industrial and commercial capacity, job opportunities, and new homes of all types and tenures, including genuinely affordable homes. It will be unlocked through a well-connected, sustainable multi-modal transport corridor that offers a range of realistic transport choices and promotes active travel modes.

Bath City Centre

3.10 Bath City Centre is at the heart of the regional visitor economy and attracts significant visitor numbers and investment to the region. With the major new development of the Fashion Museum due to open by 2030, the city centre will once again evolve.

3.11 As well as strengthening the visitor offer, Bath City Centre will have a wide range of new employment sites that come forward in the next decade – located near a wide range of housing, the long-term vibrancy of this unique

city is assured. Over the next decade, with investment for growth, we anticipate new businesses will locate in the city, strengthening the employment offer and contribution the city makes to national growth.

Somer Valley Growth Zone

3.12 The Somer Valley Growth Zone encompasses the Somer Valley Enterprise Zone, industrial estates and the market towns of Radstock, Midsomer Norton, Westfield and beyond. This is to recognise both the regenerative impact of development and the needs of specific geographic areas. This zone can also offer an exemplar for development within market town locations - both for WECA as a whole and England. This zone reflects our strong ambitions for the area. Within this zone there will be a focus on sustainability and industrial developments.

3.13 This zone will also enable both the impact of regeneration and potential impact of economic growth. This zone offers a different model of support. This will balance the requirements and impacts of housing.

3.14 Within this zone the priority objectives will focus on:

- Supportive measures to enable the development of SVEZ and the potential future extensions
- Support for regeneration initiatives – including cultural infrastructure and activities – both in the town centres and connected to the planned new housing
- Transport projects esp. mass transit and bus initiatives

Jobs and Employment Space

3.15 The council has adopted an Economic Strategy which identifies key issues facing the local economy such as lower than average wages, recent economic under performance partly resulting from a shortage 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

3.16 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.

3.17 For the local plan and in the context of the Economic Strategy, evidence has been prepared examining trends and forecasts in economic sectors and the space requirements to be addressed through the local plan. It notes that the district has experienced relatively weak economic performance over the 20-year historic period compared to both the West of England 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. The response to the evidenced requirement for employment space to accommodate key sectors as outlined below will be developed through preparing the local plan.

3.18 In light of the substantially increased housing need figure that we need to plan for, the council has reviewed and refreshed the economic evidence. In order to maintain the current balance between jobs and homes within B&NES, analysis suggests that an additional 25,000 jobs would need to be created and accommodated within the district. If job growth is below this figure and housing is delivered meeting the government's latest figure of housing need, it is likely that increased out-commuting from B&NES will take place as people

travel outside the area for work. Changes in working patterns and arrangements, including increased working from home will also need to be taken into account.

3.19 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; creative/digital; 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.

3.20 The increased jobs will be accommodated in many different ways and not all will be in sectors requiring traditional employment (office, industrial and warehousing) space. The updated evidence provides an indication of the amount of additional employment (office, industrial and warehousing) floorspace that would need to be provided in order to help deliver and

	Bath	Keynsham & Saltford	Somer Valley	Rural	B&NES
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accommodate the additional 25,000 jobs. These figures are set out in the table below and should not be treated as a target, but as a starting point in ensuring the local plan helps to facilitate sustainable economic growth and increased productivity.

	Floorspace (sq metres)	Land (ha)	Floorspace (sq metres)	Land (ha)	Floorspace (sq metres)	Land (ha)	Floorspace (sq metres)	Land (ha)	Floorspace (sq metres)	Land (ha)
Offices	74,000- 79,000	9-10	12,000- 13,000	2	7,000	0.8	9,000- 10,000	1.2	102,000- 109,000	13- 14
Industrial	15,000- 19,000	4-5	8,000	2	14,000- 17,000	3-4	33,000- 34,000	8-9	70,000- 78,000	17- 20
Warehouse & Logistics	23,000- 25,000	5	16,000- 17,000	3	15,000- 16,000	3	18,000- 19,000	4	72,000- 77,000	15

Table 1: Employment floorspace and land requirements to provide 25,000 additional jobs

3.21 Analysis has highlighted the ongoing need to deliver office, 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.

3.22 In terms of office floorspace the evidence notes that it is also possible 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 in locations accessible by public transport and with excellent amenity provision for workers.

3.23 In terms of industrial floorspace, there is currently a substantial under-supply in Bath City, Rural Areas and the Somer Valley. The evidence notes that given the constraints within Bath City, the Keynsham sub-area could 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.

3.24 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.

3.25 The spatial breakdown of employment floorspace identified in Table 1 above is based on the existing distribution of employment space across B&NES and is therefore, only a starting point. In establishing the spatial strategy for delivering additional employment space other factors will need to be considered, including the sustainability of and connectivity and linkages between places, the proposed locations for additional housing and the locational requirements of businesses. Some site options for additional employment floorspace are set out in the place-based chapters below. These comprise some site options solely for employment use, as well as the potential for some employment space delivered as part of mixed use developments on larger, strategic sites and opportunities to intensify existing areas of employment space.

Need for Housing

3.26 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) and it has been updated in light of the government's increased figure of housing need. The context for assessing and meeting local housing needs is also set by the National Planning Policy Framework (NPPF).

3.27 The overall need for housing in B&NES set by the government's standard method is for around 1,500 new homes per annum, or around 27,000 over the eighteen-year local plan period. This figure is derived from calculations by the

government, which is based on increasing the existing housing stock by 0.8% per year and 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 reflecting changes in the existing housing stock and if the level of housing affordability changes e.g. if house prices rise or fall or incomes change.

3.28 The government has also revised national planning policy to make it clear that it is mandatory for local authorities to plan for meeting the standard method figure of housing need. It may be possible for the council to seek to justify a local plan housing requirement below the standard method figure, but this is an increasingly high bar set by government. This document therefore sets out options that will meet the standard method figure of housing need.

3.29 The LHNA 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.

3.30 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 projected student population growth and specific accommodation requirements we are considering options as to how this form of accommodation can best be provided. The provision of additional student bedspaces in PBSA would count towards meeting overall housing need (based on a government established ratio of 3.13 student bedspaces is equivalent to one dwelling).

3.31 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 understand the overall student housing need arising from 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

3.34 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. Policy changes, including options to review Housing Development Boundaries for the towns and villages, may also affect likely small windfall site delivery. 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	Around 27,000
Existing Residential Commitments (including small sites with planning permission)	4,887
Expected Small Windfall sites (excluding small sites with planning permission)	2,210
Sub -Total	7,097
Housing to be planned for on new allocations (includes accommodation for students)	Around 19,900

3.35 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 components the total future need for affordable housing in Bath and North East Somerset is significant at around 12,300 dwellings, representing around 46% of total general housing need in the district (split as 67% of housing need in the City of Bath and 38% of total housing need in North East Somerset).

3.36 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. The government is now placing an increased emphasis on the delivery of social rented accommodation in order to address the needs of those least able to access the housing market. 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 45% of overall future housing need is from those households that cannot afford to rent or buy and 21% is from those that can afford to rent but aspire to home ownership. The equivalent proportions for the rest of the district are 34% and 4% respectively.

3.37 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 32% 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, (around 18% and 24% of overall housing need respectively) for smaller households e.g. younger people and older people looking to downsize.

3.38 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

3.39 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.

3.40 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 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 therefore, formally wrote to B&NES Council and also their other neighbouring authorities of North Somerset Council and South Gloucestershire Council in October 2023, 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. Under the government's December 2024 revised standard method housing need figure for Bristol City Council the amount of unmet need has increased.

Climate Change

3.41 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.

3.42 Action to mitigate climate change cannot be taken in isolation of also considering how the district will adapt to the changing climate. New development, sensitive retrofit of heritage assets and increased renewable energy generation must be designed for and be resilient to 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.

3.43 As part of the Climate and Ecological Emergency Strategies 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.

3.44 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.



















3.45 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.

Nature Recovery and Green Infrastructure

3.46 The Government is committed to an internationally agreed '30 by 30' target to protect 30% of our land and seas for nature by 2030. In addition, the government's 25-year Environment Plan sets targets for restoring protected sites to secure their wildlife value; creating or restoring other wildlife-rich habitats; taking action to recover threatened important species; and increasing woodland cover.

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

WENP Nature Recovery Ambitions adjusted for B&NES B&NES covers 26% of the West of England area		
Current situation:	By 2030 we want to:	By 2050 we want to:
 Requires further investigation	 increase the abundance of priority species from 2020 levels by 30%	 Double the abundance of priority species from 2020 levels
 Tree Canopy cover of 5,440 ha (woodland cover of 2,892 ha) ¹	 increase our semi-natural broadleaved tree and woodland cover by 650 ha	 increase our semi-natural broadleaved tree and woodland cover by 2,080 ha
 2,556 ha of Priority Habitats ²	 In addition to woodland, create 520 ha of wildlife-rich habitat outside of the protected site network	 In addition to woodland, create 1,560 ha of wildlife-rich habitat outside of the protected site network
 19 'gaps' (or connectivity opportunities) in the Ecological Network within B&NES ³	 Close at least 40% of the NRN connectivity gaps through the creation of new habitat	 Close all the NRN connectivity gaps through the creation of new habitat
 2 water bodies in good status; 12 in moderate status; 4 in poor status ⁴	 Ensure all water catchments are in at least moderate ecological status, with half in good ecological status	 Ensure all water catchments are in good ecological status
 54% of SSSI-sites in favourable condition ⁵	 Ensure 70% of designated sites are in favourable condition	 Ensure all designated sites are in favourable condition

Data sources: 1 Calculated using the Forest Research's Urban Canopy Cover Tool - Forest Research (2022) UK Urban Canopy Cover, <https://www.forestresearch.gov.uk/research/uk-urban-canopy-cover/>
2 Calculated from Bristol Environmental Record Centre (BRERC) data - Bristol Environmental Record Centre (BRERC) (2021), Priority habitat mapping for the West of England, <https://www.brerc.org.uk/index.htm>
3 West of England Nature Partnership (2022) Nature Recovery Network, <https://wenp.org.uk/nature-recovery-network/>
4 A number of these sub-catchments are only partly in B&NES - Environment Agency (2023), WFD Classification Status Cycle 2 Ecological Status, <https://experience.arcgis.com/experience/73ed24b6d30441648f24f043e75ebd2/page/Classification/>
5 Natural England (2022), Designated Sites View, Condition of SSSI Units in County AVON, <https://designatedsites.naturalengland.org.uk/SearchCounty.aspx>

Figure 2: Diagram showing WENP nature recovery ambitions adjusted for B&NES

3.48 New development will need to play its part in delivering these ambitions and the council is considering requiring 20% Biodiversity Net Gain (BNG) on sites that meet a specified threshold. It should be noted that the government is consulting on a proposal to simplify the BNG requirements relating to

development sites of 10 to 49 dwellings or up to 1 hectare to help facilitate small-medium enterprises (builders) deliver housing.

3.49 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.

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

3.51 The West of England LNRS has now been approved and will guide and inform 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.

3.52 The council is also considering introducing and using 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.

3.53 It is estimated that we need an additional approximately 200 ha of accessible greenspace across Bath and North East Somerset for the new homes (not accounting for unmet housing needs in neighbouring authorities) if we are to meet the accessible greenspace standard of 3ha per 1,000 population.

3.54 In planning for additional development we also need to assess and ensure likely significant adverse effects on European protected species and habitats are avoided or appropriately mitigated. This is addressed through a Habitats Regulations Assessment (further information is set out in paragraph 4.15).

Needs for Health and well-being

3.55 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. Work is underway to explore how the plan can best enable the delivery of strategic greenspaces to deliver for nature and people.

3.56 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 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. National guidance recognises health as a cross-cutting issue, which connects with and can be promoted by many policy areas within the Local Plan.

3.57 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

3.58 Transport systems and networks are essential in enabling everyday mobility and access and they need to become increasingly sustainable and inclusive to address climate emergency and social equity issues. The choices that are made through the local plan are integral to the sustainability of our district as a whole, including influencing where development is located, and how we enable more sustainable travel choices for our existing and future communities. 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.

3.59 Bath and North East Somerset has an ambitious aim to deliver the forecast growth within the local plan as part of its drive towards the decarbonisation of transport across the district. We cannot continue to predict and provide for increased traffic capacity, because it enables further car usage, leading to car-reliant communities and our places becoming dominated by private vehicles. We need a change in approach where the transport network is rebalanced in favour of sustainable modes, to provide more options for people to get around. So, through this local plan, we will take a 'vision-led approach' by setting an ambitious and aspirational transport vision with and for Bath & North East Somerset, to support existing and new communities with attractive sustainable transport networks and realistic alternatives to the private car. Our approach follows the sustainable transport hierarchy. In the first instance, we seek to utilise the Spatial Strategy, and the site selection process, to locate people close to the services and facilities that they need, e.g. employment, education, health, retail, leisure, public transport. The Evidence Base documents set out greater explanation of the process we are going through to develop this Transport Strategy.

3.60 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 to accommodate housing and employment growth sustainably, we must enable people currently making trips by car to choose a more sustainable alternative.

3.61 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, including with the West of England Combined Authority as the strategic transport authority and the facilitators of significant transport investment from central government to support growth.

3.62 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 test and further refine our emerging transport vision for Bath & North East Somerset, for existing and new communities. This will be via mapping the outputs of the adopted Creating Sustainable Communities strategies for North East Somerset to the community and other stakeholders. Following this, we will develop the transport vision, strategy and evidence base further as we progress towards the submission and Examination of the Plan.

3.63 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 have also developed, consulted on and adopted an Active Travel Masterplan for the district, to provide people with improved opportunities to travel by walking, wheeling and cycling. The transport evidence base will also help set the vision for public transport across the district, including for bus, rail and future mass

transit as key components of shifting medium and longer length trips within and outside of Bath & North East Somerset.

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, ensuring Bath and North East Somerset remains economically prosperous and that the economy becomes greener, more sustainable and

fairer. Development must respond to the priorities and needs identified by government, as well as 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 enabling 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 and which potential options have been and will be assessed against are summarised as:

- Climate change and nature
- Sustainable transport connectivity and minimising journey distances: distance to main centres of employment, services and facilities; existing connectivity and potential to improve connectivity to areas of employment, services and facilities
- Flood risk
- Local food production and agricultural land
- Biodiversity and nature recovery: protect priority habitats and species and facilitate nature recovery
- Landscape character impact (including designated landscapes)
- Historic environment: protect and enhance the significance of designated and non-designated heritage assets
- Green Belt: impact on openness and the national purposes (updated to also consider the implications of revised national policy including the newly introduced concepts of grey belt and 'golden rules' – see para 4.17 below)
- Infrastructure provision: infrastructure solutions and barriers relating to key infrastructure including health, education, transport and energy and energy storage
- Ground conditions including land contamination and stability
- Existing land use: protecting other important land uses/community assets e.g. recreational space
- Air Quality: protecting the health of existing and future residents
- Local character and community identity: impact on local character, distinctiveness and identity

4.5 These factors are broadly similar to those outlined in the spring 2024 options document. However, they have been refined to reflect a more nuanced basis for assessing potential locations or sites for development.

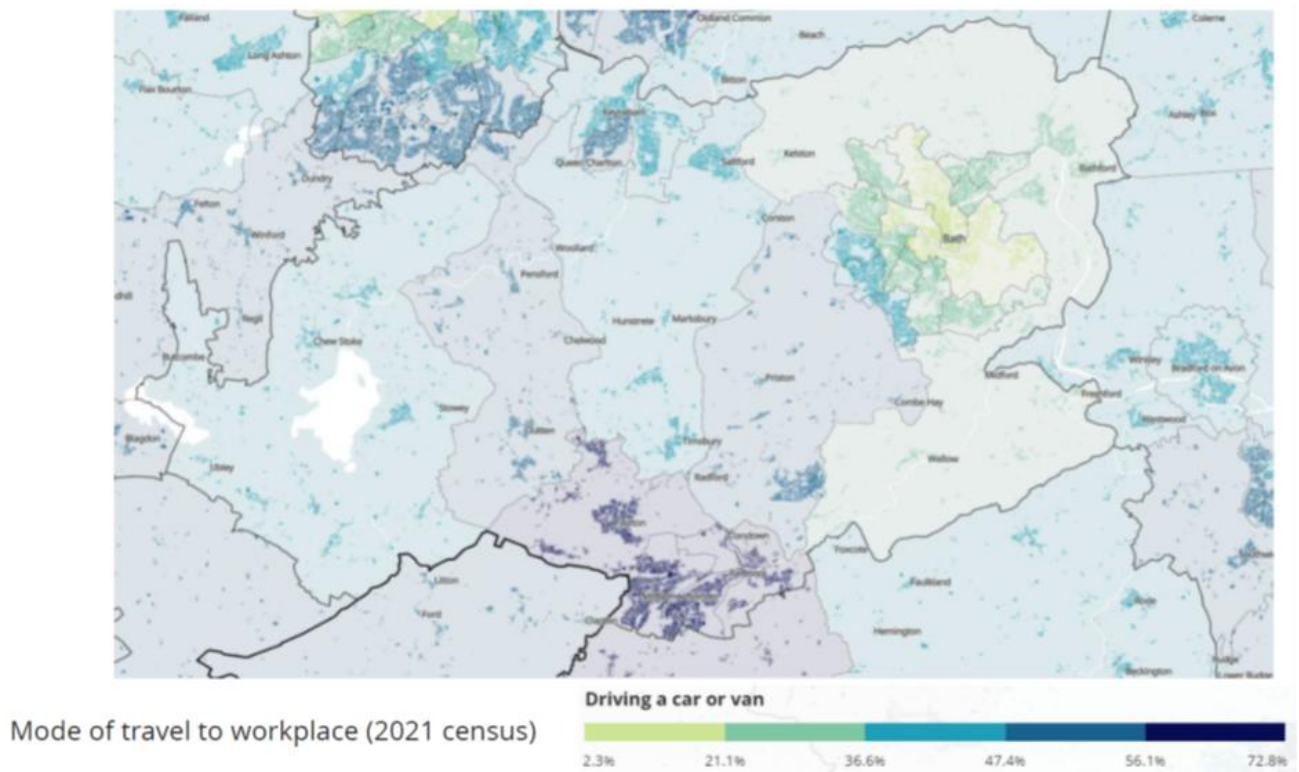
Climate change and nature

4.6 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 located and designed to promote accessible, sustainable transport (as set out below), how our new and existing buildings continue to be decarbonised and how development makes a positive contribution to nature recovery. While considering the challenges and opportunities for reducing our emissions, we must also plan for the effects of 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. There is potential for the plan to guide strategic provision of greenspace that can provide climate resilience, nature recovery and access to greenspace.

Sustainable Transport Connectivity

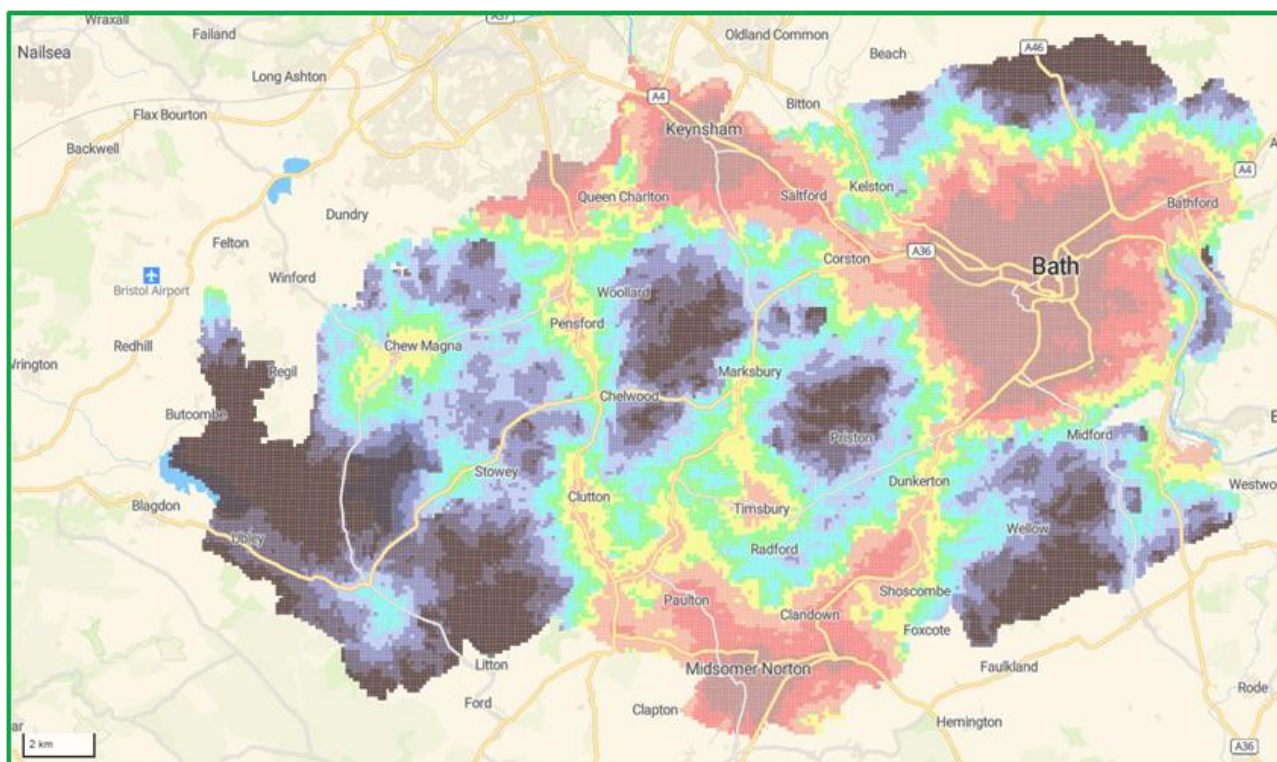
4.7 Being able to move around by sustainable means of transport, that is walking, cycling and wheeling or public transport, in order to easily access services and facilities, as well as places of work is vital in seeking to minimise carbon impact and addressing the climate emergency. Around 30% of carbon 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 in 2021 a greater proportion of people travelled to work by car and

travel a greater distance in the more rural parts of the district and also the Somer Valley.



Map 2: Extract from 2021 census showing mode of travel to work by car

4.8 Analysis has also been undertaken of 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. In the spring 2024 options document, analysis undertaken by WECA was mapped and used to inform the identification and assessment of development location options. Since that time the Department of Transport has undertaken similar connectivity mapping for the whole country. This connectivity analysis is finer grained than that undertaken by WECA. The map below illustrates the results showing comparative sustainable connectivity within B&NES which is broadly aligned with those of WECA's analysis. The areas shown in red/orange are the best connected by sustainable means of transport, moving through yellow/green and then blue/black for the least well connected. The connectivity analysis has also been used as the basis for assessing likely carbon impact of development in different locations.

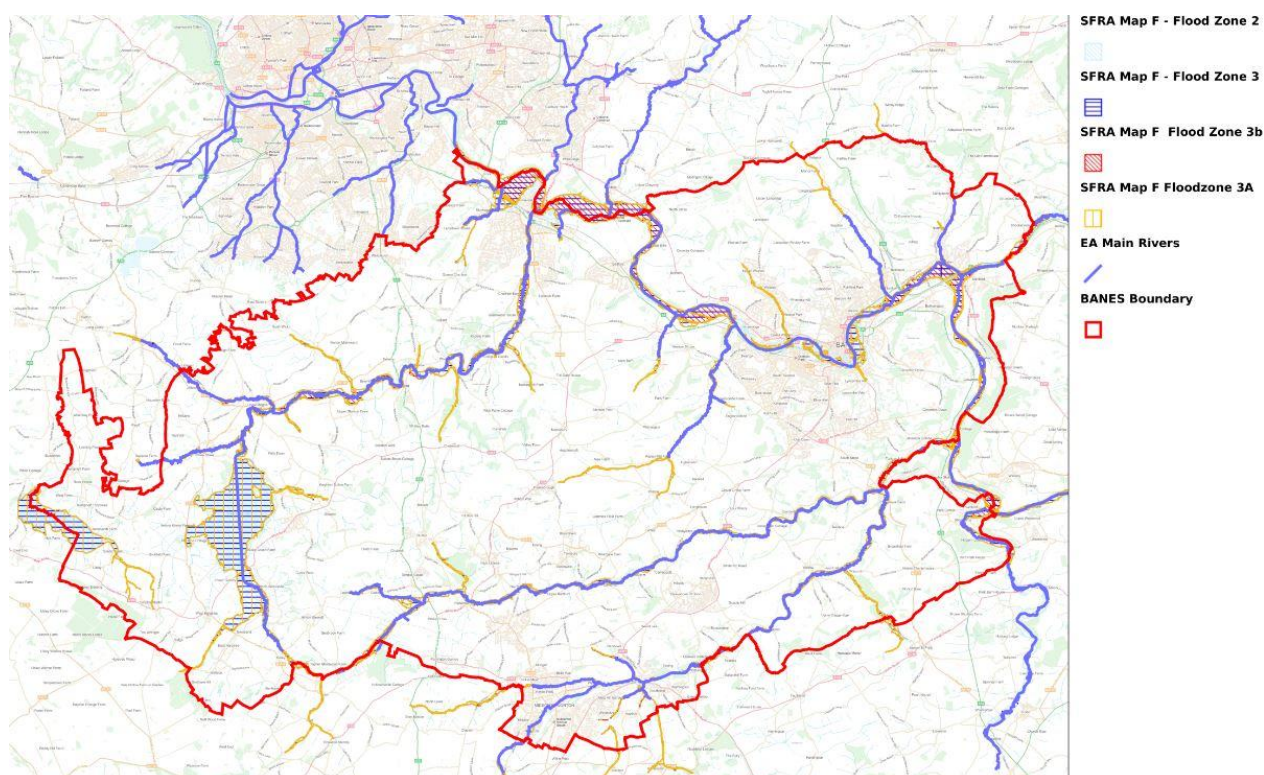


Map 4: Relative sustainable transport connectivity across B&NES

4.9 In the sub-area or place-based chapters that follow, each site option has been evaluated and graded using the Department for Transport's Connectivity Tool, which by integrating transport and land use data produces a national measure of connectivity for any location in England and Wales. This tool assigns each location a grade from A to J, where A indicates the highest level of connectivity within Bath and North East Somerset, and J the lowest. The assessment is based on the current sustainable transport network and existing land uses such as schools and shops, and does not take into account planned or future improvements. The grading from A to J is not an overall ranking of site options and in assessing and selecting which locations are taken forward for development in the Draft Local Plan the other factors or principles outlined will also be considered.

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 arising from all sources of water, for B&NES these are primarily fluvial or river and surface water. The map below is taken from the latest SFRA (2022) and identifies flood risk zones. This informs a sequential approach to the identification of 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 currently being updated



to reflect the latest Environment Agency flood zone mapping and allowances for the impact of climate change 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.

Map 5: 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.

Local food production/agricultural land

- 4.12 Enabling local food production has a number of important benefits e.g. in terms of climate change and achieving carbon neutrality by reducing food miles, as well as benefitting people's health and well-being. In terms of using land efficiently it is also important to avoid the unnecessary loss of high-quality agricultural land. National policy makes it clear that the best and most versatile agricultural land should be protected, wherever possible, from significant development. The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the best and most versatile land and Grades 3b to 5 are of poorer quality. Data from the provisional ALC shows that the majority of B&NES is underlain by Grade 3 (good to moderate quality) land; however, further clarity is needed in some areas as to whether this land is Grade 3a (best and most versatile) or Grade 3b (poorer quality). The quality of agricultural land will, therefore, influence spatial strategy and the choice of locations for strategic development, although further information on quality is likely to be required in preparing the Draft Local Plan.

Biodiversity and nature recovery

- 4.13 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 have been identified through the West of England LNRS (see also paragraphs 3.49 to 3.51) and will be supported by new and amended planning policy. The need to both protect priority habitats and species and facilitate nature recovery influence the spatial strategy, locations for development and

opportunities to plan for strategic greenspaces which deliver for nature and people.

4.14 The West of England LNRS identifies the following areas:

- Areas that are already of importance to biodiversity. These are sites that nationally are designated for their value to nature (SSSIs, SACs and SPAs), are designated as Local Nature Reserves; are locally designated as 'Sites of Nature Conservation Interest' (SNCIs); and/or are irreplaceable habitat including ancient woodland.
- Focus Areas for Nature Recovery. This is where action to recover nature will have the biggest impact and is most feasible. These have been mapped to reflect the priorities for nature recovery, and include all of the mapped measures for nature recovery. The focus areas for nature recovery are referred to as 'areas that could become of particular importance' in regulation.

4.15 The identified and mapped focus areas for nature recovery may be of strategic significance in delivering BNG and planning greenspace opportunities for nature recovery. This will be further explored in preparing the Draft Local Plan. The LNRS mapped areas are set out in each of the sub-area or place-based chapters that follow.

4.16 The likely effects of the spatial strategy and locations for development on European protected species and habitats must also be assessed through a Habitats Regulations Assessment (published separately [here](#)). A Habitats Regulations Assessment comprises two phases, a Screening Assessment to identify whether there are likely to be significant adverse effects as a result of development or at this stage of local plan preparation options for development, and if there are, a full Appropriate Assessment. Given the scale of growth that needs to be planned for because of the government's figure of housing need it is likely that a full Appropriate Assessment will be needed to identify the impacts of development and mitigation measures. In preparing the

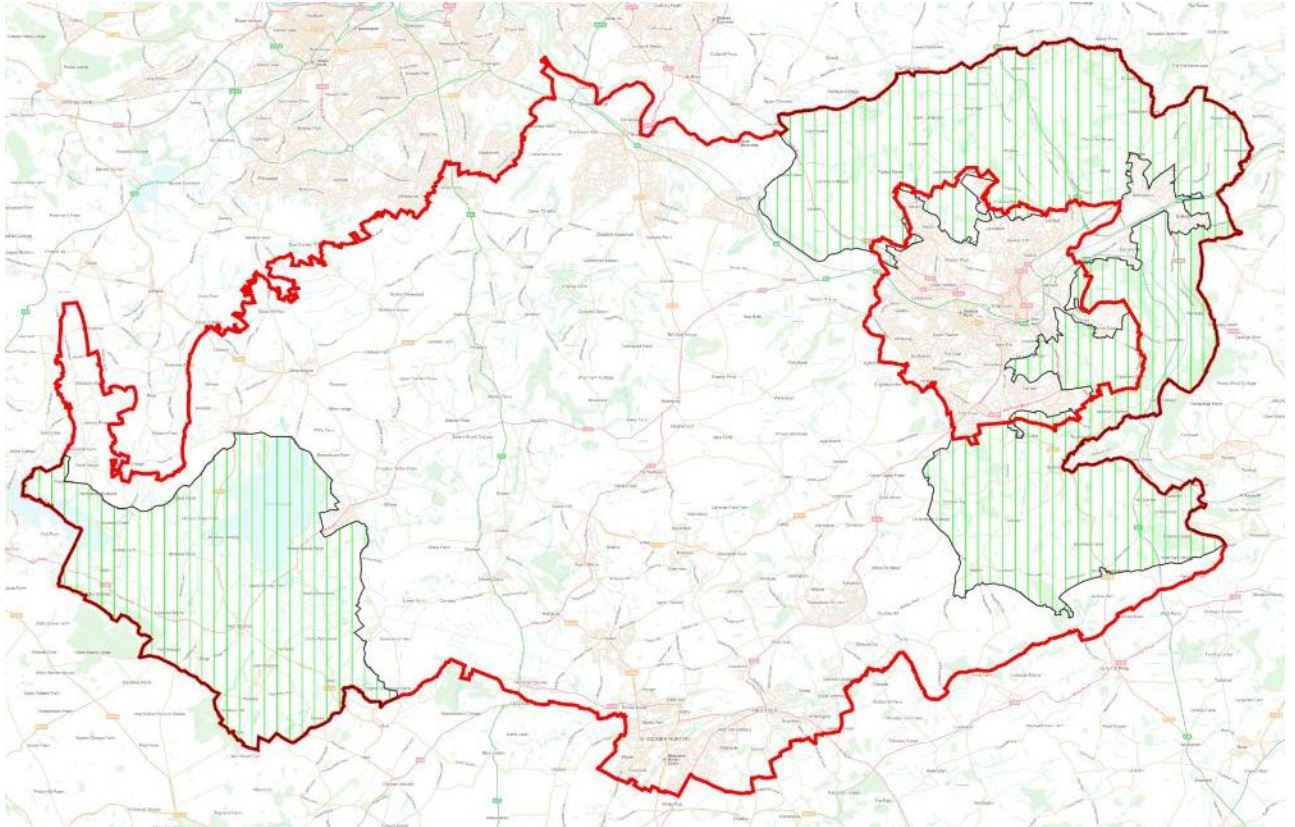
Draft Local Plan the council will consider and liaise with Natural England on the selection of locations for development and the approach to addressing issues or effects that are identified through the Appropriate Assessment. The approach currently being considered would involve:

- Development and publication of Special Area of Conservation (SAC) Bat Guidance for B&NES
- Development of strategic mitigation projects to provide robust core areas for SAC bat foraging and commuting incorporating some robust grazing areas to support bat foraging, which could also provide some access to greenspace
- Development of regional approach to lighting, including standards for new highway/cycle paths infrastructure that may or may not need planning permission

Comments are invited on the emerging proposed approach.

Landscape character impact

4.17 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.



Map 6: Map of B&NES indicating National Landscapes (green hash), and World Heritage Site boundary (inner red boundary)

Historic environment

4.18 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

4.19 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:

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

4.20 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 for many years, 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).

4.21 In December 2024 government set out some important changes to national policy on Green Belt. While retaining the importance and permanence of Green Belts the government requires local authorities to review their Green Belt if the need for development (as established through the standard method figure of housing need) cannot be sustainably met in any other way and is seeking for the strategic release of lower quality Green Belt for development to be considered. In identifying areas of lower quality Green Belt the government introduced the new concept of grey belt. Grey belt is defined as either previously developed land within the Green Belt or land that does not strongly serve purposes a, b or d as set out above. Guidance on how to identify areas of grey belt has also been set out by the government. In preparing the local plan and considering whether land from the Green Belt needs to be released for development we must do this sequentially, identifying and considering land in sustainable locations that is previously developed grey belt land, then other non-previously developed grey belt land, before considering other Green Belt land.

4.22 Through its revisions to national policy government has also set out its 'golden rules' relating to the release of land for development. These require that where land is released from the Green Belt for development an increased proportion of affordable housing is provided (either 50% or 15% above the proportion required elsewhere in B&NES); necessary improvements to local or national infrastructure are made; and the provision of new, or improvements to, existing green spaces that are accessible to the public. The improvements to green spaces should contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan.

4.23 The Green Belt will be an important influence on the location of development in the district. It is clear that development of land currently within the Green Belt will 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 extent to which different

parcels of land serve the five purposes is being undertaken. This represents stage 1 of assessing and reviewing the Green Belt and also includes the provisional identification of potential areas of grey belt land on a strategic basis. This work is being undertaken covering the Bristol-Bath Green Belt across different local authority boundaries through a West of England Strategic Green Belt Assessment. The assessment work is ongoing and will inform the Draft Local Plan. It is likely that following the Strategic Green Belt Assessment a more detailed (stage 2) assessment of the impact of development on more specific areas of the Green Belt will also be required.

Infrastructure provision

4.24 It is crucial that new development is served by the timely provision of necessary supporting infrastructure e.g. transport, schools, health and social care facilities, utilities (including digital), green infrastructure (GI), 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

4.25 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 both within and outside Bath and North East Somerset 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. At this stage the cumulative impact of development and infrastructure investment and provision required has not been undertaken because the choice of which development locations will be progressed has not yet been made. This work will be undertaken in collaboration with key infrastructure providers and agencies and will influence whether and how the need for additional development can be met.

4.26 The council's GI (Green Infrastructure) Strategy is being updated and will guide delivery of the council's GI policy and prioritising areas requiring investment, including the opportunity to plan for strategic parks or larger

accessible green spaces to serve existing and new communities and provide multiple benefits.

Ground conditions

4.27 Ground conditions, including land contamination and stability will also influence the choice of locations for development. Existing information has been used to inform this process, including understanding whether existing ground conditions are a 'show-stopper' for development or whether remediation costs are likely be very high. Where necessary it may be that more detailed assessments of specific areas to inform the Draft Local Plan are required.

Existing land use

4.28 In considering potential locations for development existing land use needs to be taken into account. Across the district the deficiency or surplus of land in different types of existing use must be considered in ensuring the needs of communities are met and a sustainable balance or mix of uses is maintained. For example, important community assets such as recreational space need to be protected or re-provided in an appropriate location.

Air Quality

4.29 In considering the choice of locations for future development it's important that we take account of the connection between them and air quality. Air quality must be considered at potential locations to ensure that we continue to improve local air quality for both existing and future residents across the district.

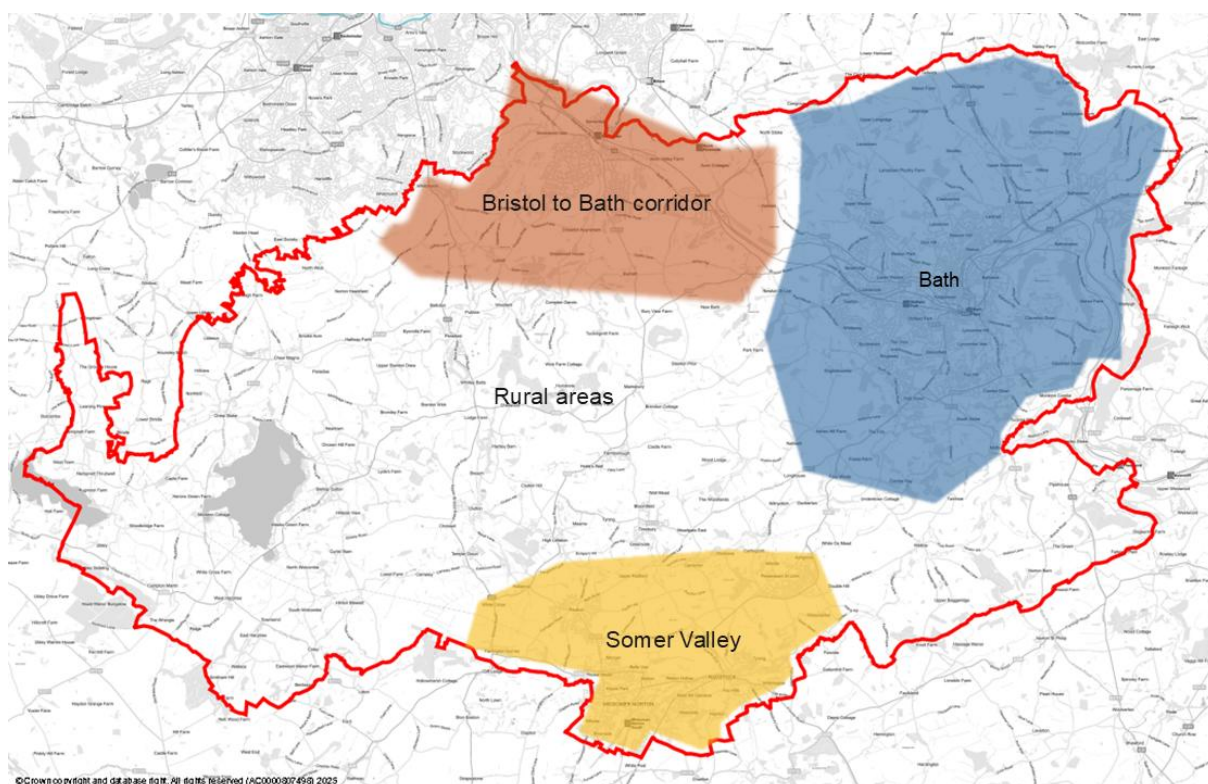
4.30 Local air pollution levels, air quality management areas and other air quality information have been used to inform the process. Where necessary it may be that more detailed information relating to specific areas and development use classes is required including prior to planning permission being granted to ensure cumulative air quality impact of developments are considered.

Local character and community identity

4.31 Bath and North East Somerset is characterised by high quality and distinctive places, which, as shown by discussion with residents and other local stakeholders, have an identity that is valued by the local community. In considering the location and form of development local character, distinctiveness and identity needs to be taken into account.

Sub-areas within B&NES

4.32 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 broad 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.



Bath

4.33 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 a significant element of the housing needed in Bath and North East Somerset and is and will continue to be 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, has a designated city-wide conservation area and is home to over 5,000 Listed Buildings. Furthermore, the city is tightly surrounded by the Green Belt and two-thirds of it is wrapped around by the Cotswolds National Landscape. Bath supports 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.

4.34 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 substantial new brownfield sites are available for development. 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 for both housing and employment space need to be explored and are set out in the Bath chapter. The villages that lie within the hinterland of the city are also of special character and development opportunities are limited. Options for development

and which needs should be met and how are considered further in chapter 5. As is currently the case it is likely that residents in nearby settlements in key transport corridors linking to Bath will look to the city as their main urban centre and employment destination. The quality of sustainable transport connections to these settlements needs to be enhanced in order to enable sustainable movement.

Bristol to Bath Corridor

4.35 Settlements within the transport and river corridor that connects Bath and Bristol, most notably Keynsham and Saltford village, but also other villages closer to Bath relate well to each other and are 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 of Bristol. However, whilst it is relatively well connected into Bristol it is important to remember that Whitchurch village (like other villages) is a separate and distinct settlement and community. The corridor between Bristol and Bath is also identified as a priority growth zone in WECA's emerging Local Growth Strategy.

4.36 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. The potential opportunities are discussed in chapter 6.

4.37 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 village are of great importance to the respective communities. In considering locations for development the need to retain, strengthen and enhance green infrastructure corridors is crucial. As set out above and in the context of revised national policy (including the new concept of grey belt) land can only be released from the Green Belt for development through a local plan and only if justified by 'exceptional circumstances'. Potential locations for development in this part of the district, both for housing and employment space, as well as opportunities to provide high quality green infrastructure are considered in chapter 6.

4.38 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

4.39 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.

4.40 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.

4.41 The Somer Valley is connected to Bath and Bristol by two major transport corridors (A367 and A37) and is comparatively well served by public transport. Rural communities within the Somer Valley have recently seen a decline in bus services under the current private commercial operating model. To address this, further significant investment is needed to improve public transport. In addition, improvements to the active travel network are required to enhance connectivity and safety.

4.42 The Somer Valley is identified as a growth zone in WECA's emerging Local Growth Strategy. It is important to improve local employment opportunities, including through delivery of the Somer Valley Enterprise Zone. Options for additional housing, employment space and the required infrastructure improvements are outlined in chapter 7. Additionally, nature recovery and greater public access to greenspace must be delivered.

Rural Areas

4.43 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), as well as the Mendip Hills and Cotswolds National Landscapes. Spatially and functionally some villages are linked. This means that the rural areas can be further subdivided based on character and/or spatially and functionally, further detail is set out in chapter 8.

4.44 Areas of strategic importance for nature recovery have been 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

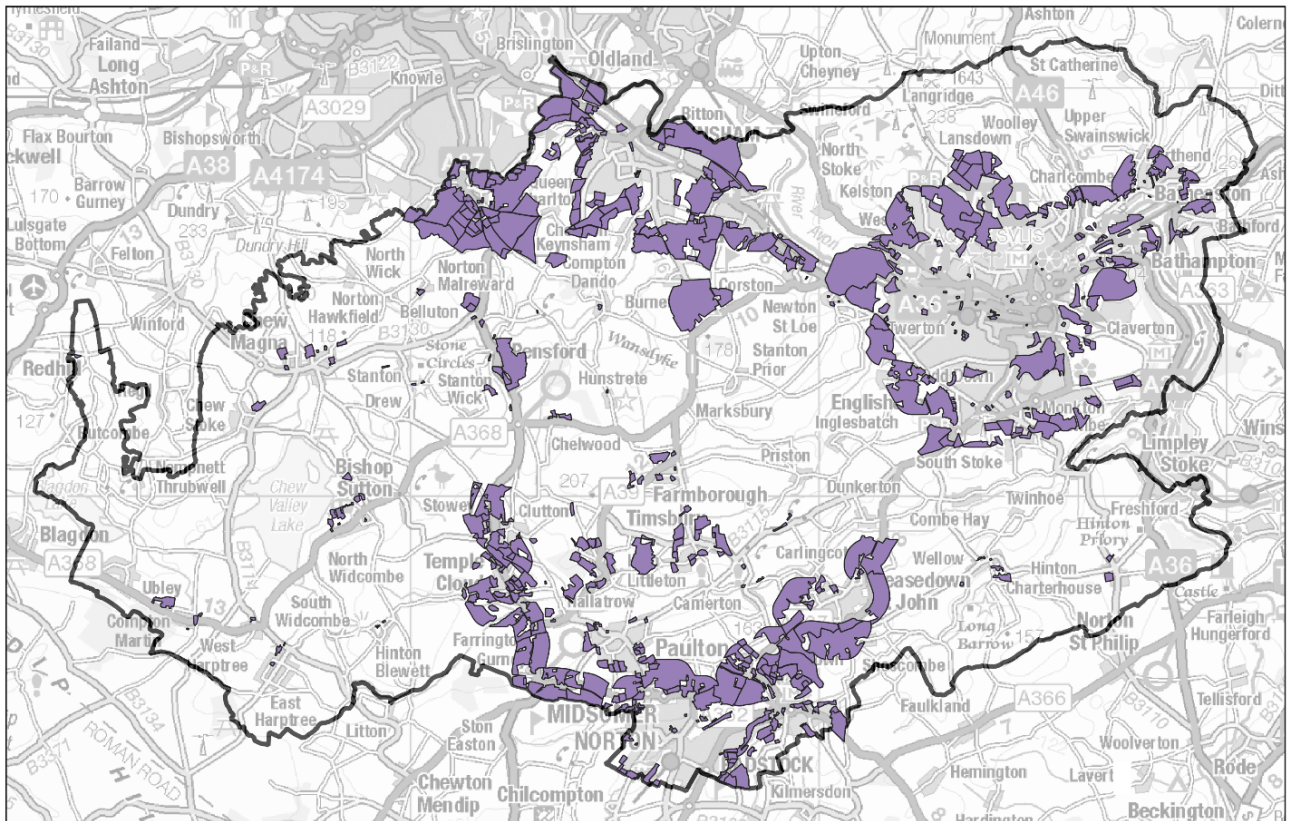
important to local communities. The connectivity by public transport from villages to larger urban centres is variable and is poor in some of the smaller villages, which also lack services and facilities that can be accessed by walking, cycling or wheeling.

4.45 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. Provision of additional employment space to provide increased local job opportunities in the rural areas and potentially reduce out-commuting also needs to be considered, including in conjunction with housing development. This is further explored in Chapter 8.

Location Options

4.46 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 settlements and location options. Specifically, relative sustainable transport connectivity and travel distances to employment opportunities and a range of key services and facilities was the starting point for identifying settlement and then location options to help minimise carbon impact. Consideration 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, the Housing and Employment Land Availability Assessment (HELAA) and the Area of Search Assessments/Topic Paper.

4.47 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.

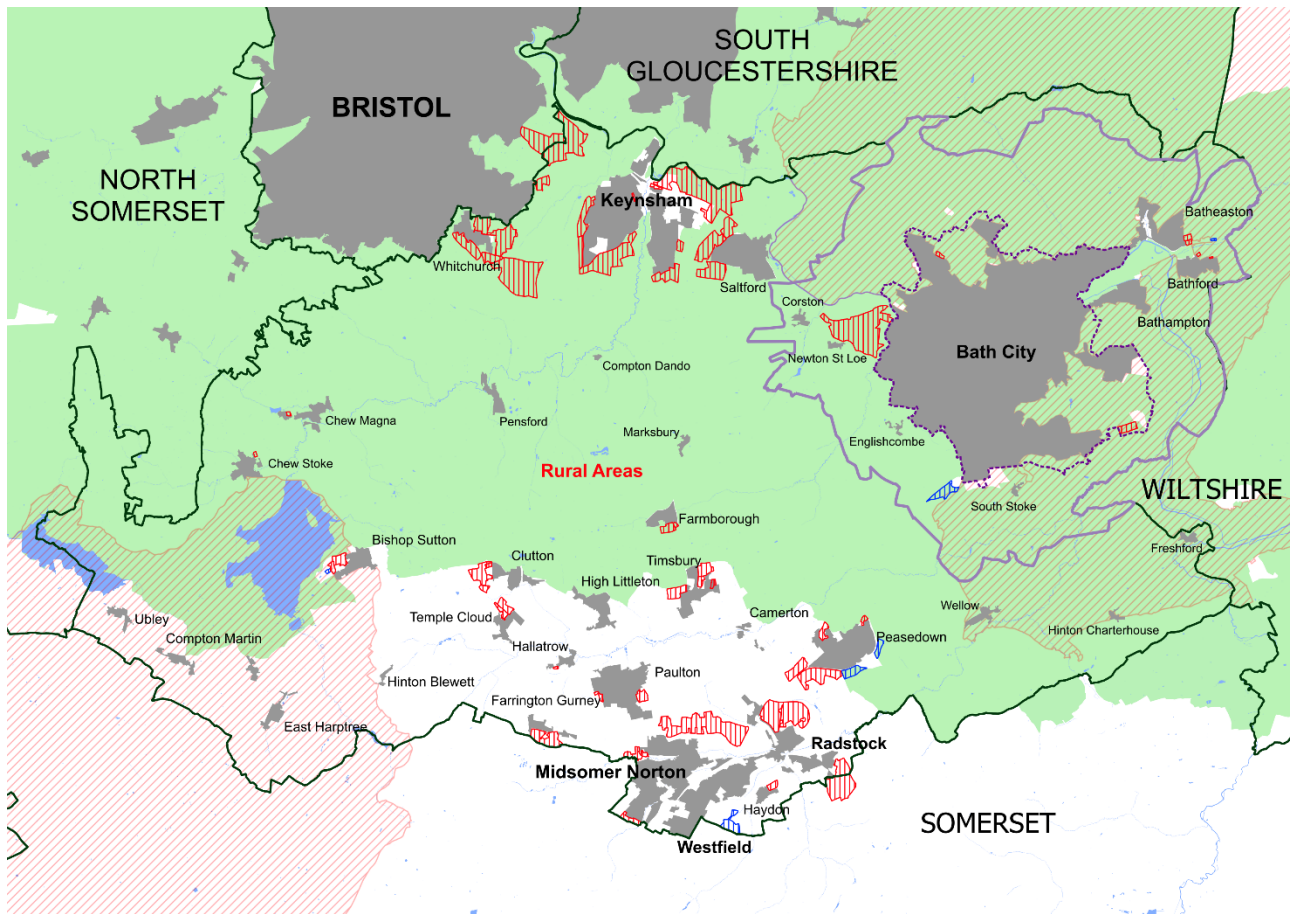


4.48 Those HELAA sites or groupings of HELAA sites assessed as being suitable, available and achievable for development that are located at the settlements identified as being the focus of strategic development have been considered against the spatial strategy principles referenced above and through the Sustainability Appraisal. This means that the broad range of HELAA sites has effectively been narrowed down to the potential options for strategic development within the Bristol to Bath growth corridor and the Somer Valley illustrated on the map below. Strategic sites or development is defined as that which is of a scale likely to require and support the provision of significant site-specific infrastructure and facilities e.g. dependent on location provision of a minimum of 500-600 dwellings could be sufficient to support the provision of a new single-form entry primary school. However, given single-form entry primary schools are often not economically viable there is a preference for a level of development that supports a two-form entry primary school and other key supporting infrastructure. Dependent on location this would be of a magnitude of 1,000-1,200 dwellings. Site options for employment space have also been identified, as well as considering those strategic sites on which

some employment space could be provided as part of mixed use development in suitable locations for businesses.

4.49 HELAA sites that lie elsewhere in the district, perform poorly against the spatial strategy principles or are otherwise constrained 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.

4.50 In addition, options for non-strategic development, primarily in the Somer Valley and at the comparatively more sustainable villages are set out in the relevant place-based chapter. Where possible site options in villages have been identified and assessed through working with local communities. In order that a supply of deliverable sites for housing can be demonstrated it is necessary to identify a diverse range of sites, both larger, strategic sites which may take a little while for housing to be delivered and some smaller, non-strategic sites that are capable of coming forward for development more quickly.



Map 9: Map showing locations of strategic site options

4.51 The location or site options illustrated on the map are also listed by sub-area in the table below. The order in the table does not indicate a level of preference at this stage. In selecting which site options are taken forward for allocation in the Draft Local Plan current sustainable transport connectivity (see DfT transport connectivity grading) and opportunities to improve such connectivity, other sustainability criteria and deliverability factors will be considered. Sustainable transport connectivity is based on government data on current connectivity to services, facilities and employment. It does not take into account measures that could improve sustainable transport connectivity which will be identified and assessed in preparing the Draft Local Plan. In the place-based chapters that follow the sustainable transport connectivity is identified and illustrated on the location options maps and concept diagrams.

4.52 The table below also includes an indicative estimate of housing and/or employment space capacity. This indicative capacity is based on assumptions regarding both development densities and the proportion of a site on which built development will take place. At this stage the capacities are only indicative as further work needs to be undertaken on masterplanning the sites and testing their cumulative impacts and associated infrastructure requirements (this can only be progressed once we have certainty on which sites will be allocated). This work will be done to inform the Draft Local Plan. For the site options identified specifically for employment uses the employment space capacity or area is set out and for the other strategic sites only the housing capacity is set out in the table. On some of these strategic sites a greater mix of uses and potential employment space provision may be appropriate. These sites are indicated with an asterisk in the table and further analysis will be undertaken in preparing the Draft Local Plan to identify the amount and type of employment space that could be appropriately provided.

4.53 Only strategic site options are individually listed in the table below. In addition, a range of smaller, non-strategic site options are referenced in the place-based chapters and the capacity of these sites also need to be included in identifying the total housing that could be delivered through the options presented. In total they could theoretically provide between 17,550 and 22,810 new homes against a requirement to allocate land for at least 19,900 to meet the government's figure of housing need.

4.54 Further information on the wider sustainability effects of the location options below is set out in the Sustainability Appraisal (available separately on the council's website) and in preparing the Draft Local Plan we will also be considering the carbon impact of the different options. The performance of locations in terms of sustainability and carbon impact also gives a useful 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 Somer Valley (see chapter 7) or 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	Existing housing commitments	New sites - appx. housing capacity	New sites - appx. employment space provision
Bath	4,293		
West of Bath*		900 – 1,950	
Non-strategic sites, including Purpose Built Student Accommodation		780 - 800	
<i>Odd Down</i>			2-5ha
Bristol to Bath Corridor	602		
Hicks Gate*		1,200 – 1,550	
North Keynsham*		1,900 – 2,400	
West/South West Keynsham		1,000 – 1,300	
South East Keynsham		400 - 550	
Non-strategic sites in Keynsham		100 - 130	
West Saltford (north of A4)*		300 - 350	
West Saltford (south of A4)*		650 - 850	
South Saltford		350 - 450	
(West Whitchurch (Whitchurch Option 1)		350 - 450	
East Whitchurch: Horseworld and Woollard Lane (Whitchurch Option 2)		–1,000-1,300	
North Whitchurch: Staunton Lane (Whitchurch Option 3)		350 - 400	
South East Whitchurch (Whitchurch Option 4) *		1,950 – 2,500	
Stockwood Lane		300 - 400	
Somer Valley	1,052		
South Peasedown (south of the by-pass)		550 - 700	
South west Peasedown (north of Bath Road, A367)		250 - 300	
<i>Bath Business Park extensions</i>			7ha
North Radstock		1,250 – 1,550	
Writhlington		950 – 1,150	
<i>Westfield Industrial Estate extension</i>			6ha
North of Midsomer Norton*		1,000	
Farrington Gurney South		400 - 500	
Somer Valley (non-strategic sites)		950 – 1,200	
Rural Areas (non-strategic sites incorporating possible longer term phases)	999	670 – 2,030	

Table 2: summary of site capacity ranges

Note - sites shown in italics are employment space options and those with asterisk are strategic sites that could be mixed use with a strategic employment role

4.55 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. Some of the location options were also presented in the spring 2024 options document. Comments previously submitted on these options will continue to be carefully considered by the council. These comments do need to be re-submitted, however, any additional comments in the context of new information are welcomed. The new or extended options presented in this document are clearly indicated in the place-based chapters to help focus review and responses.

4.56 Some of the location options listed and assessed (alongside other smaller non-strategic sites referenced in paragraph 4.30 above) will together comprise a district-wide approach or strategy in meeting development needs. As set out above the cumulative impacts of development and associated infrastructure requirements have not been assessed at this stage and therefore, it is not certain which development locations could be brought forward in combination with others. It is also clear that as set out in each place-based chapter, substantial infrastructure investment will be needed to enable development to come forward. The district-wide strategy will be set out in the Draft Local Plan published later in the year.

4.57 In order to inform the selection and preparation of the most appropriate spatial strategy in the Draft Local Plan the sustainability of different combinations of locations or strategy approaches across the district is tested through the Sustainability Appraisal (INSERT LINK).

4.58 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.

4.59 Five strategy approaches are tested. These comprise two approaches which require significant release of land from the Green Belt (if justified by 'exceptional circumstances') in seeking to meet the standard method derived housing need and associated job growth outlined in chapter 3,. An alternative approach is tested that could potentially accommodate a higher level of growth, should this be necessary, and finally two approaches which are less reliant on Green Belt release that accommodate a lower level of growth e.g. if this is established as appropriate in light of cumulative impacts and associated infrastructure requirements of development. Comments are sought on both the individual location options, 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. The strategy approach and location options are also subject to Habitats Regulation Assessment to identify likely effects on European protected species and habitats and to help identify potential mitigation approaches (see paragraph 4.15 above).

4.60 In addition, and as set out below the council is also considering whether one or more new settlements should form part of a longer-term strategy for meeting future development needs primarily beyond this local plan period (see new settlement methodology section below). This also need to be considered on a regional basis through the WECA Spatial Development Strategy.

New Settlement Methodology

4.61 In seeking to plan for greater levels of housing and economic land the council has set out various spatial strategy approaches that could act as a focus for identifying additional sites for development. One potential option that requires serious consideration, particularly in response to the significant levels of housing that we need to plan for over the longer term and given that it may not

be appropriate to continue expanding existing cities and towns, is that of new settlements.

4.62 It must be acknowledged early on however that this potential option is not considered to be deliverable within the current plan period. The complex land assembly and planning required for a new settlement of sufficient size to provide a reasonable degree of self-containment, will take a reasonably long time. As such it is proposed to consult on a methodology for identifying particular spatial locations for new settlements and that this can inform an ongoing process which will hopefully inform future iterations of the Local Plan. It should also be borne in mind that the West of England Mayoral Combined Authority is at the early stages of producing a Spatial Development Strategy for the wider area. It is expected that as part of this process that they consider a similar methodology for identifying new settlements.

4.63 In essence, the new settlement is considered to have the following key opportunities and constraints:

Opportunities

- A new or substantially expanded settlement allows for a comprehensive and strategic approach to provision of housing and economic land, enabling the integration of infrastructure such as transport, energy, education, green infrastructure, health and utilities to support the development from the start.
- Dependent on the location and size of a new settlement it could reduce the pressure on infrastructure, including local services and facilities, in existing towns and villages.
- New or substantially expanded settlements could also play a role in meeting housing need beyond the period of this Local Plan, as part of a longer-term strategy.

Constraints

- Requires extensive upfront investment for infrastructure which could impact the viability of the development.
- Given significant infrastructure requirements and complex process of bringing one forward it is likely that a new or substantially expanded

settlement would have long lead in times and will not deliver housing or other uses in the short to medium term.

This section sets out a methodology for identifying potential locations for a new settlement.

Methodology for identifying locations for a new settlement

4.64 To explore the potential scope for new settlements within B&NES it is proposed to set out a series of parameters which can guide the identification of locations. Where could be appropriate locations? What are the areas to avoid? What are the key issues that need to be considered? This is considered to be a key part of the sieving process to identify potential locations.

What do we mean by a new settlement?

4.65 Given the scale of growth that we are looking to address and the role of the local plan in exploring other spatial strategy options for meeting this growth, this section is seeking to outline the process for identifying options for larger settlements of around 5,000 to 10,000 dwellings. This scale of development would be capable of accommodating more day-to-day activities such as schools, shops and medical facilities so that they have a greater degree of self-sufficiency.

4.66 It is abundantly clear that development of this scale would have a substantial impact on any locality and that these would need to be critically understood to ensure that the benefits for affected communities outweigh negative impacts.

4.67 There could be potential in the future to devise a secondary sifting process to identify the opportunities for smaller settlements or for a cluster of smaller new villages. However, given that the benefits, in terms of delivering housing numbers, is likely to be much less, the focus will remain on seeking to identify areas for strategic levels of growth.

What areas should be explored and what conditions need to be met?

4.68 In ensuring that we plan for development that responds to local needs and creates attractive, healthy and sustainable places in line with the council's Corporate Strategy, the following are considered to be the key constraints or parameters against which potential locations can be identified:

- **Fundamental or major constraints** e.g. flood zones, that would automatically discount areas. This list of constraints will also include: mine shafts, power lines, gas mains, sewage farms and buffer zones, SSSIs, SACs, SPA, priority habitats / LNRS, most SAMs, landscape and heritage constraints, NLs, Conservation Areas.
- **Transport and levels of existing or potential public transport and active travel accessibility to larger settlements.** This is a key priority for the local plan and is likely to favour locations that are well related to the principal roads throughout B&NES where levels of inter-urban accessibility enable people to make more sustainable travel choices to larger settlements such as Bath or Bristol. It is also essential to give significant weight to the potential improvements to public transport that could be made; the scale of new settlements being explored is such that significant improvements could have a reasonable prospect of being delivered.
- **Level or gently undulating sites with limited moderate to steep slopes (? <20% site area).** It is known that steeper slopes are more expensive to build on and therefore site deliverability may be an issue. It will be partly dependent on the assumed sales values that are able to be achieved and viability assessments will play a part in this. Ground and soil conditions are also key factors.
- **Landscape character types and capacity to change.** There are a wide range of different types of landscape character areas within B&NES. Much of the district is designated as part of either the Cotswold or Mendips National Landscapes and would be particularly challenging to change (although not insurmountable). Whilst all landscapes are valued, there are areas with a greater capacity to absorb development.

Given the size of a potential new town, there is the potential to fund fairly significant levels of infrastructure that might address existing deficits. Reasonable access to basic infrastructure networks is an important consideration.

4.69 Following this initial methodology to identify potential locations, it will be necessary to devise a secondary sifting process which would ascertain how

any identified locations perform when tested against the spatial priorities for the local plan and an assessment of their deliverability, particularly in relation to willing landowners.

5. Bath

Why are we consulting again on the Local Plan option?

5.1 The council previously consulted on its Local Plan Options Document in the spring of 2024, and one of the key roles of the local plan is to demonstrate how it can meet the objectively assessed needs of future development. An important component of this is the amount of housing and employment space that the council needs to plan for. In late 2024, the government published some important changes to national policy and set out revised, mandatory housing targets for each local authority. The new housing target (known as the standard method figure of housing need) is more than double the previous figure and has increased from a little over 700 homes per year to around 1,500. In total, this changes from 14,000 over the plan period to around 27,000 new homes. The associated jobs growth in order to retain an overall balance between homes and workers within B&NES increases to around 25,000.

5.2 As a result of these national policy changes and the increased housing target, the council decided to reset the local plan so that it could undertake further evidence work and assess further options for providing increased levels of development. This Local Plan Options Document primarily sets out options for providing the additional development now required, and the opportunities for Bath to contribute towards the new housing target will be reassessed.

5.3 We previously presented options for development to meet a lower level of identified need in the Local Plan Options consultation that was undertaken in spring 2024. The comments received in response to that consultation are still entirely valid but given that we have had to reset the local plan to meet a significant increase in our housing targets, we have not responded to the comments raised at that stage.

5.4 The comments received during this Local Plan options consultation, as well as the comments on the spring 2024 options plus ongoing engagement with

communities and other stakeholders, will need to be considered as a whole, and 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.

Strategy Overview

5.5 The local plan is an important statutory document that sets out the key issues, the council's emerging vision and priorities, and the spatial strategy 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.

5.6 It is a key role of the local plan to allocate new sites and protect existing sites for particular types of development and this is informed by robust evidence. 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.

Options Consultation 2024

5.7 Comments on the previous options consultation in Spring 2024 are still relevant. These comments will be reviewed and taken into account, together with additional comments received, when the draft plan is being prepared. Below is a short summary of some of the main issues raised in the previous consultation.

Bath overview

Transport and Connectivity Improvements: Critique of current public transport with suggestions for better cycling infrastructure, pedestrianisation, and improved connections to reduce car reliance.

Brownfield vs Green Belt Development: Focus on brownfield site development while considering the potential release of green belt land, highlighting growth and conservation/World Heritage Site (WHS) concerns.

Housing Affordability and Diversity: Call for more affordable housing and various solutions amidst issues of resident displacement due to investment properties.

Support for Local Amenities and Infrastructure: Suggestions for ensuring new developments include necessary infrastructure like healthcare, schools, and community amenities.

Sustainable and Green Development: Emphasis on ecofriendly housing solutions, green space protection and development plans that incorporate climate resilience.

Historic Preservation vs Development Needs: Discussion about balancing the preservation of Bath's heritage with the modern development demands.

Community Engagement and Social Equity: Desire for increased community involvement in planning and policies addressing social disparities, such as differential council tax.

Tourism Management and Economic Diversification: Recognition of tourism's impact with suggestions for better management and the need to broaden Bath's economic base beyond tourism and education.

Bath: Site options overview

Environmental Conservation vs. Development Needs: Respondents express a need to balance housing development with conservation of Bath's natural and historical environment, prioritising brownfield over greenfield locations to secure local biodiversity and heritage.

Sustainable Urban Planning & Transport Solutions: Discussions centre on the importance of site selection near to the city to reduce car reliance, integrating sustainable transport, managing congestion, and considering park and ride facilities to mitigate traffic impacts.

Heritage, Culture, and Community Wellbeing: There's a noted tension between growth and preservation of Bath's heritage, proposing developments respect cultural values and repurpose spaces within these constraints without compromising the city's historic character.

Housing Crisis and Affordable Accommodation: The acute need for housing, particularly affordable and student accommodation, is highlighted. Calls for higher

density redevelopment of under-used sites and adherence to affordable housing provisions are mentioned.

Community Engagement and Policy Revision: Respondents encourage more community involvement in planning, revising existing site allocations to reflect updated priorities like climate adaptation and ecological preservation.

Infrastructure and Public Services Impact: Concerns focus on the potential strain of new developments on existing infrastructure and public services, advocating for corresponding infrastructural enhancements.

Climate Change and Ecological Response: Some emphasis on aligning housing developments with climate and ecological emergencies, focusing on energy-efficiency, green infrastructure, and sustainable water management practices.

West of England Growth Strategy

5.8 In addition to the council's Economic Strategy the West of England Mayoral Combined Authority (WECAWECA) is also preparing a Growth Strategy which is responding to the government's ambition to secure sustained growth and increased productivity in all areas of the country. WECAWECA is working in partnership with the four local authorities, including B&NES Council. The Local Growth Strategy will outline how WECAWECA will help to drive growth in the region, building on the area's unique strengths and opportunities to support key growth-driving sectors. It focuses on four geographical areas, with two zones within B&NES that reflect the areas of focus in our Economic Strategy i.e. the Somer Valley Growth Zone and the Bristol and Bath Growth Zone. The emerging Local Growth Strategy will also set an important part of the context for our local plan and we will need to align our planning policy framework and site opportunities to help deliver sustainable economic growth.

Bristol and Bath Growth Zone

5.9 The Bristol and Bath Growth Zone will develop the strength of partnership working between the council, universities and WECAWECA. This will also enable the benefits of both regeneration and economic growth to be realised. This zone offers a different model of support, will balance economic requirements with meeting housing needs along the Bristol to Bath Corridor, and will deliver the planned infrastructure improvements that are needed.

5.10 Within this zone the priority objectives will focus on:

- Bath Riverside Innovation Quarter/Bath Quays North, developments in North Keynsham and joint work on masterplanning key developments – including the Fashion Museum Bath and Future Fashion Works.
- Exploring the potential to partner with WECAWECA to deliver key employment and housing sites.
- Transport projects especially mass transit and Saltford rail station.

Place Profile

5.11 Bath is an incredible city, with an international reputation – beautiful, creative, green, compact, well connected – it offers fantastic quality of life. The city has a population of around 94,000 people and a larger catchment population who travel into the city for work and leisure. Despite its strengths the city has become increasingly unaffordable, and increasingly unequal – with house prices now 16 times average earnings and both life expectancy and educational outcomes starkly different for those in our most deprived areas. Our population is aging; and both our university graduates and resident young people are unable to settle here – creating a shrinking resident workforce.

5.12 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.

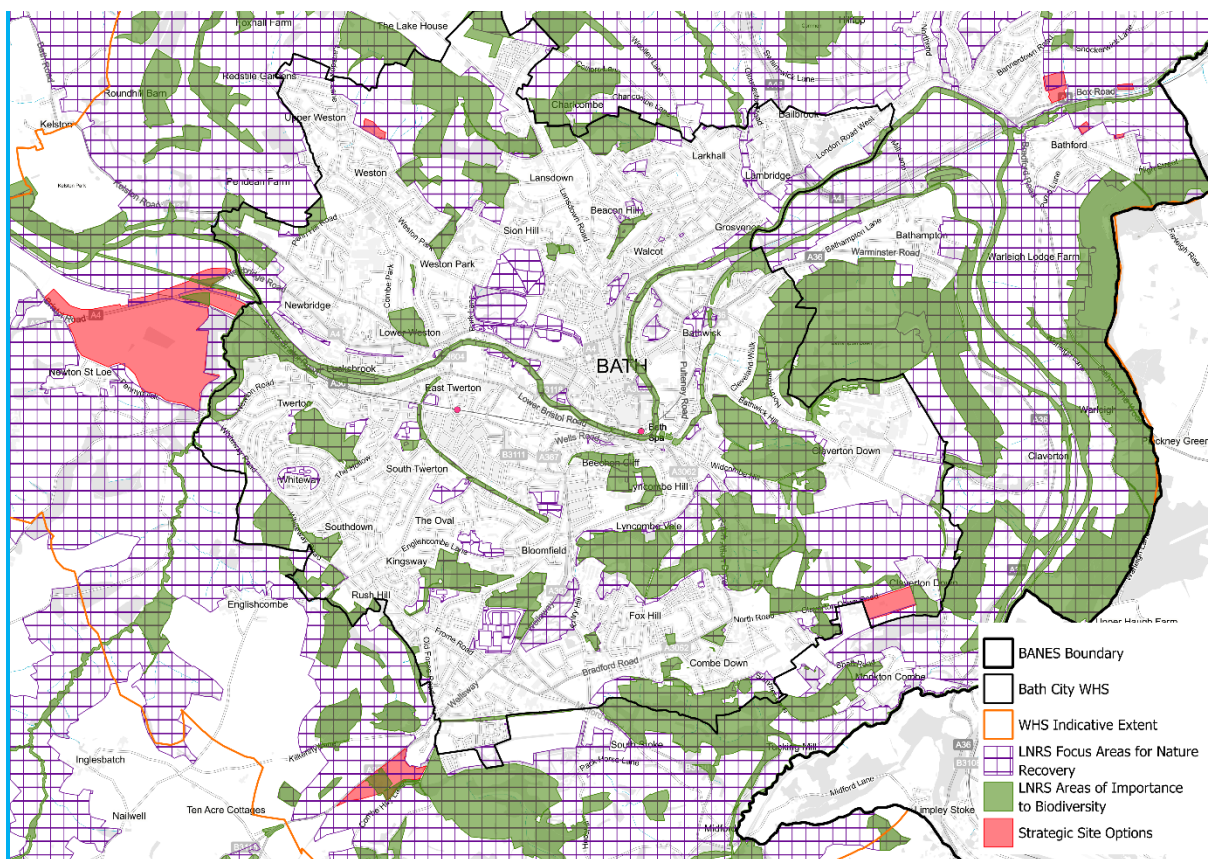
5.13 The city has a vibrant cultural offer which supports its important role as a domestic and international visitor destination that attracts over 6 million visitors annually. It is a successful regional shopping destination, with below average vacancies.

5.14 Bath is a rare double inscribed World Heritage Site, one of 22 of the currently inscribed 1,248 World Heritage Sites globally. This means that Bath is internationally significant and of Outstanding Universal Value (OUV) to the whole of humanity. It is within this context that the local plan manages how the city needs to evolve whilst avoiding harm to OUV. Some examples would be protecting sensitive landscapes such as the green setting, including the indicative setting, from inappropriate development or by controlling the height of new buildings.

5.15 The West of England Local Nature Recovery Strategy and Toolkit (LNRS) was published in November 2024. The LNRS identifies the following areas:

- Areas that are already of importance to biodiversity. These are sites that are nationally designated for their value to nature (SSSIs, SACs and SPAs); are designated as Local Nature Reserves; are locally designated as 'Sites of Nature Conservation Interest' (SNCIs); and/or are irreplaceable habitat including ancient woodland.
- Focus Areas for Nature Recovery. This is where action to recover nature will have the biggest impact and is most feasible. These have been mapped to reflect the priorities for nature recovery, and include all of the mapped measures for nature recovery. The focus areas for nature recovery are referred to as 'areas that could become of particular importance' in regulation.

5.16 Map 9 below shows where these areas are located in Bath, and the relationship between these areas and the Site Options under consideration in this Options consultation. Constraints and opportunities are referenced for each Site Option where appropriate.



Map 10 showing Local Nature Recovery Strategy sites in and around Bath.

- 5.17 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.
- 5.18 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.

5.19 Traffic congestion in the city is a major challenge that has affected air quality resulting in an Air Quality Management Area. 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. Bristol international airport is proximate to the city providing a national and international gateway to the city and region. 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 and the Two Tunnels Greenway.

5.20 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.

5.21 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

5.22 Bath is of global importance, recognised by its double inscription as a World Heritage Site. This is an international designation 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, which is characterised here by a highly complex and often very steeply sloping landform, and also the Green Belt. Whilst these are positive aspects of the city's character, 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.

5.23 House prices in the city are very expensive and many people who work in the city have to or choose to live elsewhere to 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 Housing Mission Delivery Board has been established in B&NES to unite organisations from across the housing sector, including anchor institutions, to deliver more affordable housing that addresses needs. It is also important to recognise that whilst short-term lets limit housing for residents, they are an important aspect of the visitor economy

5.24 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. Our strong visitor economy outcompetes health and care sectors - with both sectors increasingly dependent on inward commuting, placing pressure on transport networks and resulting in congestion. 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. As referenced above, central Bristol to Bath has been established as a Growth Zone in the WECAWECA Local Growth Strategy creating new opportunities to diversify our economy, unlocking prime commercial development sites in the city centre benefiting from excellent access to Bath Spa train station.

5.25 The universities jointly represent approximately 25% of the city's 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, industrial and hybrid business space development.

5.26 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. In 2002 an Air Quality Management Area was declared and to improve air quality a Clean Air Zone was introduced in 2021 due to continued exceedances of the legal limits of Nitrogen Dioxide.

5.27 The effects of climate change are expected to bring increased flood risk, surface water run-off and land slip. These need to be planned for and managed, where possible using nature-based solutions.

5.28 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.

5.29 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

5.30 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, abilities and educational attainment, as well as being health promoting more generally, will be important.

Emerging Vision and Priorities

5.31 The council is working on an emerging vision and set of priorities for Bath. These priorities reflect and seek to address the issues identified above which have been informed by engagement with community representative groups. The priorities outlined below are broader than those that can be addressed through the local plan. local plan.

5.32 Many of the priorities listed can be addressed by new development, and site or policy approach options have been selected to respond to the priorities. 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.

- Ensure that Bath remains a vibrant, attractive and sustainable city – to tackle our affordability crisis; diversify our economy whilst maintaining the success of our visitor economy, and ensure that all residents are able to benefit from its opportunities; and help build a greener, more resilient city for the future.
- Provide the space to help diversify and grow our 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.
- More joined up skills and employability support, as well as investment in physical connectivity, will help residents in our less affluent wards to access new employment opportunities in our innovation district, cultural and creative industries and foundational economy.
- Bath is also a city of invention, and reinvention. Rising to the challenge of the climate and nature emergencies, we will continue to be leaders on sustainable living, showing how we can adapt our sensitive heritage assets to be both energy efficient and more resilient to our changing climate.

- 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. As is the case across the district it is important that we build new homes and to enable greater levels of building retrofit so that they 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).
- Enable more young people to stay in Bath, who want to, with access to a wider range of employment and entry level housing options.
- 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.
 - The double World Heritage Site Inscription of Bath will be embraced and opportunities taken to build on the inspirational qualities of the OUV. We will seek to develop a global reputation for the highest quality, innovative design of a sustainable city which celebrates its unique heritage and landscape setting whilst rising to the challenges of the future.
 - 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. Investment in our cultural assets and visitor economy will bring benefits for residents, both through economic returns and a richer cultural offer.
- 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.

- The delivery of strategic Green Infrastructure and nature recovery projects such as Bath River Line and Bathscape will sustain our position as the original wellbeing city, delivering improved access to green and blue spaces and placing nature at the heart of any development opportunities.
- Ensure policy that supports the delivery of the Health and Wellbeing Strategy, and as a 'Wellbeing City', ensure that Bath's built and natural environments facilitate better health and wellbeing 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, cultural, play and community spaces for all ages, cleaner air, and improved access to green spaces and the surrounding landscape.
- 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.
- 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.
- Make 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. Bath's Journey to Net Zero Transport Plan (JTNZ) was adopted in 2022. The Bath Movement Strategy and Active Travel Strategy propose to enable the delivery of integrated transport solutions and promote sustainable mobility throughout the city. Both strategies are aligned with the objectives and funding provided by

the current City Region Sustainable Transport Settlement - government funding to improve the West of England's sustainable transport system. Together, these initiatives are intended to encourage modal shift, and improve air quality, building on Bath's established walking, wheeling and cycling network.

The Capacity of the City

- 5.33 For very good reasons, Bath is a constrained city. Its ability to expand outwards into the setting of the World Heritage Sites without causing substantial harm is very 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.
- 5.34 One of the key roles of the local plan is to seek to sustainably meet objectively assessed needs for housing, particularly affordable housing; economic space and other uses.
- 5.35 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).
- 5.36 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 Bath Cricket Club.
- 5.37 Given the significant 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. local plan.

5.38 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 Future Economic Needs Assessment Update (May, 2025) which has assessed the performance of different economic sectors and has projected future areas of growth. This latter report is clear that the city needs to protect existing space and deliver a total of 74,000 – 79,000 sqm new office and research and development space (including existing commitments). It also needs to both protect existing and enable the development of between 38,000 - 44,000 sqm of new industrial (including replacement) floorspace, including for advanced engineering purposes, clean tech, health and life sciences, warehousing and logistics. Some of the requirement for additional space will be met on sites that are already committed for employment development (sites with planning permission or allocated in the adopted Local Plan). These existing commitments will need to be reviewed in preparing the Draft Local Plan.

5.39 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 coherent delivery of exemplary developments that work together to reinforce the city's important character and identity of the city? This spatial analysis is ongoing and will inform the Draft Local Plan.

5.40 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).

5.41 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. As outlined above, challenges exist in accommodating continued levels of student growth within Bath, and across the district, particularly given the 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 to green infrastructure provision and protection of the World Heritage Sites, its setting, and other heritage assets also limit the ability to accommodate further PBSA. The council would be supportive in encouraging the universities to invest in appropriate PBSA opportunities outside of the city, and recognises that in order to achieve this better transport connections, more green/blue spaces, a better night-time economy and more cultural opportunities elsewhere are required.

5.42 Although it is appropriate to understand the overall student housing need arising from 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. Both universities are updating their future growth strategies, which will impact on student numbers, and required accommodation. The council continues to work with both universities to understand their projected growth plans and therefore, to ascertain more likely future growth in the number of students. This should then form the basis for considering options for providing additional student accommodation. As the universities are historically only able to provide forecasts for the next 5-10 years this element of future requirements and associated strategy will need to be kept under review.

Spatial Strategy for Bath

5.43 The spatial strategy for Bath recognises the different approaches that are required in different parts of the city, from the vibrancy of the city centre, to local neighbourhoods where many day-to-day needs are met, to our treasured and varied green and blue spaces that support health and wellbeing, and which are crucial for climate resilience, mitigation and nature recovery.

5.44 The strategy prioritises the delivery of general housing (especially affordable) and employment uses that help the transition from a low wage to a more productive economy. This priority is essential in a constrained city with a limited supply of land, and with healthy competition for the use of available sites.

City Centre

5.45 The local plan seeks to enable the key characteristics and diverse roles of the city centre to be enhanced, ensuring that it continues to perform as the cultural heart of the city, and the main destination for retail, entertainment, leisure, events and activities. The public realm plays a critical role as the canvas for public life, which needs to be enhanced and properly maintained for the benefit of all users.

5.46 There is a current city centre policy boundary which serves as an important planning tool that helps to prioritise the location of town centre uses. It is supported by a planning policy framework to ensure that the centre remains vibrant. A review of this boundary will be considered as part of the preparation of the Draft Plan.

5.47 The potential of existing unoccupied spaces above retail units and in other central locations needs to be brought forward as bringing people to the heart of city would have significant benefits and would help to meet housing and employment needs.

5.48 The priorities for the city centre are:

- **A visitor economy that works for the city** – capitalising on significant cultural investment in the city through emerging projects such as the Fashion Museum and the Assembly Rooms alongside existing investment in Bath Abbey, the Holburne and the Victoria Art Gallery to drive visitation whilst also exploring further how to make Bath one of the most sustainable tourism destinations in the world.
- **Affordable workspace** – repurposing of upper floors and proactive meanwhile use strategy to unlock space for a range of businesses.
- **More car-free, affordable housing options in the city centre** – including large sites, small windfall sites, and utilising vacant space on upper floors.
- **A pedestrian-oriented city centre** - supported by Bath's Movement Strategy
- **A comprehensive programme of transforming the public realm, making it more climate resilient, whilst providing a world class canvas for public life.**

Bath Riverside Innovation Quarter (BRIQ)

5.49 This area comprises a range of key development sites that are crucial to enable the city to deliver a more vibrant and successful economy. Through a partnership with the University of Bath, building on existing strengths around creative problem solving, engineering design and tech transfer, this area will evolve as a testbed of innovation and new ideas, a place for collaboration and discovery. New businesses will be born here, be nurtured and allowed to thrive and grow, and be supported by an ecosystem of research and development associated with the university sectors, and by more established businesses, small and large.

5.50 These sites will benefit from their close proximity to Bristol and from the frequent rail connections to London and beyond, and our international

reputation gives Bath global recognition for inward investment. The sites are readily accessible by sustainable means to the large residential workforce who live in a choice of locations such as Bath, Bristol, and nearby towns and villages.

Bath Production Quarter

5.51 This is a key industrial location comprising of the Locksbrook Road and Brassmill Lane areas and lying adjacent to the river in the west of the city. There is significant potential to intensify economic activity in this area and for it to play an important role in the provision of high quality jobs in a vibrant part of the city. Some of the city's larger businesses such as Rotork and Horstman operate from this area, as do an eclectic mix of smaller enterprises as well as Bath Spa University's exemplary Locksbrook Campus.

Neighbourhoods and Local Centres

5.52 Bath's networks of neighbourhoods and local centres provide for many of the day to day needs of the city's wide range of communities. They provide a network of nurseries and primary schools, local shops, services and opportunities for local employment, parks and open spaces, meeting places, festivals and events. The local plan can play a key role in shaping change in these areas, helping to protect those aspects that are valued and seeking to create the conditions to enable positive enhancements to take place in the form of development or in changes to the public realm and associated parks and open spaces.

5.53 The priorities for our neighbourhoods are:

- **Support real liveable neighbourhoods**, with accessible, diverse and thriving local centres, with health facilities and employment opportunities
- **Delivering opportunities in Bath's neighbourhoods** – enabling high quality, small scale residential development at appropriate densities. Development can bring investment to improve the public realm, amenities

and infrastructure, and support improved public transport and active travel routes.

Green and blue spaces infrastructure

5.54 The city's rich network of green and blue infrastructure is a hugely valuable resource that contributes significantly to the health and wellbeing of residents and visitors, and is crucial to climate resilience, mitigation and for nature recovery. A number of key projects such as Bath River Line and Bathscape have seen significant investment in the management and enhancement of accessible green open spaces, tree planting and the surrounding countryside – the green setting of the city is one of the six key attributes of the City of Bath World Heritage site.

Site Options

- 5.55 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.
- 5.56 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.
- 5.57 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 positive and enabling policy framework.
- 5.58 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.
- 5.59 In addition, there could be opportunities to explore potential for improvements to some of the existing housing areas in Foxhill and Twerton in Bath. Working with Curo, who manage much of the social housing stock in these areas, we will explore improving 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 better living conditions. This could also offer the opportunity to improve the quality of place and potentially 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.

5.60 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.

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

- Existing site allocations are proposed to be refreshed and refined to reflect updated priorities and to address the climate and nature emergencies.
- In the Options consultation that was undertaken in the spring of 2024, reference was made to the need to undertake a more fundamental review of the Newbridge Riverside policy area. This has now been undertaken as an important part of the evidence base to inform the future of this area. Called the Production Quarter Masterplan it seeks to continue to protect and enhance its important employment role, whilst optimising 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 or PBSA would be permitted.
- Other sites on the edge of or close to Bath:
 - A new site is proposed for employment purposes to the south west of the Odd Down Park and Ride, on the southern side of the A367.
 - Land to the West of Bath is also considered as a potential location for helping to meet the development needs of the city, and a range of options are proposed, including a new option that maximises the development potential of this area. Evidence shows that development here would cause substantial harm to the World Heritage Sites. It is included within this Local Plan Options Document to help ascertain whether substantial public benefits from strategic scale development can be identified that might outweigh this substantial harm and to facilitate continued engagement with government on growing the city.

- The council has assessed the potential of other smaller, non-strategic opportunities on the edge of the city and has identified the Bath Equestrian Centre at Weston as a potential development site. It is included in this document to test whether the need for and benefits of providing housing now outweigh the acknowledged harm to National Landscape (formerly AONB), the WHSs or the conservation area. Other potential opportunities assessed are not identified as options in this document because the significant degree of harm, primarily to the WHS or Cotswolds National Landscape, is considered to outweigh the limited public benefits of development.
- Sulis Club – this site is owned by the University of Bath. An option to consider removing the site from the Green Belt, subject to demonstration of exceptional circumstances, to facilitate development for PBSA and other university related uses is presented.
- A potential development location south of Burnett on the A39 was included in the previous consultation for further exploration and to establish whether this has potential as a longer term location for growth. This concept generated a significant response from the public consultation and this has helped to inform a review of the process for identifying new settlements. New settlements will not form part of this local plan as it cannot be demonstrated that they will deliver housing and other development to meet needs during this plan period. However, one or more new settlements may form part of a longer-term strategy for development. The council is therefore consulting on a 'New Settlement Methodology' to assist in identifying areas for future growth and it is within this context that areas such as 'south of Burnett' may be reconsidered in the future.

Site Allocations

5.62 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. Please note that hyperlinks are embedded into the headings of each site allocation in the Bath section. Please click on these to see the existing site allocation policies for reference.

5.63 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 wellbeing.

5.64 In accordance with the National Planning Policy Framework (NPPF) 'the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve'. This contextual approach reflects the existing planning policy framework in Bath, where a set of '[Design Values](#)' has been 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.

5.65 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. This aims 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.

5.66 The new site options towards the end of this section have been evaluated using the Department for Transport's Connectivity Tool, which integrates transport and land use data to produce a national measure of connectivity for any location in England and Wales. This tool assigns each location a grade from A to J, where A indicates the highest level of connectivity within Bath and North East Somerset, and J the lowest. The assessment is based on the current sustainable transport network and existing land uses such as schools and shops, and does not take into account planned or future improvements. The grading from A to J is not an overall ranking of site options and in deciding which sites are allocated in the Draft Local Plan other sustainability criteria and deliverability factors will also be considered.

Milsom Quarter:

5.67 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

5.68 Acknowledging that there is a live planning application for a new stadium on this site that is still being considered, the council has previously committed to review this site allocation, particularly in relation to the development of a new stadium. 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

5.69 This 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

5.70 The redevelopment of this site is one of the council's flagship regeneration projects and is a key part of the Bath Riverside Innovation Quarter (BRIQ), a wider area along the river corridor that will be transformed into the city's main business location to help to redefine the city's economic profile.

5.71 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.

5.72 The council has been working with the University of Bath on formulating proposals for the redevelopment of this site. The approach is to continue to meet the existing core policy requirements for this site and assist the university in its transition towards greater investment in enterprise, research and innovation. Delivery of this site is dependent on securing an anchor tenant and this is seen as the catalyst for further investment on adjacent sites, and a revival of Bath's economic performance.

5.73 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 be unacceptable as this will impede the delivery of other council objectives.

Options

Two options in respect of this site are presented below:

- a) 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.
- b) 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 the 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 Update (May, 2025) recommends around 74,000 – 79,000 sqm new office and research and development space should be delivered in the city throughout the plan period (in addition to that already 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 important objective.

South Quays and Riverside Court

5.74 This is a key development site which 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.

5.75 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

5.76 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? Perhaps keep as is? Sufficient flexibility or options are provided.

Green Park Station West & Sydenham Park

5.77 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.

5.78 The existing site allocation acknowledged that this area is complex and had uncertainty in terms of delivery. It rightly 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. It stated that to avoid the delivery of sub-optimal outcomes that do not deliver the wider opportunities in the area, it was crucial for the local plan to provide the urban design framework within which these individual developments could be delivered. This framework was 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. It is proposed to review and update this framework to enable development to be delivered that better meets our objectives, and to consider whether creating separate site allocations that better reflect land ownership parcels is a more pragmatic response.

5.79 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 the scheme was not progressed beyond this. There is a current planning application for the same site which has yet to be determined. This is proposing to provide a mixed use development, which principally includes residential build to rent dwellings and shared living accommodation.

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

5.80 This large and important site has been delivering new homes for the city for the past fifteen years. It comprises 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. The most recent consent which covers the former gasworks site is now under construction and is anticipated to be completed. 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.

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

5.82 No change proposed to the existing policy.

Bath Press

5.83 This site is finally under construction and subject to this being completed , it is proposed to delete the existing site allocation.

Roseberry Place

5.84 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 those working in the local economy, and not PBSA.

Westmark Site, Windsor Bridge Road

5.85 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.

5.86 Based on the 'Future Economic Needs Assessment Update' 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.

Stable Yard Industrial Estate

5.87 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.

The Production Quarter

5.88 This location comprises the Locksbrook Road and Brassmill Lane industrial areas and is currently referred to as Newbridge Riverside in the adopted Local Plan. It 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, which relates primarily to the creative arts sector. See below for updated reference to Weston Island, which is now anticipated to continue to be used by First Bus who are expected to invest in the electrification of their fleet and of the island (which they own).

5.89 In the Options consultation that was undertaken in the spring of 2024, reference was made to the need to undertake a more fundamental review of the Newbridge Riverside policy area. This has now been completed and forms an important part of the evidence base to inform the future of this area. The 'Production Quarter Masterplan' involved many conversations with the existing businesses in the area and it seeks to continue to protect the important employment role of the area, whilst identifying opportunities to optimise the potential development capacity and deliver environmental enhancements.

5.90 The Production Quarter Masterplan identifies that there is significant scope to reimagine the economic role of this area and to intensify development opportunities benefitting the city's economy and contributing towards wider ambitions in the Local Growth Plan, as well as ongoing work on the Bristol to Bath Growth Zone, a key component of WECA's Growth Strategy. The Masterplan seeks to respond to 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 reimaged. 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.

5.91 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.

5.92 The existing floorspace in the Production Quarter Masterplan area is approximately 50,000 sqm. Subject to existing sites being available for redevelopment, there is a theoretical potential to double this total floorspace to around 100,000 sqm. The ability to achieve this scale of change will require public sector intervention and collaboration with interested parties, as well as significant investment.

Note: This is a theoretical exercise providing initial estimates of potential capacity of sites throughout the Production Quarter. Landowners or businesses within the area have not been consulted specifically on this capacity assessment and much more analysis will be required. The GIA (gross internal areas) have been calculated by measuring the approximate GEA (gross external areas) achievable within the site and a notional 20% reduction assumed.

Options

- Intensify the development potential of this area, in terms of capacity, and promote the location for a wide range of businesses within the industrial, advanced engineering (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 as they will undermine the employment led objectives, i.e. residential (including co-living and PBSA), and more academic teaching space.
- Within a clearly defined landscape and ecological framework and infrastructure plan should the site allocation have a consistent approach across the whole of the 'Production Quarter' area 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 Horstman, Bath Spa University, the Locksbrook Creative Industry Hub, various operations including trade counters.
 - **Central area:** adjacent to Weston Island and comprising of a finer grain of mixed uses including smaller scale employment units, residential and food and beverage outlets.
 - **Brassmill Lane:** A mix of industrial type uses and trade counters including the Maltings trading estate, larger employers and manufacturers such as Rotork and Roper Rhodes.

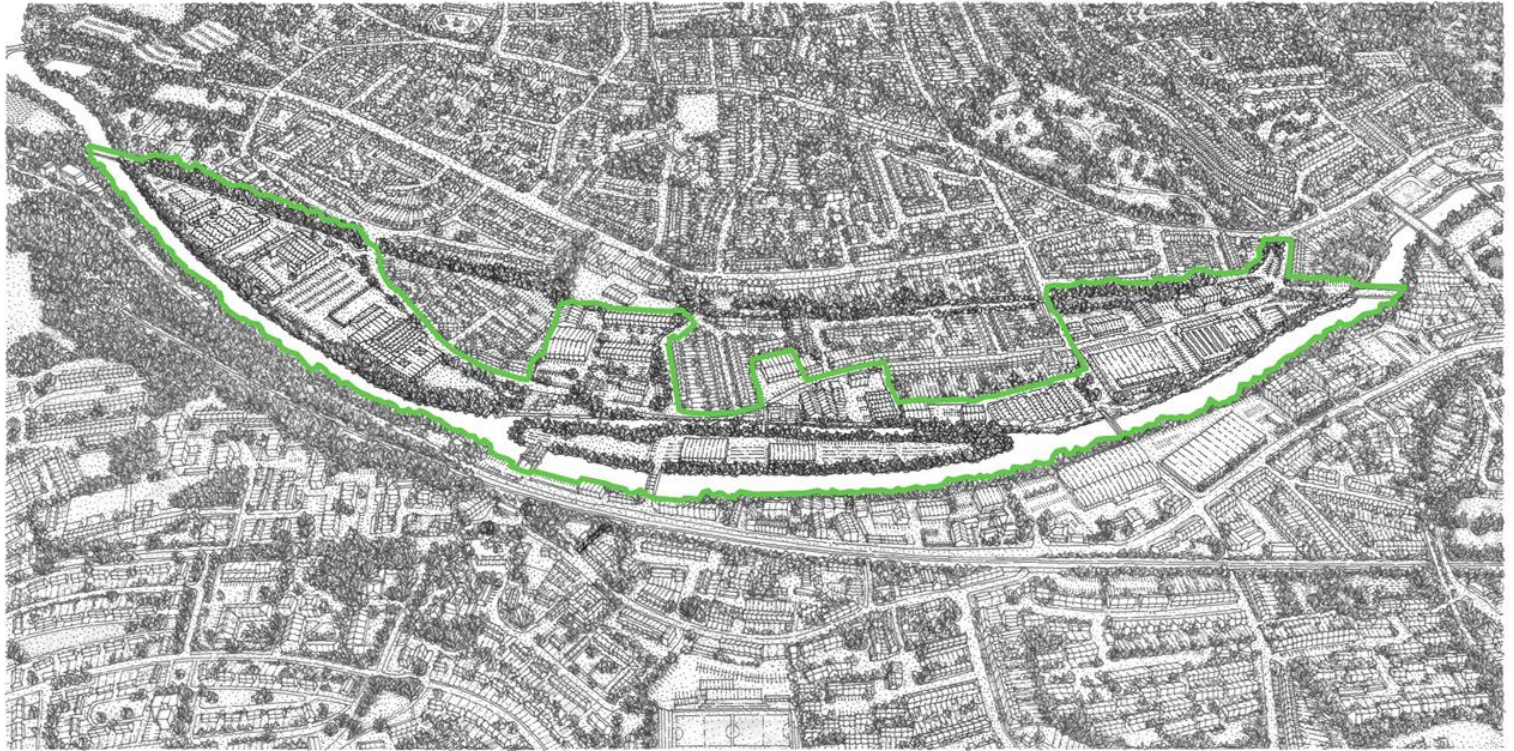


Figure 3: The Production Quarter Area

Weston Island

5.93 First Bus have emerging plans to electrify their Weston Island depot to allow for the ongoing electrification of their fleet. This significant investment is very much welcomed by the council as it contributes to the council's net zero ambitions and results in state of the art electric buses, improved air quality and significant reductions in carbon emissions.

5.94 This investment is a clear indication that First Bus are very unlikely to vacate Weston Island within this plan period. And the implication of this is that Weston Island is not going to be available for other uses that had previously been considered for this site.

5.95 However, given that the proposed electrification works are contained within the eastern half of the sites, there is, subject to agreement from the landowner, a potential opportunity for other uses to be introduced on the western half the site.

5.96 As per Evidence from the Future Economic Needs Assessment Review (May, 2025) , there are sound planning reasons to retain an industrial focus for this portion of the site. It is also in Flood Zone 3 which precludes residential and other vulnerable uses.

5.97 Notwithstanding the evidence to retain this portion of the site for industrial purposes, there is an aspiration from Bath Art Depot (BAD) to be located onto the site.

5.98 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. This will need to be explored further in preparing the Draft Local Plan.

5.99 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.

5.100 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, if any employment led development were to come forward on the western portion of the site, or indeed any proposals from Bath Spa University as part of the Locksbrook Creativity Hub concept and/or from Bath Art Depot, there would be a requirement that development provide a positive frontage to this route to help to animate and overlook this new link.

Options

The western portion of the site is to be protected for industrial uses in line with the Production Quarter area as outlined above.

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

Twerton Park

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

5.102 No change is proposed to the existing policy.

Royal United Hospital (RUH), Weston

5.103 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.

5.104 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.

5.105 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.

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

[Click to comment](#)

Hartwells Garage

5.107 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. Delivery has been delayed but is understood to still be progressing.

5.108 No change proposed to the existing policy.

[Click to comment](#)

Sion Hill

5.109 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.

5.110 No change proposed to the existing policy.

[Click to comment](#)

St Martins

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

5.112 No change proposed to the existing policy.

[Click to comment](#)

Sulis Down

5.113 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 Cotswolds National Landscape, the World Heritage Sites and its setting, as well as important heritage assets such as the Wansdyke. Phase 1 of the allocation is nearing completion and there was a recent appeal into the planning application for the comprehensive masterplan and for phases 3 and 4 that would have provided substantially more development than set out in the site allocation in the adopted Core Strategy. This appeal was dismissed on the following concluding grounds:

127 The proposed development would provide benefits that carry substantial weight in terms of the delivery of housing, including affordable housing. There would also be a range of other benefits that carry moderate and limited weight. Conversely, I (the Inspector) have afforded substantial weight to the adverse effects on the CNL [Cotswolds National Landscape] and the conflict with CS Policy B3a and other local and national policies relating to National Landscapes. The harm to heritage assets carries moderate weight and the conflict with policies relating to mixed use development carries limited weight.

128. On balance, given that CS Policy B3a limits development within the site allocation to around 300 dwellings unless all the placemaking principles can be met, which is not the case here, my conclusion is that the adverse effects outweigh the benefits. The proposed development would be contrary to the development plan taken as a whole, and there are no material considerations to indicate that planning permission should otherwise be granted.

5.114 It is a very sensitive development site and given that the evidence relating to harm has not changed and being mindful of the recent appeal Inspector's conclusions, it is not proposed to amend this site allocation.

5.115 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.

Burlington Street

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

5.117 No change proposed to the existing policy.

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University of Bath

5.118 The policy framework for the University of Bath was subject to significant review as part of the Local Plan Partial Update. It was informed by a new Masterplan that provided a vision of the future for the Claverton Campus, enabling the delivery of the development and infrastructure required to address the needs and expectations of its students and staff, and to facilitate the university's sustainable growth in a manner that also enhances the unique beauty and environmental quality of the campus.

5.119 Whilst the existing policy is robust there could be the possibility of exploring whether more PBSA could be provided on campus to help facilitate growth in student numbers without impacting further on the city. This could only be achieved through the review of current car parking provision or through intensifying existing developed areas of the campus (without increasing heights or creating other adverse impacts).

[Click to comment](#)

Sulis Club

- 5.120 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.
- 5.121 The current adopted 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 (now National Landscapes) and Green Belt, as well as the World Heritage Site and its setting and Outstanding Universal Values. For the Sulis Club the adopted policy SB19 enables the appropriate redevelopment of previously developed land, within the parameters set by the NPPF. Through this options document consideration needs to be given as to whether the Sulis Club site should be removed from the Green Belt (subject to demonstrating exceptional circumstances) in order to facilitate development primarily for PBSA.

Options

- No change to current policy SB19.
- Remove the Sulis Club from the Green Belt (subject to demonstrating exceptional circumstances) and allocating it for the development of PBSA/other university uses. Evidence through the LHNA and ongoing conversations with the University of Bath demonstrate the ongoing need for additional PBSA (both to accommodate future growth in student numbers and potentially to reduce pressure for the creation of new HMOs in the city). This option is subject to further evidence and an assessment of whether the potential development is compatible with the National Landscape designation, the requirement to protect the Outstanding Universal Value of the WHSs, the need to strengthen the important well-treed skyline, and respond to the importance of this area for bats.



Figure 4Sulis Club

[Click to comment](#)

Odd Down – land to the south west of the Park & Ride

- 5.122 This area is located to the south west of the existing Park and Ride, and to the south east of the A367. It is within the Green Belt, within the indicative setting of the World Heritage Sites outside but adjacent to the boundary of the Cotswolds National Landscape, and part of the area is a Site of Nature Conservation Interest. In addition, there are known to be small blue butterflies in the area. It is less than 2 km from the Bath & Bradford on Avon Bats Special Area of Conservation (SAC) designated in part due to its internationally important populations of Horseshoe and Bechstein bats. The area is likely to contain key commuting and foraging/feeding habitats for the bat populations of the SAC.
- 5.123 This area is proposed as an option for development for the first time in this local plan and two different sized site options are proposed and both are identified as potential employment sites. This will assist in serving the city, enabling the regeneration of more central sites, and help to meet evidenced need. Employment uses in this location are on the same corridor as the successful Bath Business Park at Peasedown St John, where options for its extension are set out in chapter 7 as part of the wider strategy for addressing the need for more employment uses.
- 5.124 The land to the north west of the A367 is not proposed to be allocated as evidence indicates that development in this location would be likely to result in substantial harm to the World Heritage Sites and other heritage issues and would result in moderate to high landscape sensitivity. In addition, there are understood to be geological and land stability concerns about development in this area.
- 5.125 Option 1 excludes the existing Bath Waste Recycling business and Option 2 includes it. There has not been any discussion about this potential allocation with the existing business and discussions will need to take place as part of the public consultation. It is not envisaged that the potential allocation would have any direct impact on their current operations.

5.126 A site allocation would provide a clear policy framework that would allow further employment uses to come forward in this area, subject to a set of development requirements and design principles. These are yet to be drafted but they would seek to ensure that any development proposals are responsive to the sensitive context of the site and protect valued assets.

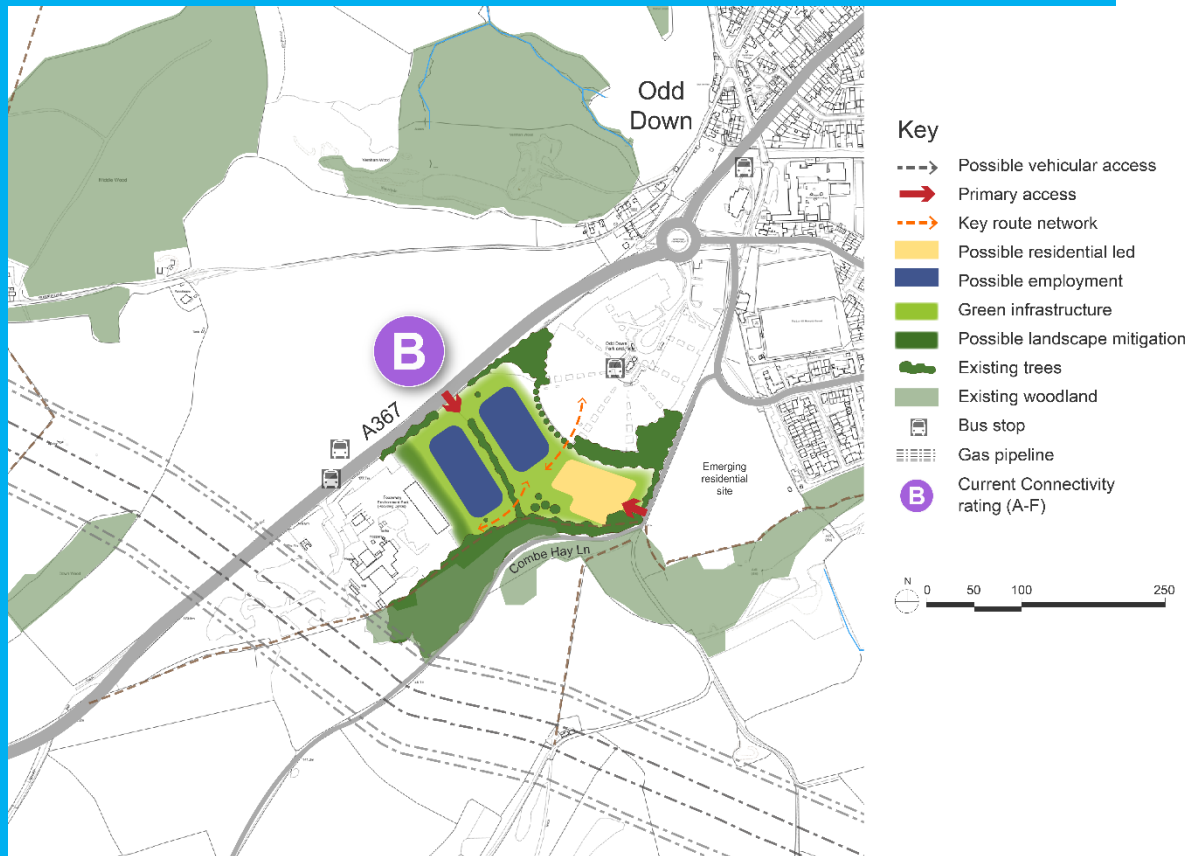


Figure 5: Odd Down Option 1

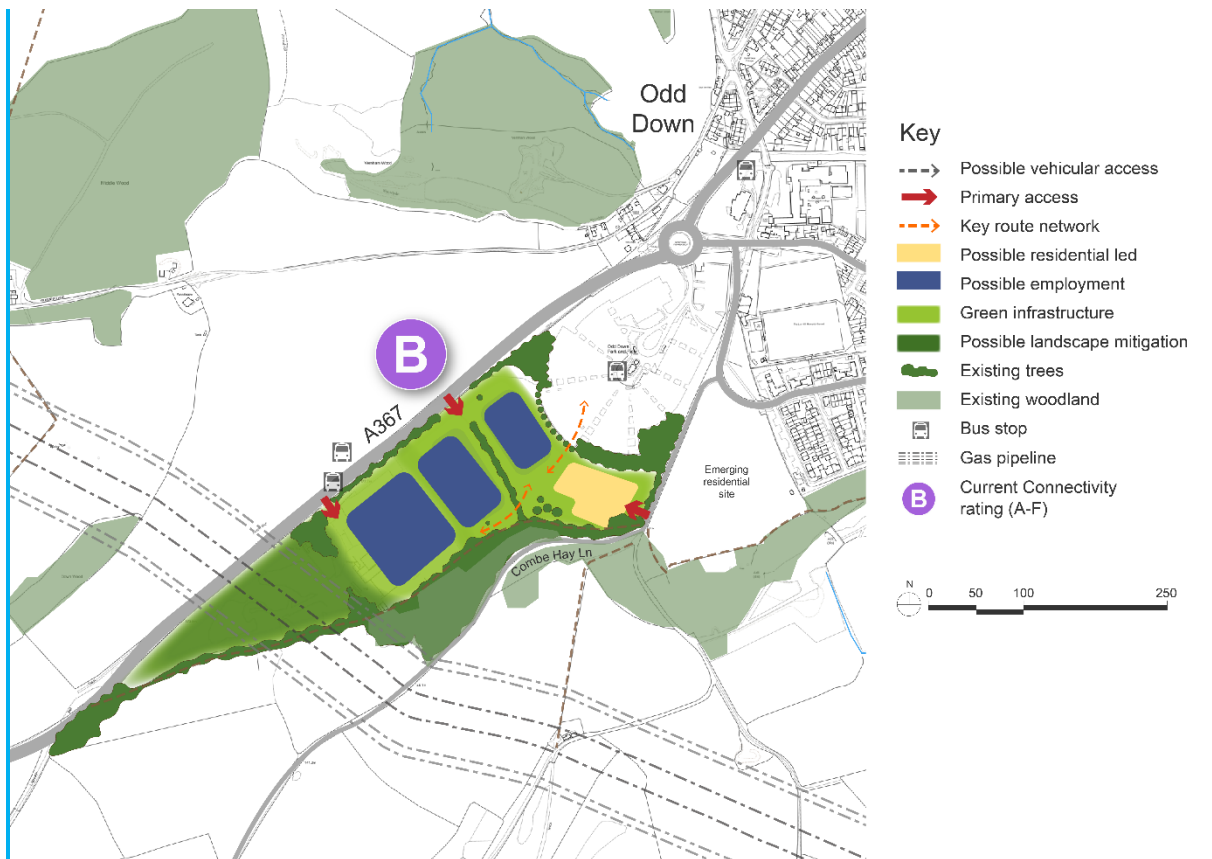


Figure 6: Odd Down Option 2

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Bath Spa University at Newton Park

5.127 Bath Spa's Newton Park Campus sits within a sensitive historic context including in the core of a registered (Grade II*) historic parkland 'of outstanding interest' which includes a Scheduled Monument (St Loe's Castle), three Grade I listed buildings (The Manor House, Castle, and Castle Gatehouse); one Grade II* listed building (the Stables); and one Grade II listed building (the Dairy). The walls to the Italian Garden are also listed (Grade II*). The wider parkland beyond the campus also contains part of the Wansdyke Scheduled Monument and other listed buildings.

5.128 The campus lies in the Green Belt where development potential is constrained i.e. national policy makes it clear that development is inappropriate unless it is either complete or partial redevelopment or limited infilling as long as it doesn't have a greater impact on openness than the existing development

5.129 Ecologically the campus hosts a number of lesser horseshoe bat roosts, which forage in the surrounding parkland. Both the campus and the parkland in which it sits are within the Green Belt.

5.130 No material changes are proposed to the existing policy, however it will need to be reviewed and updated to reflect the latest terminology and correct references in the NPPF.

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West of Bath

- 5.131 One of the locational options that is being considered to help address the development needs of Bath is land to the west of the city. This area has 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.
- 5.132 Development should be exemplary with regards to its sustainability and quality, with an efficient use of land, and excellent connections to public transport and active travel which complement the council's aspirations for high quality placemaking. It would be of higher density, include a broad mix of residential tenures, with supporting social infrastructure and access to natural green and blue spaces.
- 5.133 Development would deliver public benefits and help to address objectively assessed housing and other economic needs, but this has to be weighed against the substantial harm that all the options will cause to the World Heritage Sites and impacts on the setting of the Cotswolds National Landscape. To progress development through the Draft Local Plan we would need to demonstrate that the public benefits outweigh the substantial harm.
- 5.134 Option 1 offers a potential development capacity of between 850 to 1,150 dwellings and the proposal seeks to achieve partial mitigation in relation to the impacts on the Cotswolds National Landscape.



Figure 7: West of Bath Option 1

5.135 Option 2 provides for a range of about 1,100 to 1,450 homes and would cause greater harm to the setting of the Cotswolds National Landscape than option 1. This scale of development presents the opportunity to provide more social infrastructure such as a primary school and a local shop, which could also benefit the neighbouring communities of Newton St Loe and Corston.



Figure 8: West of Bath Option 2

5.136 Option 3 optimises the development opportunities within the area, whilst avoiding flood zones and causes greater harm to the setting of the Cotswold National Landscape than options 1 or 2.

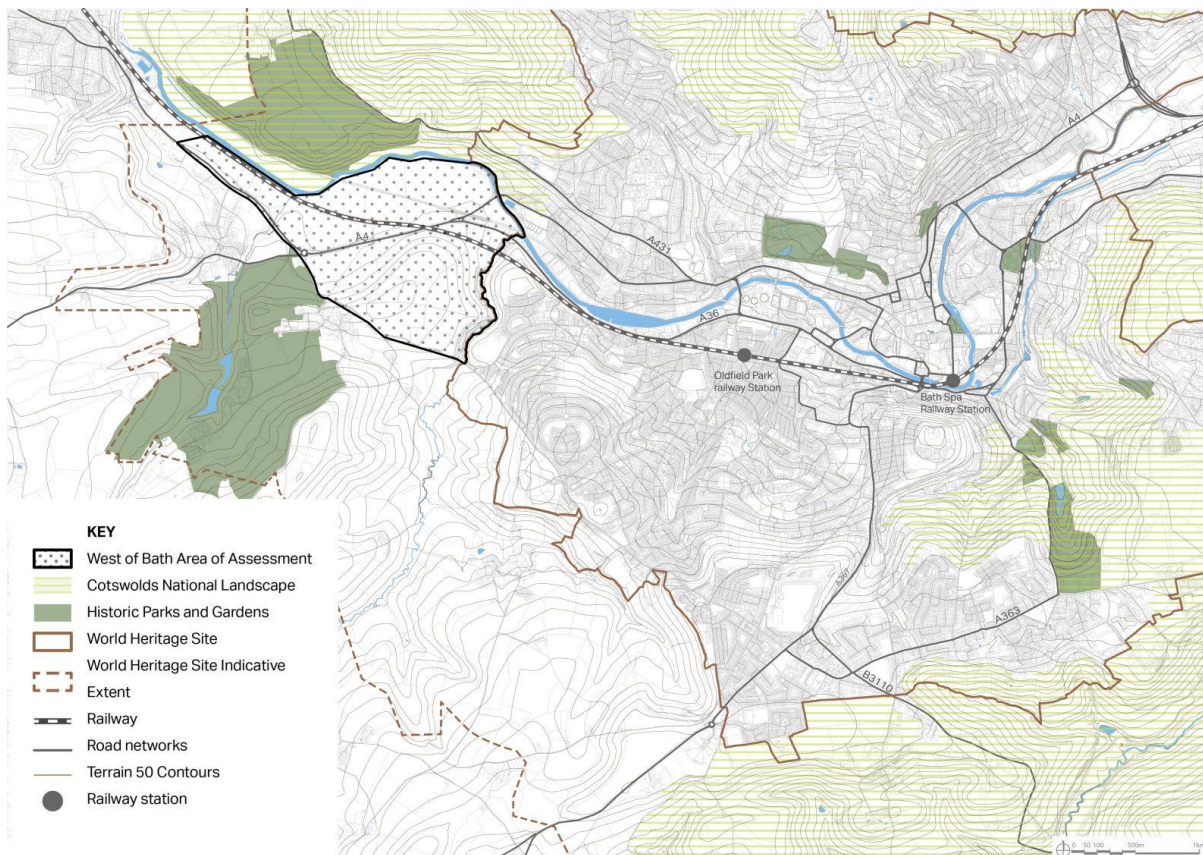
5.137 The benefits of this option are that it could deliver a thriving mixed use community on the western edge of Bath, with a range of around 1,500 to 1,950 homes, a healthy proportion of which would be affordable to help address our pressing housing needs, a new school, and a vibrant district centre. There would be an opportunity for the development of a significant amount of employment floorspace adjacent to the A4 providing a wide range of jobs in innovative sectors. It would be an exemplary development, befitting its sensitive location, with integrated green infrastructure and places for people and nature. It will be connected into Bath and the wider region with high quality public transport and active travel routes.



Figure 9: West of Bath Option 3 – Max development, mixed use, avoiding flood zones

5.138 Whilst development to the West of Bath would have public benefits particularly in terms of providing needed housing and additional employment space, a [Landscape and Historic Environment assessment](#) of a range of development typologies in land to the west and south of Bath has been

undertaken. The assessment says development is likely to cause substantial harm to the World Heritage Sites (particularly to the attribute of the 'green setting of the city in the hollow in the hills') and that this harm cannot be satisfactorily mitigated. It would also cause harm to the setting of the Cotswolds National Landscape.



Map 11: Map showing West of Bath area from the assessment into potential impacts of development

5.139 The NPPF makes it clear that substantial harm to the WHSs 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.

5.140 Given the technical assessment undertaken and the national policy context it is clear that development West of Bath would face a very high bar and would need to demonstrate substantial public benefits to be included in

the Draft Local Plan. Further work will be necessary on the form development might take and to identify the public benefits and harms. This site is included within this Local Plan Options Document to test and ascertain whether public benefits can be identified that would outweigh the harm.

Green Belt

5.1 In addition to identifying whether substantial public benefit of development would outweigh 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 within the context of revised national policy. In order to allocate land in this location for development it would need to be removed from the Green Belt. Exceptional circumstances would need to be demonstrated 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.

5.2 In order to consider harm to the Green Belt a Stage 1 Assessment needs to be undertaken to understand the contribution of land parcels to the nationally defined Green Belt purposes. This would then be followed by a Stage 2 assessment to identify impacts of development on the Green Belt in this location greater detail. A Stage 1 Strategic Green Belt Assessment is being undertaken by West of England Mayoral Combined Authority (WECAWECA) and the constituent authorities to assess contribution of land parcels to the national Green Belt purposes and to give a provisional indication of land that might meet the definition of 'grey belt'. This is relevant as the revised NPPF makes it clear that land defined as 'grey belt' should be considered for release for development, before other greenfield areas of Green Belt. The Strategic Green Belt assessment work will inform the Draft Local Plan.

Corston

5.3 It should also be noted that if the West of Bath site were to come forward for development and including a primary school then this could open up the potential to consider Corston as a location for further housing led development. At present the village does not benefit from a primary school so an option for development in this location is not currently presented.

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Bath Equestrian Centre

The council has assessed the potential of smaller, non-strategic opportunities on the edge of the city and has identified the Bath Equestrian Centre, located to the north of Weston, as a potential development site with a capacity range of about 50 to 65 homes.

This option is subject to further evidence and an assessment of whether potential development is compatible with the National Landscape designation, the requirement to protect the OUV of the WHSs, and the requirement to preserve or enhance the character or appearance of the conservation area. It is included in this document to test whether the need for and benefits of providing housing now outweigh the acknowledged harm to these important assets. This is consistent with our approach to the West of Bath and for other areas.

Should this site allocation proceed into the Draft Local Plan, it would need to be subject to a set of clear development requirements and design principles that would ensure that any development proposals are responsive to the highly sensitive context of the site and protect valued assets.



Figure 10: Bath Equestrian Centre

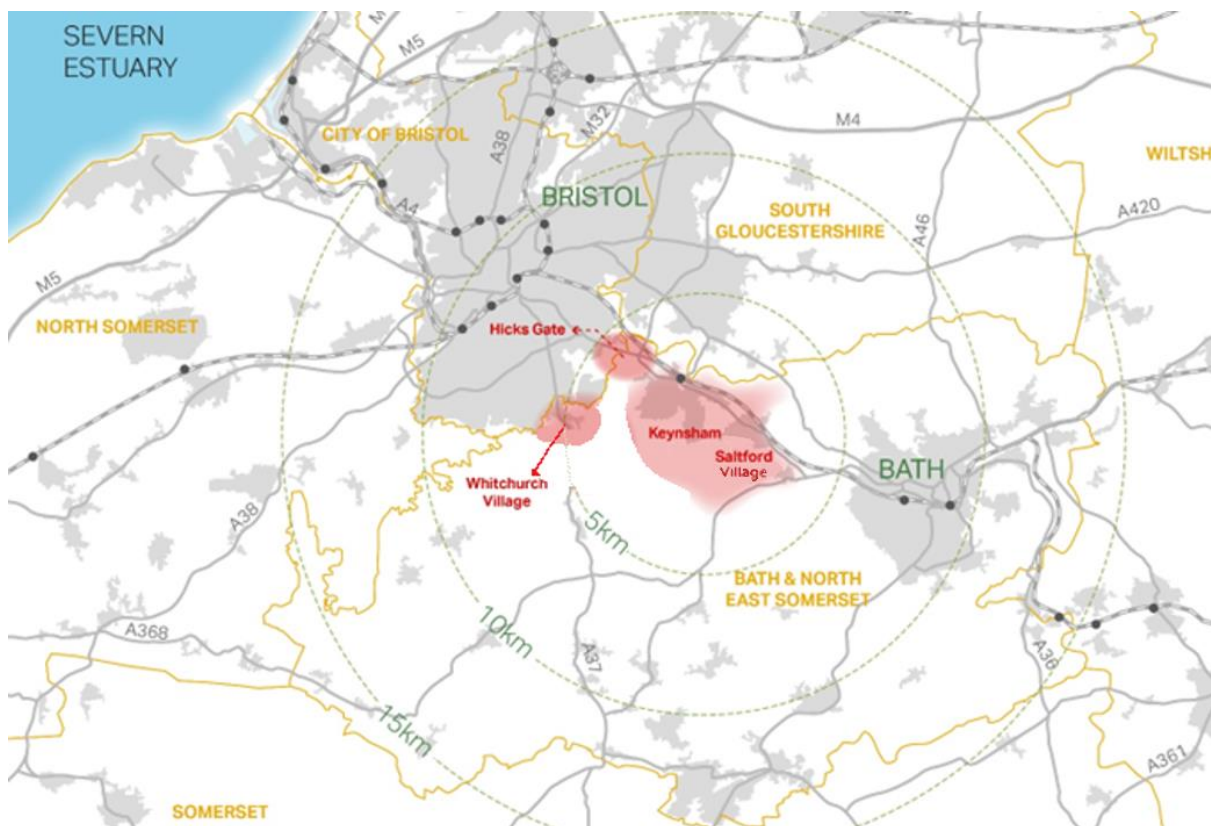
6 Bristol to Bath corridor

Strategy Overview

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

- Keynsham
- Saltford Village
- 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.



Map 12: Map showing location of area described as Bath to Bristol corridor and south east edge of Bristol

West of England Growth Strategy

6.3 B&NES Council has worked with the West of England Mayoral Combined Authority (WECA) to prepare a Growth Strategy for the West of England. This document sets out the overarching context for investment and development to support economic prosperity for our region as a whole. The Strategy envisages growth driven by an interconnected set of regional Growth Zones, where investment will bring new businesses, jobs, homes, culture, nature and opportunity. Central Bristol & Bath, together with the river corridor that connects us, and the Somer Valley are recognised in the Strategy as the two growth zones within B&NES. This will be enabled by ambitious plans to transform our transport network, set out in the regional Transport Vision.

6.4 Encompassing the urban core of our region, the Central Bristol & Bath growth zone has three distinct areas with strong investment potential:

- Central Bristol
- Bristol to Bath Corridor
- Bath City Centre

6.5 While each investment opportunity is distinct, cumulatively they will play a crucial role in transforming our region, delivering a significant proportion of the economic growth and development that will shape a bright future for our cities.

The Bristol to Bath Corridor investment opportunity

6.6 Bath and Bristol are currently two separate and distinct economic areas, and yet they are only 15 minutes apart by rail. If these economies were combined, they would become the 7th largest in England. The Corridor between these two thriving centres provides opportunities for us to better join the economies of our two cities. It will have exceptional connectivity by public transport and active travel (walking, cycling and wheeling) into Bath, Bristol and beyond, offering sustainable and affordable access to work, education and recreation for both new and existing communities.

6.7 The Bristol to Bath Corridor offers an opportunity to do things differently, building a network of connected communities within the valley landscape. The River Avon valley and its tributaries provide the environmental capital for a new way of living and can drive forward a thriving nature-positive optimum density place.

- 6.8 Exemplary net zero and landscape-led sustainable housing developments and vibrant local businesses will create the standard for climate resilient placemaking and design. This will increase industrial and commercial capacity, job opportunities, and new homes of all types and tenures, including genuinely affordable homes. It will be unlocked through a well-connected, sustainable multi-modal transport corridor that offers a range of realistic transport choices and promotes active travel modes.
- 6.9 As a council, we are clear that growth and development need to deliver a better quality of life for our residents, now and in the future. The scale of development envisaged by the targets set for us to deliver new homes and employment space presents a challenge – but also an opportunity to tackle housing affordability and to bring new investment for local communities, supporting infrastructure, services and green spaces. Our local plan will set the spatial framework for development, whilst the proposed Movement Strategy will help ensure that a growing population is able to more easily get into and circulate around our principal City of Bath.
- 6.10 We will work with communities through our autumn programme of consultation and engagement to shape our shared vision for the district and for our individual communities – in Bath, Keynsham, Saltford Village, Whitchurch Village, the Somer Valley and our wider Rural Areas. These shared place-shaping visions will inform not only where development takes place, but how we will invest and deliver services to ensure that our communities thrive.

Transport

- 6.11 The A4 corridor between Bristol and Bath, together with the A37 through Whitchurch Village, are characterised by persistent transport challenges, most notably congestion at key junctions where peak-hour traffic volumes frequently exceed capacity and lead to unreliable journey times and impacts air quality.
- 6.12 In Keynsham for example, the A4 acts as a barrier to north-south movement for pedestrians and cyclists, with limited safe crossing points and fragmented active travel infrastructure. Congestion on the main routes also results in through traffic diverting onto residential streets, impacting local communities. While bus services along both corridors are frequent, their reliability is undermined by the absence of bus priority measures, making them susceptible to delays. Additionally, clusters of road traffic collisions at major junctions highlight ongoing safety concerns for all road users.

Green Belt

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

- 6.14 Delivering future growth along the A4/rail 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 both on an individual basis, including identification of potential areas of grey belt land reflecting updated national policy, and also cumulatively across the whole area, such that the five Green Belt purposes are not 'fundamentally undermined' when considered across the area of the plan.
- 6.15 As outlined in Chapter 4, the West of England Mayoral Combined Authority (WECA) with the constituent authorities has commenced Stage 1 of a Strategic Green Belt Assessment that takes into account the updated NPPF 2024 and Green Belt Planning Practice Guidance published in 2025, including regarding the provisional identification of grey belt land. The assessment work is ongoing and will inform the Draft Local Plan. It is likely that following the Strategic Green Belt Assessment a more detailed (stage 2) assessment of the impact of development on more specific areas of the Green Belt will also be required, including consideration of whether the 'golden rules' are met, including providing new or improved publicly accessible green space.

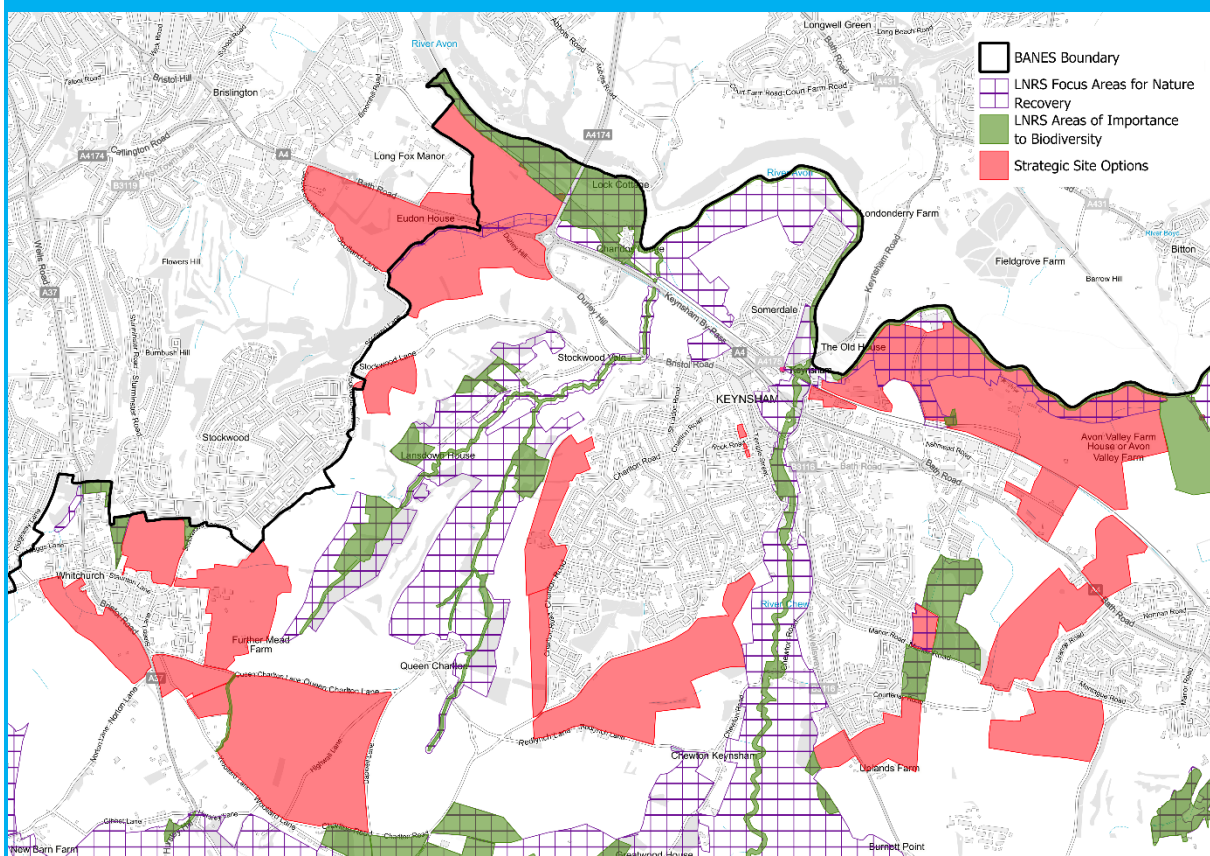
Green Infrastructure

- 6.16 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.
- 6.17 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 are indicative areas where the council consider that green infrastructure could be provided or improved to meet Natural England Green Infrastructure standards, and which may also offer nature-based solutions to address issues such as flooding and nature recovery. Work is ongoing to explore optimum locations. 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.
- 6.18 The West of England Local Nature Recovery Strategy and Toolkit (LNRS) was published in November 2024. The LNRS identifies the following areas:

Areas that are already of importance to biodiversity. These are sites that are nationally designated for their value to nature (Sites of Special Scientific Interest, Special Areas of Conservation and Special Protection Areas); are designated as Local Nature Reserves; are locally designated as 'Sites of Nature Conservation Interest' (SNCIs); and/or are irreplaceable habitat including ancient woodland.

Focus Areas for Nature Recovery. This is where action to recover nature will have the biggest impact and is most feasible. These have been mapped to reflect the priorities for nature recovery, and include all of the mapped measures for nature recovery. The focus areas for nature recovery are referred to as 'areas that could become of particular importance' in regulation.

6.19 Map 12 below shows where these areas are located in the Bristol to Bath Corridor, and the relationship between these areas and the Site Options under consideration in this Options consultation. Constraints and opportunities are referenced for each Site Option where appropriate.



Map 13: Local Nature Recovery Strategy Areas and Strategic Site Options in the Bath to Bristol Corridor

Flood Risk

- 6.20 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.
- 6.21 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.
- 6.22 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 Sustainable Urban Drainage Systems (SuDS) could be beneficial.

Duty to co-operate

- 6.23 Bristol City Council and South Gloucestershire Council administrative areas are located directly to the north and west 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.

Keynsham

Place Profile

- 6.24 Keynsham lies in a strategic location on the A4 corridor between Bath and Bristol. It is linked to the two cities by the A4, and also linked by the railway. Sustrans National Cycle Network (NCN) Route 4 links east Bristol with Bath, passing reasonably close to the north of Keynsham.
- 6.25 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.
- 6.26 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.

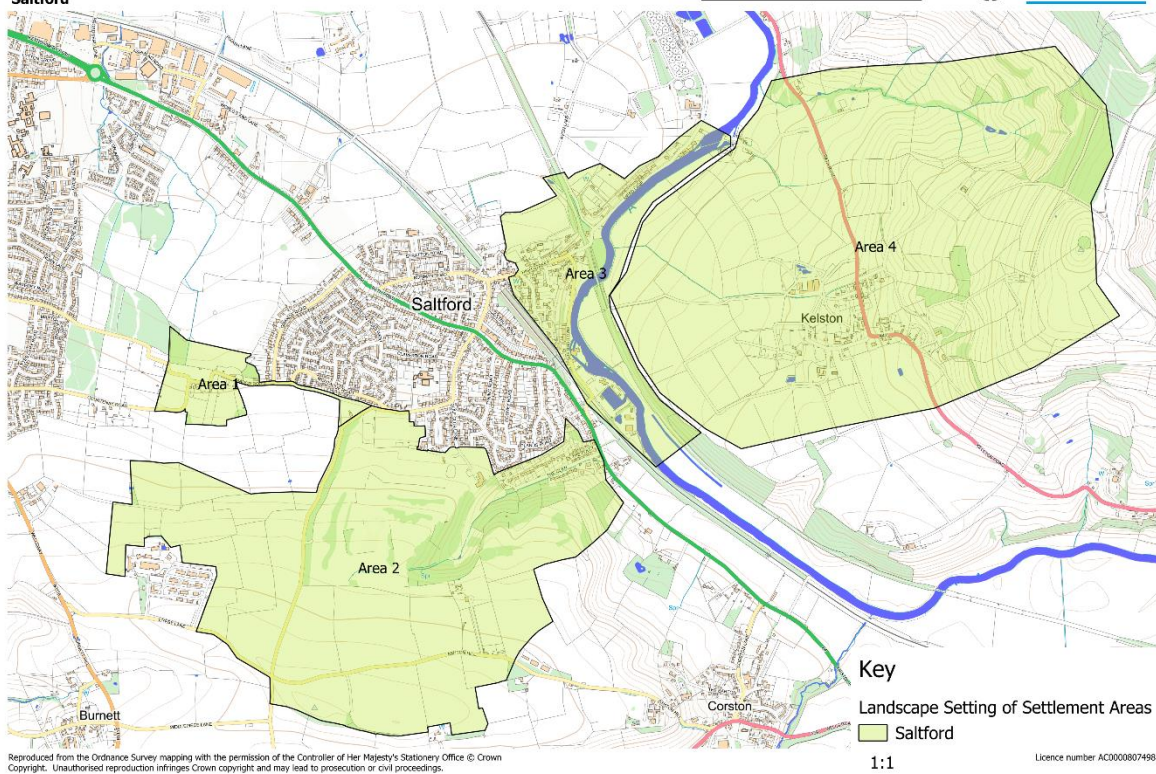
- 6.27 The River Chew provides an important landscape, wildlife and recreational corridor running through the heart of the town, providing potential to connect residents with the wider countryside, particularly through the valley, down to Chew Valley Lake, and beyond. Keynsham sits within the Chew Valley 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.
- 6.28 In Keynsham there is an imbalance of transport modes in the town centre with greater priority given to vehicles over active travel (walking, cycling and wheeling) modes. 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 Village 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.
- 6.29 The principal roads that serve Keynsham, and also Saltford Village, 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.
- 6.30 Keynsham is surrounded by the Bristol and Bath Green Belt, which separates the two settlements.
- 6.31 A local designation in the adopted Local Plan relating to the Landscape Setting of Settlements wraps around much of Keynsham. 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.
- 6.32 In the 2024 Options consultation the council sought comments on the extent of the existing designation and whether the boundaries of any existing landscape settings of settlements identified on the Policies Map should be amended. Since the 2024 Options consultation the council has committed to undertaking a review of the landscape setting of towns and villages across the district where Policy NE2A applies (see Chapter 9 for further discussion). At the time of this Options Reset consultation the landscape setting review remains in progress and will be progressed in time to inform the Draft Plan consultation in 2026.

Saltford Village

Place Profile

- 6.33 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.
- 6.34 Saltford Village occupies a strategic location on the A4 corridor between Bath and Bristol. Sustrans National Cycle Network (NCN) Route 4 links east Bristol with Bath, passing closely to the north and east of Saltford Village. There is a good frequency of bus services operating along the A4 to the centres of Bath and Bristol.
- 6.35 The principal road that serves Saltford Village is the A4. During the traditional weekday highway peak hours, there is congestion typically along the A4.
- 6.36 6.29 There is an aspiration amongst the local community and the council to reinstate a railway station at Saltford, and feasibility work is ongoing with WECA, GWR and the Department for Transport (DfT) investigating location options for the station, costing and deliverability. At this stage two broad areas are being considered along the railway alignment, to the south east (nearer where the previous Saltford station was located before it closed in 1970), and to the north west of the village.
- 6.37 Saltford Village is surrounded by the Bristol and Bath Green Belt. 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.
- 6.38 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 Village. 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. In the 2024 Options consultation the council sought comments on the extent of the existing designation and whether the boundaries of any existing landscape settings of settlements identified on the Policies Map should be amended. Since the 2024 Options consultation the council has committed to undertaking a review of the landscape setting of towns and villages across the district where Policy NE2A applies (see Chapter 9 for further discussion).

- 6.39 Settlements often have landscape settings which not only contribute to their distinctive character and quality but which are also highly valued reflecting their significance as places where people live and work. There is on-going need for further development; in particular for housing, which is primarily focussed on the larger settlements, but also in the more sustainable villages throughout B&NES. The purpose of Policy NE2A and the Landscape Setting Areas is to ensure the protection of key landscapes and landform, landmarks and views / viewpoints which particularly contribute positively to the form of the settlement, to its distinctive character and identity, and which are considered to influence the creation of a strong sense of place.
- 6.40 The policy and its associated methodology was first adopted in 2015 as part of the Place Making Plan. The council has progressed a review of the policy and its associated methodology to inform the new Local Plan (2025-43) in preparation. The review was triggered by a request from Saltford Parish Council for the surroundings of Saltford Village to be designated as an AGLV (Area of Great Landscape Value) and also responds to background evidence carried out by an independent expert consultant in December 2024.
- 6.41 The review includes the addition of a landscape setting for six new settlements (see Chapter 9 for further discussion). In addition, it includes a review of the Saltford Landscape Setting Area, which was previously assessed in 2015 (see map below indicating the proposed reviewed and revised setting). The supporting evidence which has informed this review can be found on the council's website.
- 6.42 In this Options Document, the council presents options to retain or strengthen Policy NE2A (see Chapter 9 for further discussion), and to include the Landscape Setting Area amendments reflecting the Saltford Village review (see Figure 3 overleaf) and defined setting for the six new settlements added.
- 6.43 At the time of this Options Reset consultation the landscape setting review remains in progress and will be progressed further in preparation for the Draft Plan consultation in 2026. Therefore, it is anticipated that more landscape settings of existing settlements will be reviewed in line with the revised methodology in preparation for the Draft Plan consultation.



Map 14: Landscape setting of settlements review 2025: Saltford map

Keynsham and Saltford Village area

- 6.44 Given the strong physical and functional relationship between Keynsham and Saltford Village, the following 'Key Issues and Opportunities', 'Emerging Vision and Priorities' and 'Transport Opportunities' sections are presented for Keynsham and Saltford Village together as a whole; with specific references to matters that are of relevance to Keynsham or Saltford Village made where necessary. This is then followed by discussion of all of the site options at Keynsham and then Saltford Village respectively.

Key Issues and Opportunities

The Bristol and Bath Growth Zone is a key element of the WECA Local Growth Strategy. The zone will recognise the planned infrastructure improvements and housing developments along the Bristol to Bath Corridor, exploring the potential to partner with WECA to deliver key employment and housing sites as well as transport projects, especially mass transit and Saltford rail station.

Whilst Bath and Bristol centres are readily accessible by public transport, the new communities created in the locality are likely to look towards Keynsham Town Centre meeting their day-to-day needs, and for a certain scale of leisure and cultural activities. There are likely to be significant opportunities for Keynsham Town Centre to enhance its current role and to increase its offer. The local plan will provide a proactive policy framework to enable this to happen and to ensure that town centre sites are developed in a way that supports increased demands.

Evidence from the **Future Economic Needs Assessment Update (May 2025)** suggests net employment land requirements over the Plan period in the Keynsham area comprise around:

12,000 – 13,000 sqm office space (2 ha land requirement)

8,000 sqm industrial floorspace (2 ha land requirement)

16,000 – 17,000 sqm warehousing / logistics floorspace (3 ha land requirement)

Some of this employment land requirement can be provided through existing commitments i.e. sites with planning permission or allocated in the adopted Local Plan for employment development. These existing commitments will need to be reviewed in preparing the Draft Local Plan.

The need to protect existing and provide new employment space within Bath is significant and land availability is limited. The strategy and priority is to meet Bath's full need for employment premises within and potentially on the edge of the city. However, if this is not possible the Bristol to Bath Corridor area, and specifically locations along the A4 at Keynsham, Saltford Village and Hicks Gate, could play a more strategic role in contributing to meeting Bath's needs. This will need to be explored in working towards the Draft Local Plan and may require a change in residential capacity at the site options to accommodate additional employment land.

Land surrounding Keynsham and Saltford Village is designated as Green Belt. Any new allocations 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.

Measures to improve the quality of the remaining Green Belt should be explored, including accessible green spaces and nature recovery, with funding to deliver such improvements identified. Exploring opportunities for nature recovery will be informed by the West of England Local Nature Recovery Strategy.

Flood risk from the River Avon to the north of Keynsham and the east of Saltford Village 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 Village. Congestion on the A4 also causes delays in Keynsham town centre and worsens air quality.

Whilst Keynsham and Saltford Village have had their designated Air Quality Management Areas revoked in recent years as a result of improvements to air quality, there is the potential for additional development and transport in the Bristol to Bath Corridor to cumulatively worsen air quality in the area. Developments could affect air quality in both B&NES and Bristol and an air quality assessment that considers the cross boundary and cumulative impact effects will be required.

Unreliable public transport provision and easy and cheap parking within Keynsham results in an over-dependence on travelling by car within Keynsham and Saltford Village. WECA has recently consulted on public transport improvements along the A4, which includes mobility hubs along the A4 providing better sustainable transport links along the corridor.

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.

Many areas along the corridor lack effective walking and cycling connections to the wider network, with routes often fragmented and poorly integrated with strategic corridors. There is currently no direct, continuous walking or cycling route into Bristol, which significantly restricts accessibility and limits active travel options for residents. There is poor access to Keynsham Railway Station on foot, bicycle, and bus, particularly from the A4 corridor.

Keynsham and Saltford Village in particular are located in an area of landscape sensitivity. The Cotswolds National Landscape is located to the east with views across, and a local designation relating to the Landscape Setting of Settlements is to the north, east and south of Saltford Village, and wraps around much of Keynsham.

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 Village 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 Village 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.

Emerging Vision and Priorities

6.45 The council is working on an emerging vision and set of priorities for the area. These priorities reflect and seek to address the issues identified above which have been informed by engagement with community representative groups, including parish and town councils. The priorities outlined below are broader than those that can be addressed through the local plan. However, the location and form of new development does need to be shaped and influenced in order to ensure that it does address these priorities as best as possible. Other priorities won't be addressed through new development but may be addressed through other policies in the local plan or initiatives outside the scope of the local plan undertaken by the council or by other stakeholders.

Capitalise on Keynsham's strategic location within one of WECA's four priority economic growth zones to create opportunities to enable Keynsham to attract new and innovative employers, including in established and emerging sectors.

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.

Create opportunities to enhance the role of Keynsham Town Centre, including a new purpose-built community centre, strengthening the vibrancy of the local High Street to increase amenity for existing and new residents.

Retain a sufficient green gap between Keynsham, Saltford Village and other nearby settlements, in order to retain the identity of settlements, and seek to improve the quality of the gap, making it more accessible and useable to all.

Create opportunities to enhance the role of Saltford Village Local Centre strengthening its vibrancy, increasing amenity for existing and new residents.

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 all life stages.

Improve accessibility and connectivity by sustainable modes within Keynsham and Saltford Village, 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, and addressing strategic needs and 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.

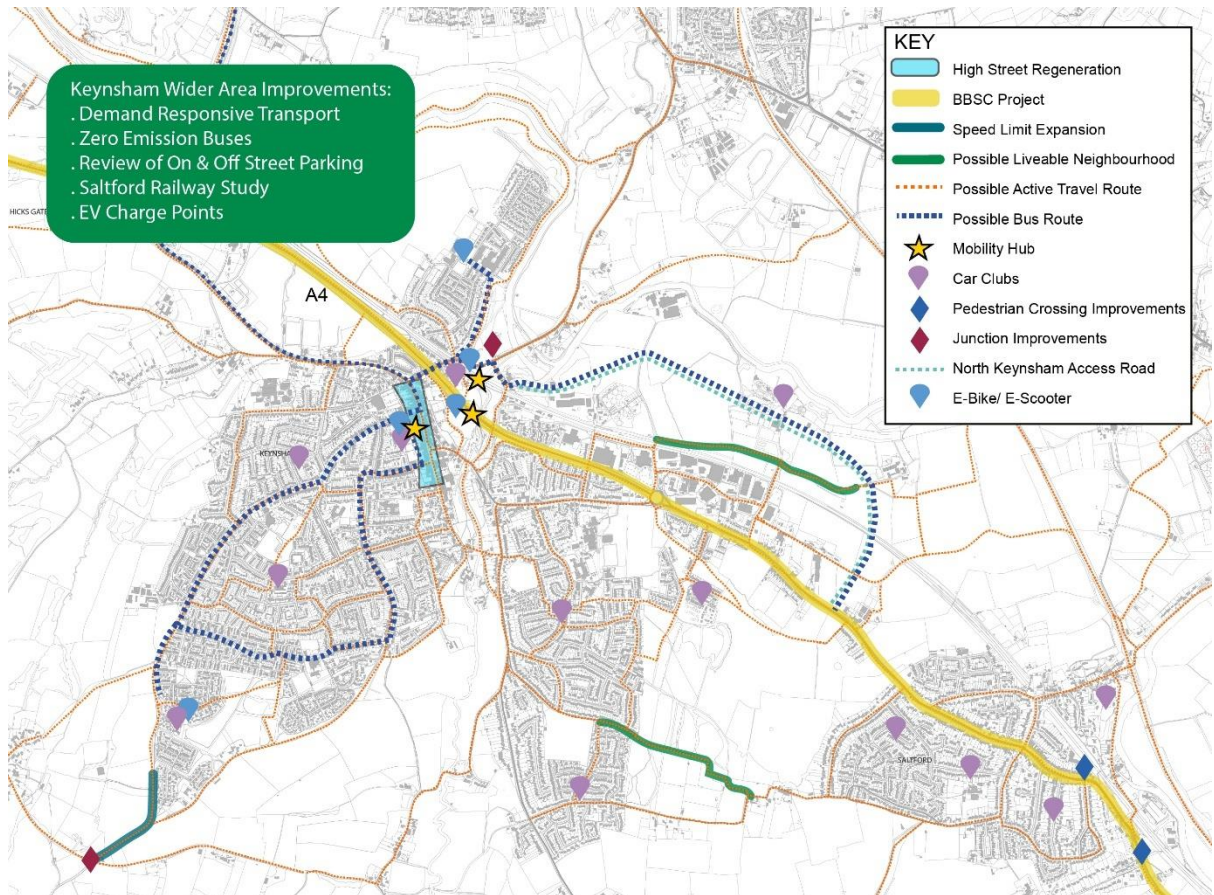
Ensure policy supports the delivery of built and natural environments that promote health and wellbeing for all.

Transport Opportunities

- 6.46 Some of the key issues in Keynsham relate to transport and highways, as listed above. A number of transport opportunities and potential interventions have been identified for Keynsham as contained within the Creating Sustainable Communities in North East Somerset Transport Strategy to address these issues. As the local plan progresses, these interventions will need more detailed consideration whilst preparing the Draft Local Plan, including mechanisms for funding them.

- 6.47 The Bath to Bristol A4 corridor provides a strategic transport link with frequent bus services between the two cities. The West of England Mayoral Combined Authority (WECA) undertook a consultation on potential 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 included continuous and designated walking and cycling routes along the A4, shared between active travel modes in locations where space is limited, 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 was also proposed along Station Road in Keynsham, providing improved connectivity between the A4, Keynsham Railway Station and Keynsham Town Centre. A revised scheme is due to be consulted upon in autumn 2025 in parallel with the Local Plan Options Consultation. This consultation aims to consider the feedback received during the initial phase and provides an opportunity for further engagement with the community. The intention is to gain a clearer understanding of local needs and preferences, helping to shape designs that more closely align with the community's aspirations.
- 6.48 Regular train services exist between Bath Spa and Bristol Temple Meads railway stations, with regular services also stopping at Keynsham Railway Station. WECA is developing a 'New Stations Feasibility Study' which is reviewing the potential to deliver a new railway station in Saltford Village. This could be a catalyst in helping to transform how both existing and new communities can travel, freeing up road capacity for those that need it.
- 6.49 The Bristol and Bath Cycle Path (Route 4) links east Bristol with Bath, passing reasonably close 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. Developments on the safeguarded land to the east of Keynsham have secured the delivery of improvements between Saltford Village and Keynsham, funding for an active travel connection to Keynsham rail station through Memorial Park and a new pedestrian and cycle connection to the Bristol and Bath Railway Path. Additional provision could include 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. Locations for active travel improvements could include improvements for active travel between Keynsham and Saltford Village; and improved routes between Whitchurch and Keynsham, including to Broadlands Academy.

- 6.50 There is an opportunity within Keynsham Town Centre to investigate reallocating road space to prioritise those walking, wheeling, cycling and bus users, to achieve mode shift and create better places. Targeted filters as part of traffic calming style interventions support active travel on key routes, and reduce the level and speed of traffic on inappropriate local routes helping to link residential areas with local centres and town centres.
- 6.51 Micromobility – including a range of small, lightweight vehicles and devices such as bicycles, e-bikes, cargo bikes, electric scooters and electric skateboards – represents a significant opportunity in terms of increasing the distances that people can travel without a car, overcoming hilly terrain that would make pedal cycles unfeasible for many people. The provision of micro-mobility rental therefore increases choice. Measures should be implemented to keep traffic on appropriate routes and away from more sensitive areas, supporting opportunities to deliver sustainable transport and public realm benefits. This includes reallocating space from private vehicles to people by widening footways, improving crossings, and creating new public spaces. Enhancing the public realm in town centres in this way will help create a more attractive and welcoming local environment. 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.
- 6.52 Public transport interventions should focus on providing bus journey time benefits by prioritising buses over private vehicles, helping to ensure more reliable and efficient services. Enhancements to the bus user experience can also be achieved through the installation of new, modern shelters equipped with digital real-time passenger information systems.
- 6.53 Demand Responsive Transport (DRT) - could be used to connect rural residents to key corridors and proposed mobility hubs within Keynsham town centre, where passengers can gain access to a connecting bus or rail service to complete their journey.



Map 15: Keynsham and Saltford Village area transport opportunities map

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Options Consultation 2024

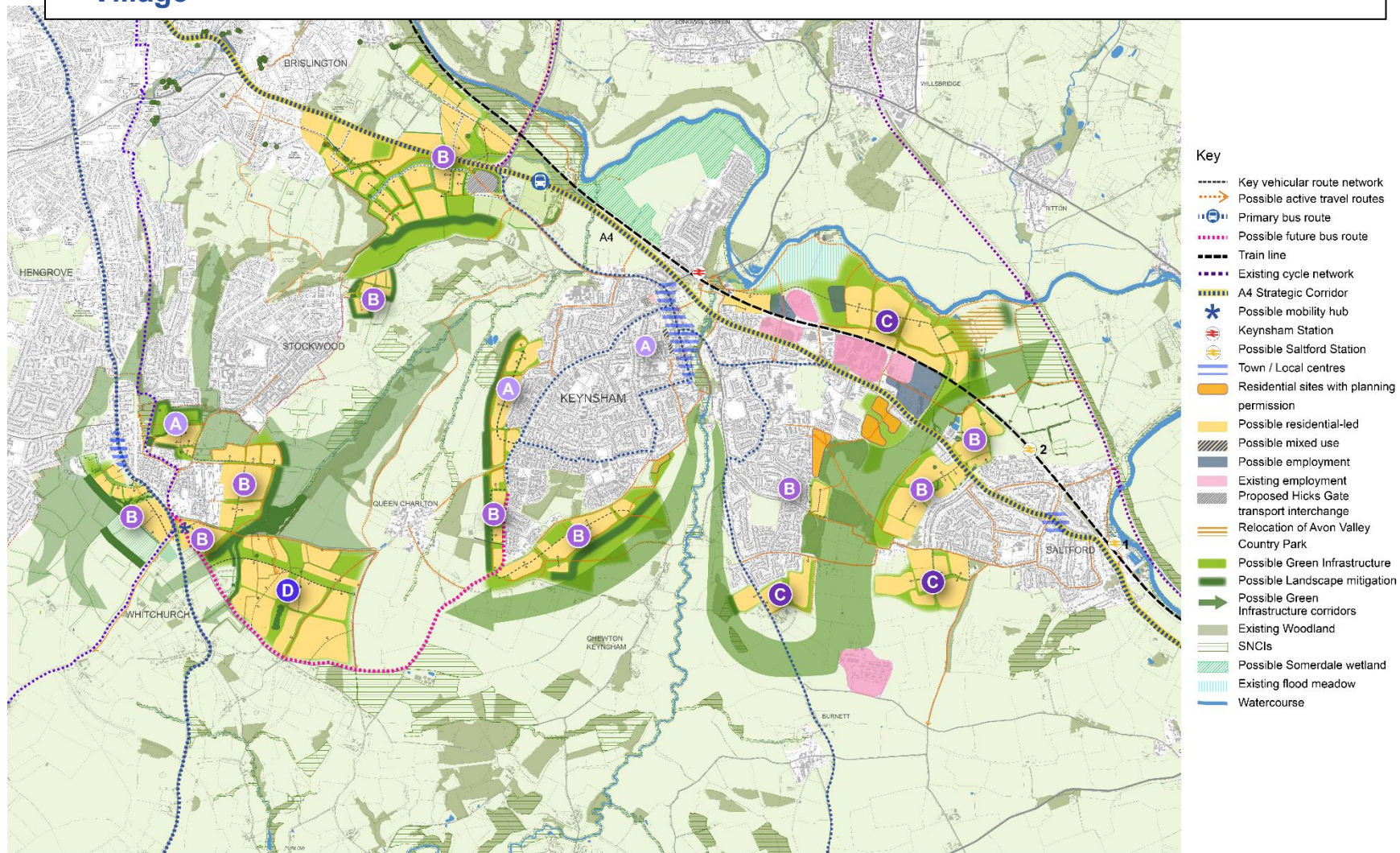
- 6.54 Comments on the previous options consultation in Spring 2024 are still relevant. These comments will be reviewed and taken into account, together with additional comments received, when the draft plan is being prepared. Below is a short summary of some of the main issues raised in the previous consultation.
- 6.55 Respondents mentioned the importance of protecting the green belt, highlighting the value of open landscapes and the risks to wildlife, community spaces, and rural identity from development.
- 6.56 Respondents mentioned concerns about building on green belt land, noting its importance for wildlife and public wellbeing. Some respondents are open to development if environmental considerations are met.
- 6.57 Respondents raised issues about increased traffic and congestion due to development, suggesting solutions such as new transport options and infrastructure improvements.
- 6.58 There was an emphasis on the need for more reliable and accessible public transport; services and schedules do not always cater to the diverse needs of users, including those with mobility issues or living far from stations.
- 6.59 In Saltford Village concerns included loss of agricultural land, impacts on biodiversity and the rural character of south Saltford. Loss of recreational space and wildlife habitats was noted, alongside recognition of the need for more, including affordable, housing.
- 6.60 At Saltford Village there was anxiety about increased traffic on the A4 due to new housing; criticisms of current road capacity and safety for non-motorized users, with suggestions for improved infrastructure and alternative transport solutions such as re-opening a railway station.
- 6.61 Concerns were raised that development may erode the rural and cultural identity of Saltford Village, transforming it into a suburban area; emphasis on maintaining individuality and the social fabric of the community.

Strategy

- 6.62 The emerging strategy set out below relates to the wider Bristol to Bath corridor, incorporating Keynsham, Saltford Village and other places. The strategy has been set out for this wider area because of the close functional and physical relationships between different places, that is they do not sit in isolation from nearby places.

- 6.63 The strategy for the Bristol to Bath Corridor seeks to deliver sustainable growth capitalising on the strategic location between Bath and Bristol to take advantage of existing, and significantly enhance improvements to, sustainable transport links in the area.
- 6.64 Economic growth will build on the area's strengths and links to Bristol and Bath with employment focused at Keynsham and Saltford Village along the A4 corridor, with a proportionate level of complementary employment at Whitchurch. Additional residential and employment growth will support the role and function of high streets and local centres in Keynsham, Saltford Village and Whitchurch Village. A review of car parking in Keynsham will inform development and public realm projects to revitalise the town centre and encourage modal shift. Development at North Keynsham will assist in removing through traffic from Keynsham High Street to support placemaking.
- 6.65 Additional housing will meet the needs of existing and future residents, including the delivery of affordable housing, which will be facilitated by the 'golden rules' where this takes place on land released from the Green Belt. The plan will retain the identity of existing communities by avoiding coalescence and integrating new development with strategic green infrastructure corridors that improve access to nature and enhance biodiversity, delivering the Chew Valley Reconnected project ambitions. Opportunities for nature recovery in the area will be informed by the Local Nature Recovery Strategy.
- 6.66 At Saltford Village options to deliver a train station will be explored to improve the sustainability of the village, with new development delivering the necessary infrastructure to sustain growth, supporting the village centre.

Map 16: OPTIONS MAP – showing all land parcels in Hicks Gate, Keynsham and Saltford Village



Current Site Connectivity - Possible residential-led development

A A-rated **B** B-rated **C** C-rated **D** D-rated **E** E-rated **F** F-rated

The grading within the map illustrates the current transport connectivity by sustainable means based on the existing network, where A indicates the highest level of connectivity. They are intended for reference only. They do not account for future infrastructure improvements, which are expected to enhance connectivity in line with the emerging transport vision.



Keynsham Site Options

- 6.67 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. Not all of the site options presented will necessarily be taken forward for allocation for development in the Draft Local Plan. 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.
- 6.68 The land parcels which make up the site options below have been assessed in more detail in various supporting documents, including the Housing and Economic Land Availability Assessment (HELAA), the Future Economic Needs Assessment Update (May 2025) the Sustainability Appraisal (SA), the Keynsham and Saltford Area of Search Assessment, and the Strategic Planning Options Document (SPO). Further information is available in the Site Selection Topic Paper.
- 6.69 Within these documents, a number of additional sites have also been assessed, and discounted, for various reasons. These sites are not included in the site options below, for the reasons set out in the evidence base. However, this Options Document consultation provides an opportunity for stakeholders and communities to provide comments on these discounted sites, by answering the question: Are there any other sites that haven't been identified, that need to be considered?

Location Option	New sites - appx. housing capacity
North Keynsham*	1,900 – 2400 dwellings
East of Avon Mill Lane	80-100 dwellings
Central Keynsham* (Ashton Way and the Labbott car parks)	20-30 dwellings
West Keynsham (North)	300-400 dwellings
West Keynsham (South)	300-400 dwellings
South West Keynsham	400-500 dwellings
East Keynsham	130-170 dwellings
South East Keynsham	400-550 dwellings

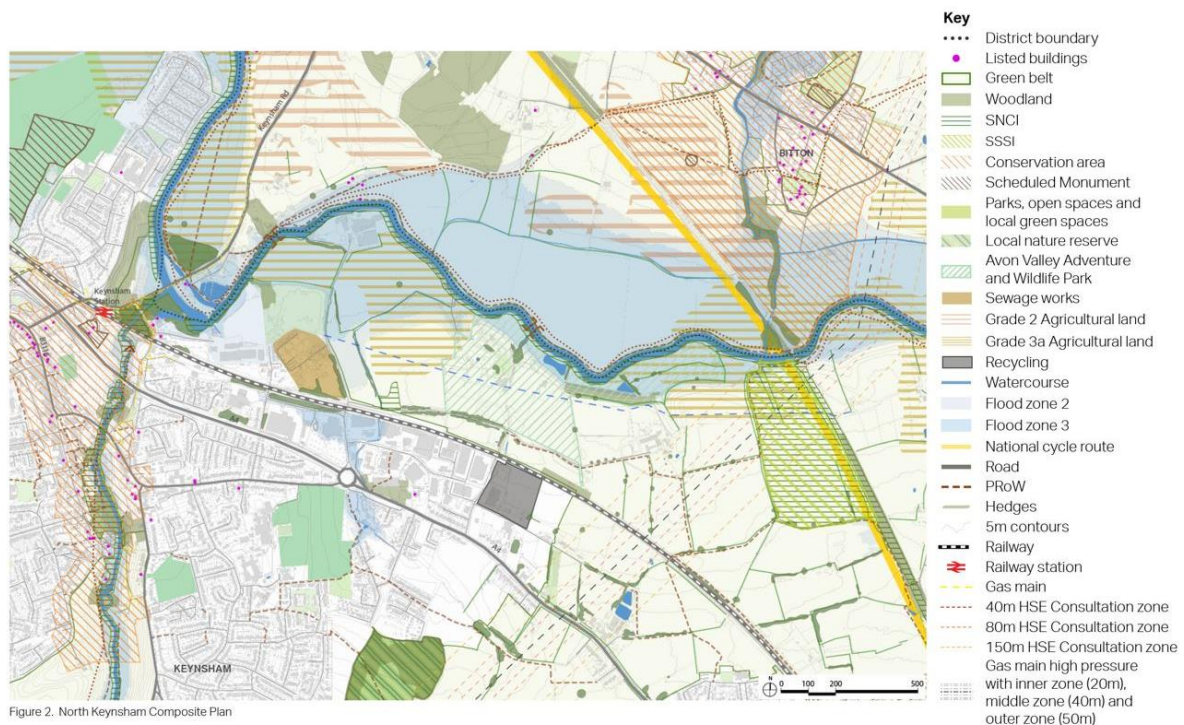
Table 3: Site Options table

- 6.70 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.
- 6.71 The Department for Transport has developed a Connectivity Tool that integrates transport and land use data to produce a national measure of connectivity for any location in England and Wales. This tool allows users to filter connectivity scores by local authority, assigning each location a grade from A to J, where A indicates the highest level of connectivity within its local authority area.
- 6.72 Each site option has been evaluated with the Connectivity Tool, and an average grade reflecting its connectivity relative to the Bath and North East Somerset area has been assigned. It's important to note that this assessment is based on the current sustainable transport network and existing land uses such as schools and shops, and does not take into account planned or future developments. The grading from A to J is not an overall ranking of site options and in deciding which sites are allocated in the Draft Local Plan other sustainability criteria and deliverability factors will also be considered.
- 6.73 It should be noted that the sustainability of development in certain locations is dependent on the continued provision of supported public transport services. Given the uncertainty of future funding for these services, is a risk when assessing the suitability of sites for allocation.

North Keynsham Context

- 6.74 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.
- 6.75 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.
- 6.76 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.
- 6.77 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.
- 6.78 Additional landscape evidence work is also being undertaken to assess the impact of development on the Cotswold National Landscape and its setting, both from individual site options and cumulatively considering wider development along the A4. In addition, work is underway to assess needs and opportunities for strategic green infrastructure and nature recovery.
- 6.79 The option for potential development at West Saltford (see page 117), will need to be considered in conjunction with this North Keynsham option, with regards to maintaining a sufficient green gap between Keynsham and Saltford to avoid coalescence and provide high quality accessible open space, which are priorities for both settlements.
- 6.80 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, removing through traffic from 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.
- 6.81 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.

6.82 The site is located in the Green Belt. Any release of land from the Green Belt and subsequent allocation for development will need to demonstrate exceptional circumstances. To understand and consider the impact of potential development on the Green Belt an assessment of the extent to which different parcels of land serve the five purposes is being undertaken. The emerging Stage 1 Strategic Green Belt Assessment being carried out by WECA and the constituent authorities will assess the site for its contribution towards meeting the five Green Belt purposes and also whether it meets the definition of grey belt set out in the NPPF and updated Planning Practice Guidance, which is sequentially preferable to developing greenfield Green Belt in national policy. The assessment work is ongoing and will inform the Draft Local Plan. It is likely that following the Stage 1 Strategic Green Belt Assessment a more detailed (stage 2) assessment of the impact of development on more specific areas of the Green Belt will also be required.



Map 17: Context Plan - North Keynsham

Site Option

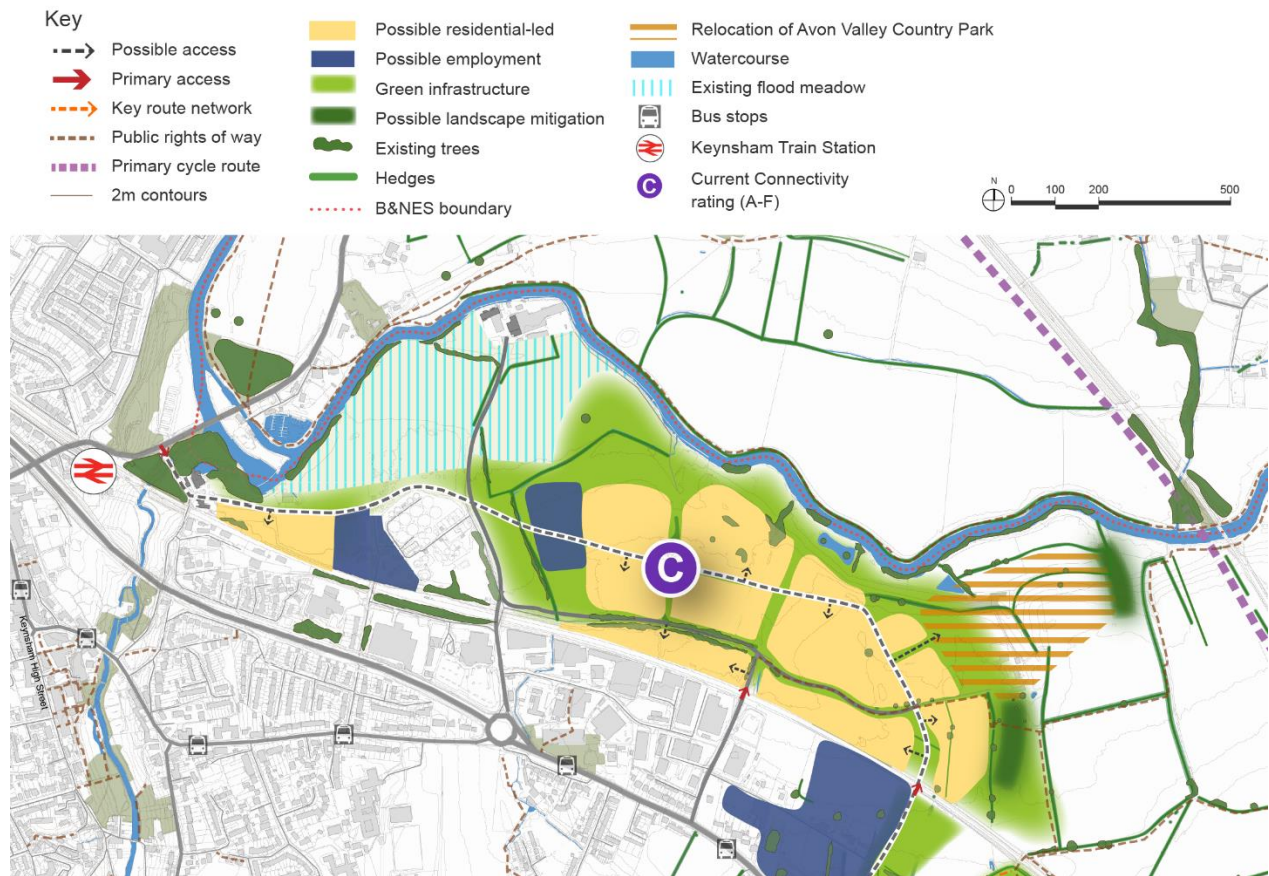


Figure 11: Indicative concept plan - North Keynsham

North Keynsham	Description
Opportunities	<p>Provision of a sustainably located mixed-use development, comprising:</p> <p>Around 1,900-2,400 new homes, with potential to include an element of Purpose Built Student Accommodation within the wider mix of housing. This figure would be reduced if other non-residential development were to be delivered at the site.</p> <p>Employment uses – the type and scale of employment uses on this site will be assessed and identified in the Draft Local Plan.</p> <p>Provision of a local centre including convenience floorspace (scale to be determined by overall quantum of development at Keynsham).</p> <p>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</p>

	<p>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 and Bath cycle route. Opportunity to provide low car development due to sustainable location.</p> <p>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.</p> <p>Potential to explore the use of the riverfront for moorings and other water-related uses.</p> <p>Location within a Local Nature Recovery Strategy Focus Area of Nature Recovery provides significant opportunities for nature recovery and wetland habitat within areas located in Flood Zone 3.</p> <p>Potential to explore the creation of woodland habitats linking Keynsham community woodland to the River Avon.</p>
Constraints	<p>Located in the Green Belt.</p> <p>Potential for loss of green gap between Keynsham and Saltford Village, particularly when considered in addition to option at West Saltford.</p> <p>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.</p> <p>Stidham Farm SSSI and SNCI located to the east of the site. Broadmead Field SNCI and River Avon SNCI located within the site boundary.</p> <p>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.</p> <p>The availability and frequency of public transport services, particularly bus services, is currently dependent on external funding, which is subject to ongoing review and cannot be guaranteed over the plan period. This uncertainty should be taken into account when considering the sustainability and deliverability of this option.</p> <p>The north-western side of the site is located in Flood Zone 3. Part of the site is also located in Flood Zone 2.</p> <p>Relocation of Avon Valley Wildlife Park required. Odour zone from water recycling centre restricts some land uses in its immediate surroundings.</p>

	High-pressure gas main running along the eastern side of the site restricts most land uses within HSE explosive standoff areas.
Mitigation required	<p>Requires significant improvement to walking and cycling routes between the site, Keynsham Train Station and the wider town, including Wellsway Secondary School.</p> <p>Significant green infrastructure buffer likely to be required to the east of any development, to reduce impact on the Cotswold National Landscape, and to buffer the river, 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.</p> <p>Ecological mitigation required to ensure safeguarding of SSSI and SNCI, and to deliver fish recovery.</p> <p>The cumulative impact of development of sites in Keynsham and Saltford Village on primary and secondary school places will need to be assessed, to ensure there is sufficient capacity.</p>
Further evidence required	<p>Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district.</p> <p>Landscape assessment required to assess impact of development on Cotswold National Landscape.</p> <p>Evidence to consider whether mitigation at water recycling centre could allow for development closer to the works.</p> <p>Evidence to consider whether mitigation along gas pipeline could allow for development within HSE explosive standoff areas.</p> <p>Evidence to support requirements for strategic Green Infrastructure and nature recovery.</p> <p>Air Quality Assessment (including all sites along A4 corridor).</p> <p>Evidence to consider secondary school place planning in the Wellsway and Broadlands catchment areas, in combination with other proposed allocations in the area.</p> <p>Evidence to consider appropriate quantum and mix of uses in the local centre, which is dependent on the scale of other developments in the area.</p>

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East of Avon Mill Lane Context

- 6.83 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.
- 6.84 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.
- 6.85 It should be noted that no discussion has taken place with the landowner or existing business occupying the site.

Site Option

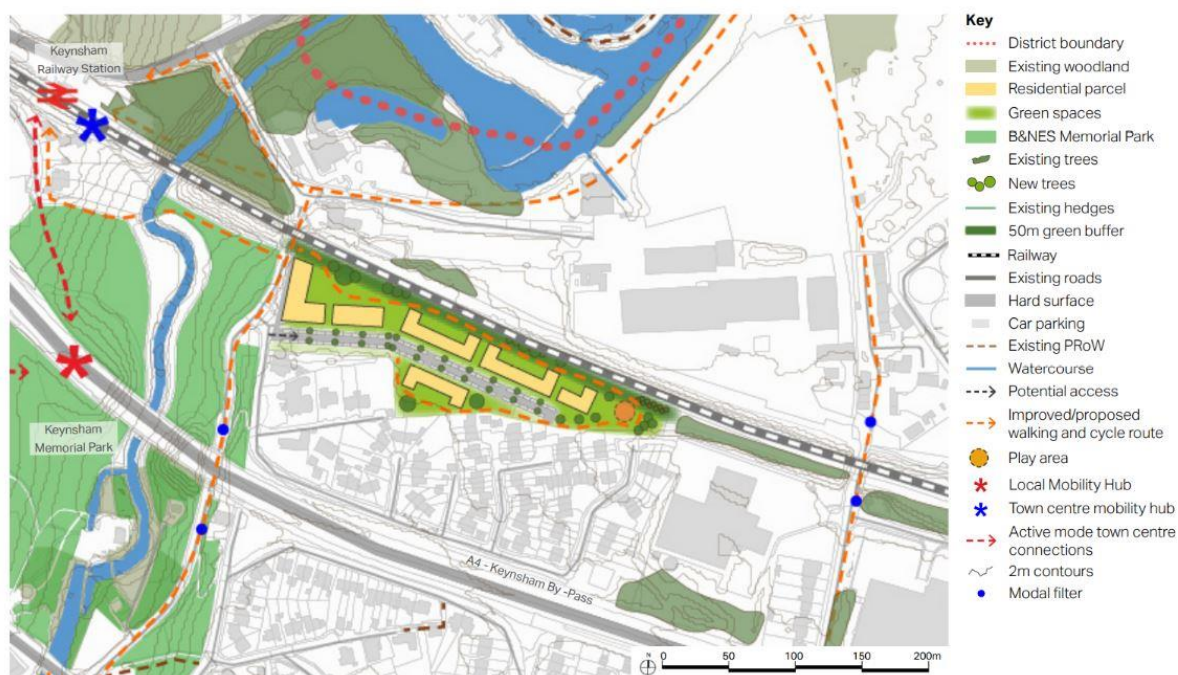


Figure 13: Indicative concept plan - East of Avon Mill Lane

East of Avon Mill Lane	Description
Opportunities	<p>Provision of around 80-100 homes, plus a playground for use by existing and new residents, on brownfield site.</p> <p>Opportunity to improve the well-being of existing residents living directly south of the existing industrial units, through replacement with more compatible</p>

	<p>neighbouring residential use.</p> <p>Potential to explore local food growing opportunities, such as provision of a small orchard.</p> <p>Opportunity to provide car free development in a sustainable location close to Keynsham railway station.</p>
Constraints	<p>Loss of existing industrial employment land.</p> <p>Site located directly adjacent to the railway line.</p> <p>Active travel routes into town centre require improvement.</p> <p>The availability and frequency of public transport services, particularly bus services, is currently dependent on external funding, which is subject to ongoing review and cannot be guaranteed over the plan period. This uncertainty should be taken into account when considering the sustainability and deliverability of this option.</p>
Mitigation required	<p>Significant planting to the north of the site required to provide a visual and noise buffer to the existing rail lines.</p> <p>Consideration of active travel routes into town centre required.</p>
Further evidence required	<p>Holistic review of employment space across the district required, including the impact of the loss of this industrial site.</p> <p>Contamination assessment required due to current industrial land use.</p>

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Central Keynsham Context

- 6.86 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.
- 6.87 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.
- 6.88 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.
- 6.89 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. The option 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. In the spring 2024 Options Document we consulted on options to explore the potential to redevelop a site primarily occupied by Tesco supermarket and car parking. This site is not available for redevelopment and the part of the site adjoining Danes Lane now has planning permission for the development of flats. Therefore, these options are no longer being pursued.

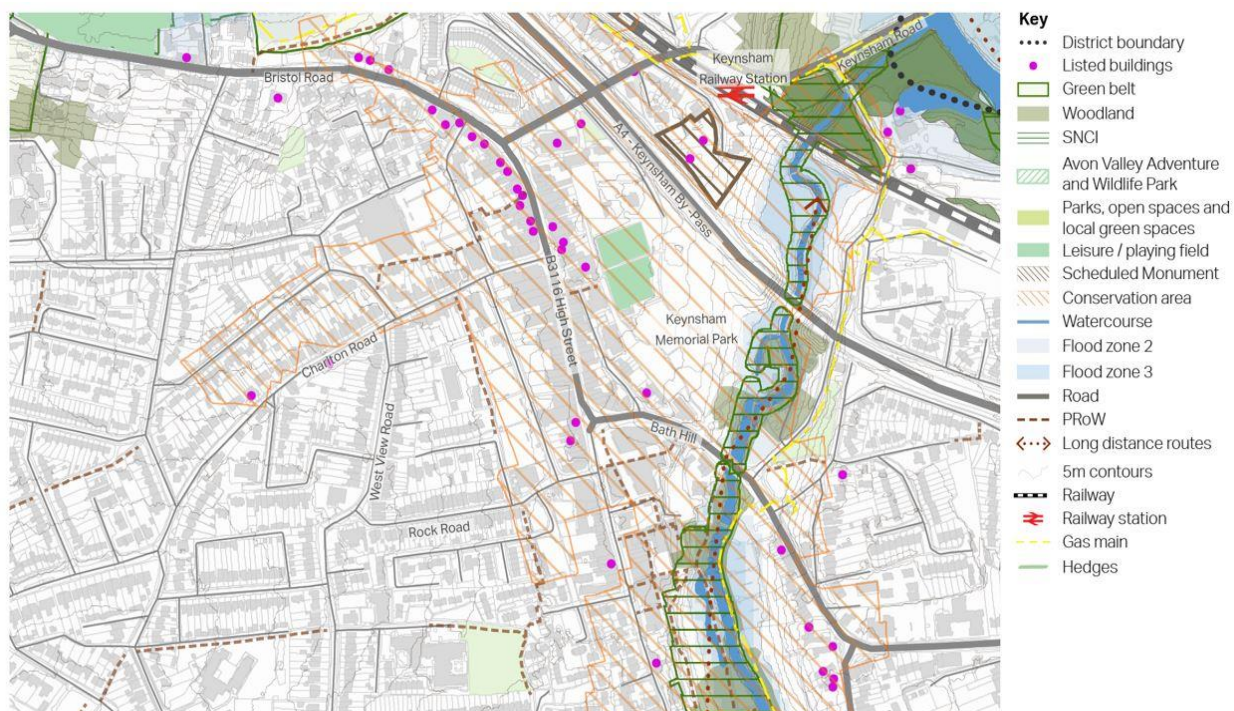


Figure 14: Context plan - Central Keynsham

Site Options Central Keynsham

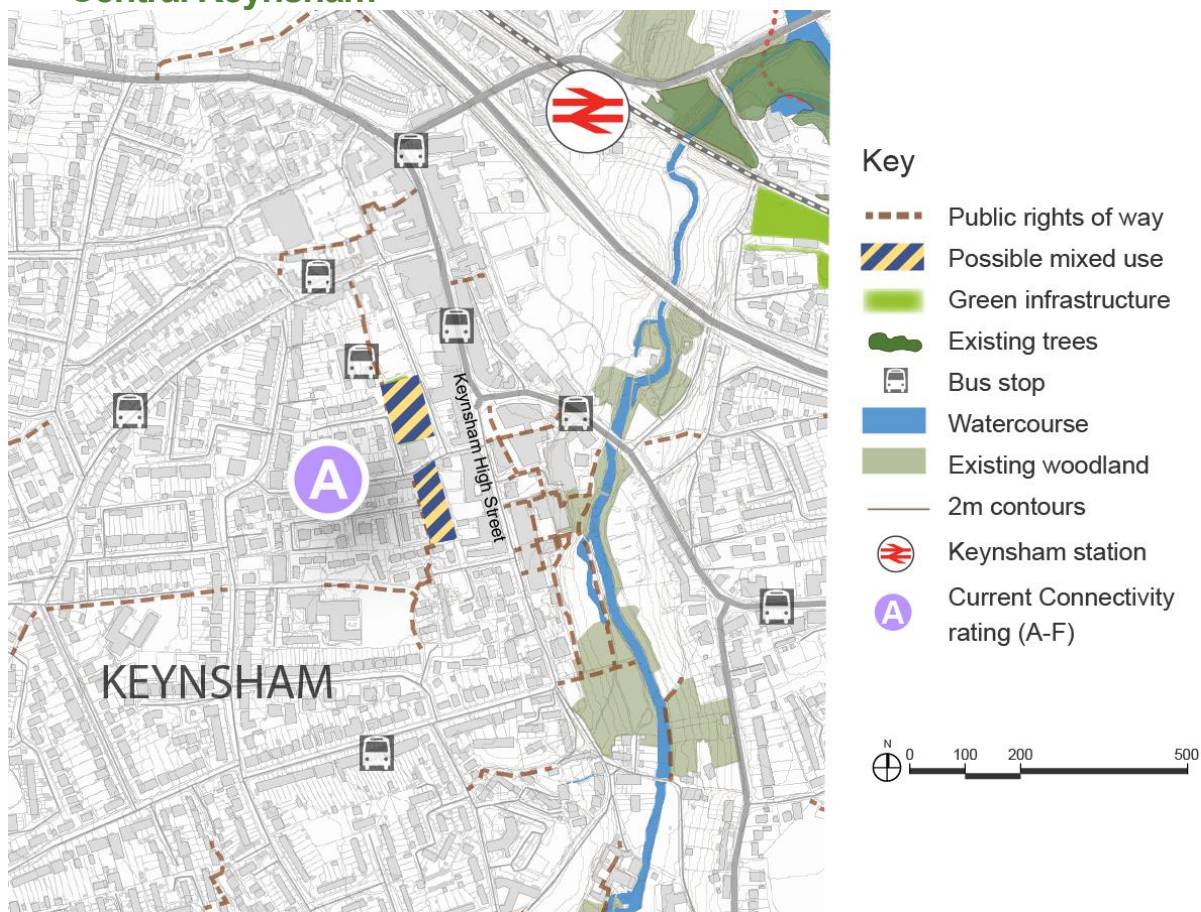


Figure 15: Indicative concept plan - Central Keynsham

Central Keynsham	Description
Opportunities	<p>Provision of around 20-30 homes and office development. If these sites were developed solely for residential use a greater number of homes could be provided.</p> <p>Optimise development on brownfield land, located in highly sustainable town centre location.</p> <p>Creates active frontage on Ashton Way.</p> <p>Opportunity to explore urban greening through planting of street trees and provision of green infrastructure.</p>
Constraints	<p>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.</p> <p>The availability and frequency of public transport services, particularly bus services, is currently dependent on external funding, which is subject to ongoing review and cannot be guaranteed over the plan period. This uncertainty should be taken into account when considering the sustainability and deliverability of this option.</p> <p>Embodied carbon considerations relating to redevelopment of existing building.</p> <p>Located adjacent to Keynsham Conservation Area, and multiple listed buildings.</p> <p>Constrained brownfield sites with little opportunity for green space provision.</p>
Mitigation required	<p>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.</p>
Further evidence required	<p>Further analysis of car parking use in Keynsham Town Centre.</p> <p>Embodied carbon analysis relating to redevelopment of existing building.</p> <p>Commercial demand for office development in Keynsham Town Centre</p> <p>Air quality assessment</p>

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West Keynsham Context

- 6.90 West Keynsham is located to the west of Charlton Road. In light of the increased housing need for the district and the amended national planning policy context for Green Belt, the two West Keynsham sites consulted on in the 2024 Options consultation have now been expanded further in this Options Reset consultation. The previous two options have been expanded northwards and southwards respectively, such that the entire western edge of Keynsham is now covered by an option.
- 6.91 The southern end of the site directly fronts Charlton Road, whereas the northern side neighbours the back gardens of the houses on Lays Drive.
- 6.92 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.
- 6.93 Two options for West Keynsham are set out below. It is important that local employment uses are retained in this area. The first option optimises housing development, but would potentially require the relocation of businesses at Lays Farm Trading Estate within the site, retaining the overall quantum of employment floorspace. The second reduces the number of homes proposed significantly, retaining Lays Farm Trading Estate in situ.
- 6.94 The sites are located in the Green Belt. Any release from the Green Belt and subsequent allocation for development will need to demonstrate exceptional circumstances. To understand and consider the impact of potential development on the Green Belt an assessment of the extent to which different parcels of land serve the five purposes is being undertaken. The emerging Stage 1 Strategic Green Belt Assessment being carried out by WECA will assess the site for its contribution towards meeting the five Green Belt purposes and also provide a provisional indication as to whether it meets the definition of grey belt set out in the NPPF and updated Planning Practice Guidance, which is sequentially preferable to greenfield Green Belt in national policy. The assessment work is ongoing and will inform the Draft Local Plan. It is likely that following the Stage 1 Strategic Green Belt Assessment a more detailed (stage 2) assessment of the impact of development on more specific areas of the Green Belt will also be required.

6.95 Strategic development on the west and south western edges of Keynsham could provide significant benefits. This part of the town (especially the south western extremity) is not well served by either community facilities or walking, cycling or wheeling access to the town centre. Planned and co-ordinated development could provide opportunities to substantially improve sustainable transport links northwards along Charlton Road and eastwards from the Parkhouse Lane area into the town centre, as well as opportunities to provide improved community facilities in this part of Keynsham. Recent housing development has meant Keynsham has grown significantly without supporting infrastructure. Additional development can help improve this part of the town as a community well linked into the rest of the town and town centre.

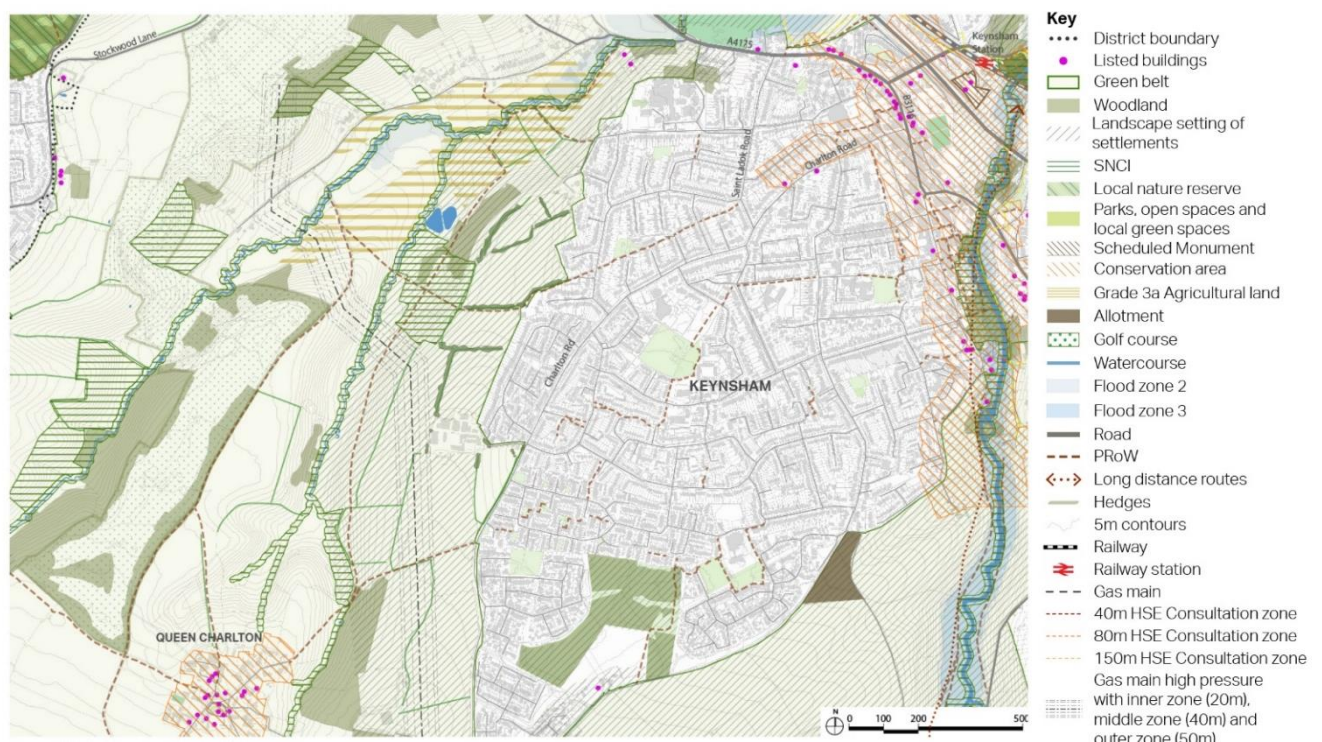


Figure 16: Context plan - West Keynsham

Site Options

West Keynsham Option 1
(northern half of western edge below)

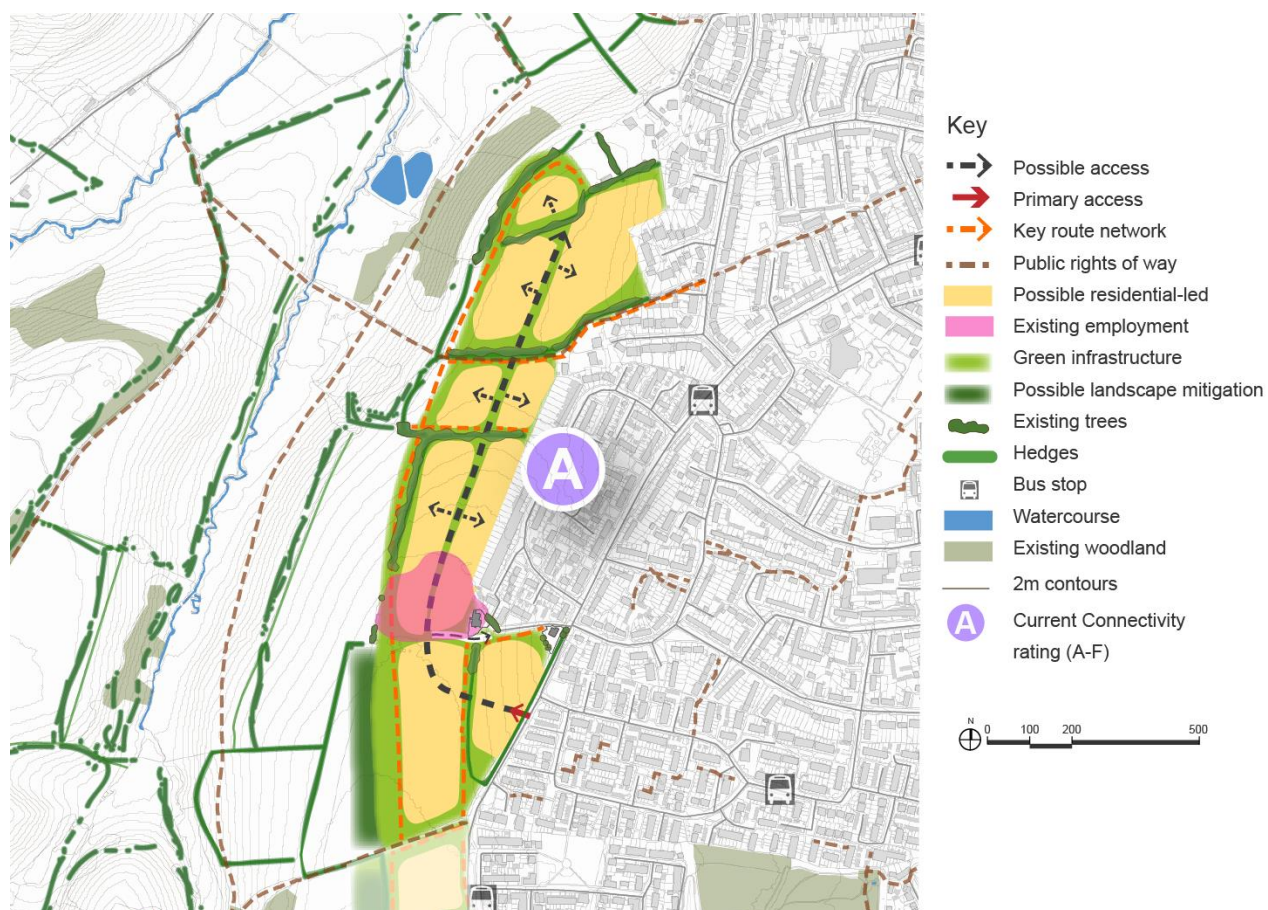


Figure 17: Indicative concept plan - West Keynsham (Option 1)

West Keynsham Option 1	Description
Opportunities	<p>Provision of 300-400 homes</p> <p>Opportunity to enhance and/or relocate the existing employment at Lays Farm Industrial Estate to improve access</p> <p>Opportunity to increase permeability of the existing street network should be explored</p> <p>Adjacent to a Local Nature Recovery Strategy Focus Area of Nature Recovery.</p>
Constraints	<p>Located in the Green Belt</p> <p>Existing employment land at Lays Farm Industrial Estate to be retained or reprovided</p>

	<p>Loss of agricultural land</p> <p>Single vehicular access only from Charlton Road</p> <p>Pedestrian access to the north of the site linking to town centre currently very narrow – improved access required</p> <p>The availability and frequency of public transport services, particularly bus services, is currently dependent on external funding, which is subject to ongoing review and cannot be guaranteed over the plan period. This uncertainty should be taken into account when considering the sustainability and deliverability of this option.</p> <p>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.</p> <p>Site lies adjacent to a grassland Site of Nature Conservation Importance (SNCI).</p>
Mitigation required	<p>50m minimum Green Infrastructure (GI) buffer along western edge of site to mitigate harm to views from west.</p> <p>Tree-lined streets, and tree-line avenue to run north to south at highest point to enhance screening.</p> <p>SNCI to be retained and protected.</p> <p>The cumulative impact of development of sites allocated in the Draft Local Plan in Keynsham and Saltford Village on primary and secondary school places will need to be assessed, to ensure there is sufficient capacity.</p>
Further evidence required	<p>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</p> <p>Landscape assessment required to consider impact of development on Landscape Setting of Settlement.</p> <p>Consideration of potential risk to watercourse due to elevated position of site.</p> <p>Evidence to consider secondary school place planning in the Wellsway and Broadlands catchment, in combination with other proposed allocations in the area.</p> <p>Evidence to support requirements for strategic Green Infrastructure</p> <p>Air Quality Assessment</p>

	Evidence to consider secondary school place planning in the Wellsway and Broadlands catchment areas, in combination with other proposed allocations in the area.
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West Keynsham Option 2 (southern half of western edge below)

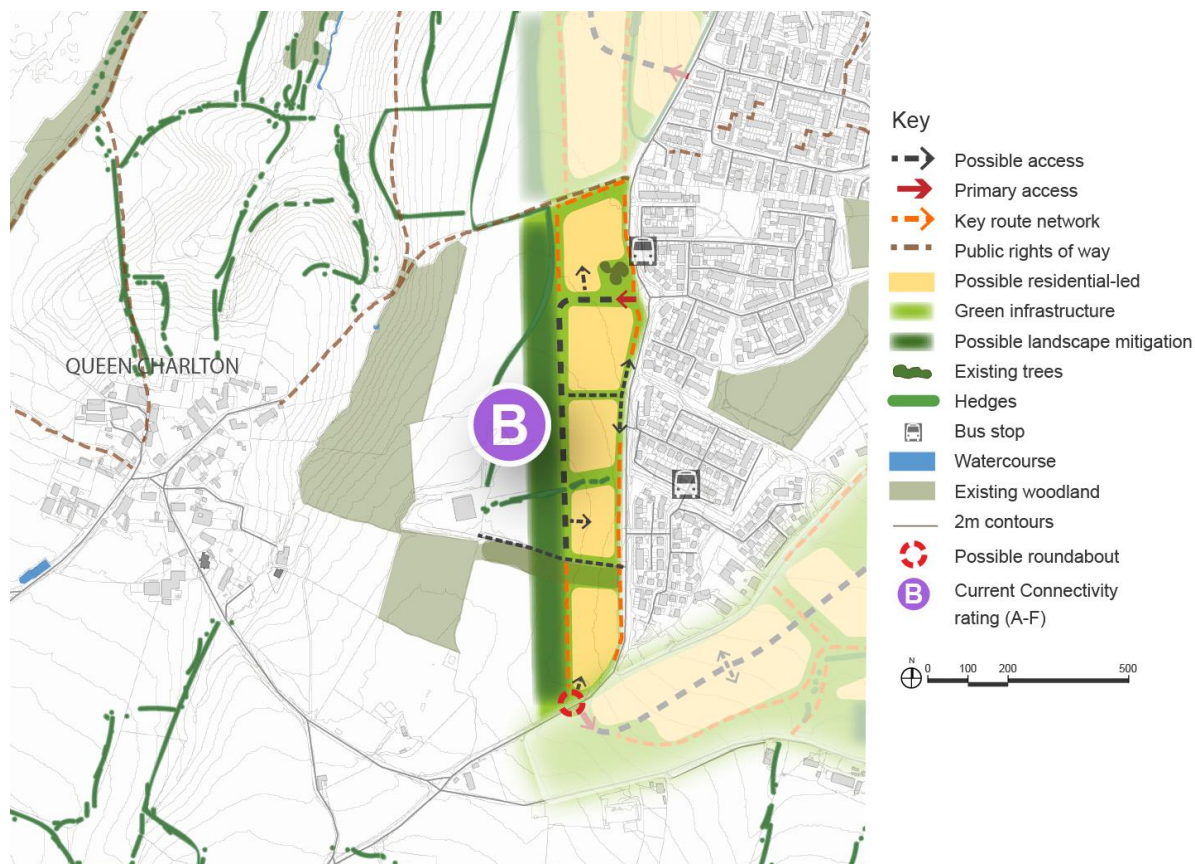


Figure 18: Indicative concept plan - Option 2

West Keynsham Option 2	Description
Opportunities	<p>Provision of 300-400 homes.</p> <p>Opportunity to increase permeability of the existing street network for walking, cycling and wheeling should be explored</p>
Constraints	<p>Located in the Green Belt</p> <p>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.</p> <p>Limited access to green space and local food growing provision. Green space would need to be accommodated on site.</p>
Mitigation required	<p>50m GI buffer along western edge of site to mitigate harm to views from</p>

	<p>west</p> <p>The availability and frequency of public transport services, particularly bus services, is currently dependent on external funding, which is subject to ongoing review and cannot be guaranteed over the plan period. This uncertainty should be taken into account when considering the sustainability and deliverability of this option.</p> <p>The cumulative impact of development of sites to be allocated in the Draft Local Plan in Keynsham and Saltford Village on primary and secondary school places will need to be assessed, to ensure there is sufficient capacity.</p>
Further evidence required	<p>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.</p> <p>Landscape assessment required to consider impact of development on Landscape Setting of Settlement.</p> <p>Consideration of potential risk to watercourse due to elevated position of site.</p> <p>Exploration of extent of possible green infrastructure enhancements between Keynsham and Saltford Village required (noting constraint of gas pipeline in this location).</p> <p>Air quality assessment</p> <p>Evidence to consider secondary school place planning in the Wellsway and Broadlands catchment, in combination with other proposed allocations in the area.</p>

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South Keynsham

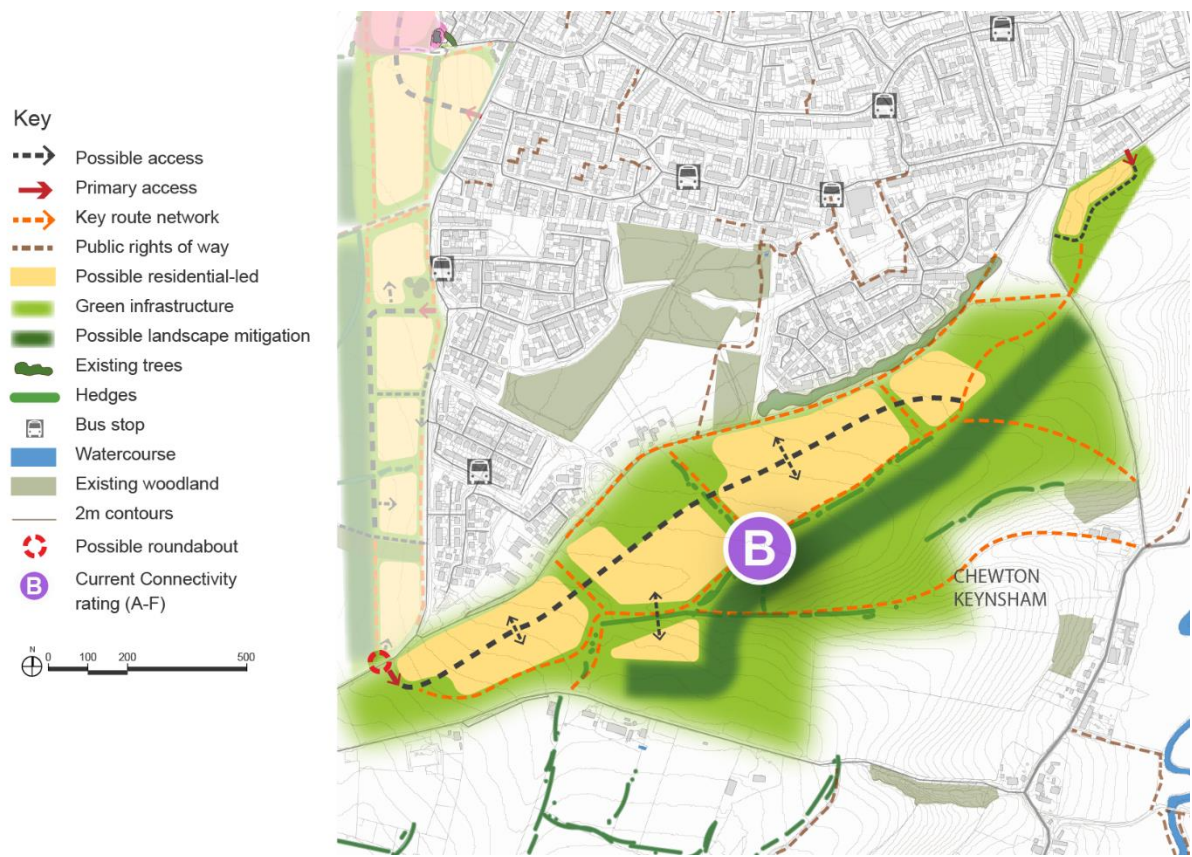


Figure 199: Indicative concept plan - South Keynsham

South Keynsham	Description
Opportunities	<p>Provision of 400-500 homes.</p> <p>Opportunity to increase permeability of the existing street network for walking, cycling and wheeling should be explored</p>
Constraints	<p>Landscape setting of the Chew Valley.</p> <p>Parkhouse Lane unsuitable for vehicular access.</p> <p>The availability and frequency of public transport services, particularly bus services, is currently dependent on external funding, which is subject to ongoing review and cannot be guaranteed over the plan period. This uncertainty should be taken into account when considering the sustainability and deliverability of this option.</p>
Mitigation required	<p>The cumulative impact of development of sites to be allocated in the Draft Local Plan in Keynsham and Saltford Village on primary and secondary school places will need to be assessed, to ensure there is sufficient capacity.</p> <p>Landscape mitigation along eastern boundary to retain the landscape setting of the Chew Valley</p>
Further evidence required	<p>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.</p> <p>Exploration of extent of possible green infrastructure enhancements between Keynsham and Saltford Village required (noting constraint of gas pipeline in this location).</p>

East Keynsham Context

- 6.96 East Keynsham is located towards the south of the area to the east of Keynsham, comprising a parcel of pasture land which is bordered to the north east, east and south by woodland at the Manor Road Local Nature Reserve (LNR). The site is bordered to the west by residential development along Hurn Lane and planning permission has been granted for 70 dwellings directly to the north of the site, east of Minsmere Road.
- 6.97 The site forms a small part of a gap between Keynsham and Saltford Village along the single lane Manor Road which has the potential to become a 'Quiet Lane'.
- 6.98 The site is located in the Green Belt. Any release from the Green Belt and subsequent allocation for development will need to demonstrate exceptional circumstances. To understand and consider the impact of potential development on the Green Belt an assessment of the extent to which different parcels of land serve the five purposes is being undertaken. The emerging Stage 1 Strategic Green Belt Assessment being carried out by WECA will assess the site for its contribution towards meeting the five Green Belt purposes and also provide a provisional indication as to whether it meets the definition of grey belt set out in the NPPF and updated Planning Practice Guidance, which is sequentially preferable to greenfield Green Belt in national policy. The assessment work is ongoing and will inform the Draft Local Plan. It is likely that following the Stage 1 Strategic Green Belt Assessment a more detailed (stage 2) assessment of the impact of development on more specific areas of the Green Belt will also be required.

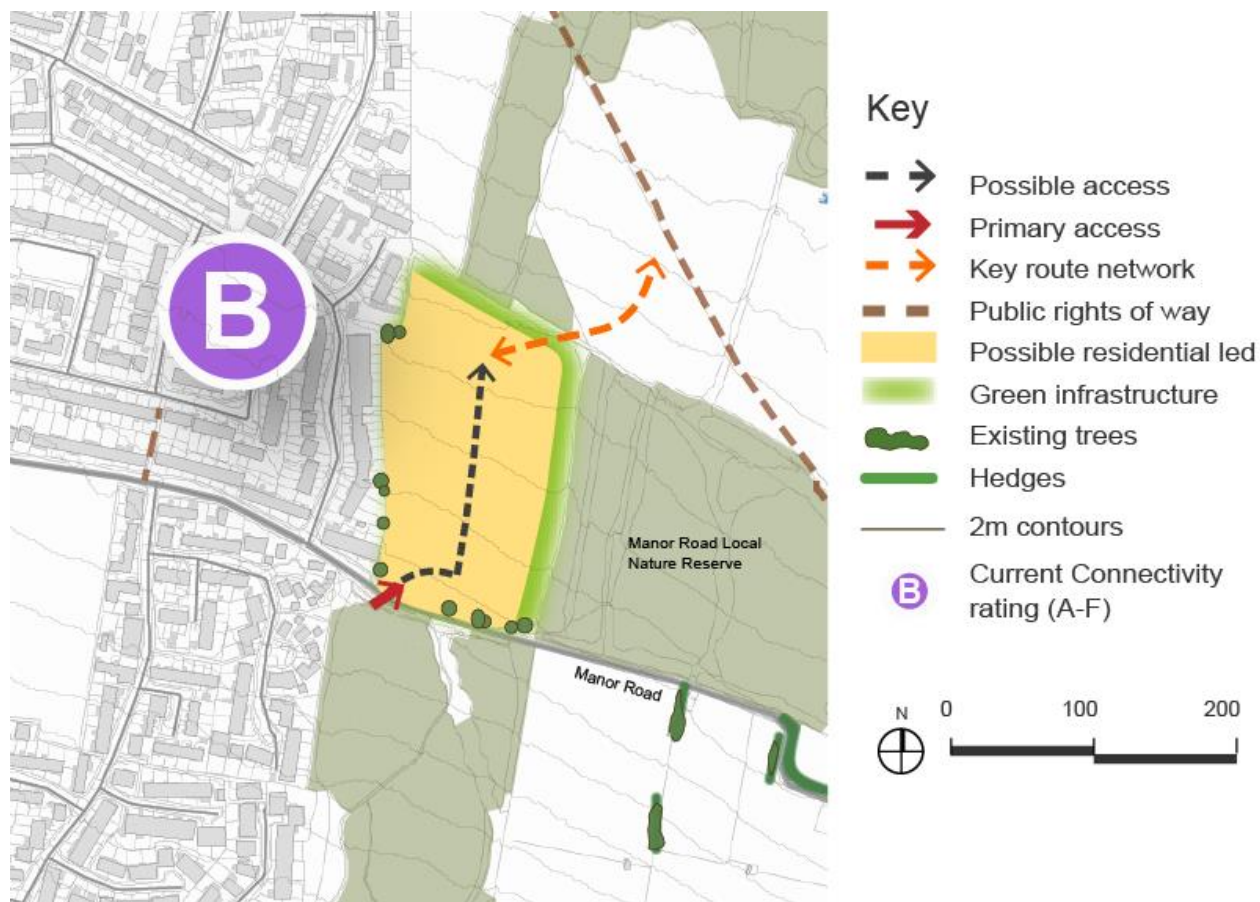


Figure 20: Indicative concept plan: East Keynsham

East Keynsham	Description
Opportunities	<p>Provision of around 130-170 homes.</p> <p>Improved access to adjacent Manor Road Local Nature Reserve (LNR). Location within a Local Nature Recovery Strategy Focus Area of Nature Recovery provides an opportunity to enhance the Local Nature Reserve (LNR).</p> <p>Opportunity to explore and fund Manor Road becoming a “Quiet Lane” between Keynsham and Saltford Village, 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.</p>
Constraints	<p>The site is located within the Green Belt.</p> <p>Single lane access along Manor Road.</p> <p>The availability and frequency of public transport services, particularly bus services, is currently dependent on external funding, which is subject to ongoing review and cannot be guaranteed over the plan period. This uncertainty should be taken into account when considering the sustainability and deliverability of this option.</p>
Mitigation required	<p>The cumulative impact of development of sites allocated in the Draft Local Plan in Keynsham and Saltford Village on primary and secondary school places will need to be assessed, to ensure there is sufficient capacity.</p> <p>Road widening to accommodate a suitable access at the south west of the site</p>
Further evidence required	<p>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.</p> <p>Exploration of extent of possible green infrastructure enhancements between Keynsham and Saltford Village required (noting constraint of gas pipeline in this location).</p>

South East Keynsham Context

- 6.99 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.
- 6.100 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.
- 6.101 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.
- 6.102 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 exists.
- 6.103 The nearest existing convenience shop is located on Chandag Road, approximately 1 mile away from the site.
- 6.104 The site is located in the Green Belt. Any release from the Green Belt and subsequent allocation for development will need to demonstrate exceptional circumstances. To understand and consider the impact of potential development on the Green Belt an assessment of the extent to which different parcels of land serve the five purposes is being undertaken. The emerging Stage 1 Strategic Green Belt Assessment being carried out by WECA will assess the site for its contribution towards meeting the five Green Belt purposes and also whether it meets the definition of grey belt set out in the NPPF and updated Planning Practice Guidance, which is sequentially preferable to greenfield Green Belt in national policy. The assessment work is ongoing and will inform the Draft Local Plan. It is likely that following the Stage 1 Strategic Green Belt Assessment a more detailed (stage 2) assessment of the impact of development on more specific areas of the Green Belt will also be required.

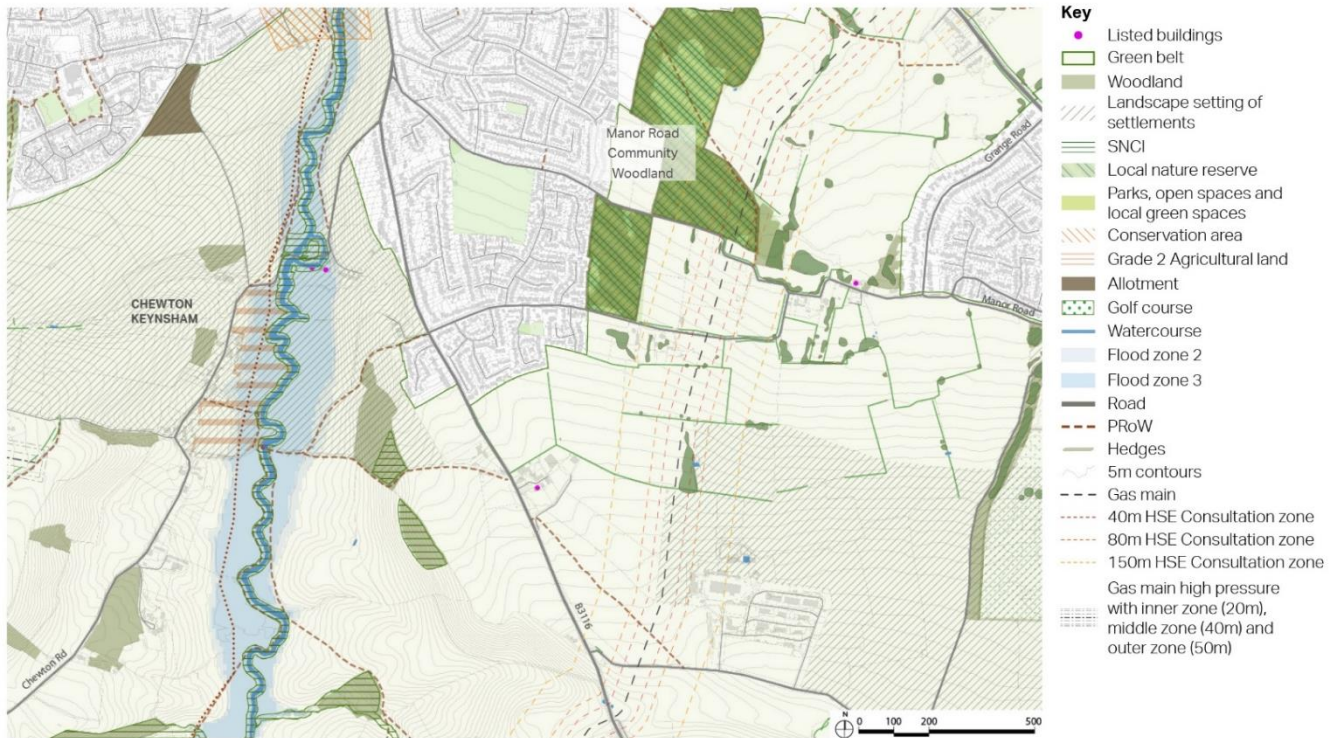


Figure 21: Context plan - South East Keynsham

Site Option

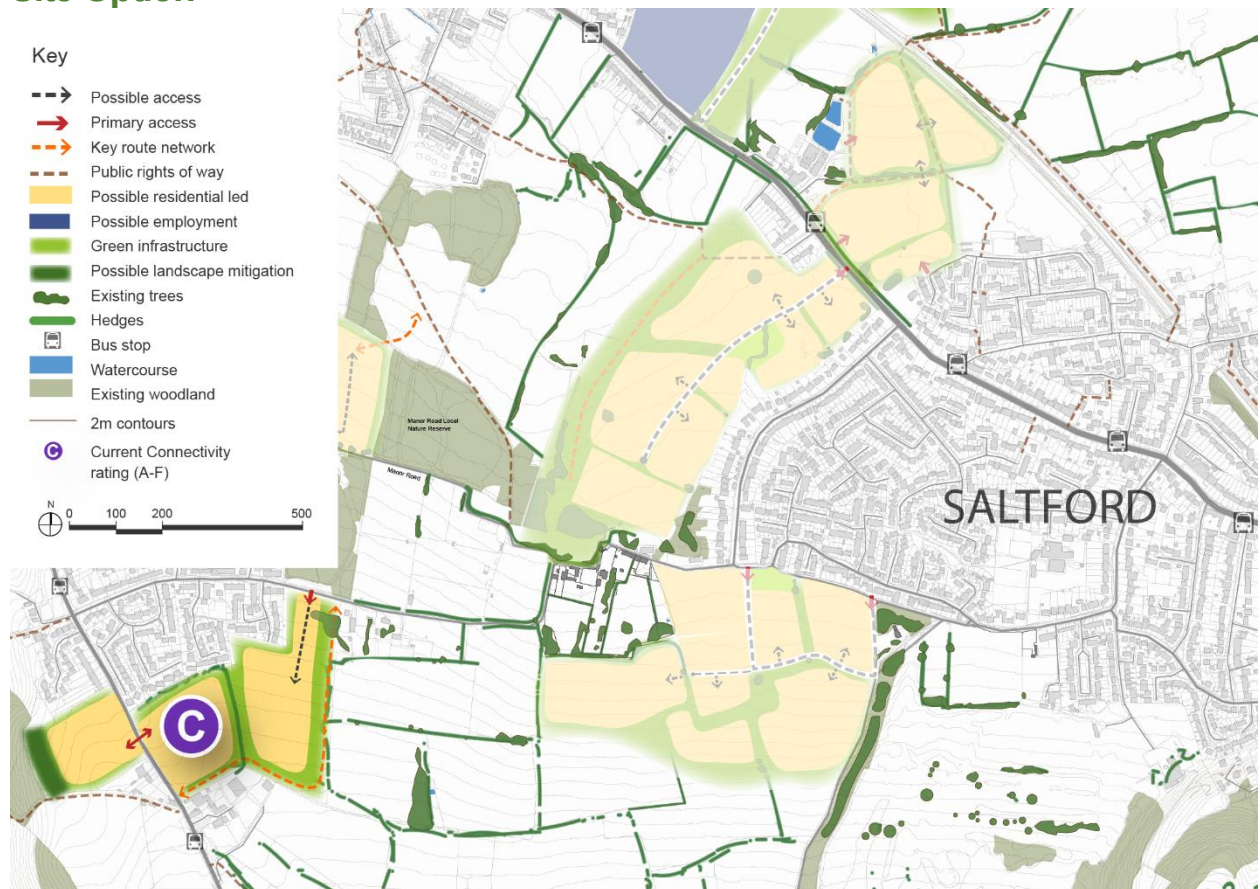


Figure 22: Indicative concept plan - South East Keynsham (bottom left)

South East Keynsham	Description
Opportunities	<p>Provision of around 400-550 homes.</p> <p>Potential to provide a convenience shop on Wellsway, to serve existing and new residents.</p> <p>Adjacent to a Local Nature Recovery Strategy Focus Area of Nature Recovery. 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).</p> <p>Opportunity for provision of local food growing.</p>
Constraints	<p>Located in the Green Belt.</p> <p>Poor active travel route availability into Keynsham town centre.</p> <p>Significant walking times to nearest convenience shop on Chandag Road, and to Chandag Primary School.</p> <p>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.</p> <p>The availability and frequency of public transport services, particularly bus services, is currently dependent on external funding, which is subject to ongoing review and cannot be guaranteed over the plan period. This uncertainty should be taken into account when considering the sustainability and deliverability of this option.</p> <p>Gas pipeline between Keynsham and Saltford Village may restrict the types of Green Infrastructure that could be provided between the two settlements.</p> <p>The site is next to woodland Local Nature Reserve (LNR), which would require an adequate buffer to boundary trees and measures to protect and enhance the woodland.</p>
Mitigation required	<p>Significant improvements to walking and cycling infrastructure required, both into Keynsham and across to Saltford Village.</p> <p>Significant tree buffer required along eastern boundary of the site, to reduce impact of built development in views from the Cotswold National Landscape.</p> <p>Significant street tree planting required throughout development parcels, to</p>

	<p>reduce impact of development in views from the Cotswold National Landscape.</p> <p>The cumulative impact of development of sites allocated in the Draft Local Plan in Keynsham and Saltford Village on primary and secondary school places will need to be assessed, to ensure there is sufficient capacity.</p>
Further evidence required	<p>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.</p> <p>Exploration of extent of possible green infrastructure enhancements between Keynsham and Saltford Village required (noting constraint of gas pipeline in this location).</p> <p>Evidence to consider secondary school place planning in the Wellsway and Broadlands catchment areas, in combination with other proposed allocations in the area.</p> <p>Air quality assessment</p>

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Saltford Village Site Options

- 6.105 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. Not all of the site options presented will necessarily be taken forward for allocation for development in the Draft Local Plan. 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.
- 6.106 The land parcels which make up the site options below have been assessed in more detail in various supporting documents, including the Housing and Economic Land Availability Assessment (HELAA), the Future Economic Needs Assessment Update (May 2025) the Sustainability Appraisal (SA), the Keynsham and Saltford Area of Search Assessment, and the Strategic Planning Options Document (SPO). Further information is available in the Site Selection Topic Paper.
- 6.107 Within these documents, a number of additional sites have also been assessed, and discounted, for various reasons. These sites are not included in the site options below, for the reasons set out in the evidence base. However, this Options Document consultation provides an opportunity for stakeholders and communities to provide comments on these discounted sites, by answering the question: Are there any other sites that haven't been identified, that need to be considered?

Location Option	New sites - appx. housing capacity
West Saltford (south of A4)*	650-850 dwellings
West Saltford (north of A4)*	300-350 dwellings
South Saltford	350-450 dwellings

- 6.108 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.
- 6.109 The Department for Transport has developed a Connectivity Tool that integrates transport and land use data to produce a national measure of connectivity for any location in England and Wales. This tool allows users to filter connectivity scores by local authority, assigning each location a grade from A to J, where A indicates the highest level of connectivity within its local authority area.
- 6.110 Each site option has been evaluated with the Connectivity Tool, and an average grade reflecting its connectivity relative to the Bath and North East Somerset area has been assigned. It's important to note that this assessment is based on the current sustainable transport network and existing land uses such as schools and shops, and does not take into account planned or future developments. The grading from A to J is not an overall ranking of site options and in deciding which sites are allocated in the Draft Local Plan other sustainability criteria and deliverability factors will also be considered.
- 6.111 It should be noted that the sustainability of development in certain locations is dependent on the continued provision of supported public transport services. Given the uncertainty of future funding for these services, is a risk when assessing the suitability of sites for allocation.

West Saltford Context

- 6.112 West Saltford is located on the western edge of the village of Saltford Village. The area is mostly flat arable fields with some hedgerows containing hedgerow trees.
- 6.113 Two site options for development are under consideration at West Saltford, one to the south of the A4 and one to the north. The sites both connect directly onto the A4 corridor, providing good access to frequent bus stops providing services into Bath and Bristol. The site to the north of the A4 is a new site in this Options consultation and was not previously presented in the spring 2024 options consultation. It is potentially in proximity to a new train station at Saltford Village, with land to the north west of Saltford one of two locations being considered for a potential rail station through feasibility work being undertaken by WECA and Network Rail.

- 6.114 The land parcel south of the A4 is located to the west of Grange Road in Saltford Village. 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.
- 6.115 A key priority for the Keynsham and Saltford Village 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 Village will need to be carefully assessed in conjunction with the options at North Keynsham (see page 94) and South East Keynsham (see page 113), 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.
- 6.116 The sites are located in the Green Belt. Any release from the Green Belt and subsequent allocation for development will need to demonstrate exceptional circumstances. To understand and consider the impact of potential development on the Green Belt an assessment of the extent to which different parcels of land serve the five purposes is being undertaken. The emerging Stage 1 Strategic Green Belt Assessment being carried out by WECA will assess the site for its contribution towards meeting the five Green Belt purposes and also whether it meets the definition of grey belt set out in the NPPF and updated Planning Practice Guidance, which is sequentially preferable to greenfield Green Belt in national policy. The assessment work is ongoing and will inform the Draft Local Plan. It is likely that following the Stage 1 Strategic Green Belt Assessment a more detailed (stage 2) assessment of the impact of development on more specific areas of the Green Belt will also be required.

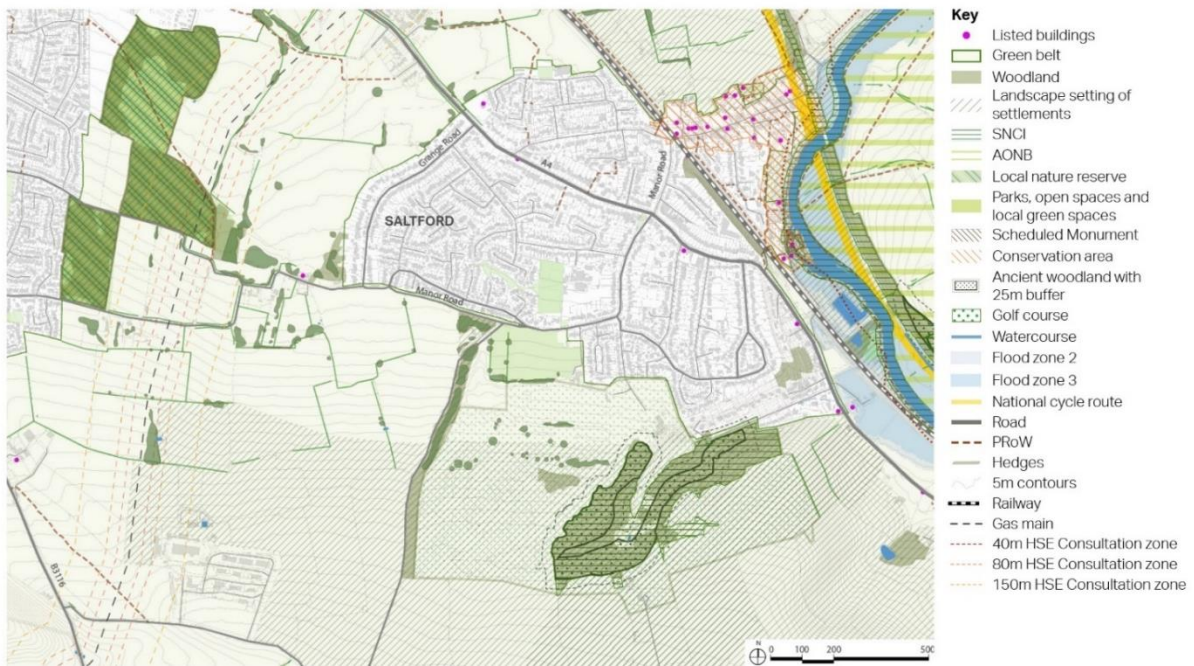


Figure 23 Context plan - West Saltford



Figure 24 Indicative concept plan - West Saltford (south of A4)

West Saltford (south of the A4)	Description
Opportunities	<p>Provision of around 650-850 homes, a new primary school (if delivered in combination with South Saltford and/or West Saltford north of the A4), and a public green space.</p> <p>Opportunity for provision of local food growing.</p> <p>Direct access to A4, providing easy access to sustainable travel options, with potential for employment land development. Opportunity to strengthen and enhance the remaining green infrastructure gap between Keynsham and Saltford Village, seeking to make it more accessible and useable. Further evidence is required to understand the extent of possible enhancements.</p> <p>Opportunity to explore and fund Manor Road becoming a “Quiet Lane” between Keynsham and Saltford Village, 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.</p>
Constraints	<p>Located in the Green Belt.</p> <p>Reduces green gap between Saltford Village and Keynsham, particularly when considered in addition to option at North Keynsham.</p> <p>The defined landscape setting of settlement designation is proposed to be amended and would be directly adjacent to the southern boundary of the potential development parcels. In order to ensure no impact on setting, building heights must not exceed 2-storeys in height. Gas pipeline between Keynsham and Saltford may restrict the types of Green Infrastructure that could be provided between the two settlements.</p> <p>Grade II listed Keynsham Manor house located on Manor Road. Impact on setting to be considered, particularly impact of new primary school building.</p> <p>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.</p>
Mitigation required	<p>Strengthening and enhancement of the remaining green infrastructure gap between Keynsham and Saltford Village required.</p> <p>The cumulative impact of development of sites in Keynsham and Saltford Village on primary school places will need to be assessed, to ensure there is sufficient capacity.</p>

<p>Further evidence required</p>	<p>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.</p> <p>Consideration in conjunction with extent of options at North Keynsham and South East Keynsham, to ensure significant green gap between Keynsham and Saltford Village remains.</p> <p>Exploration of extent of possible green infrastructure enhancements between Keynsham and Saltford Village required (noting constraint of gas pipeline in this location).</p> <p>Discussion with landowners on Grange Road to understand if walking route between plot and village could be created.</p> <p>Evidence to consider secondary school place planning in the Wellsway and Broadlands catchment areas, in combination with other proposed allocations in the area.</p> <p>Air quality assessment</p>
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West Saltford (North of the A4)

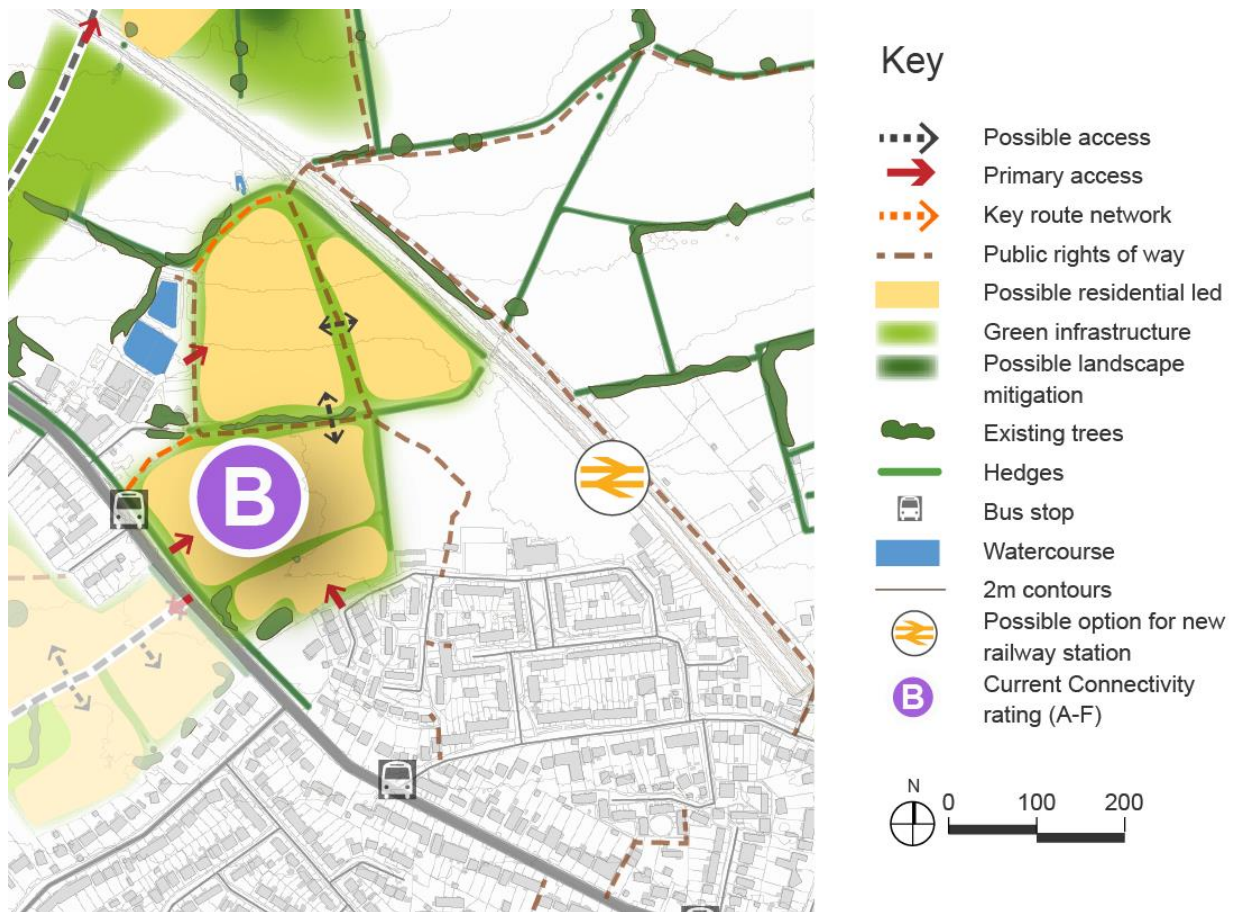


Figure 25: Indicative concept plan – West Saltford (North of the A4)

West Saltford (North of the A4)	Description
Opportunities	<p>Provision of around 300-350 homes</p> <p>Direct access to A4, providing easy access to sustainable travel options, with potential for employment development.</p> <p>Opportunity to strengthen and enhance the remaining green infrastructure gap between Keynsham and Saltford Village, seeking to make it more accessible and useable. Further evidence is required to understand the extent of possible enhancements.</p> <p>If a new train station is opened at North West Saltford, there is the potential for a greater mix of uses, and higher density development, to reflect the increased accessibility.</p>
Constraints	<p>Located in the Green Belt.</p> <p>Reduces green gap between Saltford Village and Keynsham, particularly when considered in addition to option at North Keynsham.</p> <p>Gas pipeline between Keynsham and Saltford may restrict the types of Green Infrastructure that could be provided between the two settlements.</p>
Mitigation required	<p>Strengthening and enhancement of the remaining green infrastructure gap between Keynsham and Saltford required.</p> <p>The cumulative impact of development of sites in Keynsham and Saltford on primary school places will need to be assessed, to ensure there is sufficient capacity.</p>
Further evidence required	<p>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.</p> <p>Consideration in conjunction with extent of options at North</p>

	<p>Keynsham and South East Keynsham, to ensure significant green gap between Keynsham and Saltford remains.</p> <p>Exploration of extent of possible green infrastructure enhancements between Keynsham and Saltford Village required (noting constraint of gas pipeline in this location).</p> <p>Evidence to consider secondary school place planning in the Wellsway and Broadlands catchment, in combination with other proposed allocations in the area.</p>
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South Saltford Context

6.117 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 paddocks with small woodland areas and tree belts to the north of the Saltford Golf Club. Since the 2024 Options consultation amended landscape evidence (and associated proposed revision of the landscape setting of the settlement) and demonstration of the community value of the Golf Club mean that the site boundary has been reduced from that previously consulted on, excluding land occupied by the Golf Club from consideration.

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

6.119 The site is located in the Green Belt. Any release from the Green Belt and subsequent allocation for development will need to demonstrate exceptional circumstances. To understand and consider the impact of potential development on the Green Belt an assessment of the extent to which different parcels of land serve the five purposes is being undertaken. The emerging Stage 1 Strategic Green Belt Assessment being carried out by WECA will assess the site for its contribution towards meeting the five Green Belt purposes and also whether it meets the definition of grey belt set out in the NPPF and updated Planning Practice Guidance, which is sequentially preferable to greenfield Green Belt in national policy. The assessment work is ongoing and will inform the Draft Local Plan. It is likely that following the Stage 1 Strategic Green Belt Assessment a more detailed (stage 2) assessment of the impact of development on more specific areas of the Green Belt will also be required.

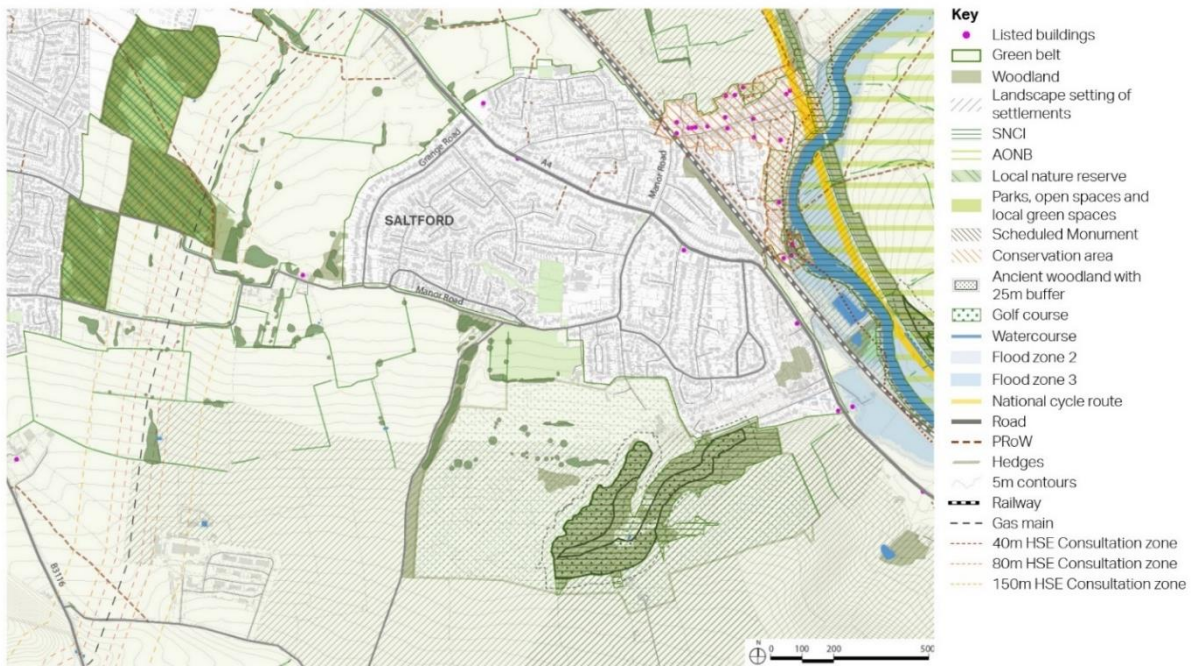


Figure 26: Context plan - South Saltford

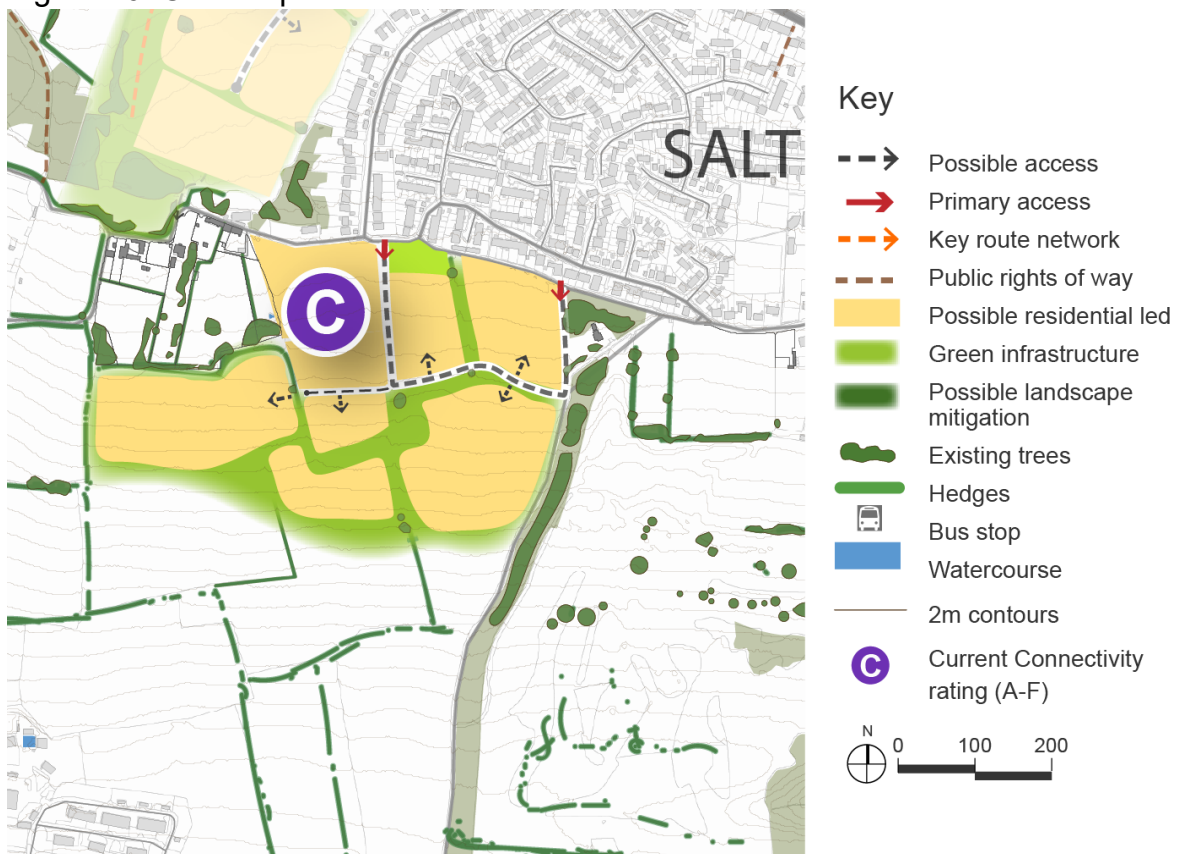


Figure 27 1: Indicative concept plan - South Saltford

South Saltford	Description
Opportunities	<p>Provision of around 350-450 homes, a new primary school (if delivered in combination with West Saltford (south of the A4 and north of the A4), a village green, and a small local centre, with facilities such as a village shop to serve residents to the south of the village.</p> <p>Opportunity to explore and fund 'Quiet Road' along Manor Road between Keynsham and Saltford Village, 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.</p>
Constraints	<p>Located in the Green Belt.</p> <p>Relationship with the Golf Club and the floodlit driving range needs to be considered.</p> <p>Grade II listed Keynsham Manor house located on Manor Road. Impact on setting to be considered, particularly impact of new primary school building.</p> <p>The defined landscape setting of settlement designation is proposed to be amended and would be directly adjacent to the western boundary of the potential development parcels. In order to ensure no impact on setting, building heights must not exceed 2-storeys in height.</p>
Mitigation required	<p>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.</p> <p>The cumulative impact of development of sites in Keynsham and Saltford Village on primary school places will need to be assessed, to ensure there is sufficient capacity.</p>
Further evidence required	<p>Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact</p>

	<p>when considering strategic removal across the district.</p> <p>Exploration of extent of possible green infrastructure enhancements between Keynsham and Saltford required (noting constraint of gas pipeline in this location).</p> <p>Air quality assessment</p> <p>Evidence to consider secondary school place planning in the Wellsway and Broadlands catchment, in combination with other proposed allocations in the area.</p>
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Hicks Gate

Place Profile

6.120 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 agricultural fields typically used for grazing, with a network of public rights of way. This wider area includes a range of sports pitches, Brislington House, St Brendan's Sixth Form College, allotments and the Brislington Park and Ride Site.

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

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

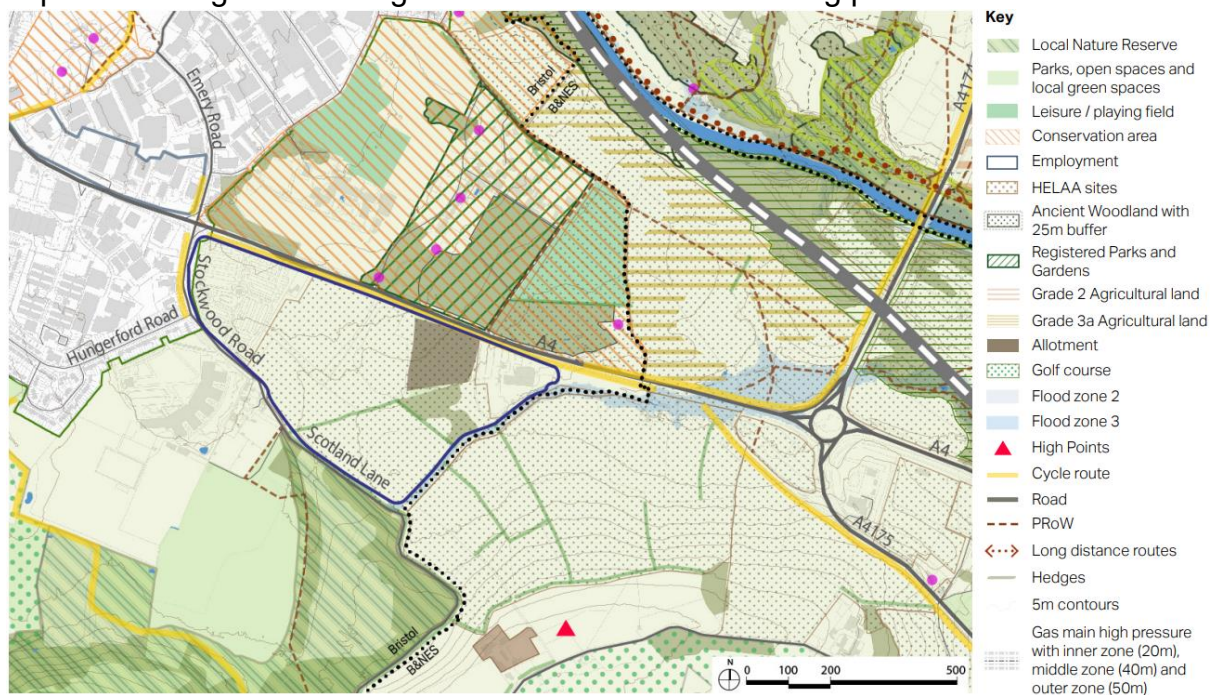


Figure 28: Context plan - Hicks Gate

6.123 Bristol City Council submitted the [Bristol Local Plan Publication Version \(November 2023\)](#) for independent examination in April 2024. The examination hearings have concluded and the Inspectors have published an Interim Post Hearing Advice note. The council is currently working on outstanding actions from the examination hearings.

6.124 '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, Bristol 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 29: Extract from Bristol City Council Draft Local Plan showing area proposed to be removed from the Green Belt

Key Issues and Opportunities

The Bristol and Bath Growth Zone is a key element of WECA Local Growth Strategy. The zone will recognise the planned infrastructure improvements and housing developments along the Bristol to Bath Corridor, exploring the potential to partner with WECA to deliver key employment and housing sites as well as transport projects, especially mass transit.

Whilst Bath and Bristol centres are readily accessible by public transport, the new communities created in the locality are likely to look towards Keynsham Town Centre meeting their day to needs, and for a certain scale of leisure and cultural activities. There are likely to be significant opportunities for Keynsham Town Centre to enhance its current role and to increase its offer. The local plan will provide a proactive policy framework to enable this to happen and to ensure that town centre sites are developed in a way that supports the increased demands.

Land at Hicks Gate is designated as Green Belt. Any new site allocations would require the removal of land from the Green Belt, and removal would require exceptional circumstances to be fully evidenced and justified in the context of revised national policy. Measures to improve the quality of the remaining Green Belt should be explored, including accessible green spaces and nature recovery, with funding to deliver such improvements identified.

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

This area has primarily been considered for its potential as a residential led development, with the opportunity for employment led regeneration within the existing and adjacent areas of Bristol. One of the issues 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 movement. 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 inbound 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 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.

Whilst there are many footpaths south of the Hicks Gate site there are no footpaths in the Hicks Gate site allocation, 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 substantively integrated in the new development and any unavoidable hedgerow loss must be compensated at some other areas in line with the Biodiversity Net Gain (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 be 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.

Emerging Vision and Priorities

6.125 The priorities for the Hicks Gate Area are set out below and these will inform a vision for the area should it be allocated for development in the Draft Local Plan. Many of the priorities can be addressed by new development, and the 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.

6.126 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 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. **It will be important to seek to optimise the density of development proposed in this area.**

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 significant 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 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.

The diagram below represents these conceptual themes:

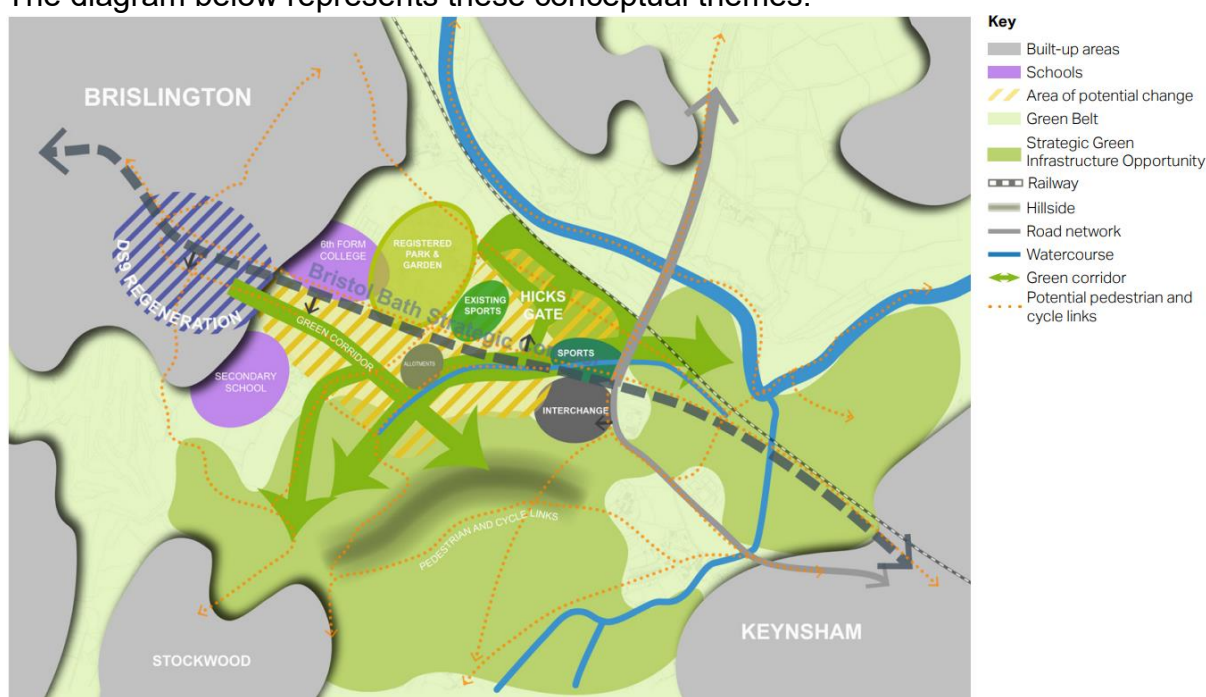


Figure 30: Indicative concept plan - Hicks Gate

Transport Opportunities

- 6.127 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 Hicks Gate Interchange (HGI) is proposed to be provided in the south west corner of the Hicks Gate roundabout and this will replace the existing Park and Ride facility at Brislington. The new Interchange will expand the existing functionality of the P&R to incorporate interchange for other modes of transport, including but not limited to walking/wheeling, cycling, micromobility options (such as public hire e-scooters and e-bikes), electric vehicle charging infrastructure, car club pick-up points, in addition to the potential co-location of community and leisure facilities.

The Interchange provides an excellent and realistic opportunity to intercept vehicle trips and transfer these to sustainable modes of transport as well as serving the new residential-led, mixed-use neighbourhood. It is well situated to support connectivity by sustainable modes on the Bristol to Bath corridor, as well as linking communities such as Keynsham (including the railway station), Stockwood, Brislington and Bristol's East and North Fringe. The HGI is therefore an important link in providing a joined-up strategy towards achieving high uptake of sustainable transport within B&NES and the wider region. It is therefore essential that the HGI will need to be well integrated with and connected via high quality and attractive sustainable transport links to both the existing A4 and A4174 transport corridor and proposed improvement schemes including via the Bristol to Bath Strategic Corridor (BBSC) project.

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 southeast 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 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.

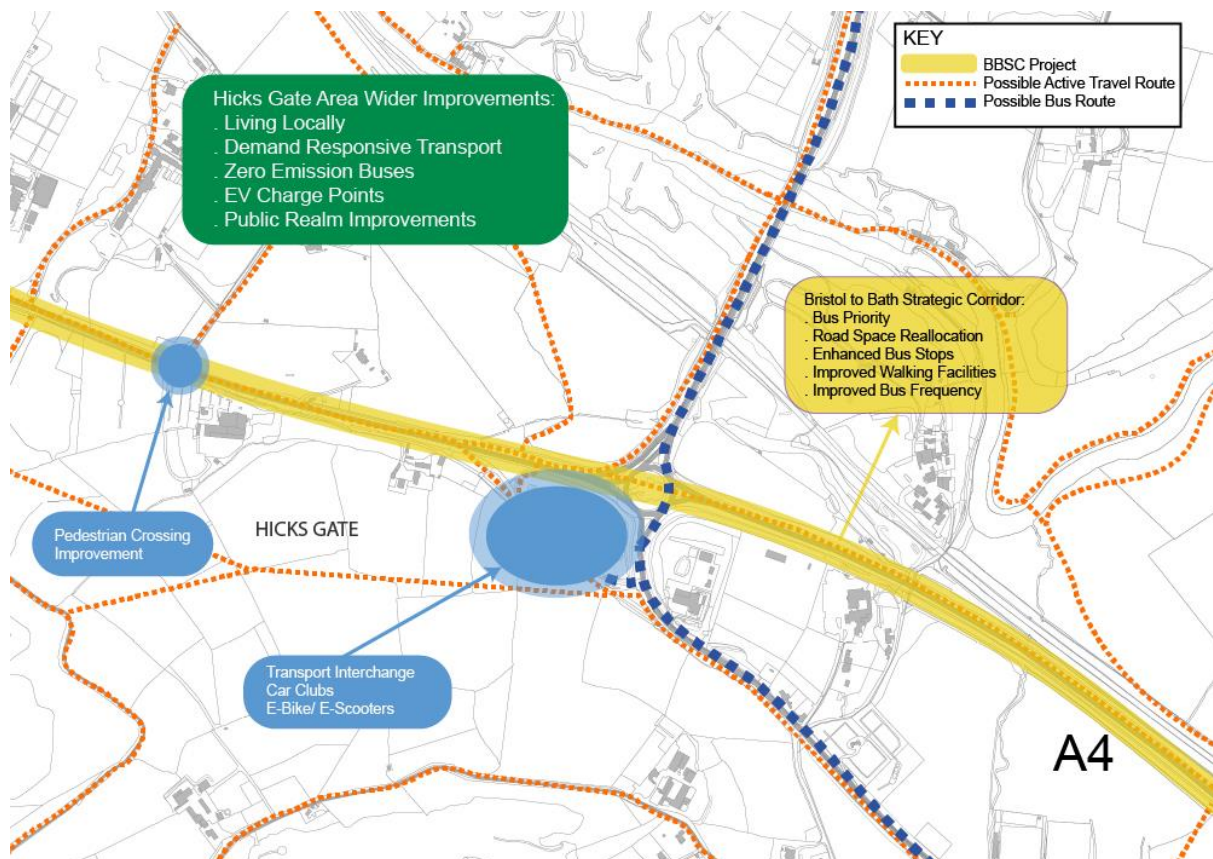


Figure 31: Transport opportunities in the Hicks Gate area

Options Consultation 2024

6.128 Comments on the previous options consultation in Spring 2024 are still relevant. These comments will be reviewed and taken into account, together with additional comments received, when the draft plan is being prepared. Below is a short summary of some of the main issues raised in the previous consultation about Hicks Gate.

- **Transport and Accessibility Considerations:** Proximity to A4 and mass transit potential at Hicks Gate is valued; sustainable travel options like park and ride, cycling, and walking paths are advocated, while concerns over A4 congestion and traffic safety are noted.
- **Housing Needs and Development Preferences:** The need for affordable housing at Hicks Gate is recognised; preferences are split between higher-density housing or mixed-use development and fears of urban sprawl, greenbelt encroachment, and under-utilisation of brownfield sites.
- **Socio-Economic Impacts and Community Infrastructure:** Potential for local employment and enhanced community facilities at Hicks Gate is

acknowledged; concerns about community character erosion, anti-social behaviour risk, and pressure on services are also raised.

- **Strategic Planning and Regulatory Compliance:** Adherence to planning policy framework and alignment with local and regional frameworks at Hicks Gate are discussed, with calls for development priorities on brownfield sites and meeting conditions on sustainability and community benefit.
- **Environmental Sustainability and Green Infrastructure:** Support for carbon-neutral development at Hicks Gate is shown, suggesting renewable energy integration and high building insulation standards; importance is placed on retaining and enhancing green spaces.
- **Flood Risk and Environmental Protection:** Concerns about flooding risks in areas like Stockwood Lane at Hicks Gate are prominent; emphasis on comprehensive flood mitigation, greenbelt protection, and ecologically considerate development is evident.

Strategy

6.129 The emerging strategy set out below relates to the wider Bristol to Bath corridor, incorporating the Hicks Gate area and other places. The strategy has been set out for this wider area because of the close functional and physical relationships between different places, that is they do not sit in isolation from nearby places.

6.130 The strategy for the Bristol to Bath Corridor seeks to deliver sustainable growth that capitalises on the strategic location between Bath and Bristol to take advantage of existing, and significantly enhanced improvements to, sustainable transport links in the area.

6.131 Development at Hicks Gate will be exemplary and will redefine this key entrance into Bristol. It will be zero carbon and residential development will meet the needs of existing and future residents, including the delivery of affordable housing, which will be facilitated by the 'golden rules' as this is on land intended to be released from the Green Belt.

6.132 There is a significant opportunity for employment led regeneration within the existing and adjacent areas of Bristol, or the potential for a proportion of employment land to be provided within the B&NES area of Hicks Gate.

6.133 The proposed development area seeks to avoid the coalescence of Keynsham with Bristol and integrates new development with strategic green infrastructure corridors that improve access to nature and enhance biodiversity.

Location Option	New sites - appx. housing capacity range
Bristol to Bath Corridor	
Hicks Gate	1,200 – 1,550 (for Option 2, see below)

Note – Hicks Gate could be mixed use with an increased employment role. This would reduce the housing capacity anticipated.

6.134 The Department for Transport has developed a Connectivity Tool that integrates transport and land use data to produce a national measure of connectivity for any location in England and Wales. This tool allows users to filter connectivity scores by local authority, assigning each location a grade from A to J, where A indicates the highest level of connectivity within its local authority area.

6.135 Each site option has been evaluated with the Connectivity Tool, and an average grade reflecting its connectivity relative to the Bath and North East Somerset area has been assigned. It's important to note that this assessment is based on the current transport network and existing land uses such as schools and shops, and does not take into account planned or future developments.

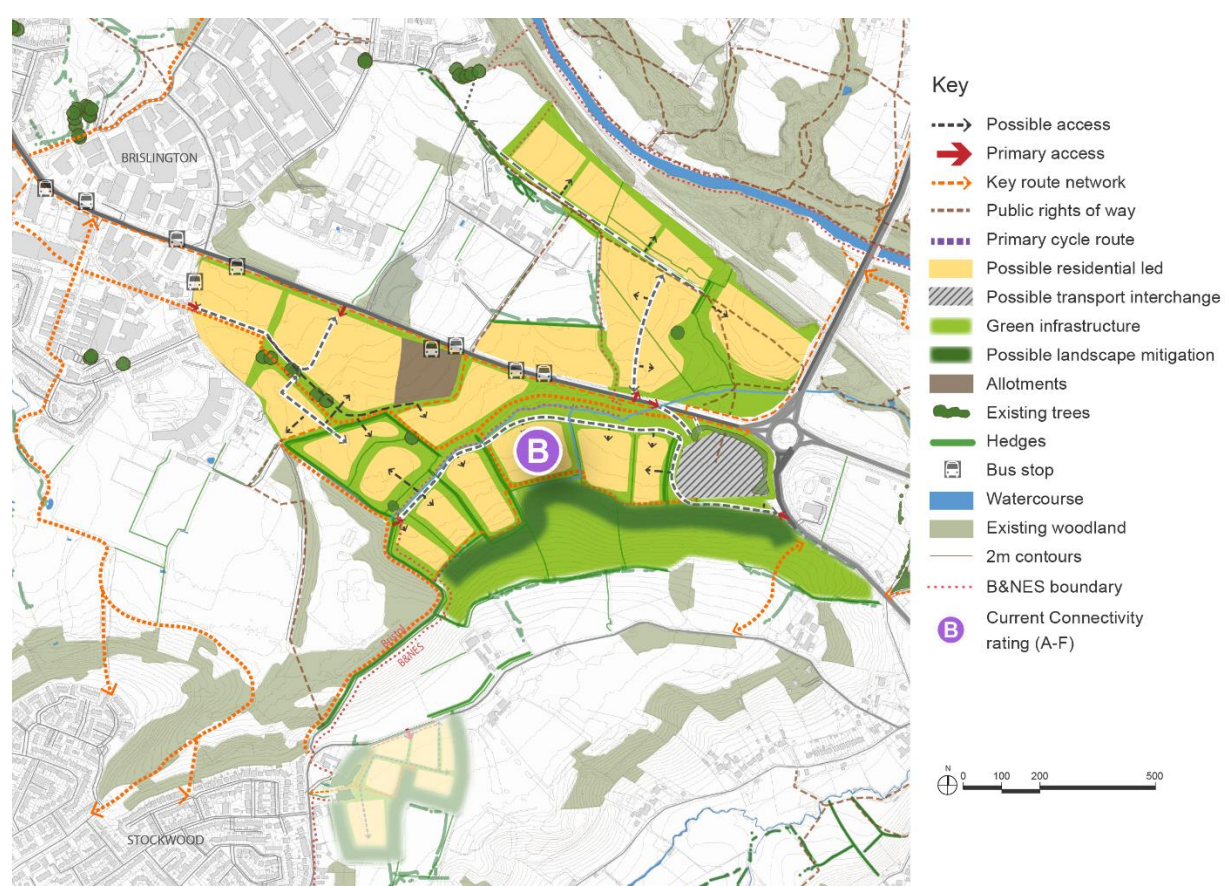
Hicks Gate Site Options

6.136 Two options are proposed which are broadly similar, but with one option providing more development to the south than the other. Option 1 contains the landscape mitigation required within the same landownership and Option 2 requires third party land to deliver the landscape mitigation.

6.137 Both options seek to optimise development capacity and densities in the area whilst ensuring that a sufficient Green Belt gap between the Hicks Gate area and Keynsham is retained and enhanced.

6.138 Subject to the completion of further evidence relating to the Green Belt, and to further evidence relating to the Hicks Gate Interchange, specifically the amount of land required for delivery, there may be the opportunity for further development to the south and south east of the proposed Transport Interchange shown on both options.

6.139 It should be noted this area has primarily been considered as a residential led development, with the opportunity for employment led regeneration within the Brislington Retail and Trade Parks. This area is within Bristol City Council's jurisdiction and any proposed changes will be in their own local plan or other regeneration initiatives. However, 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 these options 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 Hicks Gate Interchange.



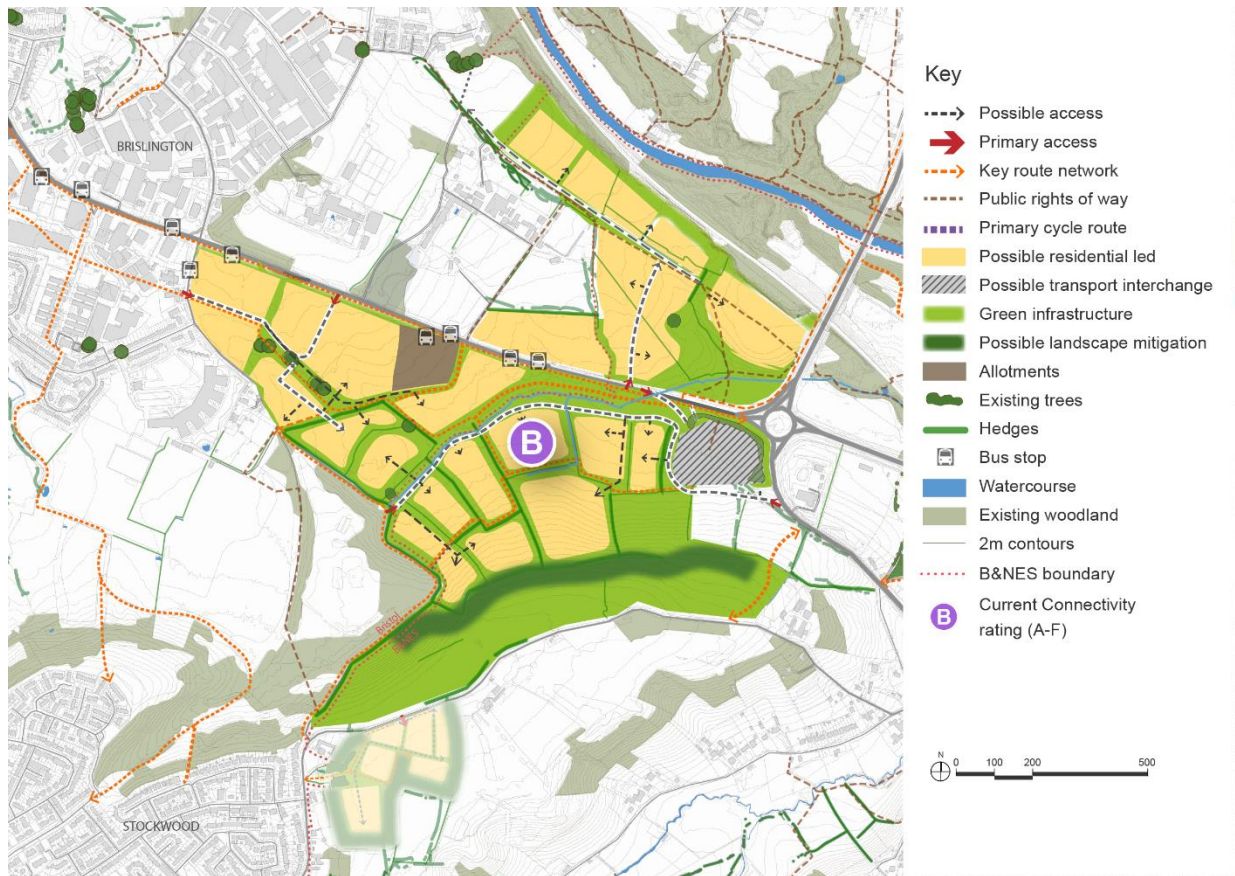


Figure 33: Indicative concept plan - Hicks Gate Option 2

Hicks Gate	Description
Opportunities	<p>The delivery of a vibrant, well connected, higher density, 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.</p>
Constraints	<p>Located in the Green Belt.</p> <p>The A4 corridor is an important strategic transport corridor into Bristol and can get congested.</p> <p>Both options propose development in areas of landscape sensitivity. In Option 1, all land, including the area for landscape mitigation, is within the same ownership. Further assessment is required to ascertain whether the proposed landscape mitigation at the southern edge in Option 2 is deliverable, as this would be on land owned and controlled by a third party.</p> <p>Secondary school pupils within B&NES would need safe access to Broadlands in Keynsham.</p> <p>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 and the delivery of social infrastructure to deliver a high quality place to live and work.</p>
Mitigation required	<p>Careful consideration of the location, accessibility and integration 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 and allow access to public transport.</p> <p>Significant green infrastructure and planting required throughout and along the edge of the development sites. An area to the south has been identified for landscape mitigation, but this area is in different ownership to the main area proposed for development and delivery of this landscape mitigation is uncertain and based wholly on the consent of the landowner. If this is not deliverable, then appropriate landscape mitigation must take place within the proposed development area and the overall quantum of development will be reduced.</p> <p>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.</p>

Further evidence required	<p>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.</p> <p>Landscape sensitivity assessment and mitigation.</p>
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Whitchurch Village

Place Profile

6.140 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.

6.141 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 within the context of revised national policy, including consideration of whether any land meets the definition of the newly introduced concept of grey belt. This will be informed by Green Belt assessment which is being undertaken to inform the Draft Local Plan.

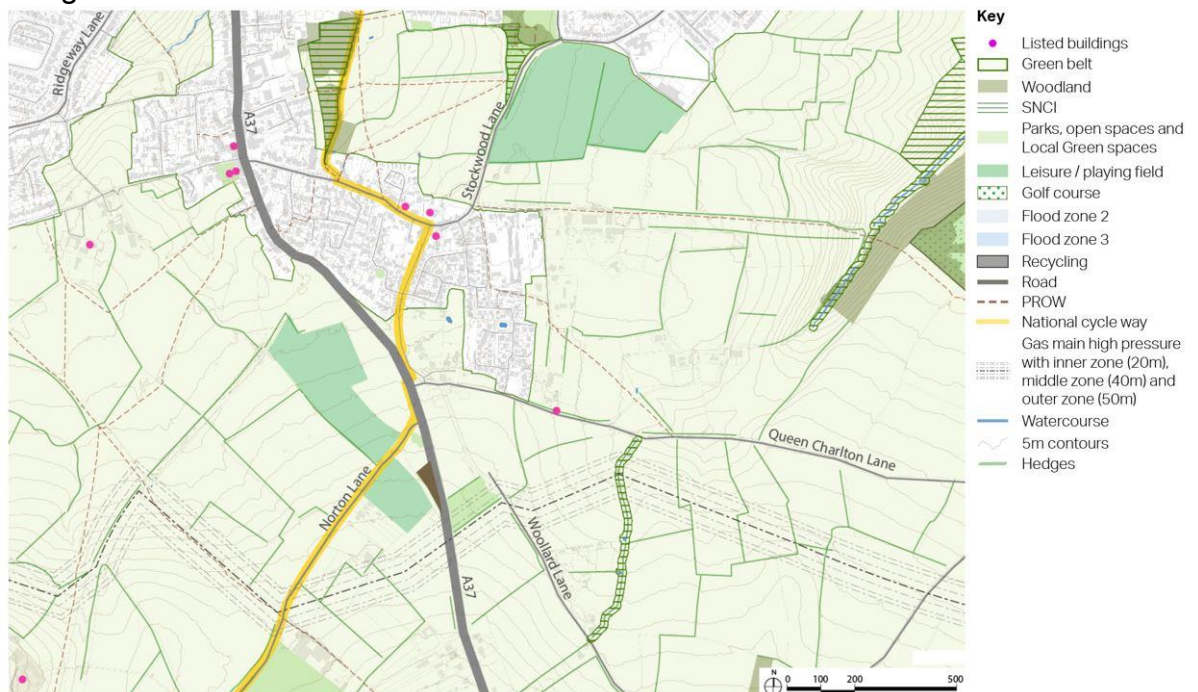


Figure 34: Context plan - Whitchurch Village

- 6.142 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 high quality sustainable alternatives, notably a railway station, results in a high proportion of private car journeys, particularly to Bristol. For local journeys, walking, cycling and wheeling are not popular choices because of the lack of safe, attractive 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.
- 6.143 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.
- 6.144 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 the 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.
- 6.145 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.
- 6.146 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.

- 6.147 With the exception of Option 4 which is a larger development of a scale that could potentially deliver significant public benefits as part of a comprehensive and well-planned new development 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. Any future development assessed to cause substantial harm should be 'wholly exceptional' in line with the NPPF.
- 6.148 The area covered by Option 4 is shown in the Whitchurch Heritage Assessment as being entirely within an area of 'very high' risk of harm to the significance of heritage assets . A further area to the south west of Whitchurch Village at Lyon's Court Farm is also in an area of 'very high' or 'high' risk, however in contrast to Option 4 it is considered that a smaller residential-only option located south west of Whitchurch Village at Lyon's Court Farm is unlikely to be able to deliver sufficient public benefits to outweigh the heritage harm. This site has therefore not been proposed as an option in this Local Plan Options Consultation.
- 6.149 The full heritage assessment can be viewed in the supporting evidence base.

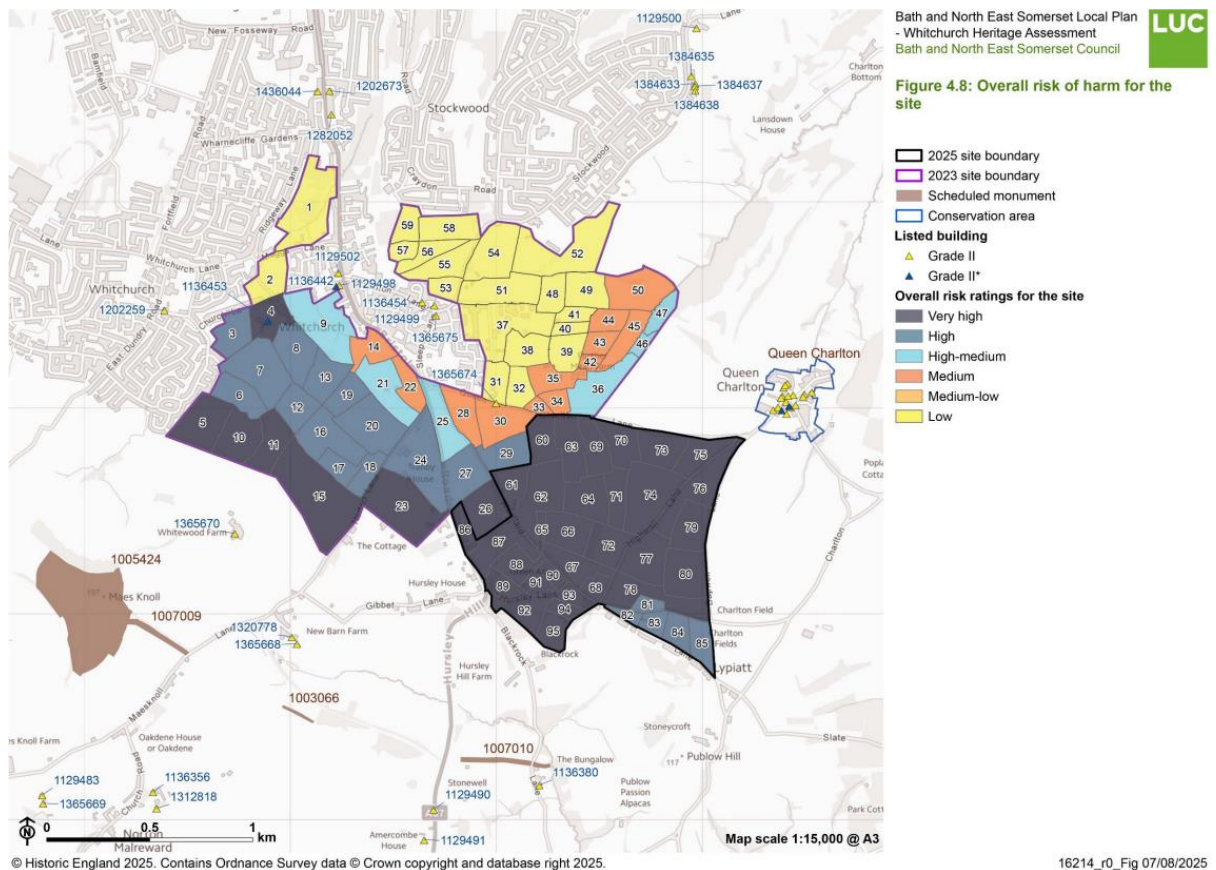


Figure 35: Extract from LUC Heritage Impact Assessment, Addendum (August, 2025)

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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.

6.150 The area surrounding Whitchurch Village 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 the 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 Local Plan stage, these will need to be informed by additional landscape sensitivity work, and consideration of potential mitigation.

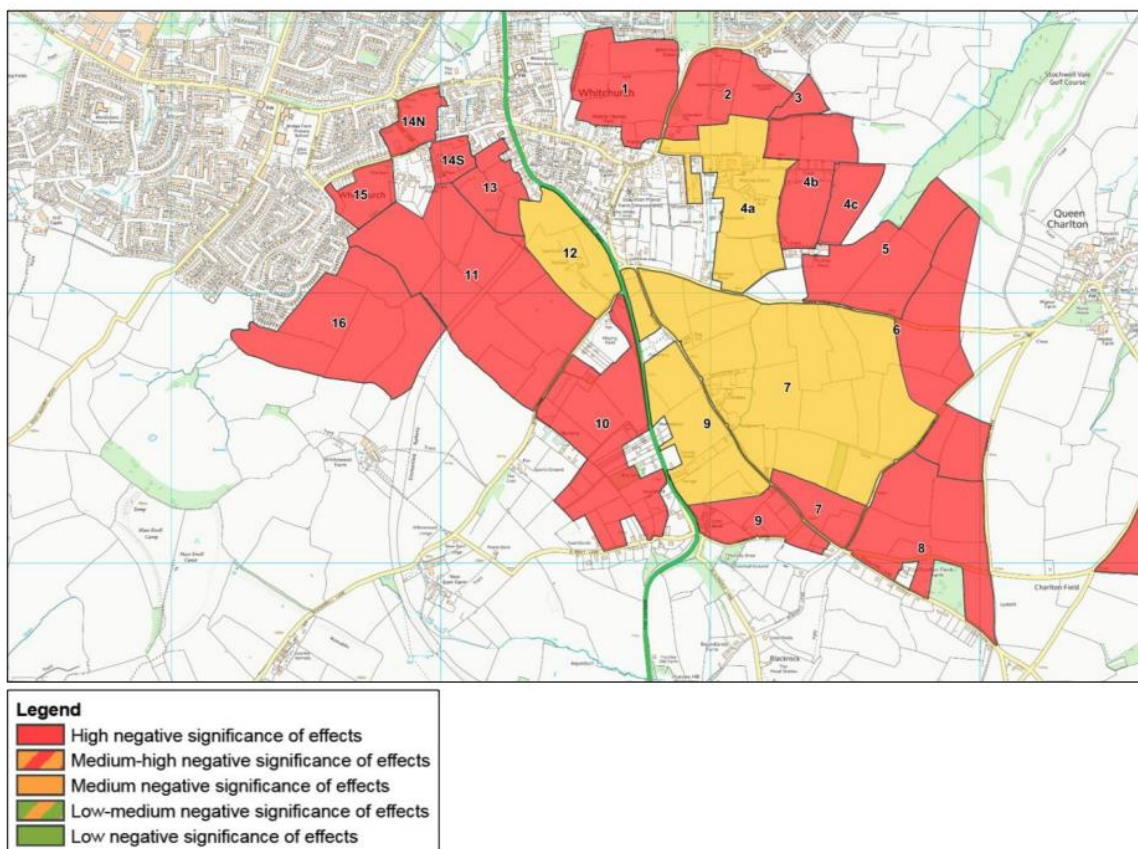


Figure 36: Extract from 2017 Landscape and Visual Impact Assessment

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 existing village primary school could accommodate pupils from around 150 new homes, but any larger scale of development would need to be supported by the provision of a new primary school as there is insufficient space for on-site expansion.

Without the provision of a new secondary school at Whitchurch, secondary age pupils from any new development at Whitchurch Village will need to be transported to school in Keynsham or the Chew Valley, 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. This can lead to poor air quality.

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 Liveable 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 sustainable modes.

Emerging Vision and Priorities

6.151 The following list sets out the key priorities for Whitchurch Village. These priorities will inform a vision for the village that will also cover and reflect areas that are proposed for development in the Draft Local Plan. 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.

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Transport Opportunities

6.152 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.

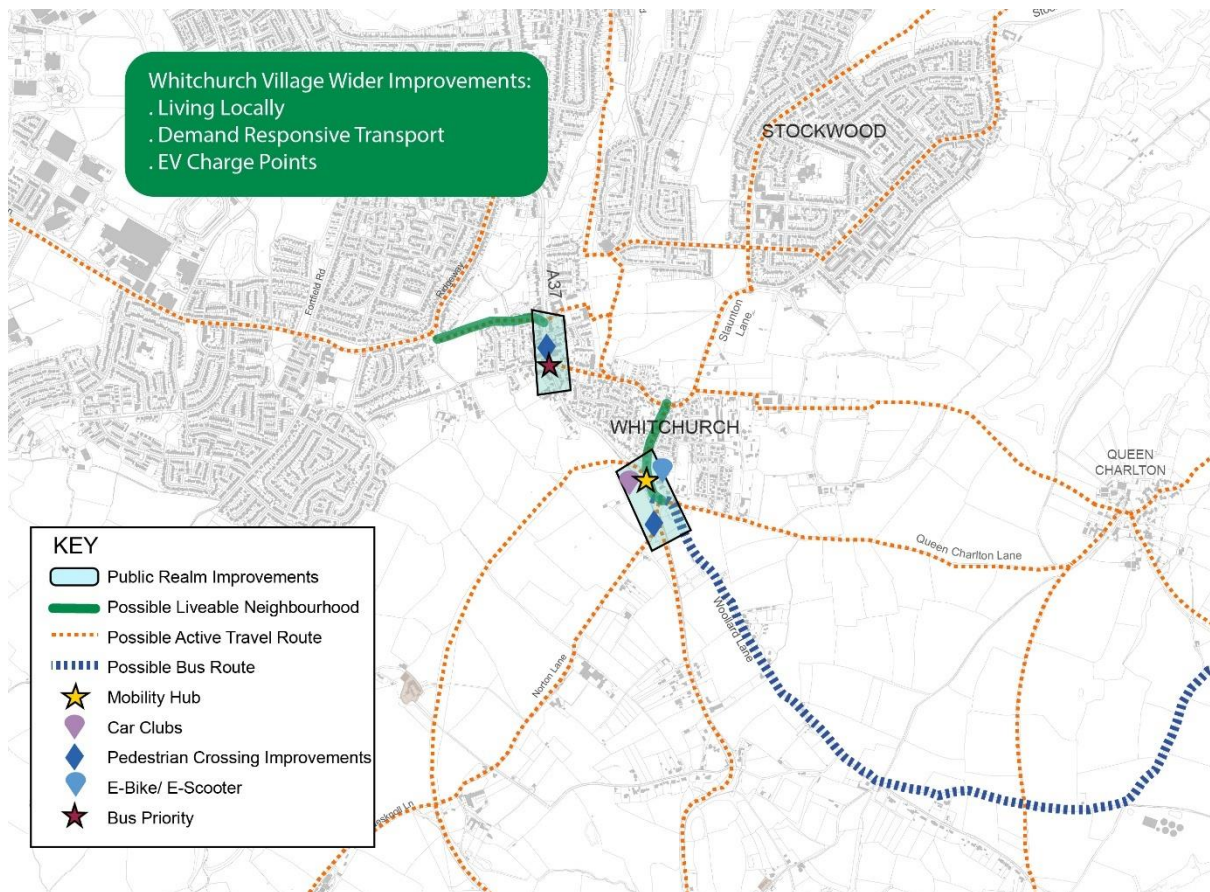


Figure 37: Transport opportunities in Whitchurch Village

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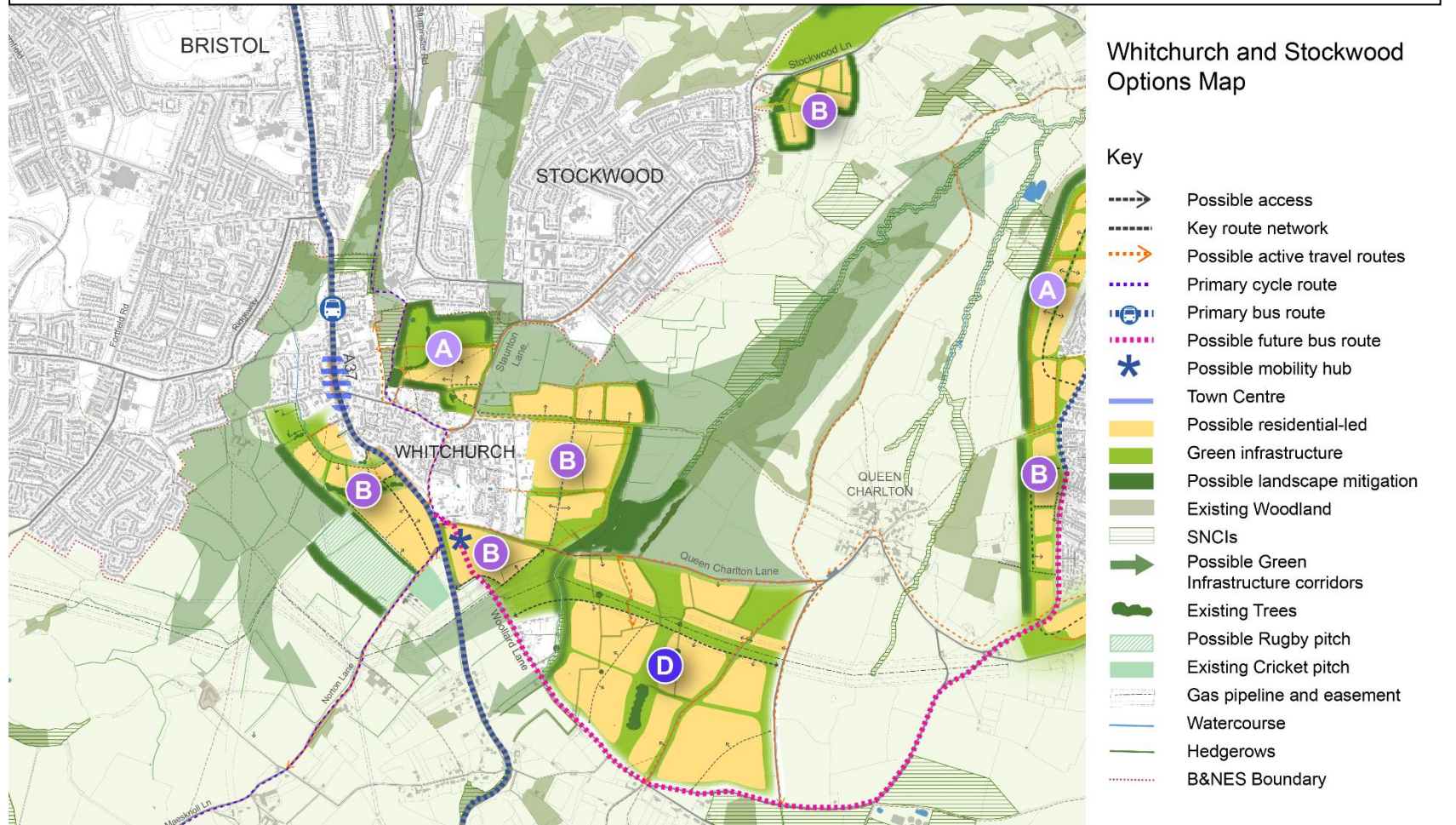
Options Consultation 2024

6.153 Comments on the previous options consultation in Spring 2024 are still relevant. These comments will be reviewed and taken into account, together with additional comments received, when the draft plan is being prepared. Below is a short summary of some of the main issues raised in the previous consultation.

- Issues raised relating to addressing the housing shortage and the need for affordable options for young people, but also concerns about development not reflecting and therefore changing the village's local character and resulting in overdevelopment. Preference for development on brownfield sites is noted to protect green spaces.
- There is concern that local infrastructure and services (GP and dental practices, schools, shops) are inadequate for current residents, exacerbated by poor public transport that disconnects the community. There's a call for improving infrastructure alongside or prior to housing expansion.
- There is a push for a sustainable Whitchurch with reduced car dependency via better planning, despite the current reliance on cars due to inadequate public transport.
- There is concern over potential increases in traffic congestion, particularly on the A37, with suggestions including enhancing public transport, promoting sustainable travel, and upgrading road infrastructure.
- Proposals to reduce traffic congestion and improve air quality include rerouting heavy goods vehicles and establishing traffic calming measures, amid concerns that new development could intensify these issues.

Figure 38:

OPTIONS MAP showing all the potential site allocations in Whitchurch Village and adjacent to Stockwood



Current Site Connectivity - Possible residential-led development

- A** A-rated **B** B-rated **C** C-rated
D D-rated **E** E-rated **F** F-rated

The grading within the map illustrates the current transport connectivity based on the existing network, where A indicates the highest level of connectivity. They are intended for reference only. They do not account for future infrastructure improvements, which are expected to enhance connectivity in line with the emerging transport vision.



Strategy

- 6.154 The emerging strategy set out below relates to the wider Bristol to Bath corridor, incorporating Whitchurch and other places. The strategy has been set out for this wider area because of the close functional and physical relationships between different places, that is they do not sit in isolation from nearby places.
- 6.155 The strategy for the Bristol to Bath Corridor seeks to deliver sustainable growth that capitalises on the strategic location between Bath and Bristol to take advantage of existing, and significantly enhance improvements to, sustainable transport links in the area.
- 6.156 Economic growth will build on the area's strengths and links to Bristol and Bath, with a proportionate level of complementary employment at Whitchurch. Additional residential and employment growth will support the role and function of Whitchurch village centre.
- 6.157 Additional housing will meet the needs of existing and future residents, including the delivery of affordable housing, which will be facilitated by the 'golden rules' where this takes place on land released from the Green Belt. The plan will retain the identity of Whitchurch by avoiding coalescence with Bristol and integrating new development with strategic green infrastructure corridors that improve access to nature and enhance biodiversity. Development at Whitchurch will retain the village's separate identity to Bristol and will ensure planned growth delivers improved services and infrastructure for the village, address the severance caused by the A37, whilst respecting the setting of Maes Knoll.

Site Options

- 6.158 A variety of site options for development are set out below, which have been prepared in response to the key issues and priorities set out above. Some of the site options comprise more than one land parcel or area that means they are not in single ownership. Not all of the site options presented will necessarily be taken forward for allocation for development in the Draft Local Plan. Explanation as to how each of the site options responds to the key issues and priorities 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.
- 6.159 The land parcels which make up the site options below have been assessed in more detail in various supporting documents, including the Housing and Economic Land Availability Assessment (HELAA), the Sustainability Appraisal (SA), and the Whitchurch Village Strategic Planning Options Document (SPO). The table below sets out the HELAA and SA references relevant to each site option:

Location Option	New sites - appx. housing capacity
West Whitchurch (Option 1)	350-450 dwellings
East Whitchurch (Horseworld and Woollard Lane) (Option 2)*	1,000-1,300 dwellings
North Whitchurch (Staunton Lane) (Option 3)	300-400 dwellings
South East Whitchurch (Option 4)*	1,950-2,500 dwellings (2,950-3,800 dwellings in combination with East Whitchurch Option 2)
Stockwood Lane	300-400 dwellings

** denotes a site option with potential for mixed use and/or economic development*

6.160 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.

6.161 The Department for Transport has developed a Connectivity Tool that integrates transport and land use data to produce a national measure of connectivity for any location in England and Wales. This tool allows users to filter connectivity scores by local authority, assigning each location a grade from A to J, where A indicates the highest level of connectivity within its local authority area.

6.162 Each site option has been evaluated with the Connectivity Tool, and an average grade reflecting its connectivity relative to the Bath and North East Somerset area has been assigned. It's important to note that this assessment is based on the current transport network and existing land uses such as schools and shops, and does not take into account planned or future developments. The grading from A to J is not an overall ranking of site options and in deciding which sites are allocated in the Draft Local Plan other sustainability criteria and deliverability factors will also be considered.

6.163 Sustainable growth of Whitchurch Village will need to be unlocked by significant investment in transport infrastructure delivering on projects and mitigation measures outlined in the [Creating Sustainable Communities Strategy for Whitchurch Village](#) and referenced in the Transport Opportunities above.

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Whitchurch Village Option 1: West Whitchurch (land to the west of the A37) (range between 350 and 450 dwellings)

6.164 Option 1 includes:

Land located to the west of the A37, between Norton Lane to the south, and Blackacre to the north.

6.165 The land is primarily used as arable fields. However, the Bristol Barbarians RFC club is located in the southeastern part of the area, which would need to be relocated to the south if this option was to be taken forward.

6.166 The site is located in the Green Belt. Any release from the Green Belt and subsequent allocation for development will need to demonstrate exceptional circumstances. To understand and consider the impact of potential development on the Green Belt an assessment of the extent to which different parcels of land serve the five purposes set out in national policy is being undertaken. The emerging Stage 1 Strategic Green Belt Assessment being carried out by WECA will assess the site for its contribution towards meeting the five Green Belt purposes and also whether it meets the definition of grey belt set out in the NPPF and updated Planning Practice Guidance, which is now sequentially preferable to greenfield Green Belt in national policy. The assessment work is ongoing and will inform the Draft Local Plan. It is likely that following the Stage 1 Strategic Green Belt Assessment a more detailed (stage 2) assessment of the impact of development on more specific areas of the Green Belt will also be required.

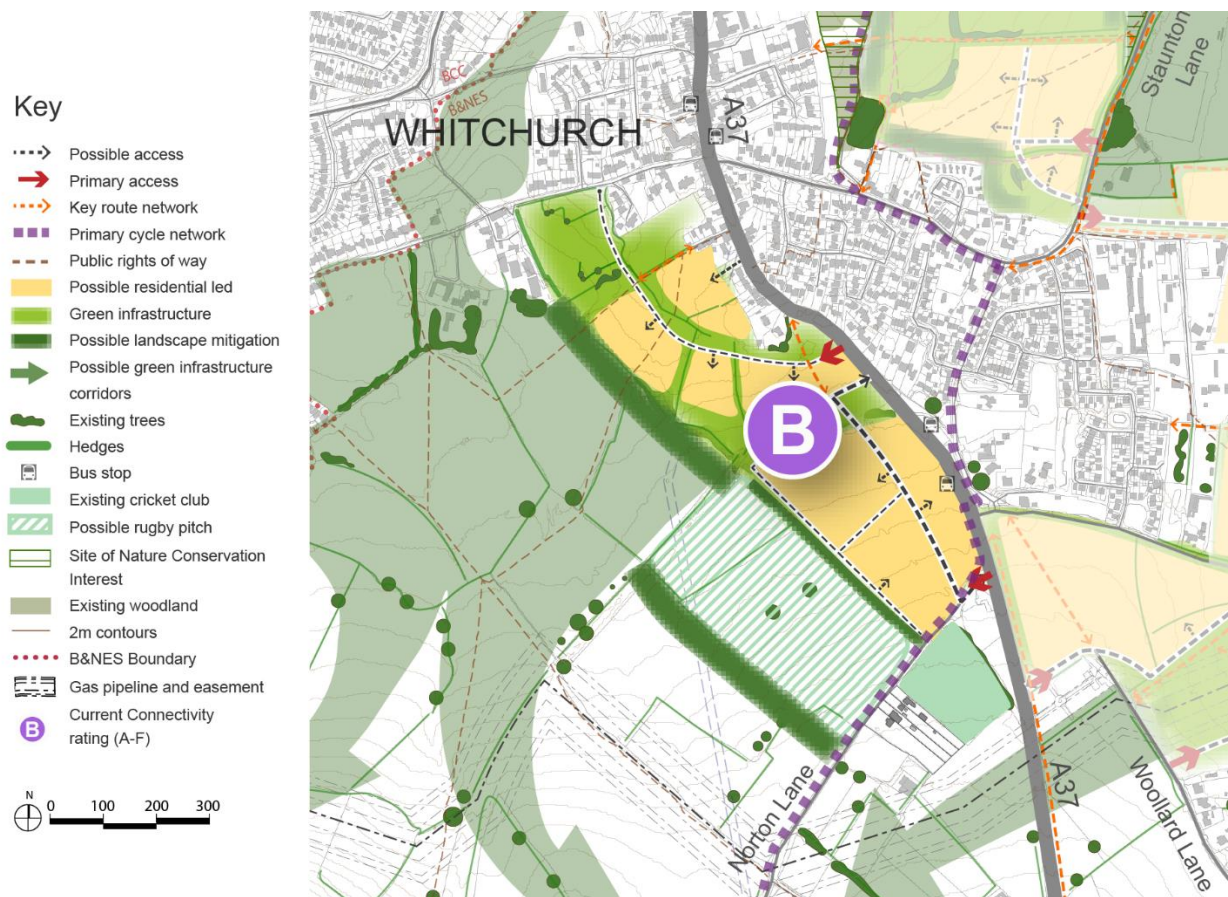


Figure 39: Indicative concept plan – Whitchurch Village Option 1

Whitchurch Village Option 1: West Whitchurch	Description
Opportunities	<p>Provision of around 350-450 homes, plus extension of existing village centre along A37, with provision of a primary school (if brought forward in combination with other options), village green, village shop, and other community facilities. Development of this site in isolation would not require the delivery of additional primary school places in the Whitchurch area.</p> <p>Located close to the existing village centre, and with good access by active travel modes to facilities located in Whitchurch Bristol.</p> <p>Safe and attractive walking route from north west end of village to existing village playground.</p> <p>Public realm improvements along the A37 to improve pedestrian and cycle connectivity, with local mobility hub connecting to national cycle route.</p>

<p>Constraints</p>	<p>Located in the Green Belt.</p> <p>Requires relocation of rugby club further south.</p> <p>Further exploration required relating to whether relocated rugby club could be adequately accommodated within the existing hedgerow network, with buffers.</p> <p>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.</p> <p>Development would impact historic field pattern to the west of A37.</p> <p>Located in area of high landscape sensitivity – further assessment and consideration of appropriate mitigation required.</p> <p>Secondary school pupils would need to be transported to school at cost to the council, and would not be able to reach school using active travel modes.</p> <p>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.</p> <p>The availability and frequency of public transport services, particularly bus services, is currently dependent on external funding, which is subject to ongoing review and cannot be guaranteed over the plan period. This uncertainty should be taken into account when considering the sustainability and deliverability of this option.</p>
<p>Mitigation required</p>	<p>Careful consideration of pedestrian and cycle crossings required within public realm improvements to alleviate severance issues.</p> <p>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.</p>
<p>Further evidence required</p>	<p>Landscape sensitivity assessment and mitigation.</p> <p>Green Belt assessment required to assess impact of removing land from Green</p>

	<p>Belt, including cumulative impact when considering strategic removal across the district.</p> <p>Further heritage assessment required relating to levels of harm to heritage assets, and consideration of weight of harm against public benefit.</p> <p>Impact of development on historic field patterns to be considered.</p> <p>Evidence to consider secondary school place planning in the Wellsway and Broadlands catchment areas, in combination with other proposed allocations in the area.</p> <p>Evidence to support requirements for strategic green infrastructure and nature recovery</p> <p>Air quality assessment</p>
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Whitchurch Village Option 2: Eastern extension of the village (Horseworld) and Woollard Lane (range between 1,000 and 1,300 dwellings)

6.167 This site option comprises two main parcels or areas of land, namely:

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.

Comments are invited on the extent of this site option and whether it is considered appropriate and deliverable that it comprises two main areas or parcels of land that mean it is not in single ownership.

6.168 The site option is located in the Green Belt. Any release from the Green Belt and subsequent allocation for development will need to demonstrate exceptional circumstances. To understand and consider the impact of potential development on the Green Belt an assessment of the extent to which different parcels of land serve the five purposes set out in national policy is being undertaken. The emerging Stage 1 Strategic Green Belt Assessment being carried out by WECA will assess the site for its contribution towards meeting the five Green Belt purposes and also whether it meets the definition of grey belt set out in the NPPF and updated Planning Practice Guidance, which is now sequentially preferable to greenfield Green Belt in national policy. The assessment work is ongoing and will inform the Draft Local Plan. It is likely that following the Stage 1 Strategic Green Belt Assessment a more detailed (stage 2) assessment of the impact of development on more specific areas of the Green Belt will also be required.

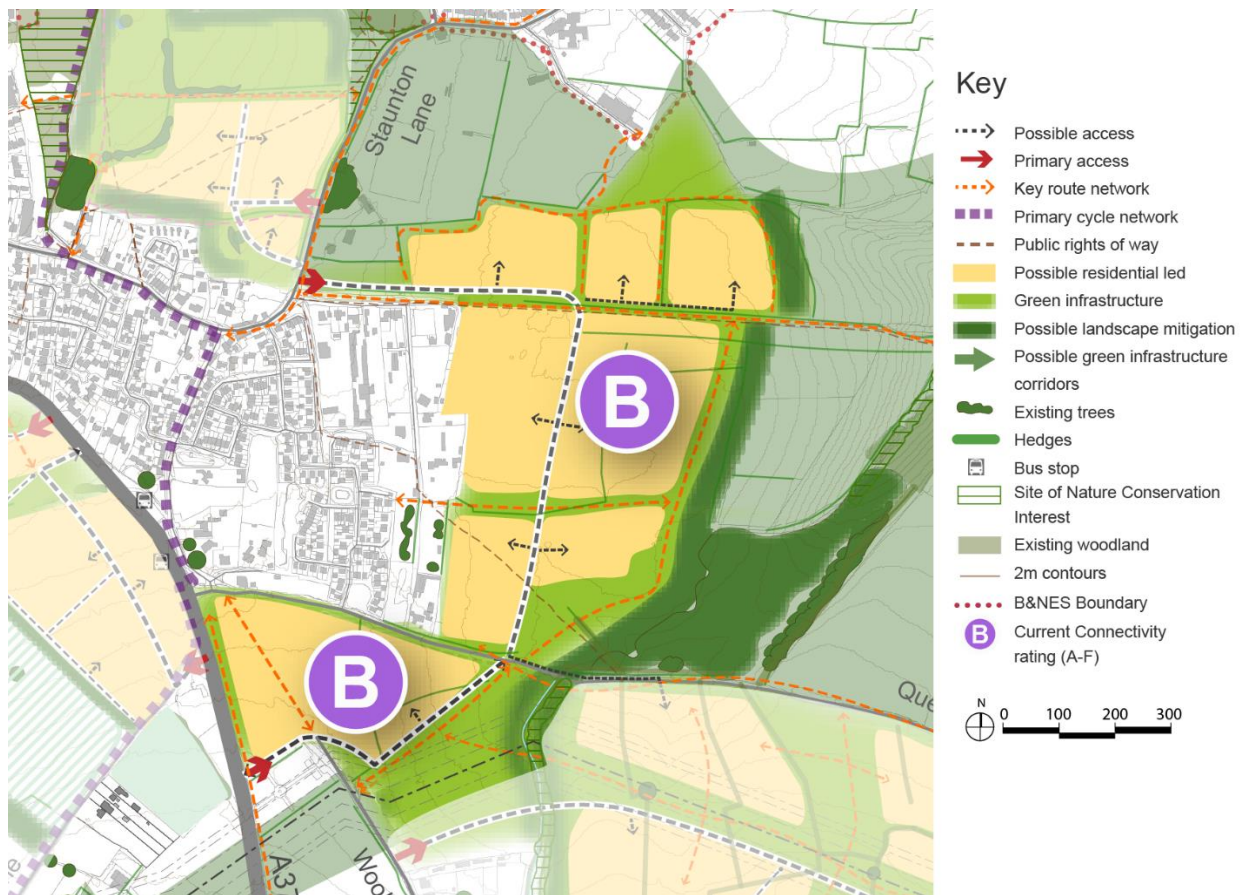


Figure 40: Indicative concept plan - Whitchurch Village Option 2

Whitchurch Village Option 2: Horseworld & Staunton Lane	Description
Opportunities	<p>Provision of around 1,000-1,300 homes.</p> <p>Residential-led mixed-use development, including provision of a primary school and small-scale employment space.</p> <p>Public realm improvements along the A37 to improve pedestrian and cycle connectivity, with local mobility hub connecting to national cycle route.</p> <p>Development in location less sensitive in heritage and landscape terms.</p> <p>Opportunity to improve access for residents into Stockwood Vale Valleys, and walking routes across to Keynsham.</p>
Constraints	<p>Located in the Green Belt. The site is in a sensitive gap between the village and the City of Bristol.</p> <p>Not considered to be a particularly good location to provide a village shop, due to distance from existing village centre and the A37.</p> <p>Significant walking distances from eastern edge of development parcels to existing village centre, and facilities located in Whitchurch Bristol.</p> <p>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.</p> <p>Secondary school pupils would need to be transported to school at cost to the council, and would not be able to reach school using active modes.</p> <p>The availability and frequency of public transport services, particularly bus services, is currently dependent on external funding, which is subject to ongoing review and cannot be guaranteed over the plan period. This uncertainty should</p>

	<p>be taken into account when considering the sustainability and deliverability of this option.</p>
Mitigation required	<p>Significant green buffer required to eastern edge, to protect views from Queen Charlton Conservation Area.</p> <p>Green infrastructure required along A37 to soften edge of development parcel when viewed from heritage assets located to the south west.</p>
Further evidence required	<p>Landscape sensitivity assessment and mitigation.</p> <p>Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district.</p> <p>Further heritage assessment required relating to levels of harm to heritage assets, and consideration of weight of harm against public benefit.</p> <p>Evidence to consider secondary school place planning in the Wellsway and Broadlands catchment areas, in combination with other proposed allocations in the area.</p> <p>Evidence to support requirements for strategic green infrastructure and nature recovery</p> <p>Air quality assessment</p>

Whitchurch Village Option 3: North of Whitchurch, Staunton Lane (range between 300 and 400 dwellings)

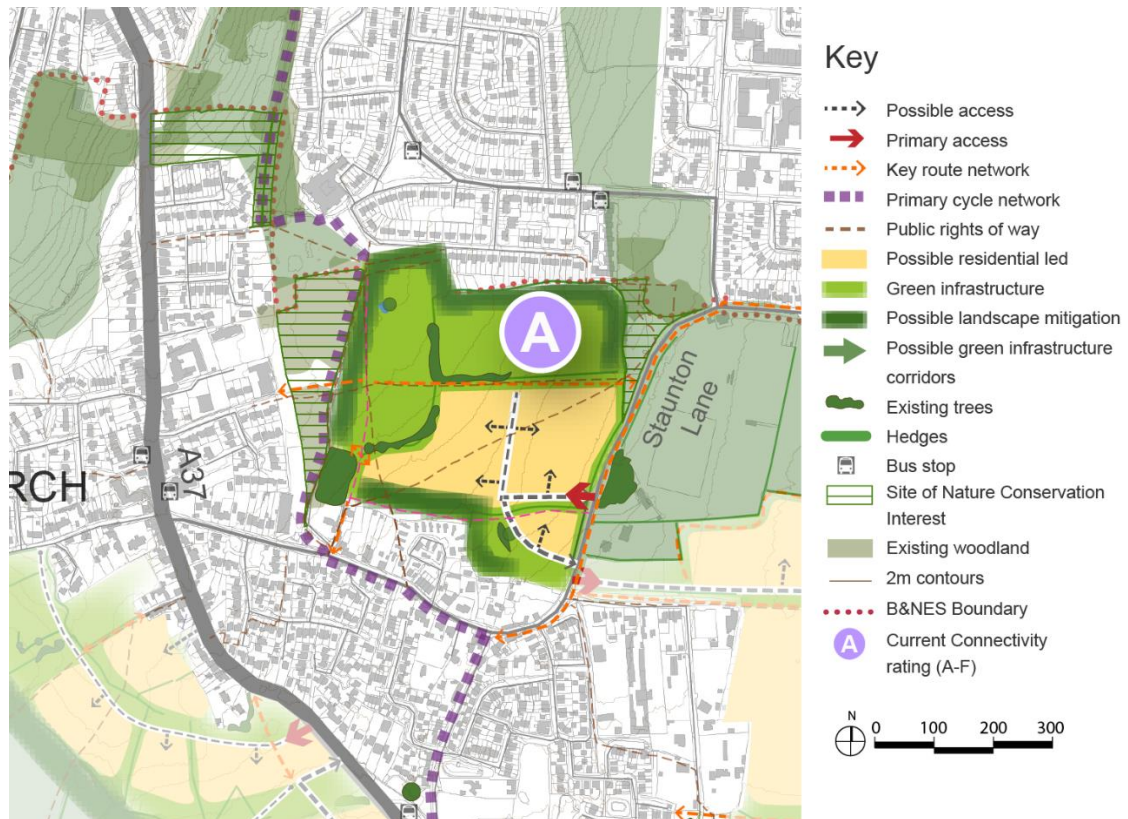


Figure 41: Indicative concept plan - Whitchurch Village Option 3

6.169 The site is located in the Green Belt in a sensitive gap between Whitchurch village and the City of Bristol to the north. Any release from the Green Belt and subsequent allocation for development will need to demonstrate exceptional circumstances. To understand and consider the impact of potential development on the Green Belt an assessment of the extent to which different parcels of land serve the five purposes set out in national policy is being undertaken. The emerging Stage 1 Strategic Green Belt Assessment being carried out by WECA will assess the site for its contribution towards meeting the five Green Belt purposes and also whether it meets the definition of grey belt set out in the NPPF and updated Planning Practice Guidance, which is now sequentially preferable to greenfield Green Belt in national policy. The assessment work is ongoing and will inform the Draft Local Plan. It is likely that following the Stage 1 Strategic Green Belt Assessment a more detailed (stage 2) assessment of the impact of development on more specific areas of the Green Belt will also be required.

Whitchurch Village Option 3: Staunton Lane	Description
Opportunities	<p>Provision of around 300-400 homes</p> <p>Development of this site in isolation would not require the delivery of additional primary school places in the Whitchurch area.</p> <p>Located close to the existing village centre, and with good access by active travel modes to facilities located in Whitchurch Bristol.</p> <p>Public realm improvements along the A37 to improve pedestrian and cycle connectivity, with local mobility hub connecting to national cycle route.</p>
Constraints	<p>Located in the Green Belt.</p> <p>Secondary school pupils would need to be transported to school at cost to the council, and would not be able to reach school using actives modes.</p> <p>The availability and frequency of public transport services, particularly bus services, is currently dependent on external funding, which is subject to ongoing review and cannot be guaranteed over the plan period. This uncertainty should be taken into account when considering the sustainability and deliverability of this option.</p>

Mitigation required	Significant green infrastructure and planting required throughout and along the edge of the development parcels.
Further evidence required	<p>Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district.</p> <p>Evidence to consider secondary school place planning in the Wellsway and Broadlands catchment areas, in combination with other proposed allocations in the area.</p> <p>Air quality assessment</p>

Whitchurch Village Option 4: South East Whitchurch (Range between 1,900 and 2,500 homes)

6.170 The site is located in the Green Belt. Any release from the Green Belt and subsequent allocation for development will need to demonstrate exceptional circumstances. To understand and consider the impact of potential development on the Green Belt an assessment of the extent to which different parcels of land serve the five purposes is being undertaken. The emerging Stage 1 Strategic Green Belt Assessment being carried out by WECA will assess the site for its contribution towards meeting the five Green Belt purposes and also whether it meets the definition of grey belt set out in the NPPF and updated Planning Practice Guidance, which is sequentially preferable to greenfield Green Belt in national policy. The assessment work is ongoing and will inform the Draft Local Plan. It is likely that following the Stage 1 Strategic Green Belt Assessment a more detailed (stage 2) assessment of the impact of development on more specific areas of the Green Belt will also be required.

6.171 For the site to be a logical extension to Whitchurch Village it would need to be planned in combination with Option 2 (East Whitchurch). This would result in a combined 2,950-3,840 dwellings across both options.

Key

- > Possible access
- Primary access
- - - - - Key route network
- Primary cycle network
- - - - - Public rights of way
- Possible residential-led
- Green infrastructure
- Possible landscape mitigation
- Possible green infrastructure corridors
- Existing trees
- Hedges
- B Bus stop
- S Site of Nature Conservation Interest
- Existing woodland
- 2m contours
- Gas pipeline and easement
- D Current Connectivity rating (A-F)

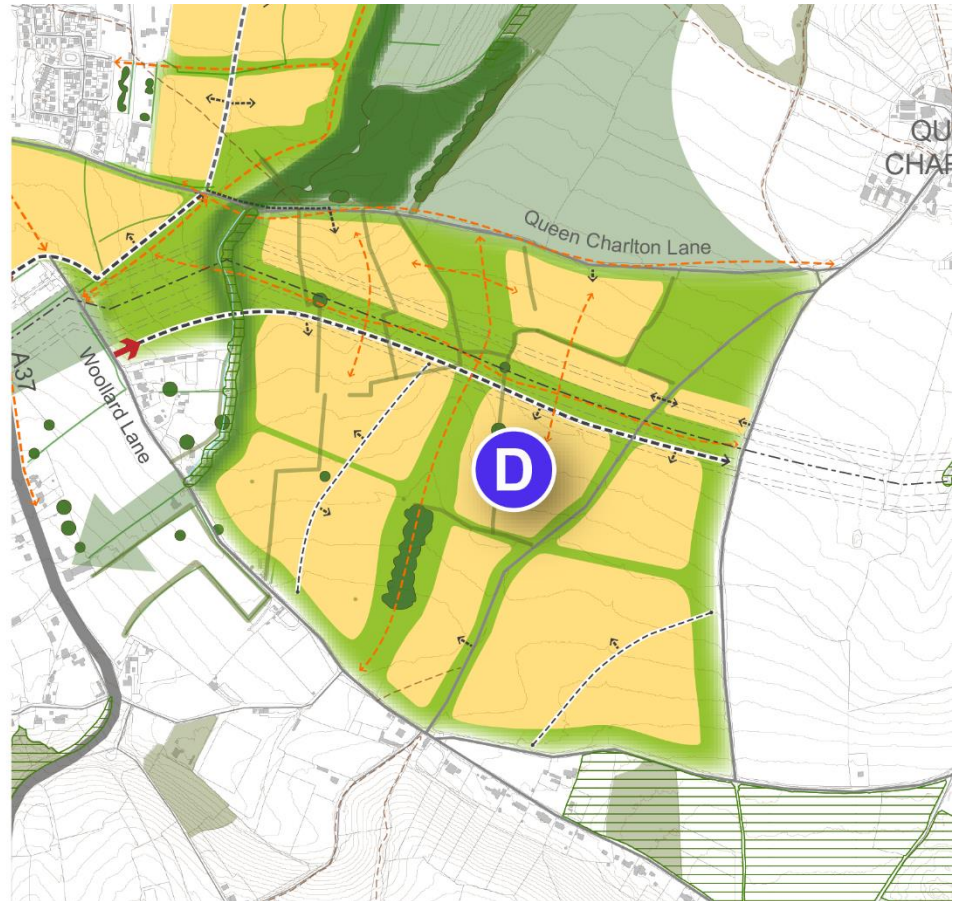
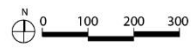


Figure 42: Indicative concept plan - Whitchurch Village Option 4

Whitchurch Village Option 4: South East Whitchurch	Description
Opportunities	<p>Provision of around 1,900-2,500 homes, though this site would only form a logical expansion of Whitchurch if taken forward in conjunction with Option 2 (a combined 2,950-3,800 homes)</p> <p>New local centre</p> <p>Potential flexible small-scale employment workspace</p> <p>Requirement for two new 420 place primary schools should Options 2 and 4 come forward together.</p> <p>There could potentially be the need for new on-site secondary school provision, meeting needs of future Whitchurch Village residents without the cost of school transport to schools elsewhere. The need for this will be assessed once the sites to be bought forward in the Draft Local Plan, together with their dwelling capacities, have been finalised.</p> <p>Opportunity to improve access for residents into Stockwood Vale Valleys.</p>
Constraints	<p>Located in the Green Belt.</p> <p>Significant walking distance to existing village centre, and from facilities located in Whitchurch Bristol.</p> <p>Land parcels making up this option are located within areas assessed to have a high risk of harm to heritage assets where it is considered that development could result in a harmful impact on the significance of heritage assets, potentially falling within the definition of ‘substantial harm’, with no potential for meaningful mitigation. Any harm will need to be weighed against public benefits that are provided by developing the parcel, with ‘substantial harm’ needing to be ‘wholly exceptional’ in line with the NPPF</p> <p>The availability and frequency of public transport services, particularly bus services, is currently dependent on external funding, which is subject to ongoing review and cannot be guaranteed over the plan period. This uncertainty should be taken into account when considering the sustainability and deliverability of</p>

	this option.
Mitigation required	<p>50m green buffer required to eastern edge, to protect views from Queen Charlton Conservation Area.</p> <p>Further heritage assessment required relating to levels of harm to heritage assets, and consideration of weight of harm against public benefit.</p>
Further evidence required	<p>Landscape sensitivity assessment and mitigation.</p> <p>Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district.</p> <p>Evidence to consider secondary school place planning in the Wellsway and Broadlands catchment areas, in combination with other proposed allocations in the area.</p> <p>Evidence to support requirements for strategic green infrastructure and nature recovery</p> <p>Air quality assessment</p>

Stockwood Lane (Range between 300 and 380 dwellings)

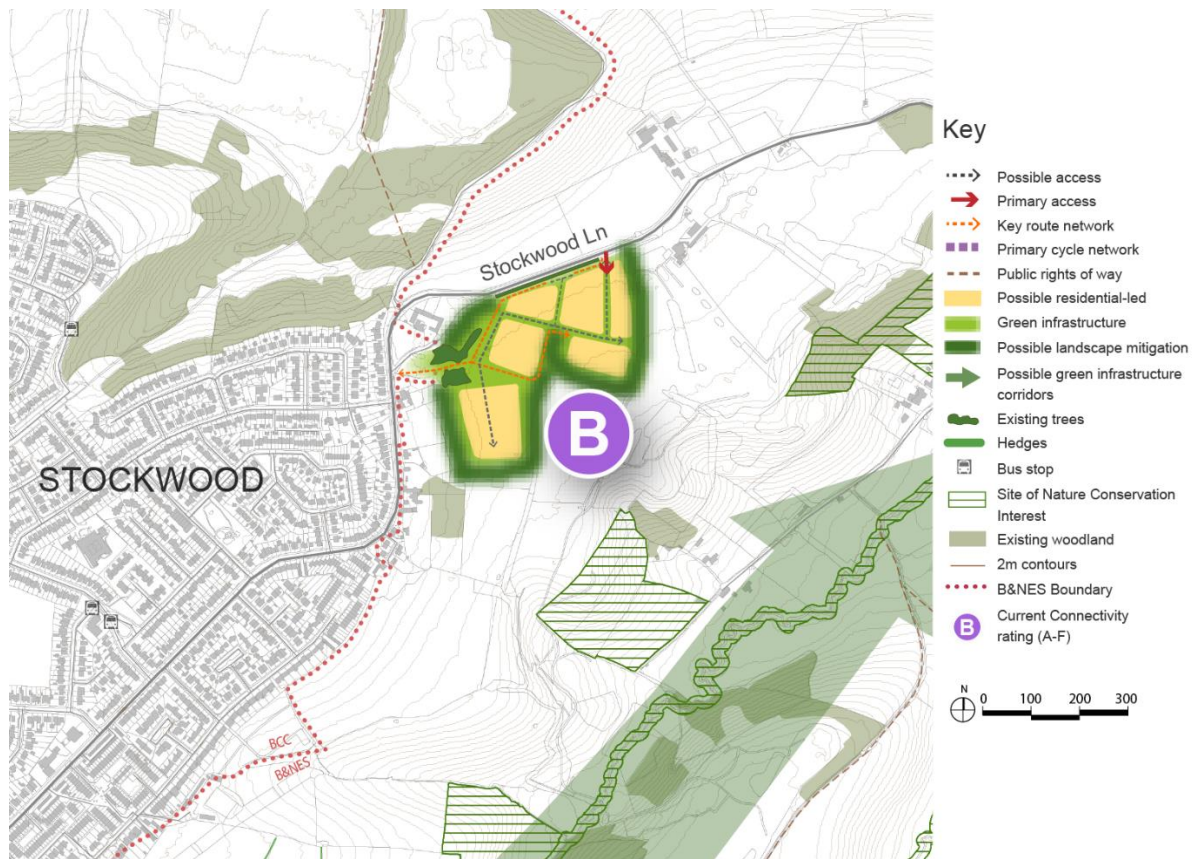


Figure 43: Indicative concept plan - Stockwood Lane

Option 5: Stockwood Lane	Description
The Opportunities	<p>Provision of around 300-400 homes</p> <p>Opportunity to improve access for residents into Stockwood Vale Valleys.</p> <p>Opportunity to tie in to public transport and active travel improvements at Hicks Gate via a sustainable transport link along Stockwood Lane between the site and the proposed Hicks Gate Interchange.</p>
Constraints	<p>Located in the Green Belt.</p> <p>Significant walking distance to existing village centre and existing primary school, and from bus stop and facilities located in Stockwood (Bristol).</p> <p>Secondary school pupils would need to be transported to school at cost to the council, and would not be able to reach school using active modes.</p> <p>The availability and frequency of public transport services, particularly bus services, is currently dependent on external funding, which is subject to ongoing review and cannot be guaranteed over the plan period. This uncertainty should be taken into account when considering the sustainability and deliverability of this option.</p>
Mitigation required	<p>50m green buffer required to eastern edge, to protect views from Queen Charlton Conservation Area.</p> <p>There is a need for the site to provide early and substantial investment in active travel infrastructure, the creation of new or enhanced bus services with stops integrated into the development, connecting the site to Hicks Gate Interchange and the introduction of a mobility hub.</p>
Further evidence required	<p>Landscape sensitivity assessment and mitigation.</p> <p>Green Belt assessment required to assess impact of removing land from Green Belt, including cumulative impact when considering strategic removal across the district.</p> <p>Evidence to consider secondary school place planning in the Wellsway and Broadlands catchment areas, in combination with other proposed allocations in</p>

	<p>the area.</p> <p>Evidence to support requirements for strategic green infrastructure and nature recovery</p> <p>Air quality assessment</p>
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7. Somer Valley: Vision, Strategy and Options

Strategy Overview

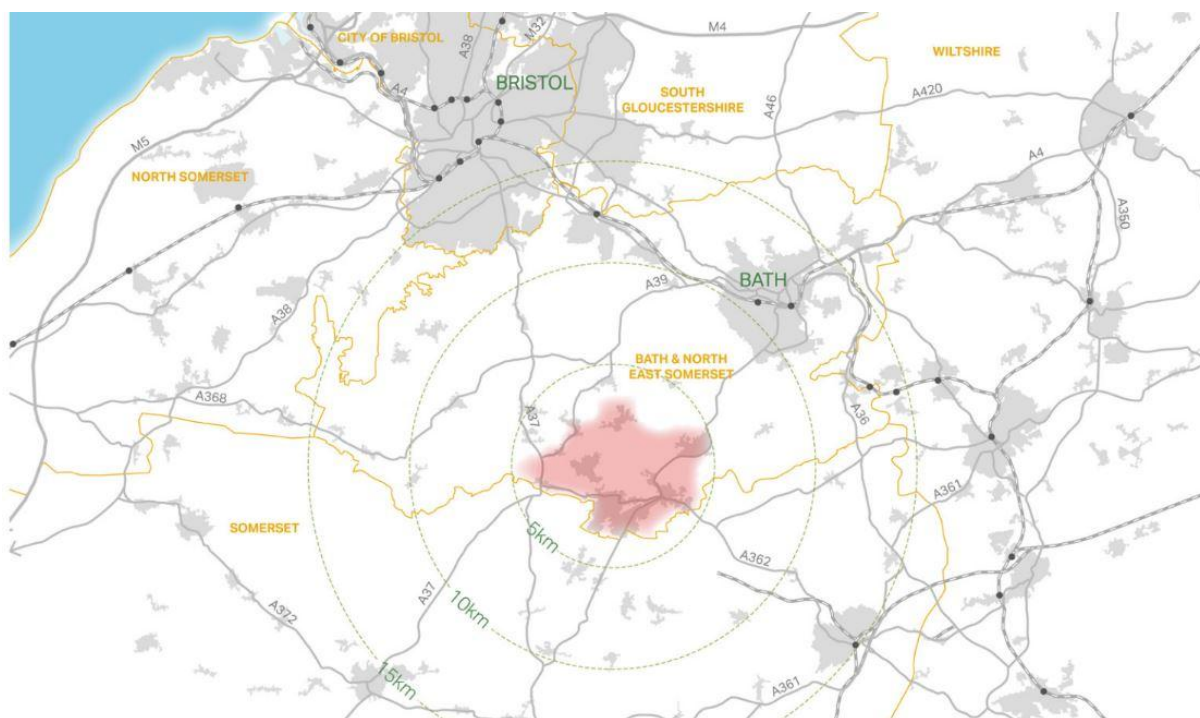


Figure 44: Somer Valley Location

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. There have been significant employment losses in Manufacturing in the Somer Valley in recent decades.

West of England Growth Strategy

7.6 B&NES Council is working with the Mayor and Combined Authority (WECA) to prepare a Growth Strategy for the West of England. This document sets the overarching context for investment and development to support economic prosperity for our region as a whole. The Strategy envisages growth driven by an interconnected set of regional Growth Zones, where investment will bring new businesses, jobs, homes, culture, nature and opportunity. Central Bristol & Bath, together with the river corridor that connects us, and the Somer Valley are recognised in the Strategy as the two growth zones within B&NES. This will be enabled by ambitious plans to transform our transport network, set out in the regional Transport Vision.

Somer Valley

7.7 The Somer Valley is the West of England's opportunity to showcase rural innovation and sustainable industry. With a rich legacy of mining, engineering and manufacturing, the Somer Valley is now entering a new chapter, evolving from its industrial past into a modern, green productivity zone, where sustainable business, vibrant communities and landscape-led regeneration can go hand in hand.

7.8 There is an emerging cultural and creative economy that can be developed alongside investments in housing and industry. With emerging projects such as Trinity Hub and Old Printworks in Radstock alongside established community festivals such as Midsomer Norton Carnival the cultural offer will be a vital component of creating vibrant communities.

7.9 The area's location, close to important transport routes like the A37 and A362, requires significant investment to make this a better-connected area that enhances its appeal for businesses seeking connectivity to regional and national markets.

7.10 The Somer Valley Enterprise Zone will unlock 1,300 jobs and 35,800 sq m of high-quality commercial space, with capacity for advanced engineering, creative industries, and clean technology businesses. Anchoring the site is the UK's first combined heating and cooling network powered by water from naturally flooded coal mines. Co-investment potential is strong, particularly if the site attracts energy-intensive users such as data centres.

7.11 Complementary investments include a Somer Valley Innovation Centre focused on engineering and net zero solutions, affordable creative workspace to meet unmet demand, and flagship town centre regeneration in Radstock and Midsomer Norton.

Duty to co-operate

7.12 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.

Transport

7.13 The Somer Valley has a dispersed settlement pattern, an undulating topography and is physically distant to other key settlements such as Bristol

and Bath. The Somer Valley has relatively limited dedicated cycle infrastructure to connect towns and villages 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.

7.14 To support sustainable growth in the Somer Valley, improvements to the area's connectivity must precede any new housing or economic development. The council is actively collaborating with the West of England Mayoral Combined Authority (WECAWECA) to secure appropriate investment within the region. Enhanced connectivity is fundamental to unlocking the area's full development potential.

Key Issues

- Restructuring of the local economy has resulted in some businesses closing and an increase in out-commuting.
- 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.
- There is a lack of integrated high quality sustainable and active travel links in the area, and steep topography creates a constraint to active travel. Access to public transport is patchy, and within some areas access is very limited. Bus provision has been reduced in recent years.
- There is a lack of wayfinding which impacts residents and visitors ability to access the countryside.
- A significant amount of housing growth has been permitted in the Somerset Council area connected to the Somer Valley. This will result in additional pressure on services and infrastructure.

- There is an identified need for accessible greenspace of at least 100 ha to serve the Somer Valley. There are a number of opportunities to be taken forward through the Somer Valley Rediscovered project linking Waterside valley; Haydon Batch, Grove Wood, and Norton Radstock Disused Railway Line, with the Midsomer Norton Town Park and beyond.

Emerging Vision and Priorities

7.15 The council is working on an emerging vision and set of priorities for the area. These priorities reflect and seek to address the issues identified above which have been informed by engagement with community representative groups, including parish and town councils. The priorities outlined below are primarily focussed on those that can be addressed through the local plan. The council's emerging vision is likely to encompass priorities that are outside the remit of the local plan.

7.16 The following list sets out the key priorities for the Somer Valley. 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. 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, WECAWECA or by other stakeholders.

Affordable Housing

7.17 A significant number of new homes are set to be built in both the Somer Valley and across the wider district, addressing the growing need for affordable housing.

Employment

7.18 Additional employment spaces will be allocated in the Local Plan, to meet the increasing demand for jobs while also helping reduce the need for residents to commute elsewhere for work. This will contribute to balancing the distribution of jobs and homes, ensuring that people can live and work within the same community.

Transport

7.19 Enhancing bus services and developing efficient mass transit options is key to improving overall access to public transport in the region. Better active

travel links, such as walking and cycling routes, will encourage more people to live locally.

Town Centre and Local High Streets

7.20 Supporting the regeneration of Radstock and Midsomer Norton High Streets is a vital step in revitalising these local areas. New housing development can increase footfall and overall activity within the town centres.

Green Spaces

7.21 The surrounding landscape is a defining feature of the Somer Valley's unique character and identity. New development should seek to enhance and reflect this natural identity. By creating strong connections to existing green spaces, future growth can integrate more harmoniously with the local environment.

Opportunities

Economic Development

7.22 The Somer Valley is identified as a growth zone in WECA's emerging growth strategy. It is important to improve local employment opportunities, including through the delivery of the Somer Valley Enterprise Zone.

7.23 A key issue within the Somer Valley is the lack of employment space which has led to a high level of out-commuting. The provision of additional employment space is key to the ongoing development of the Somer Valley.

7.24 Current evidence suggests around 7.8ha of additional economic land is required in the Somer Valley comprising of ;

- Office: 7,000 sq. metres
- Industrial: 14,000-17,000 sq. metres

- Warehouse: 15,000-16,000 sq. metres

7.25 The previous options consultation has considered the expansion of Bath Business Park in Peasedown. Additional options for employment development are included in this options document.

Retail

7.26 Work is currently underway on the Midsomer Norton town centre masterplan which looks to increase the employment levels within the town centre, such as through the provision of light industrial premises. The current town centre policies in the adopted Local Plan can help to facilitate this in the short term.

7.27 The proposed site options for additional housing outlined in this chapter have the potential to generate a significant level of capacity or need for additional retail floorspace and in particular for convenience goods (primarily food) equivalent to one large supermarket or two medium sized food stores. In preparing the Draft Local Plan and determining the housing site options to be progressed we will also consider and identify the most appropriate form and location of additional retail provision.

Transport Opportunities

7.28 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.

7.29 The area can be improved in terms of active travel. Currently there is a high level of out commuting 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. The introduction of car clubs in the area could also offer an alternative to private car ownership. Mobility hubs should be strategically located to support an

improved public transport offer. Development should be located in areas with access to shops and services.

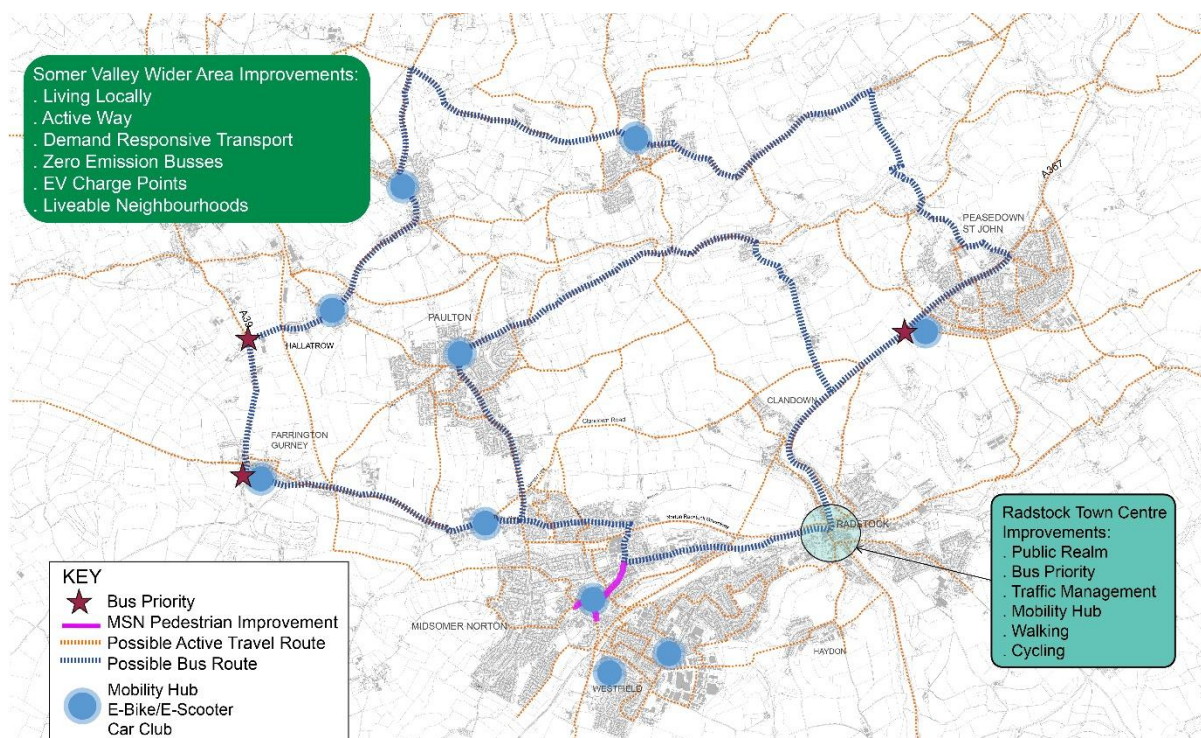


Figure 45: Somer Valley wider area improvement plan

Green Infrastructure Opportunities

7.30 Green infrastructure (GI) 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, GI should be central to the design of new developments, and development proposals should demonstrate strong links to the wider green infrastructure network.

7.31 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. Identifying where these are is work in progress, but the aim is to indicate where the council consider that GI could be provided or improved to meet B&NES GI standards, and where they 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.

Ecology

7.32 The West of England Local Nature Recovery Strategy and Toolkit (LNRS) was published in November 2024. The LNRS identifies the following areas:

- Areas that are already of importance to biodiversity. These are sites that are nationally designated for their value to nature (SSSIs, SACs and SPAs); are designated as Local Nature Reserves; are locally designated as 'Sites of Nature Conservation Interest' (SNCIs); and/or are irreplaceable habitat including ancient woodland.
- Focus Areas for Nature Recovery. This is where action to recover nature will have the biggest impact and is most feasible. These have been mapped to reflect the priorities for nature recovery, and include all of the mapped measures for nature recovery. The focus areas for nature recovery are referred to as 'areas that could become of particular importance' in regulation.

7.33 The diagram below shows where these areas are located in the Somer Valley and the relationship between these areas and the Site Options under consideration in this Options consultation. Constraints and opportunities are referenced for each Site Option where appropriate.

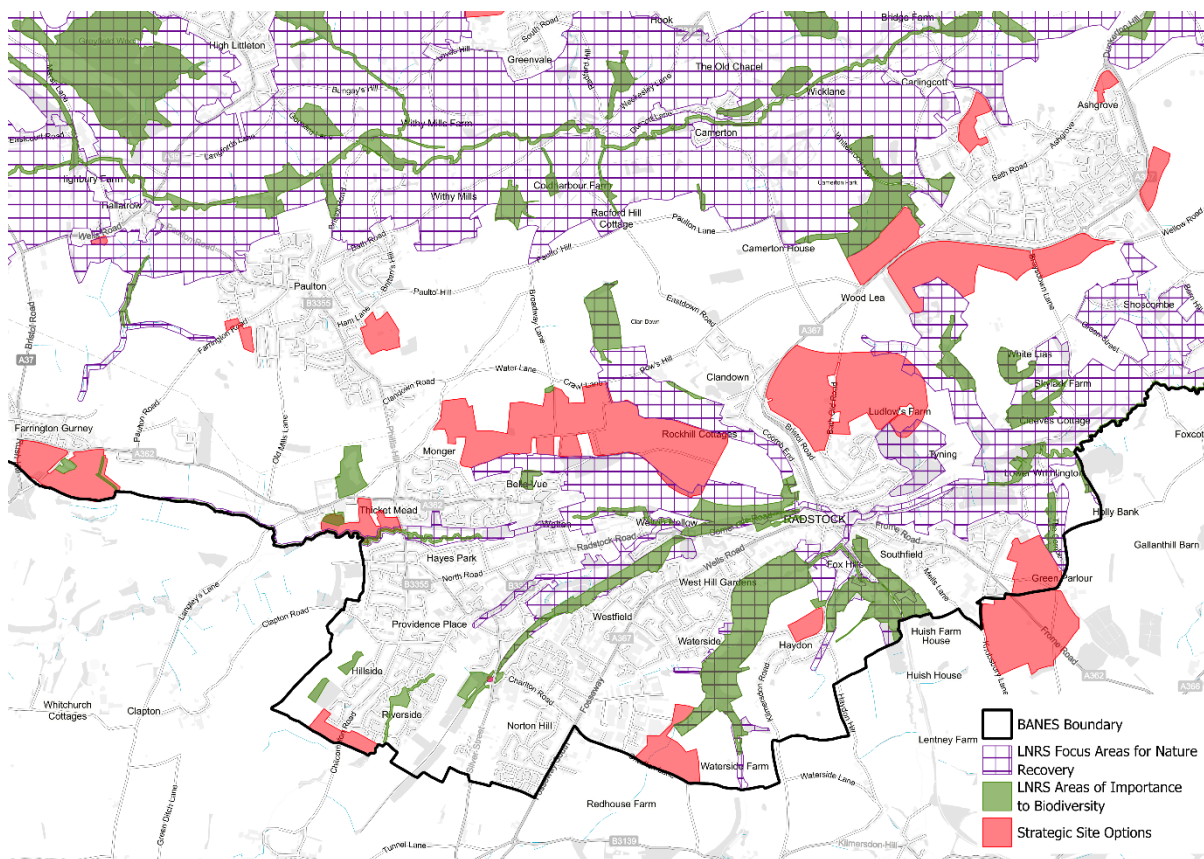


Figure 46: Somer Valley Local Nature Recovery Sites

Options Consultation 2024

7.34 Comments on the previous options consultation in Spring 2024 are still relevant. These comments will be reviewed and taken into account, together with additional comments received, when the draft plan is being prepared. Below is a short summary of some of the main issues raised in the previous consultation.

- There is a high level of car dependency in the local area and limited access to public transport. Additional housing would exacerbate this issue and impact the existing road network.
- Concern is raised over the impact of a larger population on existing services such as doctors surgeries and schools
- There is limited access to local employment.
- The proposed locations for housing are not sustainably located.
- Improvements to active travel are needed.

Strategy

7.35 The strategy for the Somer Valley focusses on boosting the economic role of the area and providing additional housing to help address local needs (including for affordable housing), with this development unlocked by substantial investment in improving sustainable transport connectivity to and from and within the Somer Valley. Economic growth will reflect and build on the area's strengths and also shift towards green/renewable energy and creative sectors. The strategy for employment space focusses on the Peasedown area (linking to economic needs associated with Bath), as well as Midsomer Norton and Westfield serving the needs of the more local economy and businesses. Economic growth and additional housing needs to respect and help deliver key GI improvements recognising the opportunity to deliver additional GI through the Somer Valley Rediscovered project.

7.36 The map below indicates all potential sites for development within the Somer Valley. This includes strategic options at Peasedown St John, Radstock, Midsomer Norton and Farrington Gurney. These strategic sites will need new infrastructure such as schools and local centres in order to be developed. To unlock large scale growth in the Somer Valley investment in public transport infrastructure is required.

7.37 The proposal also includes a number of small site options which would be largely housing sites that do not require additional site specific infrastructure to be developed.

7.38 The SVEZ has been allocated in previous local plans and is covered by a Local Development Order. The options document proposes additional economic floorspace at Peasedown and Westfield to help meet additional requirements for further economic floorspace.

7.39 Currently only Westfield has an adopted Neighbourhood Plan. However, neighbourhood plans are currently being prepared in Radstock and Farrington Gurney.

Site Options

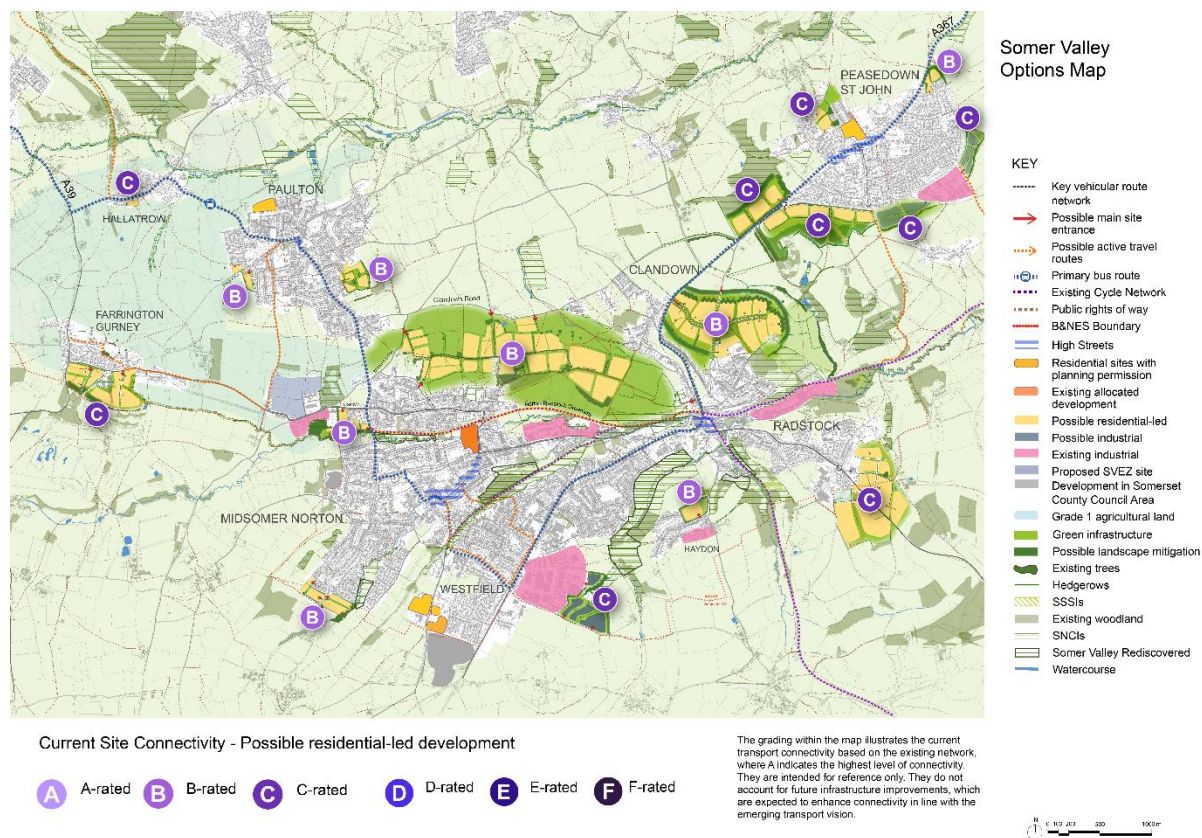


Figure 47: Somer Valley site options map

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7.40 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.

7.41 The land parcels which make up the site options below have been assessed in more detail in various supporting documents, including the

Housing and Economic Land Availability Assessment (HELAA), the Sustainability Appraisal (SA), the Somer Valley Area of Search Assessment, and the Strategic Planning Options Document (SPO).

7.42 Within these documents, a number of additional sites have also been assessed, and discounted, for various reasons. These sites are not included in the site options below, for the reasons set out in the evidence base.

7.43 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.

7.44 As highlighted above, some areas within the Somer Valley have limited access to public transport and limited employment opportunities, as a result there is a high level of out commuting by private vehicles. To deliver the options below would require a significant improvement in the area's connectivity through the provision of frequent and widespread public transport. Alongside this, investment in its economy is required to provide local jobs and reduce out commuting. The council is in ongoing discussions with WECAWECA with regards to economic development and public transport provision in the Somer Valley.

7.45 The Department for Transport has developed a Connectivity Tool that integrates transport and land use data to produce a national measure of connectivity for any location in England and Wales. This tool allows users to filter connectivity scores by local authority, assigning each location a grade from A to J, where A indicates the highest level of connectivity within its local authority area.

7.46 Each site option has been evaluated with the Connectivity Tool, and an average grade reflecting its connectivity relative to the Bath and North East Somerset area has been assigned. It's important to note that this assessment

is based on the current transport network and existing land uses such as schools and shops, and does not take into account planned or future developments.

Peasedown

Place Profile

- 7.47 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.
- 7.48 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 area's mining heritage can be seen within the landscape, most notably Braysdown Colliery batch which sits to the south of the village.
- 7.49 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.
- 7.50 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.



Map 18: Peasedown St John site map

Key Issues and Opportunities

- The bypass is a hard boundary to the settlement and residential development on the southern side of the bypass could result in severance issues if not carefully designed.
- There is an increased requirement and opportunities for employment in the area in order that local residents can access good jobs.
- The village sits on a busy commuter route between Radstock and Bath

Priorities and Objectives

7.51 The following list sets out the key priorities and objectives for Peasedown.

- 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.

Site Options

South Peasedown

7.52 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.

7.53 The area has the potential to be developed for residential uses providing an estimated 250 – 300 homes, 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.

7.54 The area south of Peasedown St John bypass 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 of the village turn their backs to the A367. 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.

7.55 In the previous options document the land to the south of the bypass was proposed as an option that could be developed for renewable energy. In light of the local plan reset and substantially increased housing requirement

the site has been reviewed and identified as a potential option for housing. It would have capacity for an estimated 550-700 homes. Given the high landscape value of the site any development would need to include extensive green infrastructure to integrate into the surrounding landscape. Public rights of way would need to be protected and walking recreational routes provided.

7.56 The site is also severed from the village by the existing bypass. To facilitate development the nature of the bypass would need to be substantially altered for example through the provision of crossing points, slower traffic speeds and for development to address the street scene. Pedestrian access to the village centre is required. There may be potential for additional retail provision.

7.57 Previous engagement as part of the Somer Valley Links project had proposed a roundabout on the south junction of the A367 and Bath Road to improve access to the village. The provision of the roundabout may be required to facilitate development at the proposed location.

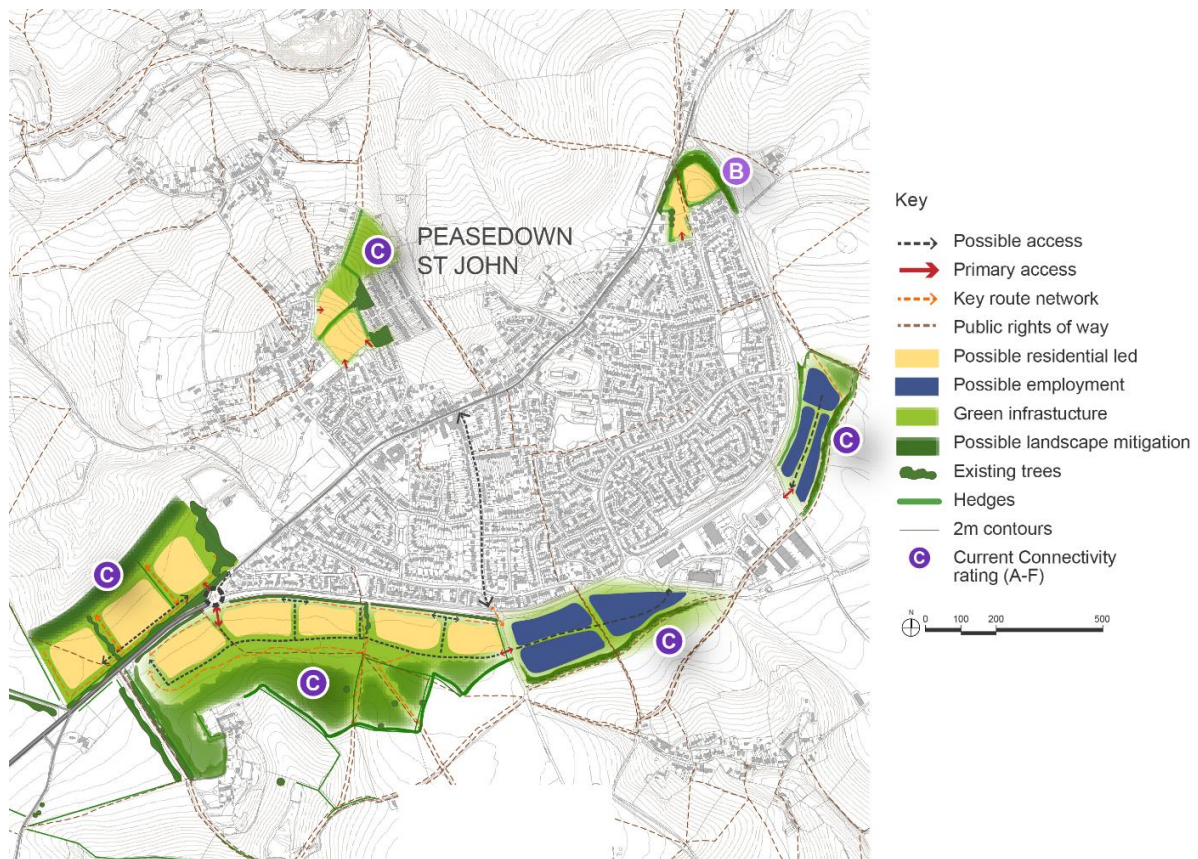


Figure 48: Peasedown St John site options



Figure 49: South Peasedown Options

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Bath Business Park

7.58 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.

7.59 The current development is highly visible within the landscape and therefore any development here would need substantial mitigation to screen the buildings from the surrounding landscape.

7.60 In addition to the previous consultation, land to the north east of the business park has also been identified as a potential extension.

7.61 These sites are located within the Green Belt and therefore, exceptional circumstances to justify release of the land from the Green Belt would need to be demonstrated in order that it can be allocated for employment development. This process will be informed by updated green belt assessment.

7.62 Expansion of the Business Park has the potential to provide the maximum floorspace for the following uses should only one use class come forward. A mix of uses would result in a lesser amount of floorspace of each use type.

- Industrial – 19,840 square metres
- Office – 39,680 square metres
- Warehouse – 24,800 square metres

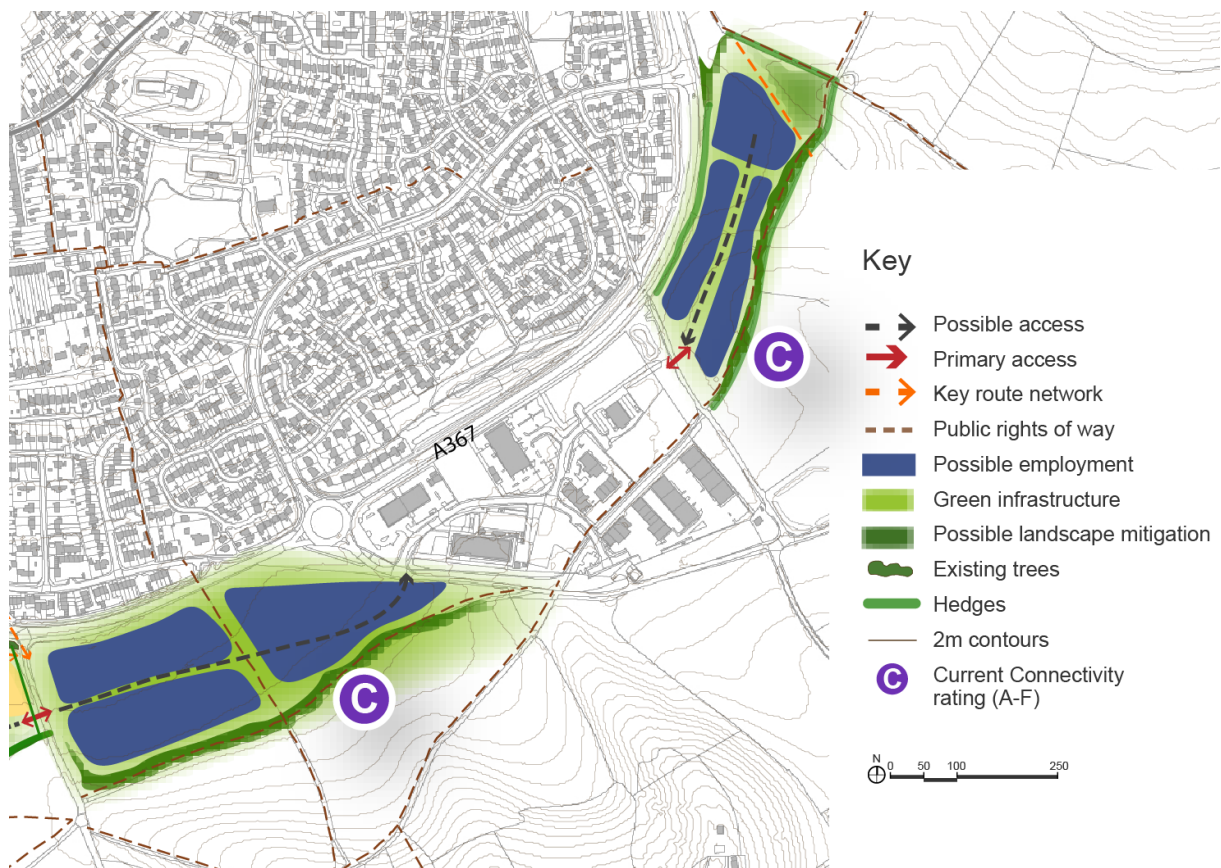


Figure 50: Bath Business Park Options

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Peasedown St John	Description
Opportunities	<p>Addition of approximately 800 to 1,000 homes (250 to 300 to the north and 550 to 700 to the south), of which an element would be affordable housing</p> <p>Expansion of Bath Business Park</p> <p>Highway improvements to existing junctions.</p> <p>Quiet lanes proposed by the Somer Valley Links project.</p>
Constraints	<p>Landscape character, Conservation Area, highways, Ancient Woodland, green space provision</p> <p>Secondary school pupils may need to be transported to Writhlington School in Radstock at cost to the council, and would not be able to reach school using active modes of travel.</p> <p>17th century landscape of Woodborough Court and Medieval fishpond.</p> <p>A367 is a barrier to the village.</p> <p>Close to an SNCI</p>
Mitigation required	<p>Landscape buffers</p> <p>Protection of nearby SNCI</p> <p>Highway improvements</p> <p>Biodiversity net gain, planting, provision of on site green space and access to local food growing.</p> <p>Alterations to the A367</p> <p>Addition of a new roundabout</p> <p>Pavement access to the village centre</p>
Further evidence required	<p>Archaeological assessment</p> <p>Heritage assessment</p> <p>Confirmation of highways improvements</p>

	<p>Landscape Visual Impact Assessment.</p> <p>Transport Assessment</p>
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Smaller non-strategic sites

7.63 Alongside the strategic development options above some additional smaller sites have been identified within Peasedown as potential opportunities for additional housing.

7.64 Lower Peasedown - the site sits to the north of Peasedown above Hillside View. The site is relatively flat and the steep slope within the site is not proposed for development. The site can be accessed from Church Road.

Option	Opportunities	Constraints
PEA 05a, 05b and 06	<p>Opportunity for small scale additional housing of around 100 to 150 homes</p> <p>Affordable housing</p> <p>Improve pavement access to the village centre</p>	<p>Impact on the existing landscape.</p> <p>Setting of Grade II church</p>



Figure 51: Lower Peasedown Options

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7.65 North Peasedown - these parcels of land sit on the northern tip of Peasedown Village. The site is largely screened from the surrounding area by vegetation and is accessed from Eckweek Lane. This site is located within the Green Belt and therefore any allocation for residential development would require exceptional circumstances to be demonstrated justifying removal of the land from the Green Belt. This will be informed by updated green belt assessment.

Option	Opportunities	Constraints
PEA 08 and PEA 09	<p>Opportunity for small scale additional housing of approximately 30 to 40 homes.</p> <p>Affordable housing</p>	<p>Impact on the existing landscape.</p> <p>Green Belt</p> <p>Possible bronze age barrow, archaeological assessment required.</p>

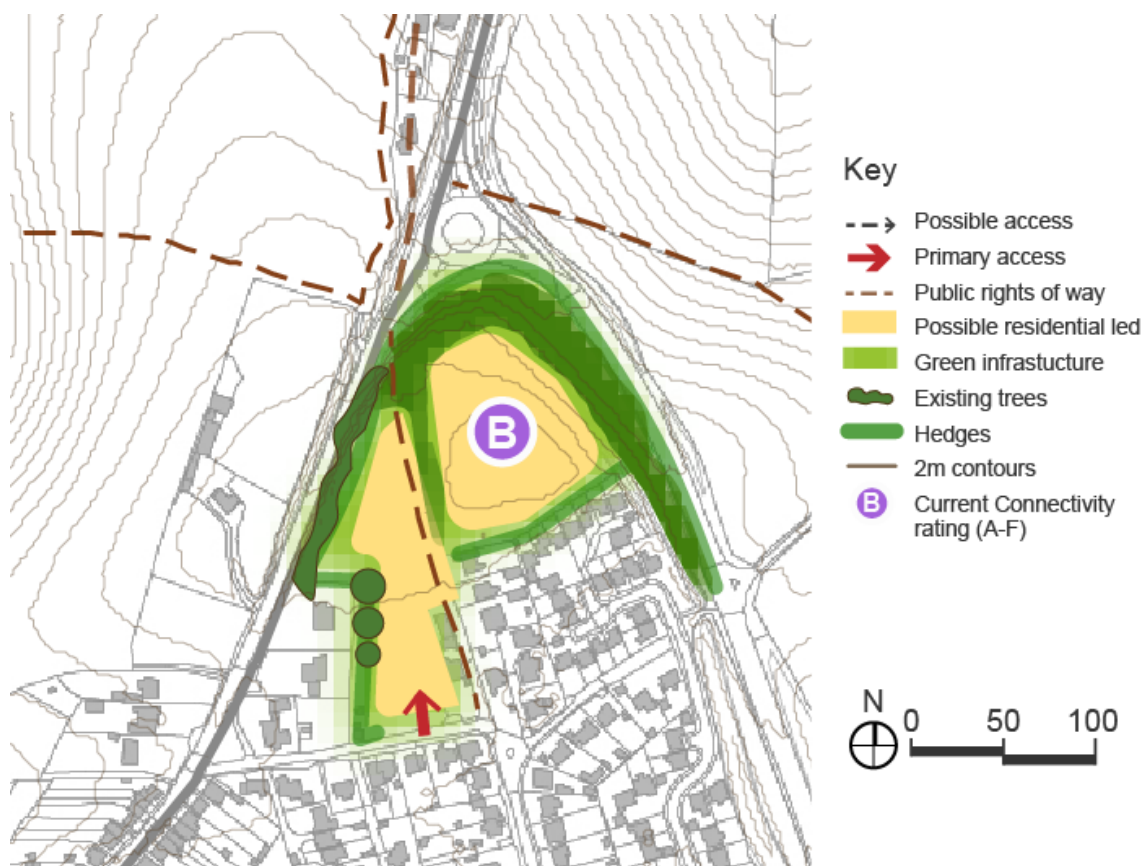


Figure 52: North Peasedown Options

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Radstock

Place Profile

7.66 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, primarily designated due to the town's well preserved mining heritage. 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.

7.67 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. Recently, investment in cultural infrastructure has begun in the town centre including the Trinity Hub project and the Old Print Works. Surrounding Radstock Town Football Club there is a playing field, 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 one secondary school.

7.68 Radstock is served by bus services including on the A367 towards Peasedown St John and Bath. But to the south of Radstock in 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 convergence of the A362 and A367 which cuts through the centre negatively impacting the quality of the public realm within the town centre.
- Access to the Wellow Brook is limited within Radstock town centre.
- Radstock town centre is well serviced by public transport to and from Bristol, Bath and Wells, however there are limited opportunities to access other destinations by public transport.
- Radstock town centre has limited footfall due to the lack of diversity in retail offers, as well as a lack of cultural amenity, night-time economy businesses and an attractive food and beverage offer.
- There is a strong network of public rights of way. 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.
- There are limited employment opportunities

Priorities and objectives

7.69 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

- Provide homes to meet the needs of the local area, including provision of homes that are affordable.
- 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 residents and visitors to engage with and enable nature recovery.
- New development should enable a greater choice of transport via sustainable and active travel (walking, cycling, wheeling and public transport). New development should link into the existing public transport network allowing for buses to become more viable.
- Ensure built and natural environments promote health and wellbeing for all.
- Improving the town centre public realm, cultural assets, heritage assets, facilities and infrastructure will help attract visitors and investment

North Radstock

Context

7.70 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 (primary) 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.

7.71 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.

7.72 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.

7.73 Bath Old Road appears to be used as a 'cut through' 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 Church School are poor. Any new development would require and could deliver significant improvements to these connections.

7.74 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. 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 53: Map of North Radstock

Site Option

7.75 The site option presented below could provide up to 1,250 to 1,550 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.

7.76 Development can also incorporate small scale economic uses that are compatible with a residential area.

7.77 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.

7.78 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.

7.79 The development will extend to the west and east 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.

7.80 Vehicle access to the development areas can be provided to connect onto the A367. 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.

7.81 A greater quantum of development would allow for additional facilities such as a local centre. Wide tree belts around the development area along with a strong boulevard of trees through the centre, should be strategically placed to provide screening to mitigate the visual impacts of this prominent development from long views to the north, east, and south-west. There is a strategic green infrastructure opportunity on the slopes to the east of the site and work is underway to assess the opportunities for strategic green infrastructure, nature recovery and climate resilience.

7.82 Whilst the A367 is not currently an Air Quality Management Area (AQMA), it is the main road into Radstock and therefore care must be taken if a larger quantum of development is provided to ensure that this does not result in harm to air quality.

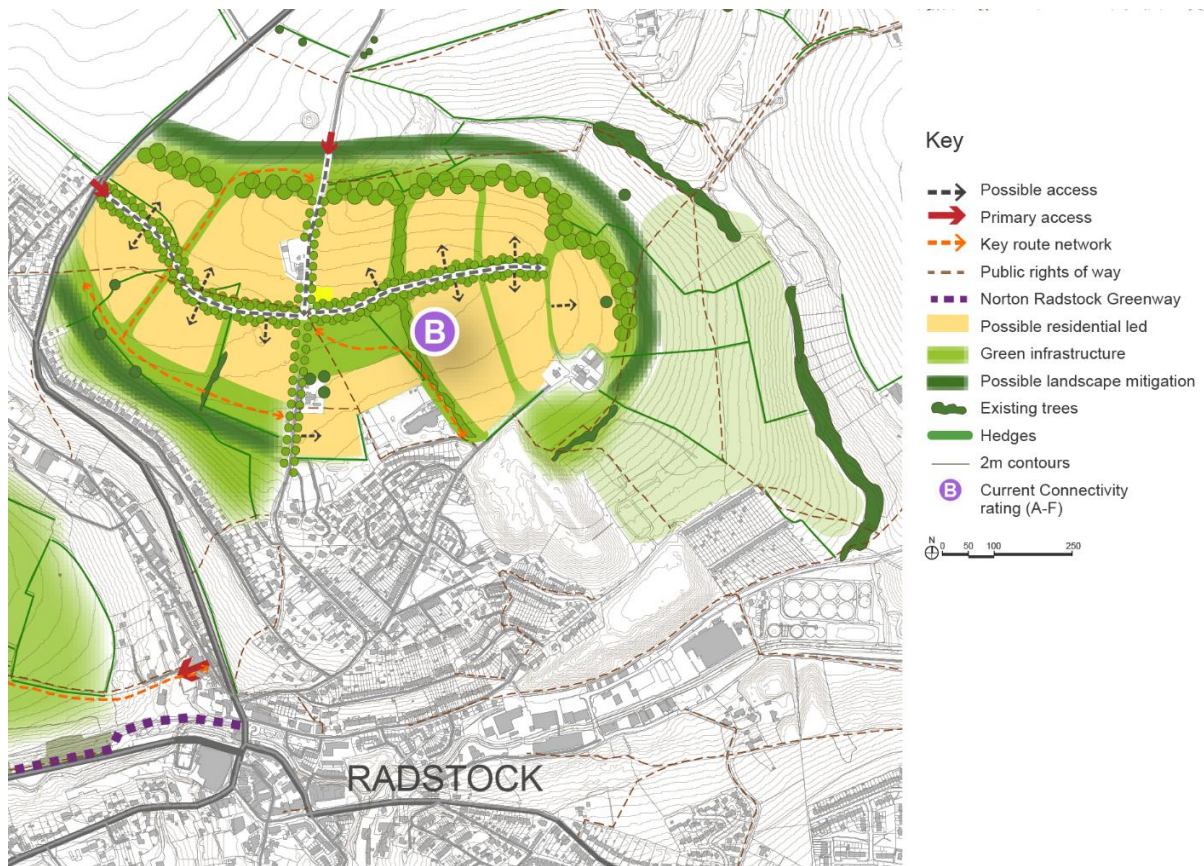


Figure 54: North Radstock Options

North Radstock	Description
Opportunities	<p>Approximately 1,250 to 1,550 homes, of which an element would be affordable housing.</p> <p>The speed of traffic on Bath Old Road could be reduced and new pavement provided. There is potential for a quiet lane.</p> <p>A larger quantum of development can provide new community facilities.</p> <p>Improved access to Trinity Church School.</p> <p>Improved access to the countryside and surrounding public rights of way.</p> <p>Strategic green infrastructure opportunities.</p> <p>Green Space Provision and Allotments</p> <p>New local centre</p> <p>Connections to the bus route along the A367</p> <p>Small scale economic uses compatible with residential uses</p>
Constraints	<p>Hillside location with landscape value and close to the Conservation Area.</p> <p>Bath Old Road is used as a cut through and does not have pavement access.</p> <p>Nearby is Camerton Romano settlement which is a Scheduled Ancient Monument.</p> <p>Safeguarded existing sport and recreational facilities (Roundhill Recreational Ground)</p> <p>Proximity to the Conservation Area</p> <p>Air quality</p> <p>Cumulative impact on school places in particular secondary</p> <p>Development between Radstock and Peasedown will impact on the heritage assets</p> <p>Trinity School may need to expand and be funded through developer contributions</p>

Mitigation required	<p>Landscaping and green infrastructure.</p> <p>Additional access to Trinity Church School.</p> <p>Provision of on-site green space (including provision for local food growing)</p> <p>Consideration of site layouts to avoid canyoning and avoid harm to air quality.</p>
Further evidence required	<p>Archaeological assessment.</p> <p>Detailed Landscape Assessment</p> <p>Heritage Assessment</p> <p>Detailed assessment of primary school capacity</p>

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Writhlington

Context

- 7.83 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.
- 7.84 The A362 runs through the area providing vehicular access to both the northern and southern parts of the locality.
- 7.85 Writhlington has one secondary school and one primary school.
- 7.86 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. 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 'cut through' 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.
- 7.87 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.
- 7.88 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.

7.89 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.

7.90 Given the topography of the site close attention would need to be paid to the drainage of the site to ensure that development does not cause surface water flooding.

7.91 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.

7.92 In addition, the councils would need to liaise on identifying infrastructure requirements and funding arrangements including developer contributions. This will need to be carefully assessed from a school admission

perspective as Somerset residents may look at school provision within B&NES.

7.93 The area 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 55: Map of Writhlington

Site Options

- 7.94 Development in this location could provide up to 950 to 1,150 homes. 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.
- 7.95 Development can also incorporate small scale economic uses that are compatible with a residential area.
- 7.96 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.
- 7.97 The nearest frequent bus services are located in Radstock town centre, although there may be potential to extend services if critical mass can be achieved. WECA are currently trailing a new 768 service between Writhlington, local villages and Bath.
- 7.98 Vehicle access would be provided from routes which provide connections to the A362. To the north, the A362 connects to Radstock town centre and surrounding residential areas. 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.
- 7.99 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.
- 7.100 If development is extended to the south there could be the option to provide new recreation facilities. There would be a further road connection onto Knobsbury Lane.

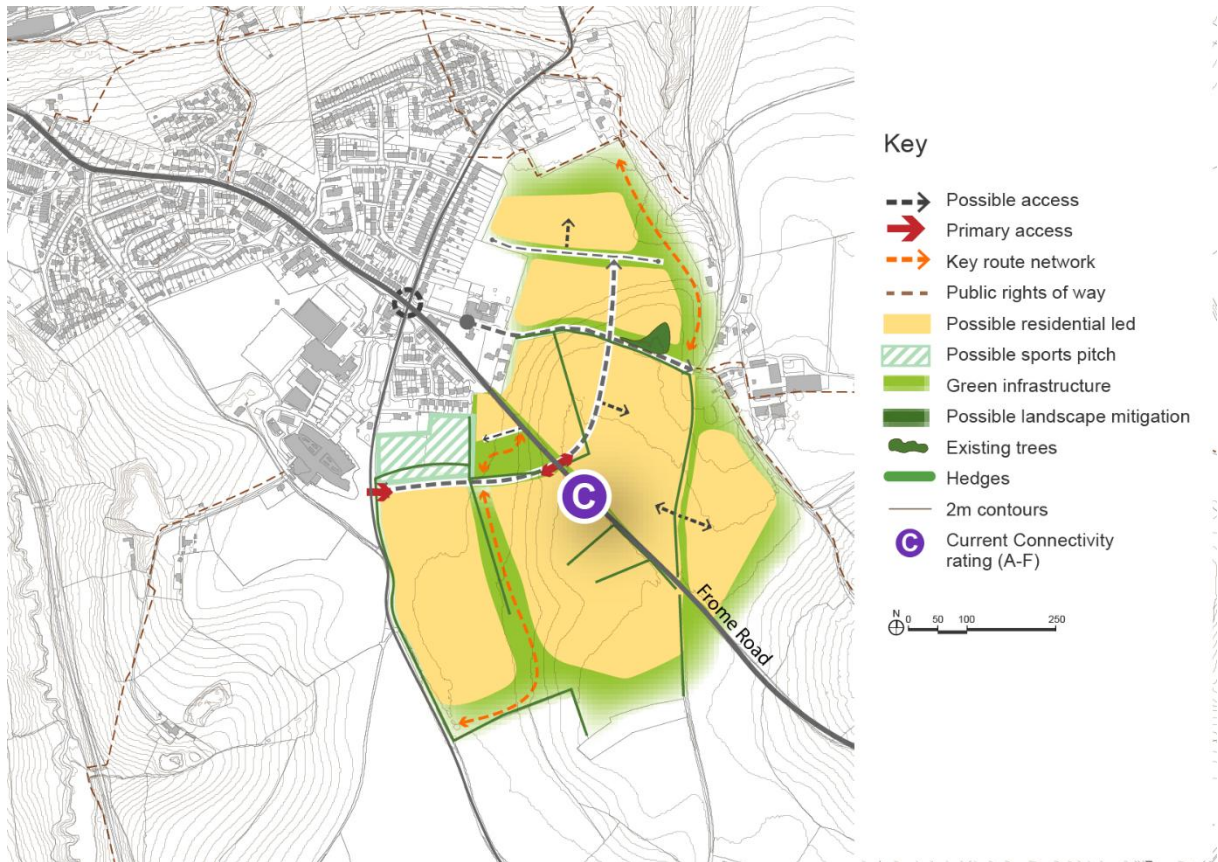


Figure 56: Map of Writhlington Options

Writhlington	Description
Opportunities	<p>Provide up to 950 to 1,150 homes, encompassing an element of affordable housing.</p> <p>New community and recreation facilities.</p> <p>Improvements to existing road junctions.</p> <p>Improve access to the countryside</p> <p>Small scale economic uses compatible with residential use</p>
Constraints	<p>The landscape setting of the existing site.</p> <p>Existing traffic congestion.</p> <p>Cumulative impact on school places, particularly secondary school</p> <p>Knobsbury Lane is an important skyline view and would require significant landscape buffering</p> <p>Ancient woodland</p> <p>Proximity to the Conservation Area</p> <p>Limited access to public transport</p> <p>Close to an SNCI</p> <p>St Marys primary school may need to expand and be funded through developer contributions</p>
Mitigation required	<p>Highways improvements including accommodations for buses</p> <p>Landscaping</p> <p>Community facilities</p> <p>Site drainage</p> <p>Protection of nearby SNCI</p> <p>Local Green Space</p>
Further evidence required	Landscape plan

	Ecological assessment, Transport assessment
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Smaller (non-strategic) Sites

7.101 In addition to the strategic locations the following non-strategic sites has been identified.

Haydon

7.102 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	<p>Opportunity for small scale additional housing of approximately 110 to 140 homes.</p> <p>Affordable housing</p> <p>Infill development following the contours of the existing settlement.</p> <p>Opportunity for nature recovery.</p> <p>Existing infrastructure can be used.</p>	<p>No public transport.</p> <p>Environmentally sensitive location close to SSSI and SNCI.</p> <p>Proximity to the Conservation Area</p> <p>Potential changes to the Conservation Area boundary</p> <p>Setting of nearby listed buildings</p>

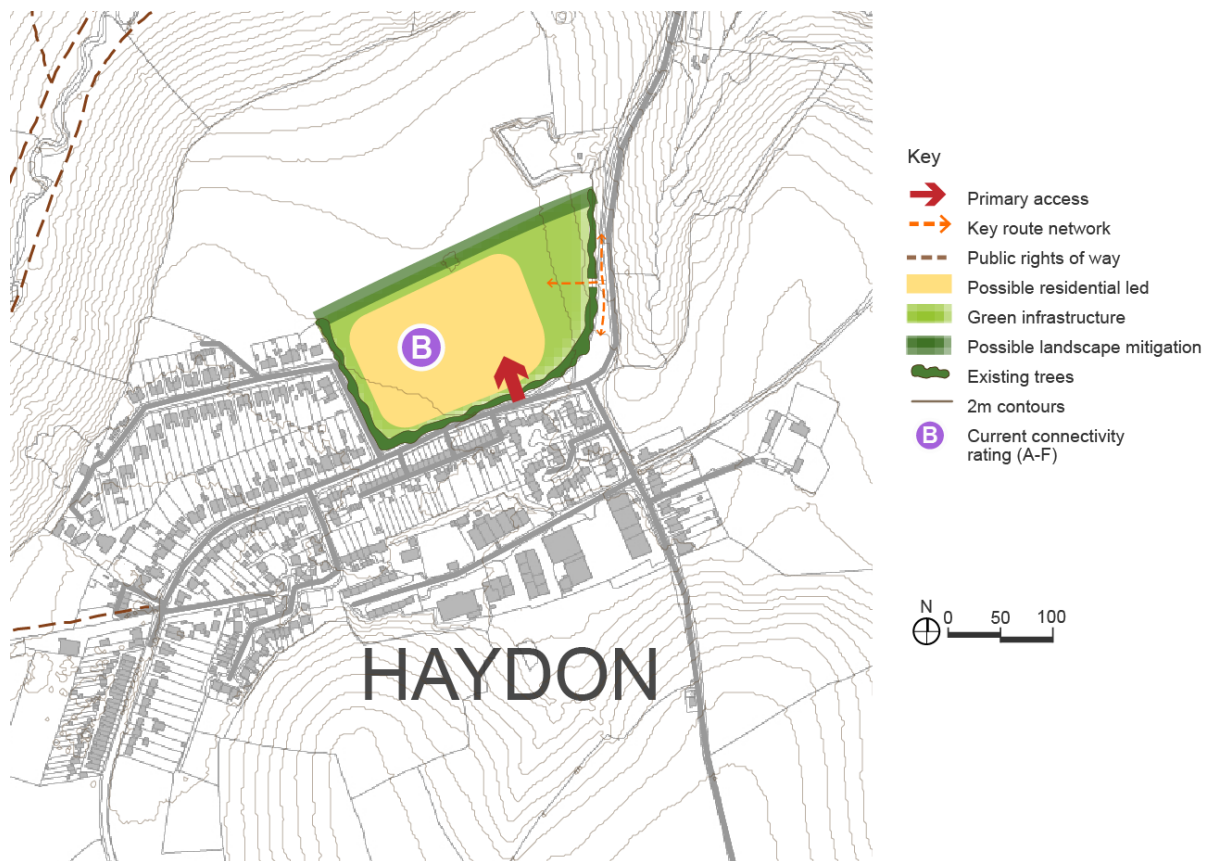


Figure 57: Map of Haydon Options

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Westfield

Place Profile

7.103 Westfield is located between Midsomer Norton and Radstock. It was designated as a parish in 2011, with the boundary incorporating Westfield industrial estate and Norton Hill to the south and extending north-east to the centre of Radstock. The main road serving the area is the A367 from which both residential and industrial development extends to the east and west, housing predominantly being in the form of cul-de-sacs.

7.104 The parish has a rich history with heritage from its Roman settlement and later mining industry. Coal mining was established in the area in 1763 and became a significant industry in Westfield until the closure of the mines in the mid-late 20th century. Up until the early 19th century Westfield remained a predominantly rural area.

7.105 Development and infrastructure grew in the parish alongside its coal industry during the 19th and 20th centuries and the terraced Miners' Cottages, built to accommodate local workers, defined the street scene. During the late 20th century, following the closure of the coal industry, residential development utilised the brownfield sites with several residential cul-de-sac estates being built in this period. Other industries were also established, primarily at Westfield Industrial Estate to the southern end of the parish.

7.106 In recent years new housing development has been permitted to the south of Westfield on the other side of the border in Somerset. The majority of Radstock Town centre sits within the Radstock boundary and therefore Westfield currently lacks a local centre of its own.

7.107 There is a primary school, Fosse Way School and Bath College Somer Valley Campus.

7.108 There are two important green corridors within Westfield comprising Waterside Valley and the green land which borders the cycleway in the north which provide valuable recreational space and long-distance views into surrounding rural landscape.

Key Issues and Opportunities

- 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 town is surrounded by green hillsides which are integral to its landscape character.
- The town's mining heritage has shaped its landscape character.
- Westfield does not have its own local centre
- Housing development has been permitted to the south of Westfield within Somerset impacting on local services

Priorities and Objectives

- Provide homes to meet the needs of the local area, including provision of homes that are affordable.
- 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.
- Ensure built and natural environments promote health and wellbeing for all.

Site Options

Westfield Industrial Estate East – Economic Use

7.109 The site is located on the southern edge of Westfield and sits adjacent to Westfield Industrial Estate. Whilst this land is being promoted for housing it

has the potential to become an extension to Westfield Industrial Estate and connect into the existing access points.

7.110 Expansion of the Industrial Estate has the potential provide the maximum floorspace of the following uses should only one use class come forward. A mix of uses would result in a lesser amount of floorspace for each use.

- Industrial – 48,240 square metres
- Office – 96,480 square metres
- Warehouse – 60,300 square metres

Option	Opportunities	Constraints
Westfield Industrial Estate East – Economic Use	Development could facilitate additional employment floorspace and form an extension to a successful industrial estate.	<p>The presence of the stream will make it difficult to develop.</p> <p>Visual impact of the development on the wider landscape.</p> <p>Setting of Kilmersdon colliery and Conservation Area</p> <p>No pavement access to the main road and bus routes</p> <p>The North East boundary is adjacent to the SNCI</p>

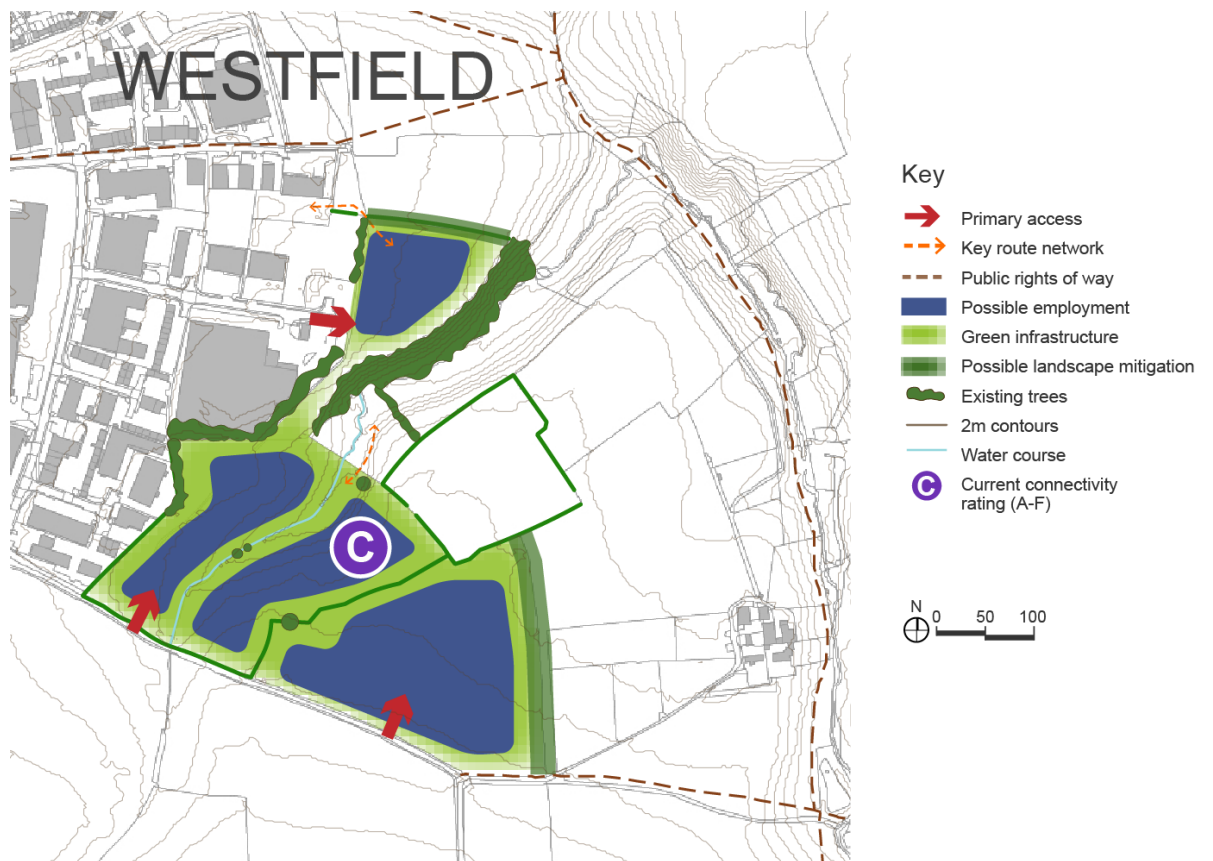


Figure 58: Map of Westfield Industrial Estate Options

[Click to comment](#)

Westfield Industrial Estate East – Housing

- 7.111 Within the previous consultation the site was also considered as a housing site. 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 the waterside valley. The land could accommodate around 200 homes.

Option	Opportunities	Constraints
Westfield Industrial Estate East – Housing	<p>Opportunity for small scale additional housing of approximately 200 homes.</p> <p>Affordable housing</p> <p>Development could facilitate new pavements and lower traffic speed limits.</p> <p>Improved connection to Hayden Batch and Biodiversity Net Gain (BNG)</p>	<p>The presence of the stream will make it difficult to develop.</p> <p>There is no pavement access to the main road.</p> <p>The site is cut off from shops and services.</p> <p>Access would need to go through a busy industrial site. Development of this land might be more suitable for industrial/employment purposes.</p> <p>Visual impact of the development on the wider landscape.</p> <p>Setting of Kilmersdon colliery and Conservation Area</p> <p>No pavement access to the main road and bus routes</p> <p>The North East boundary is adjacent to the Site if Nature Conservation Importance (SNCI)</p>

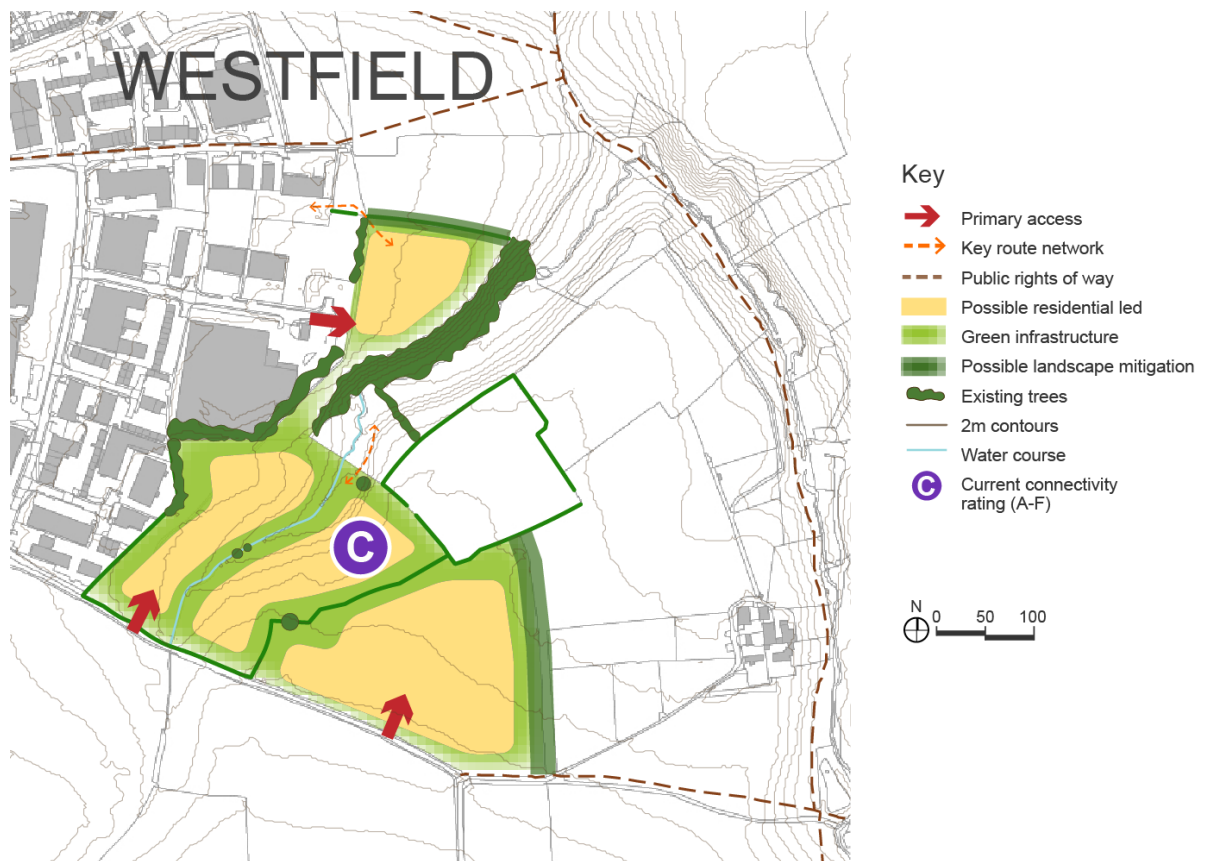


Figure 59: Map of Westfield Options, Housing

[Click to comment](#)

Midsomer Norton

Place Profile

7.112 Midsomer Norton is a Medieval market town which later became an important coal mining settlement during the 18-19th centuries following the discovery of coal at Welton. The railway arrived in the 1870s, providing further impetus for development investment, supported by coal mining employment at Norton Hill Colliery.

7.113 The historic core of Midsomer Norton covers the southern and eastern side of the settlement, along the B3355 and incorporating the area of Welton. Formalised expansion during the 1920's along North Road included development at Clevedon Road, Burlington Road and opposite the

recreational ground at Elm View (which took the form of small terraces set back) as well as the area parallel to North Road. Westfield, located to the south of the Somerset & Dorset Railway, expanded during the late 19th and 20th centuries, with development focussed close to Norton Hill Colliery in an area characterised by short row terraces. Development continued at pace across the area through the post-war period.

7.114 The Conservation Area in Midsomer Norton is focused on the valley of the River Somer. The small settlement of Welton, located to the north-east of Midsomer Norton, forms part of the Conservation Area and can be characterised as being primarily an 18th century coal mining community. Listed buildings are principally focused within Midsomer Norton.

7.115 The town is well served by Midsomer Norton High Street which is being improved by the High Street regeneration programme, with ongoing masterplanning work. The town includes leisure facilities at Dragonfly leisure and the new town park. The town has two secondary schools and five primary schools. The Somer Valley Links Enterprise Zone sits to the north west of the town. It will be accessible by public transport links and new cycle infrastructure from the town centre.

7.116 The town is served by the bus route which connects Midsomer Norton with Bristol, Bath and Wells. But some areas of the town can be seen as less well connected including Welton and Radstock Road. The town is connected to the active travel route which connects Midsomer Norton to Radstock and the Colliers Way.

Key Issues and Opportunities

- 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 town is surrounded by green hillsides, a number of which are designated as Site of Nature Conservation Importance which are integral to its landscape character.
- The town's mining heritage has strongly influenced its landscape character.

Priorities and Objectives

- Provide homes to meet the needs of the local area, including provision of homes that are affordable.
- New development should work with the Midsomer Norton Town Centre Plan (Masterplan and 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 enable 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.
- Ensure built and natural environments promote health and wellbeing for all.

Land to the North of Midsomer Norton

Context

- 7.117 Land to the north of Midsomer Norton and west of Paulton consists of agricultural fields. The area is just over 1km walk to Midsomer Norton High Street. There are a number of public rights of way across the fields and some residential dwellings.
- 7.118 Landscape character is an important attribute of the area. The green hillsides are integral to the setting of Midsomer Norton. Any new development should be confined to the plateau above the town and should not encroach onto the green hillsides or the landscape setting of Midsomer Norton.
- 7.119 The site is currently accessed by a series of narrow lanes and any development would need to improve access to the site, incorporating wider roadways and footways. The western part of the site is within walking distance of the 172 bus route providing access to Paulton, Bristol and Bath. Should a wider area be brought forward for development then there is an opportunity to provide a new link between Paulton and Clandown. Development should provide pedestrian links to public transport, town centre facilities and schools.
- 7.120 The site sits to the north of the designated Conservation Area which extends up the green hillsides. To the west of the site planning permission has recently been granted for a solar farm. Nearby Bowditch Quarry is a SSSI.

Site Options

- 7.121 The site option presented below could provide up to around 1,000 homes, as well as supporting facilities and green infrastructure. The development would need to be landscape led with screening needed to the north and south alongside landscape buffers to ecological assets.

7.122 The site is currently accessed by a series of narrow lanes. Therefore, any development would need to significantly improve the current access to the site, incorporating wider roads and pavements. Part of the site to the west is within walking distance of Phillis Hill providing access to bus services to the local area as well as Bristol and Bath.

7.123 There is a potential opportunity to provide a new route linking Paulton and Clandown. It is envisaged that the route would play a strategic role, removing vehicles from Midsomer Norton and Radstock town centres and helping to relieve congested local roads. This will enable significant improvements to be made to the wider area enabling enhancement of the public realm and increasing space and facilities for sustainable modes of transport. Development will also provide active travel links to public transport, town centre facilities and schools to improve connectivity and make sustainable travel a viable realistic option for more people.

7.124 If this option is pursued through the local plan, further detailed studies will need to be conducted to understand the broader impacts including the effect on the wider transport network.

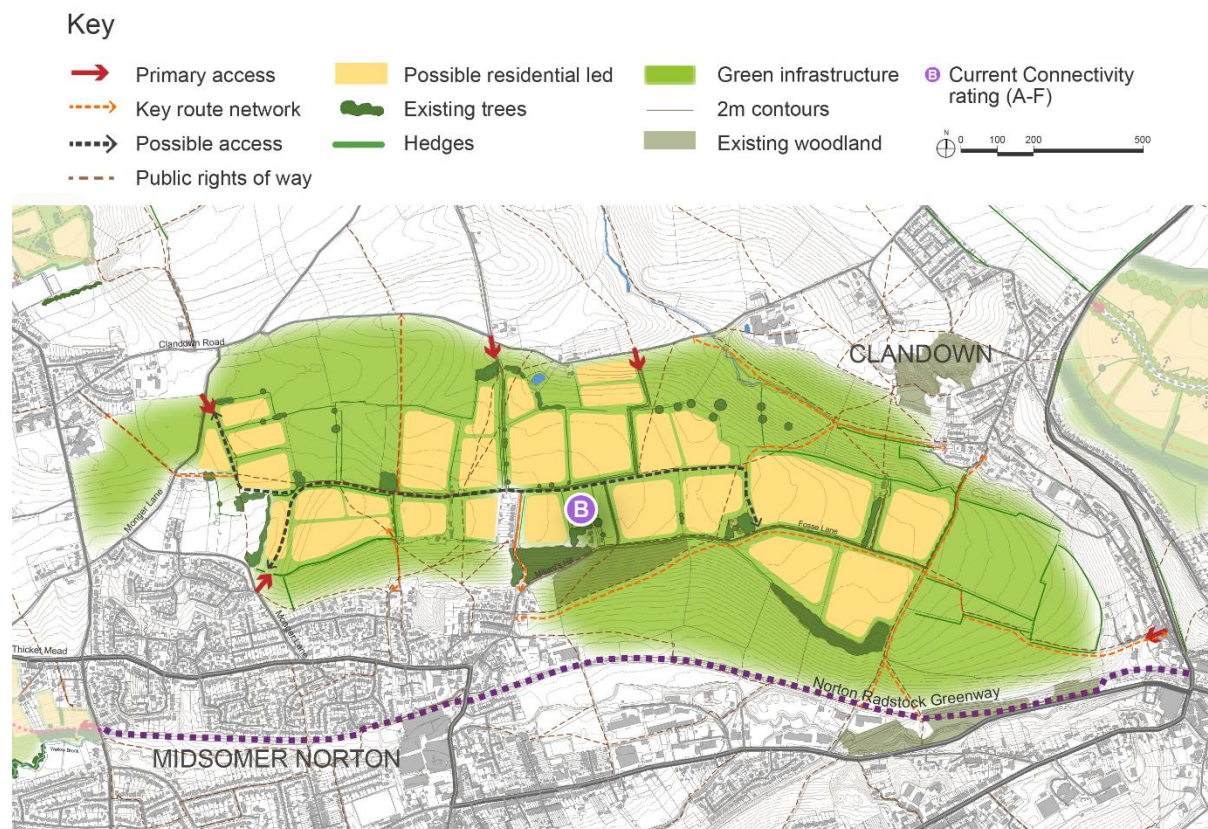


Figure 60: Map of North Midsomer Norton Options

	Description
Opportunities	<p>Provide up to 1,000 homes, encompassing an element of affordable housing.</p> <p>New community and recreation facilities.</p> <p>Improvements to existing road junctions.</p> <p>Improve access to the countryside</p> <p>Connections to the existing Radstock Greenway and potential to improve the existing route.</p>
Constraints	<p>The landscape setting of the existing settlement</p> <p>Cumulative impact on school places</p> <p>Setting of nearby heritage assets.</p> <p>Cumulative impact on secondary school places</p> <p>Impact on the setting of Conservation Areas and boundary extension to Radstock Conservation Area</p> <p>Development between Radstock and Midsomer Norton will impact on the historic patterns of development</p>
Mitigation required	<p>Landscaping</p> <p>Community facilities</p> <p>Improvement of public rights of way and roads</p> <p>Pavement access to local bus routes, cycle paths and the town centre.</p>
Further evidence required	<p>Landscape plan</p> <p>Ecological assessment</p> <p>Highways and traffic assessment</p>

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Smaller (non-strategic) Sites

7.125 In addition to the strategic locations the following non-strategic sites have been identified

7.126 Midsomer Norton South A and B - 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
Midsomer Norton South A and B	<p>Opportunity for small scale additional housing of approximately 130 to 170 homes.</p> <p>Affordable housing</p> <p>Extension to existing residential development.</p> <p>Development could facilitate new pavements and lower traffic speed limits.</p> <p>Potential for a pedestrian route to Staddlestones Park</p>	<p>The site is not close to local shops and services.</p> <p>Limited access to public transport</p> <p>South eastern boundary is adjacent to the River Somer SNCI</p>

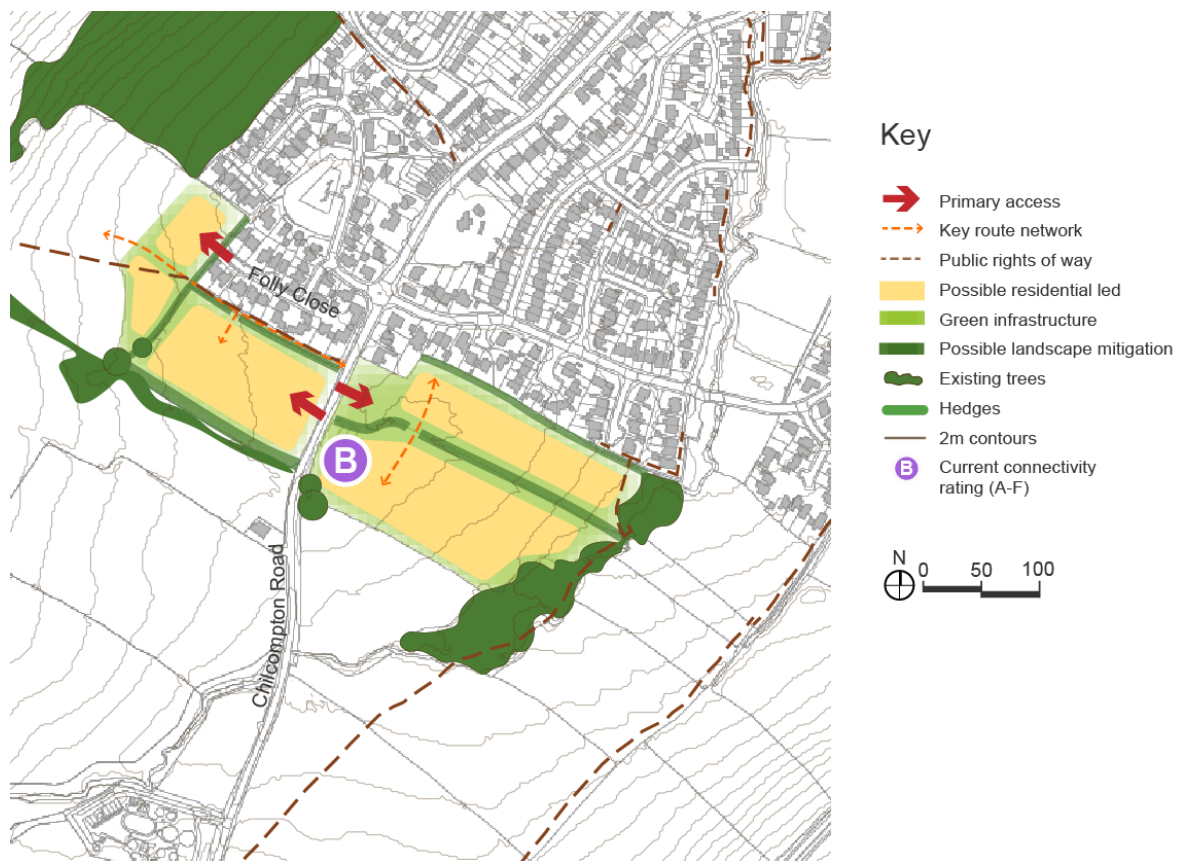


Figure 61: Map of South Midsomer Norton Options

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Thicket Mead A and B

7.127 The sites are located on the western edge of Midsomer Norton close to the Tesco store at Old Mills. Site A is a sloping site that sits close to the valley floor. Site B is a plateau site adjacent to Tesco that slopes down toward the valley.

Option	Opportunities	Constraints
Thicket Mead A and B	<p>Opportunity for small scale additional housing of approximately 250-300 homes.</p> <p>Infill gaps within existing development.</p> <p>Opportunity for better pedestrian connections between Tesco and Midsomer Norton.</p> <p>Opportunity to extend the Greenway along the disused railway line</p>	<p>Due to land ownership this will result in piecemeal development and there is limited opportunity for cohesive design.</p> <p>Landscape setting, including the route of the old railway line</p> <p>Site is adjacent to Springfield Colliery and Wellow Brooks SNCIs</p>

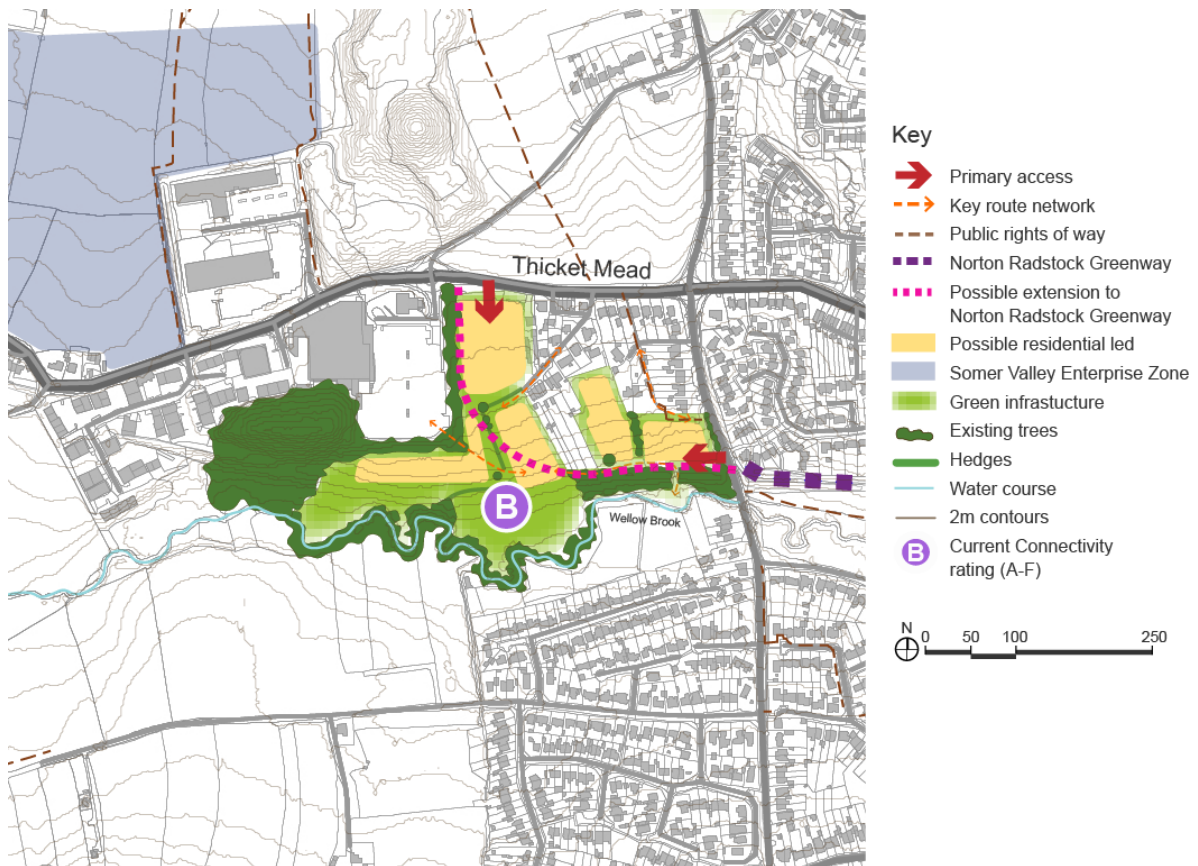


Figure 62: Map of Thicket Mead Options

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Paulton

Place Profile

7.128 In Paulton the decline in coal mining brought opportunities in manufacturing and, notably, printing, with the print works on the lower slopes of the Cam Valley being a major employer for the settlement before it finally closed in 2005. Following the demise of Purnell's printworks, house building has expanded northwards and, in the northeast of the village, there is a concentration of recreational/sport facilities including Paulton Sports Club, Purnell's Bowls Club and the Cam Valley Sports Club. Paulton High Street is narrow with narrow footways meaning the area is dominated by the car. The Paulton Memorial Hospital is positioned to the south of the village along the B3355. Paulton is served by one primary school and a pre-school.

7.129 Paulton Conservation Area is split into several parcels, with the original part of the Conservation Area focused on the core of the village located on a ridgeline. As with Radstock, the designation reflects the coal mining and industrial heritage of the area as represented by the buildings and landscape surrounding the village.

Key Issues

- Paulton has good public transport access to Bristol and Bath however, opportunities to access other destinations are limited.
- The village is surrounded by green hillsides which are integral to its landscape character.
- The village's mining heritage has shaped its landscape character.
- The village has been subject to substantial growth to the north

Priorities and Objective

- Provide homes to meet the needs of the local area, including provision of homes that are affordable.
- New development should enable 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.

- Ensure built and natural environments promote health and wellbeing for all.

Small non-strategic sites

Farrington Road South and North

7.130 Farrington Road North sits to the north of Farrington Road adjacent to Westview and Downsway. It is a relatively flat site. Farrington Road South is accessed from Abbots Farm Close and slopes upwards to the south.

Option	Opportunities	Constraints
Farrington Road South and North	<p>Opportunity for small scale additional housing of approximately 70 – 100 homes.</p> <p>Affordable housing</p> <p>Extend 20mph speed limit and provide pavement access to the village centre.</p>	<p>Due to the location of the site development would likely be characterised by cul-de-sacs with little connectivity to the surrounding settlement.</p> <p>Impact on the existing landscape.</p> <p>Medieval field system and potential archaeological interest.</p>



Figure 63: Map of Farrington Road South and North Options

[Click to comment](#)

Paulton East

7.131 The site is located to the east of Paulton village. Access to the site would need to be taken from Alexandra Park.

Option	Opportunities	Constraints
Paulton East	<p>Opportunity for small scale additional housing of approximately 190 - 230 homes.</p> <p>Affordable housing</p>	<p>Due to the location of the site development would likely be characterised by cul-de-sacs with little connectivity to the surrounding settlement.</p> <p>Impact on the existing landscape.</p> <p>Impact on former colliery and potential for contaminated land</p> <p>Impact on heritage assets including the former memorial hospital</p>



Figure 64: Map of Paulton East Options

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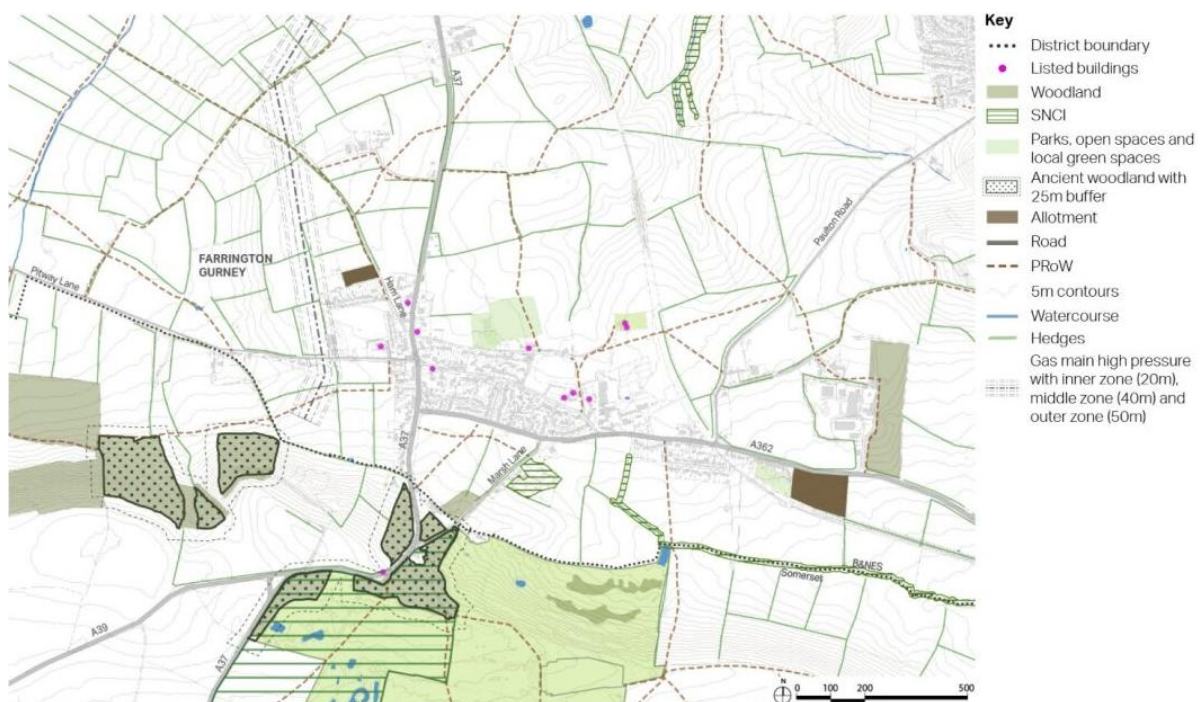
Farrington Gurney

Place Profile

- 7.132 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.
- 7.133 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 also proposes a new mobility hub at Farrington Gurney.
- 7.134 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 isolated setting of the church will be an important consideration for any development proposals.
- 7.135 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.
- 7.136 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.
- 7.137 There are opportunities for a good size residential and landscape-led development. The new mobility hub along the A37 would help with access to public transport, and active travel is promoted through the Somer Valley Links.

7.138 To improve walking, wheeling and cycling permeability throughout the village, the existing main roads need to be downgraded and vehicle speeds need to be reduced to provide improved safety. 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.

7.139 There is an Air Quality Management Area within Farrington Gurney at the junction of the A37 and A362. An increase in development to the village may impact on air quality and any new development may need to be designed so as to avoid damage to future air quality.



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) and AQMA in Temple Cloud
- Distance from Midsomer Norton town centre is over 3 miles.
- 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.
- Agricultural land classification

Priorities and Objectives

7.140 The following list sets out the key priorities and objectives for Farrington Gurney. 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.

- Around 500 homes could be provided, including housing that is affordable and meets local needs
- The existing primary school has limited capacity to accept new children. 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 connections 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

7.141 The previous options consultation included a strategic option for housing to the north of the village. This land is situated wholly within Grade 1 farmland and therefore its development would result in a substantial loss of Grade 1 farmland.

7.142 The land to the north of the village also sits adjacent to the Grade II listed St John the Baptist Church. The church's isolated setting away from the village is integral to its history and therefore development in this area could harm the historic setting of the church.

7.143 Therefore the option of development to the north of the village is not proposed to be taken forward.

7.144 The development option to the south of the village proposed below would require vehicular access off the A37, which would need 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.

7.145 Green links throughout the residential areas would enhance local biodiversity and provide a high-quality public realm and direct access to the countryside.

7.146 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.

7.147 Development can also incorporate small scale economic uses that are compatible with a residential area.

Option 1

7.148 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.

7.149 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.

7.150 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.

7.151 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.

7.152 Evidence from DEFRA mapping suggest that the land is partly Grade 1 farmland (high grade) and partly Grade 3 (lower grade). Anecdotal evidence has been provided through the previous options consultation that none of the site is Grade 1. Therefore, if this site were to be allocated for development in the Draft Local Plan further investigation would be required to ascertain if any of the site is high grade farmland.

7.153 Marsh Lane colliery is an undesignated heritage asset and important landscape feature. Its setting should be carefully considered if this site were to be allocated.

7.154 There is limited access to public transport particularly going east towards Midsomer Norton. Further crossing points would be required to provide pedestrian access to bus stops.

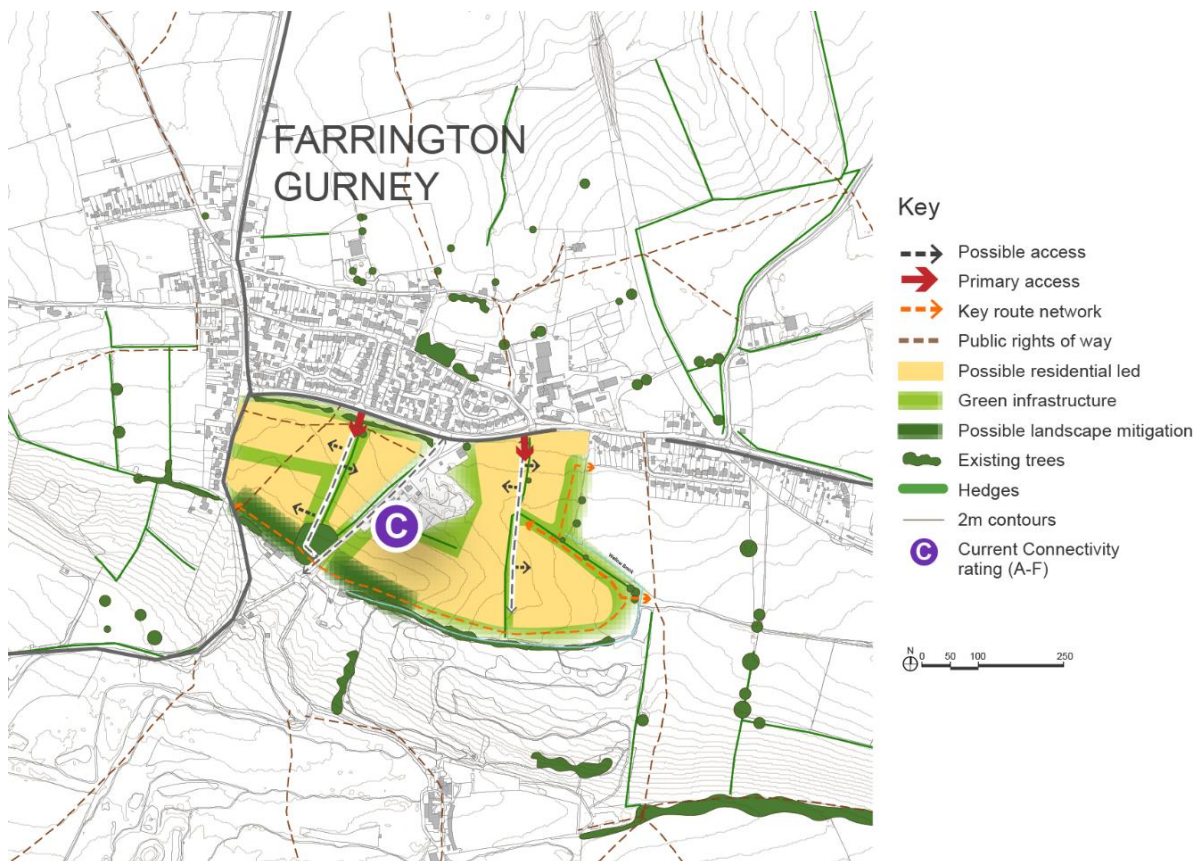


Figure 66: Map of South Farrington Gurney Options

Farrington Gurney (south) - Option 1	Description
Opportunities	<p>Approximately 400-500 homes of which an element would be Affordable Housing</p> <p>Small scale economic development compatible with residential uses.</p>
Constraints	<p>Site of Nature Conservation Importance</p> <p>Ancient Woodland</p> <p>Mendip Hills</p> <p>Agricultural Land Classification</p> <p>Air Quality Management Area</p> <p>Marsh Lane Colliery</p> <p>Limited access to public transport</p>
Mitigation required	<p>New primary School</p> <p>Highway improvement on the A362 and A37</p> <p>Landscape buffer to ancient woodland and SNCI</p> <p>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 active modes of travel.</p> <p>Consideration of site layouts to avoid canyoning and avoid harm to air quality.</p>
Further evidence required	<p>Archaeological assessment</p> <p>Landscape Assessment</p> <p>Contaminated land assessment</p> <p>Agricultural land assessment</p> <p>Air quality impact assessment</p>

	Transport assessment
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Option 2

7.155 The option for 400-500 homes would yield a quantum of development that could facilitate a new 210-place primary school. However, current assessment of primary school admissions suggests that the school could potentially accommodate children generated by a residential development providing around 50 homes. Therefore, option 2 proposes a smaller development to the south of the village for 50 homes.

Farrington Gurney (south) - Option 2	Description
Opportunities	Approximately 50 homes of which an element would be Affordable Housing
Constraints	<p>Site of Nature Conservation Importance</p> <p>Ancient Woodland</p> <p>Mendip Hills</p> <p>Agricultural Land Classification</p> <p>Air Quality Management Area</p> <p>Marsh Lane Colliery</p>
Mitigation required	<p>Highway improvement on the A362 and A37</p> <p>Landscape buffer to ancient woodland and SNCI</p> <p>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 active modes of travel.</p> <p>Consideration of site layouts to avoid canyoning and avoid harm to air quality</p>
Further evidence required	<p>Archaeological assessment</p> <p>Landscape Assessment</p> <p>Agricultural land assessment</p> <p>Air quality impact assessment</p> <p>Transport assessment</p>

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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 **related** 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 both the 2024 Options and Launch Consultation as well as Workshops with parish councils and other community representatives. These key issues can be summarised as:

- 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 cultural infrastructure, including community and social facilities, services and shops.
- Importance of maintaining and enhancing the character and local identity of our rural areas and communities.
- Reliance of the rural economy 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.
- Poor digital connectivity continues to be a barrier to business growth, home working, and access to services, and must be addressed to support economic and social inclusion.
- The ageing population in rural areas presents specific challenges for housing, healthcare, and service provision, requiring more adaptable and accessible infrastructure.
- Climate change resilience and adaptation must be embedded in rural planning, including flood risk management, sustainable land use, and energy efficiency.
- Protection and restoration of natural capital and ecosystem services is essential to support biodiversity, climate goals, and the long-term sustainability of rural communities.
- Rural areas are not a single place – they encompass varied geographies and identities, and strategies must be flexible and locally responsive.

Emerging Vision and Priorities

8.8 The following list sets out the key priorities for the Rural Area. Many of the priorities can be addressed through development, either local plan-led or by communities through Neighbourhood Plans. However, there are some issues 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.

- **Create vibrant, inclusive rural communities** where people of all ages can live, work, and thrive, supported by affordable homes, accessible services, and strong social infrastructure.
- **Champion a green rural economy** that supports local enterprise, sustainable tourism, and innovation in food, energy, and land-based industries.
- **Transform rural connectivity** by delivering a network of safe, accessible walking, cycling, and wheeling routes, and by improving public transport and digital infrastructure.
- **Empower communities to shape their future**, supporting locally-led development through Neighbourhood Plans, community land trusts, and rural exception sites.
- **Plan for climate resilience and environmental recovery**, embedding nature-based solutions, low-carbon design, and flood adaptation into all aspects of rural growth.
- **Unlock the potential of strategic rural development**, where appropriate, to deliver wider benefits such as employment land, new services, and infrastructure that sustain long-term community wellbeing.
- **Celebrate and protect the unique character of rural places**, ensuring that growth enhances rather than erodes the landscapes, heritage, and identities that define them.
- **Respond to national challenges with local solutions**, using the local plan as a springboard for bold, place-based planning that meets housing need while respecting local distinctiveness.

8.9 The Government's Unleashing Rural Opportunity report sets out a framework to support rural communities across the UK. Since its publication, progress has been made in areas such as digital connectivity, transport, and rural economic diversification. However, access to funding for rural areas remains limited and uneven. In B&NES, the UK Shared Prosperity Fund (UKSPF), administered through the West of England Mayoral Combined Authority (WECA), has provided support to rural communities. Five rural parishes have successfully delivered energy efficiency and biodiversity projects, demonstrating the effectiveness of a decentralised delivery model. These include:

- Farmborough Village Sport & Social – installation of an air-to-air source heat pump and hot water system in a refurbished building to reduce energy consumption.
- East Harptree and Bishop Sutton – installation of solar panels on community buildings.
- Compton Martin – insulation added to the vaulted roof of the village hall.
- Chelwood Parish Council – roof repairs and insulation of the village hall.
- Chew Magna Old Schoolroom Charity – retrofitting a room to improve resilience to flooding events.

8.10 These projects highlight the potential for community-led, place-based investment in rural areas. However, the scale of funding available remains limited, and further support is needed to ensure that rural communities across B&NES can fully participate in the transition to a greener, more resilient economy.

8.11 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.

Transport Opportunities

8.12 Improving connectivity is also a key priority for rural communities. The [Active Travel Masterplan](#) sets out a 20-year vision to make walking, wheeling, and cycling the natural choice for more journeys across the district. It proposes a holistic network of safe, accessible, and interconnected routes that link rural settlements to key services, employment, and public transport hubs. By reducing reliance on private vehicles, the Masterplan supports climate goals, improves air quality, and enhances health and wellbeing. For rural areas, it offers the opportunity to address isolation, improve access to services, and strengthen local economies through better physical connectivity.

8.13 Enhancing public transport is also a key priority for rural communities in B&NES. The council's approach focuses on a simple, dependable and integrated rural bus network that links villages to key services, employment and town centres via well located mobility hubs, supported by bus priority on strategic corridors such as the A37, A367 and A362. WECA's forthcoming work on bus ownership options will help to inform how rural services are specified and delivered. [Some key rural public transport services, particularly buses, are currently WECA grant funded and it is vital that this funding remains in place in order to support existing rural communities, as well as potential additional development. However, the future of this funding is uncertain and subject to periodic review, which should be taken into account when considering options for allocation in the Draft Local Plan.](#)

Green Infrastructure

8.14 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.

8.15 The WECA Local Nature Recovery Strategy and Toolkit (LNRS) was published in November 2024. The LNRS identifies the following areas:

- Areas that are already of importance to biodiversity. These are sites that are nationally designated for their value to nature (SSSIs, SACs and SPAs); are designated as Local Nature Reserves; are locally designated as 'Sites of Nature Conservation Interest' (SNCIs); and/or are irreplaceable habitat including ancient woodland.
- Focus Areas for Nature Recovery. This is where action to recover nature will have the biggest impact and is most feasible. These have been mapped to reflect the priorities for nature recovery, and include all of the mapped measures for nature recovery. The focus areas for nature recovery are referred to as 'areas that could become of particular importance' in regulation.

8.16 Figure 67 below shows where these areas are located in the Rural Area, and the relationship between these areas and the Site Options under consideration in this Options consultation. Constraints and opportunities are referenced for each Site Option where appropriate.

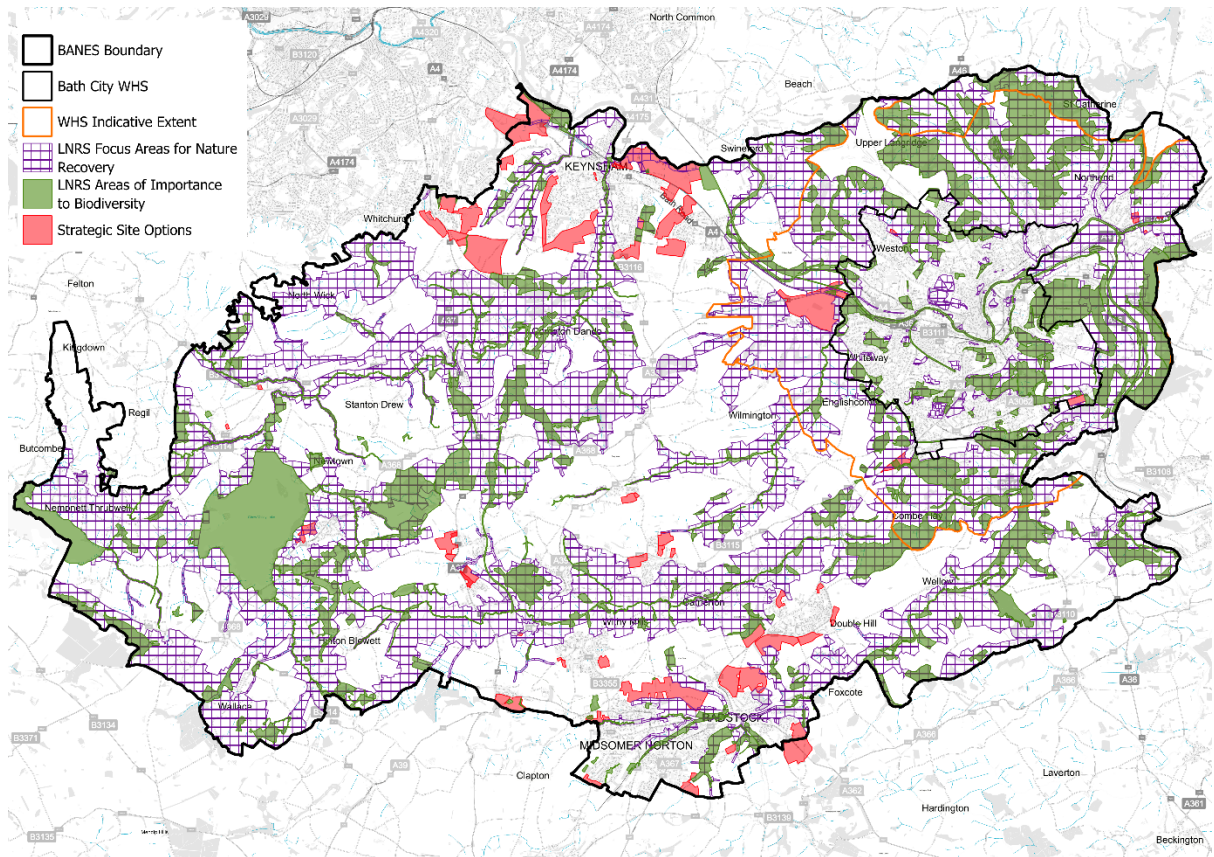


Figure 67: WECA LNRs areas and rural site options

Proportionate Growth:

8.17 Central to the vision and priorities for the rural areas 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. However, as a result of changes to national policy and the Government's proposed revised housing figure, aimed at tackling the country's acute housing crisis and stimulating economic growth, the council reset the local plan in February 2025. This reset discussed the increased housing pressures across the district, including in rural areas. While proportionality remains a guiding principle, there is now a need to consider whether some comparatively sustainable rural locations may be suitable for larger-scale development.

8.18 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. Larger developments, where appropriate, can help unlock wider benefits such as employment land, improved services and facilities, and enhanced infrastructure—benefits that smaller-scale growth may not be able to deliver.

Pathway 1: Community-Led Growth

8.19 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

8.20 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.

8.21 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.
- Enable investment in new infrastructure, including employment space, schools, and transport improvements, where larger-scale development is appropriate.

8.22 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.

8.23 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. However, proportionality must now be considered in the context of increased housing requirements and the need to deliver development that brings meaningful benefits to rural communities.

8.24 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.

8.25 As part of the local plan process, we are also separately consulting on amended Housing Development Boundaries (HDBs) for rural settlements. This includes an option for a revised methodology for defining HDBs, primarily to ensure they reflect changes on the ground and address known inconsistencies. While the main purpose is to provide clarity and alignment with current circumstances, the amended boundaries may also enable a limited amount of small scale 'windfall' growth in appropriate locations. This consultation runs alongside the site options process and complements the identification of relatively sustainable villages, helping to ensure that all forms

of rural growth, whether plan-led or windfall, are managed in a coordinated and locally responsive way.

8.26 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.

8.27 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.

8.28 The villages identified as relatively sustainable compared to others are proposed to become the focus of attention for some local plan led rural growth. Our commitment is to engage with the community and parish council in these villages to explore the potential for 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. We have met with parishes that have engaged with us, and as a result, we have identified site options within these areas to set out our thinking on the most appropriate locations and scales of potential growth. If taken forward this 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 during the plan period. In preparing the draft Local Plan we will also need to consider whether there are opportunities to phase development in the villages in the context of the need to maintain a five-year housing land supply across B&NES. Opportunities outlined in the Housing and Economic Land Availability Assessment (HELAA) were considered as a starting point for potential locations. In addition, the February 2025 Call for Sites has provided further opportunities to assess land availability and suitability across the district.

8.29 As part of this process, parish councils were offered training on site assessment, and many have reviewed HELAA opportunities within their areas. Through this collaborative approach, at some villages previously identified for proportionate growth no site options are identified at this time due to either a lack of development opportunities or the high levels of harm that could result from local plan scale growth. We continue to work with these parishes and encourage them to pursue Pathway 1 (Community-Led Growth) as an alternative route to meet local needs. We will continue to work 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.

8.30 Should other villages wish to be considered for further growth then there is the opportunity for them to respond through this consultation. Comments received during the Spring 2024 Options consultation, as well as those from this consultation and ongoing engagement with rural communities and stakeholders, will all be considered together in shaping the Draft Local Plan. There is no need to resubmit previous comments unless you wish to add new information or context.

Village Options

8.31 A summary of the village approach options is set out in Table below, these are then be presented as site options in the next section. Each village with an identified site option has been evaluated using the Department for Transport's Connectivity Tool, which integrates transport and land use data to produce a national measure of connectivity for any location in England and Wales. This tool assigns each location a grade from A to J, where A indicates the highest level of connectivity within Bath and North East Somerset, and J the lowest. The assessment is based on the current sustainable transport network and existing land uses such as schools and shops, and does not take into account planned or future improvements. The grading from A to F is not an overall ranking of site options and in deciding which sites are allocated in the Draft Local Plan other sustainability criteria and deliverability factors will also be considered.

Village	5% Growth	Opportunities	Constraints	Options
Bathampton	40 dwellings over the Plan Period	<p>High connectivity score</p> <p>Broad range of services & facilities</p> <p>Some primary school capacity identified</p>	<p>The village is surrounded by the Green Belt and lies within a National Landscape. Allocation of greenfield sites would require exceptional circumstances to justify Green Belt release. However, land that may qualify as Grey Belt under the revised NPPF could be considered for development, subject to further assessment.</p> <p>Within indicative extent of the setting of the World Heritage Sites</p>	<p>No options presented – Due to the constraints identified, no site options are proposed. However, opportunities for community-led growth (Pathway 1), including affordable housing through rural exception sites, could be explored.</p>
Batheaston	63 dwellings over the Plan Period	<p>High connectivity score</p> <p>Broad range of services & facilities</p>	<p>The village is surrounded by the Green Belt and lies within a National Landscape. Allocation of greenfield sites would require exceptional circumstances to justify Green Belt release. However, land that may qualify as Grey Belt under the revised NPPF could be considered for development, subject to further assessment.</p> <p>Within indicative extent of the setting of the World Heritage Sites</p> <p>Limited primary school capacity</p>	<p>No options presented – While no suitable sites have been identified within Batheaston itself due to significant constraints, adjoining land within Bathford parish—functionally part of the wider Batheaston settlement—may offer opportunities for mixed-use or economic development. These will be considered under Bathford's growth strategy.</p>

Village	5% Growth	Opportunities	Constraints	Options
Bathford	40 dwellings over the Plan Period	<p>High connectivity score</p> <p>Moderate range of services & facilities</p> <p>Some primary school capacity identified</p>	<p>The village is surrounded by the Green Belt and lies within a National Landscape. Allocation of greenfield sites would require exceptional circumstances to justify Green Belt release. However, land that may qualify as Grey Belt under the revised NPPF could be considered for development, subject to further assessment.</p> <p>Within indicative extent of the setting of the World Heritage Site</p>	<p>Options presented – Opportunities for development have been identified on the edge of the village, including land along Box Road that may be suitable for mixed-use or economic development. Smaller sites within Bathford are also being considered. Some of this land adjoins Batheaston and may contribute to meeting wider settlement needs.</p>
Bishop Sutton	33 dwellings over the Plan Period	<p>Moderate range of services & facilities</p> <p>Some primary school capacity identified</p>	<p>Low connectivity score</p> <p>Village surrounded by the Mendip Hills National Landscape</p>	<p>Options presented – Working with the Parish and a local landowner, new land has been promoted to the west of the village, including an extension to Westway Business Park and new housing. If a longer-term view is taken, this could unlock access to constrained HELAA sites around Cappards Road and Stitching Shord Lane. A larger, potentially phased option is therefore being presented through this consultation, while noting constraints in terms of the Mendip Hills National Landscape, transport connectivity and agricultural land.</p>

Village	5% Growth	Opportunities	Constraints	Options
Chew Magna	28 dwellings over the Plan Period	Broad range of services & facilities	<p>Low connectivity score</p> <p>The village is washed over by the Green Belt. Development is generally limited to infill and redevelopment of previously developed land. Under the revised NPPF, land that meets the definition of Grey Belt may offer limited opportunities for development, subject to assessment.</p> <p>Limited primary school capacity</p>	<p>Options presented – A site to the west of the village, comprising abandoned tennis courts off Dark Lane and located between the two infill boundaries, is being considered for development. The site may offer a suitable opportunity for proportionate growth, subject to further assessment of its landscape impact and planning context.</p>
Chew Stoke	21 dwellings over the Plan Period	Moderate range of services & facilities	<p>Low connectivity score</p> <p>The village is washed over by the Green Belt. Development is generally limited to infill and redevelopment of previously developed land. Under the revised NPPF, land that meets the definition of Grey Belt may offer limited opportunities for development, subject to assessment.</p> <p>Limited primary school capacity</p>	<p>Options presented – A site to the north of the village is being considered for development. Although the land is classified as Grade 1 agricultural, it is viewed as a more sustainable location due to its proximity to the primary/secondary school, doctor's surgery, and bus stops. Further assessment of the agricultural land quality will be required, but the potential loss is expected to be minimal.</p>

Village	5% Growth	Opportunities	Constraints	Options
Clutton	35 dwellings over the Plan Period	<p>Moderate connectivity score</p> <p>Some primary school capacity identified</p>	<p>Limited range of services & facilities</p> <p>The northern edge of the village is in the Green Belt</p>	<p>Options presented – Land to the west of the A37 is being considered for development, reflecting Clutton's strategic location along this corridor and the direction of growth supported by the Neighbourhood Plan. Initial growth would be proportionate to the size of the village, with potential for further phases. This could support delivery of the permitted farm shop and wider development opportunities.</p>
Corston	11 dwellings over the Plan Period	<p>Moderate connectivity score</p>	<p>Limited range of services & facilities</p> <p>Within indicative extent of the setting of the World Heritage Sites</p> <p>No primary school</p> <p>The village is washed over by the Green Belt. Development is generally limited to infill and redevelopment of previously developed land. Under the revised NPPF, land that meets the definition of Grey Belt may offer limited opportunities for development, subject to assessment.</p>	<p>No options presented – Due to the constraints identified and the absence of a primary school, no site options are proposed. However, community-led opportunities (Pathway 1), including specialist or affordable housing, could be explored to meet local needs.</p>

Village	5% Growth	Opportunities	Constraints	Options
Farmborough	28 dwellings over the Plan Period	<p>Moderate connectivity score</p> <p>Moderate range of services & facilities</p> <p>Some primary school capacity identified</p>	<p>The village is inset from the Green Belt. Allocation of greenfield sites would typically require exceptional circumstances to justify Green Belt release. However, under the revised NPPF, land that meets the definition of Grey Belt could be considered as a first priority for release for development, subject to further assessment.</p>	<p>Options presented – Sites to the south of the village, accessed from Timsbury Road, are being considered for proportionate growth. A further phase of development may also be appropriate, subject to assessment, to support wider community needs and infrastructure.</p>
Freshford	15 dwellings over the Plan Period	<p>High connectivity score</p> <p>Moderate range of services & facilities</p>	<p>Limited primary school capacity</p> <p>The village is washed over by the Green Belt. Development is generally limited to infill and redevelopment of previously developed land. Under the revised NPPF, land that meets the definition of Grey Belt may offer limited opportunities for development, subject to assessment.</p> <p>Village within the Cotswolds National Landscape</p>	<p>No options presented – Due to the constraints identified, including limited primary school capacity and location within the Cotswolds National Landscape, no site options are proposed. However, community-led opportunities (Pathway 1), including affordable or specialist housing, could be explored to support local needs.</p>

Village	5% Growth	Opportunities	Constraints	Options
High Littleton and Hallatrow	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	Options presented – Due to the high landscape sensitivity around High Littleton, only limited options have been identified. However, there is potential for smaller-scale growth in Hallatrow, which may offer a more appropriate location for proportionate development, subject to further assessment.
Pensford	25 dwellings over the Plan Period	Moderate range of services & facilities	Low connectivity score The village is washed over by the Green Belt. Development is generally limited to infill and redevelopment of previously developed land. Under the revised NPPF, land that meets the definition of Grey Belt may offer limited opportunities for release for development, subject to assessment. Limited primary school capacity	No options presented – Due to the constraints identified, no site options are proposed. However, opportunities for community-led growth (Pathway 1), including affordable housing through rural exception sites, could be explored.
Temple Cloud	30 dwellings over the Plan Period	Moderate connectivity score Broad range of services & facilities Some primary school capacity identified	Air Quality Management Area	Options presented – As a key location on the A37, the council considers growth beyond 5% could be appropriate. However, any development must carefully address constraints.

Village	5% Growth	Opportunities	Constraints	Options
Timsbury	59 dwellings over the Plan Period	<p>Moderate connectivity score</p> <p>Broad range of services & facilities</p> <p>Some primary school capacity identified</p>	The northern edge of the village is in the Green Belt	<p>Options presented –</p> <p>In addition to the existing Placemaking Plan allocation to the east of the village, new sites to the west and centre of Timsbury have been promoted. It is considered appropriate to test development in all three locations to assess the potential for a comprehensive growth strategy in the village.</p>

Table 4: Summary of village options

Bathford and Batheaston

Context

8.32 Bathford and Batheaston are closely linked villages located to the east of Bath, forming part of the wider Bath urban fringe. Both villages benefit from high connectivity, including proximity to the A4 and public transport links into Bath, and a broad range of local services and facilities. The area is characterised by its attractive landscape setting, with the River Avon to the south and surrounding hills forming part of the Cotswolds National Landscape. The villages also lie within the indicative setting of the Bath World Heritage Sites, which adds further sensitivity to development proposals.

8.33 Batheaston, while constrained by Green Belt and landscape designations, functions as a key service centre for the area. Bathford, slightly more detached, has a moderate range of services and some primary school capacity. Together, the settlements present a complex planning context where growth must be carefully balanced against environmental and heritage constraints.

Site Option

8.34 Two areas on Box Road, within Bathford parish but on the edge of Batheaston, are identified as options for housing development. The lower parcel (Bathford Nurseries South) could accommodate 45-60 homes, while the upper parcel (Bathford Nurseries North), with proposed access from Meadow Park, has capacity for 55-70 homes. Both sites are within the Green Belt and National Landscape, and assessment will need to be undertaken of the impact on the Green Belt of possible development and whether either of the sites would meet the definition of 'Grey Belt' under the revised NPPF. Overall capacity would be guided by infrastructure capacity, landscape mitigation (including a new woodland belt to the north), and biodiversity enhancement. Pathways are proposed to connect the sites with existing employment zones and residential areas, improving permeability and access to services. Further along Box Road, a separate site is identified for economic use, supporting local employment opportunities.

- 8.35 Within Bathford itself, two small-scale sites are considered for proportionate development. Land north of the recreation ground, adjacent to Titan Drive, has been promoted for affordable housing and could accommodate between 15 and 20 homes, though this would need to be balanced with limited access along Bathford Hill. A second site at Ashley Road could accommodate up to 10 dwellings as an infill scheme, but access will require careful consideration due to the narrowness of the road.
- 8.36 In Batheaston, no larger-scale site options have been identified due to significant environmental and heritage constraints. However, a small area of previously developed land within the village is included within the Housing Development Boundary (adopted Placemaking Plan, 2017). While not allocated due to limited capacity and deliverability concerns, its inclusion enables modest housing to come forward in future. This presents an opportunity to make more effective use of underused land and to support local aspirations for improvements to the surrounding area, including enhanced recreational facilities.
- 8.37 Connectivity scores shown in the site options below are based on the Department for Transport's A–J grading, where A is the highest within B&NES.

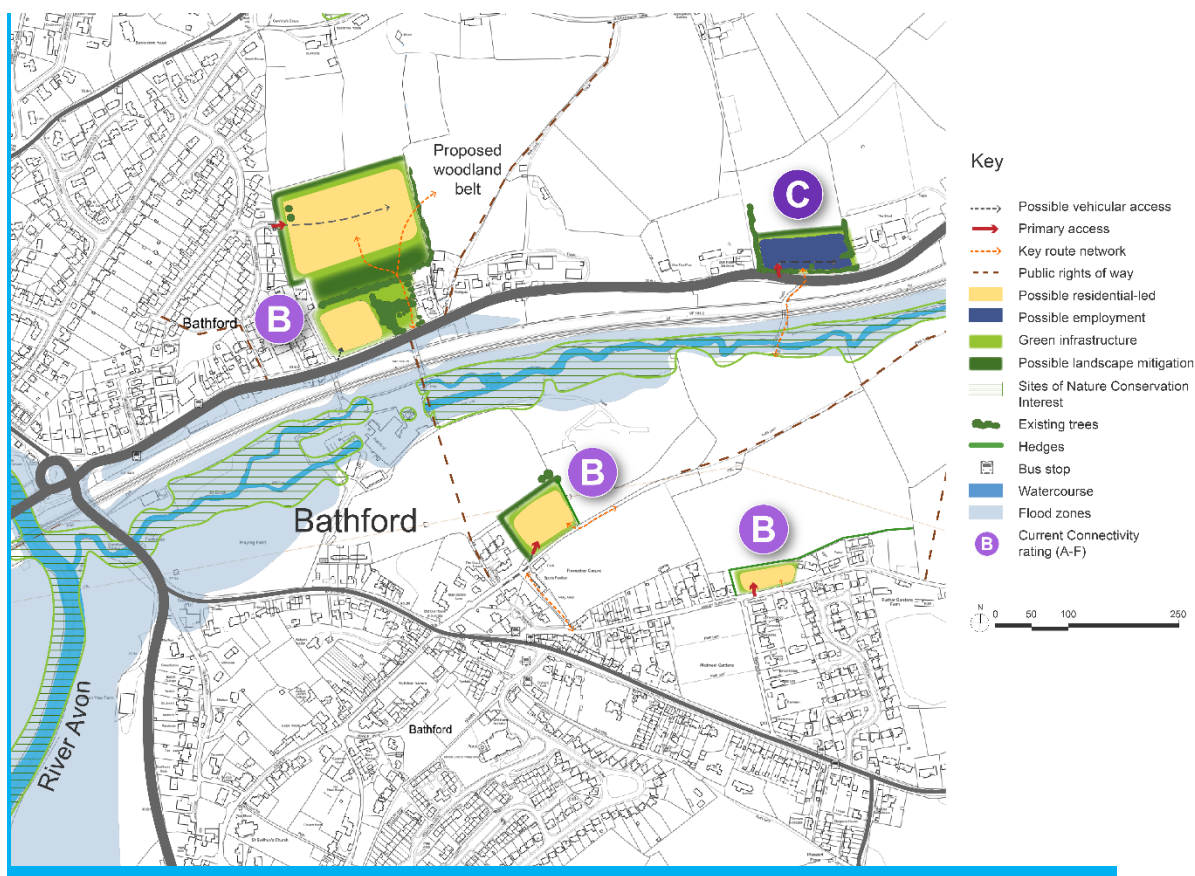


Figure 68: Bathford and Batheaston site options.

Category	Details
Opportunities	<ul style="list-style-type: none"> - High connectivity to Bath and regional transport network - Potential for mixed-use development - Proximity to services and employment zones - Two areas on Box Road (Bathford Nurseries South: 45-60 homes; Bathford Nurseries North: 55-70 homes, access from Meadow Park), subject to infrastructure capacity and landscape mitigation - Site further along Box Road identified for Economic Use, supporting local employment - In Bathford village: land north of the recreation ground/adjacent to Titan Drive promoted for affordable housing (15–20 homes, subject to access) - In Bathford village: land at Ashley Road could accommodate up to 10 dwellings as an infill site (access constraints apply) - In Batheaston: previously developed land within the

Category	Details
	Housing Development Boundary enables modest infill housing and supports local aspirations for improved recreational facilities
Constraints	<ul style="list-style-type: none"> - Green Belt and National Landscape designation - Within setting of Bath World Heritage Site
Mitigation	<ul style="list-style-type: none"> - Landscape buffering through woodland planting - Sensitive design to respect heritage setting - Infrastructure upgrades to support growth
Further Evidence Required	<ul style="list-style-type: none"> - Green Belt and landscape impact assessment - Heritage setting appraisal - Transport and access feasibility - Primary school capacity review – noting that the evidence currently shows some primary school capacity for Bathford, however Batheaston is identified as having limited primary capacity



Bishop Sutton

Context

8.38 Bishop Sutton is a relatively sustainable village located in the Chew Valley, with a moderate range of services and facilities, including a primary school, shop, and community amenities. While the village has a low connectivity score, it benefits from a strong sense of identity and community engagement.

8.39 The village is covered by the Stowey Sutton Neighbourhood Plan, which sets out a clear vision for the future of the parish. The plan seeks to ensure that Bishop Sutton and Stowey continue to thrive as vibrant and distinctive villages, evolving in a way that reflects community aspirations while retaining their unique character and delivering a high quality of life for current and future generations. The Neighbourhood Plan and accompanying Character Assessment provide a valuable framework for shaping future growth in a locally responsive and place-sensitive manner.

Site Option

8.40 Land to the west of the village, adjacent to the existing settlement edge and including a potential extension to Westway Business Park, is considered the most appropriate location for planned growth. This reflects its ability to integrate with the village and to enable access to land between Cappards Road and Stitchingshord Lane, which is known to be constrained.

8.41 An initial phase of around 70-90 homes would exceed the 5% baseline (approximately 33 homes) but is considered appropriate given the opportunity to deliver wider benefits, including employment space, infrastructure improvements and enhanced connectivity.

8.42 Subject to access being secured from the initial phase, a comprehensively masterplanned extension with an overall capacity in the order of 300 homes could be explored. Later phases would only be released when key requirements are met, including confirmation of sufficient primary school capacity or delivery of additional provision, alongside transport improvements and environmental mitigation.

- 8.43 The site adjacent to Westway Business Park includes areas of agricultural land, some of which is classified as Grade 1 (best and most versatile) in DEFRA mapping. Any allocation would require robust justification, with a focus on minimising the loss of high-grade land and ensuring that development is only supported where there is clear evidence that no reasonable alternative exists. The quality and extent of Grade 1 land will need to be fully assessed as part of the site's evidence base.
- 8.44 Given the site's proximity to the Chew Valley Lake Special Protection Area (SPA), a Habitat Regulations Assessment (HRA) will be required to evaluate potential impacts during both the construction and to identify appropriate mitigation to safeguard the SPA's ecological integrity.
- 8.45 The site lies within the setting of the Mendip Hills National Landscape (formerly AONB), and any major development proposals will need to be assessed against national policy, which sets a high bar for justification. In line with paragraph 182 of the NPPF, planning permission for major development within National Landscapes should be refused other than in exceptional circumstances and where it can be demonstrated to be in the public interest. Public interest considerations typically include the need for the development (for example, to meet identified housing requirements or deliver essential infrastructure), the scope for meeting that need outside the designated area, and the extent to which environmental and landscape impacts can be moderated.
- 8.46 While new homes would bring significant opportunities for the village, there are important implications for local infrastructure, particularly education and healthcare provision. Bishop Sutton Primary School, already expanded to its maximum capacity of 210 places, is likely to be at or near its limit in accommodating projected pupil numbers from the initial phase of development (70–90 homes). Further growth beyond this would require additional provision or mitigation to avoid placing unsustainable pressure on local education services.
- 8.47 Similarly, local GP services are under pressure, and further growth could exacerbate existing capacity constraints. Without additional provision, further development could place unsustainable strain on essential services. To support growth in a sustainable manner, further assessment will be

required to identify solutions, which may include on-site provision, expansion of existing facilities, or developer contributions to alternative provision. Securing these measures will be critical to ensuring that development meets the needs of current and future residents and delivers wider community benefits.

8.48 Connectivity scores shown in the site options below are based on the Department for Transport's A–J grading, where A is the highest within B&NES.



Figure 69: Bishop Sutton site options

Category	Details
Opportunities	<ul style="list-style-type: none"> - Provide up between 70-90 homes, encompassing an element of affordable housing - Potential extension to Westway Business Park - Opportunity to unlock access to constrained land for future phases (between 180-240 homes). - Improve access to the countryside - Improvements to community and recreation facilities
Constraints	<ul style="list-style-type: none"> - Low public transport connectivity - Landscape sensitivity, within the setting of the Mendip Hills National Landscape - Presence of Grade 1 agricultural land (best and most versatile) – allocation would require robust justification and minimisation of land loss - Site is in very close proximity to the Chew Valley Lake Special Protection Area (SPA)
Mitigation	<ul style="list-style-type: none"> - Phased approach to growth - Sensitive design in line with Neighbourhood Plan and Character Assessment - Infrastructure and access improvements - HRA required to assess potential impacts during both construction and operational phases, with appropriate mitigation measures to ensure no adverse effect on the integrity of the Chew Valley Lake SPA
Further Evidence Required	<ul style="list-style-type: none"> - Landscape and visual impact assessment - Transport and access feasibility - Infrastructure capacity review, including primary school capacity for further phases of development in the village - Agricultural land quality assessment to determine the extent and significance of Grade 1 land - HRA to evaluate potential impacts on the Chew Valley Lake SPA during both construction and operational phases

Chew Magna

Context

8.49 Chew Magna is a key service centre for the surrounding rural area. It has a broad range of services and facilities, including a primary school, shops, pubs, restaurants, and community spaces. The village is well-connected to nearby settlements but has a low connectivity score due to limited public transport options and its distance from major employment centres.

8.50 Chew Magna is washed over by the Green Belt, which restricts most new development to infill or redevelopment of previously developed land. However, the revised NPPF introduces the concept of “Grey Belt,” which may allow for limited development on underutilised or previously developed land, subject to assessment.

Site Option

8.51 A site to the west of Chew Magna, comprising previously developed land (including disused tennis courts) between two infill boundaries, is being considered for development. The village is washed over by the Green Belt, and any allocation would require the site to be removed from the Green Belt through the local plan, supported by a Green Belt review and demonstration of exceptional circumstances.

8.52 The site has been identified as potentially meeting the definition of Grey Belt under the revised NPPF and a potential priority for release. This will be subject to further assessment in preparing the Draft Local Plan. The site could accommodate approximately 25–30 homes, with a focus on delivering affordable housing to meet local needs. Development would need to be sensitively designed to reflect the village’s character and landscape setting, as defined in the Chew Valley Neighbourhood Plan.

8.53 Connectivity scores shown in the site option below are based on the Department for Transport’s A–J grading, where A is the highest within B&NES.

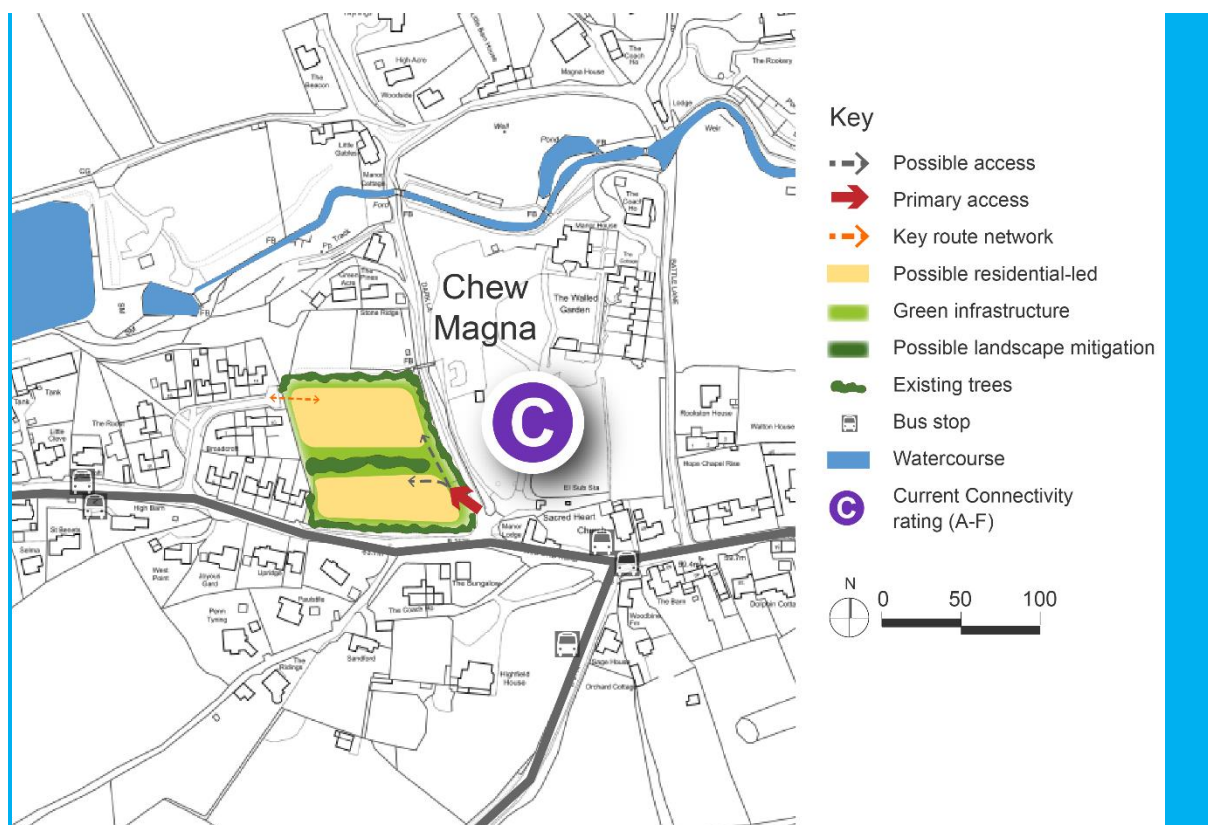


Figure 70: Chew Magna site option

Category	Description
Opportunities	<ul style="list-style-type: none"> - Opportunity for proportionate growth of approximately 25 – 30 homes, including an element of affordable housing. - Previously developed land within village envelope - Close to local services and facilities - Potential to meet local housing need
Constraints	<ul style="list-style-type: none"> - Washed over by Green Belt - Low public transport connectivity - Limited primary school capacity
Mitigation	<ul style="list-style-type: none"> - Careful design to minimise landscape impact - Improved pedestrian and cycle links
Further Evidence Required	<ul style="list-style-type: none"> - Green Belt and landscape impact assessment - Access and transport feasibility-

Chew Stoke

Context

- 8.54 Chew Stoke is a rural village in the Chew Valley, known for its attractive landscape setting and proximity to Chew Valley Lake. The village has a moderate range of services and facilities, including a primary school, secondary school, medical practice, and community amenities. Despite these strengths, Chew Stoke has a comparatively low connectivity score due to limited public transport and its distance from major employment centres.
- 8.55 The village is washed over by the Green Belt, which restricts development to infill or redevelopment of previously developed land. However, under the revised NPPF, land that meets the definition of “Grey Belt” may offer limited opportunities for proportionate growth, subject to further assessment.

Site Option

- 8.56 A site to the north of Chew Stoke been identified for proportionate growth in the village. The site is adjacent to the existing built form and lies close to key services, including the primary and secondary schools, health centre, and bus stops. The site is currently in agricultural use and is classified as Grade 1 in DEFRA mapping, indicating it is among the best and most versatile agricultural land. Any allocation would be strictly limited and subject to robust justification, with a focus on minimising land loss and ensuring that development is only supported where there is clear evidence that no reasonable alternative exists.
- 8.57 Chew Stoke is also washed over by the Green Belt. To allocate this site, it would need to be removed from the Green Belt through the local plan, supported by a Green Belt assessment and demonstration of exceptional circumstances. This will include assessing whether the site meets the definition of Grey Belt under the revised NPPF and a potential opportunity for release.

8.58 The site could accommodate between 20-30 homes, with a focus on affordable provision and the potential to improve access to the adjacent cricket club, enhancing local recreational infrastructure. Development would need to be carefully designed to respect the village's topography and character, in line with the Chew Valley Neighbourhood Plan, which emphasises locally sensitive, sustainable growth.

8.59 Connectivity scores shown in the site option below are based on the Department for Transport's A–J grading, where A is the highest within B&NES.

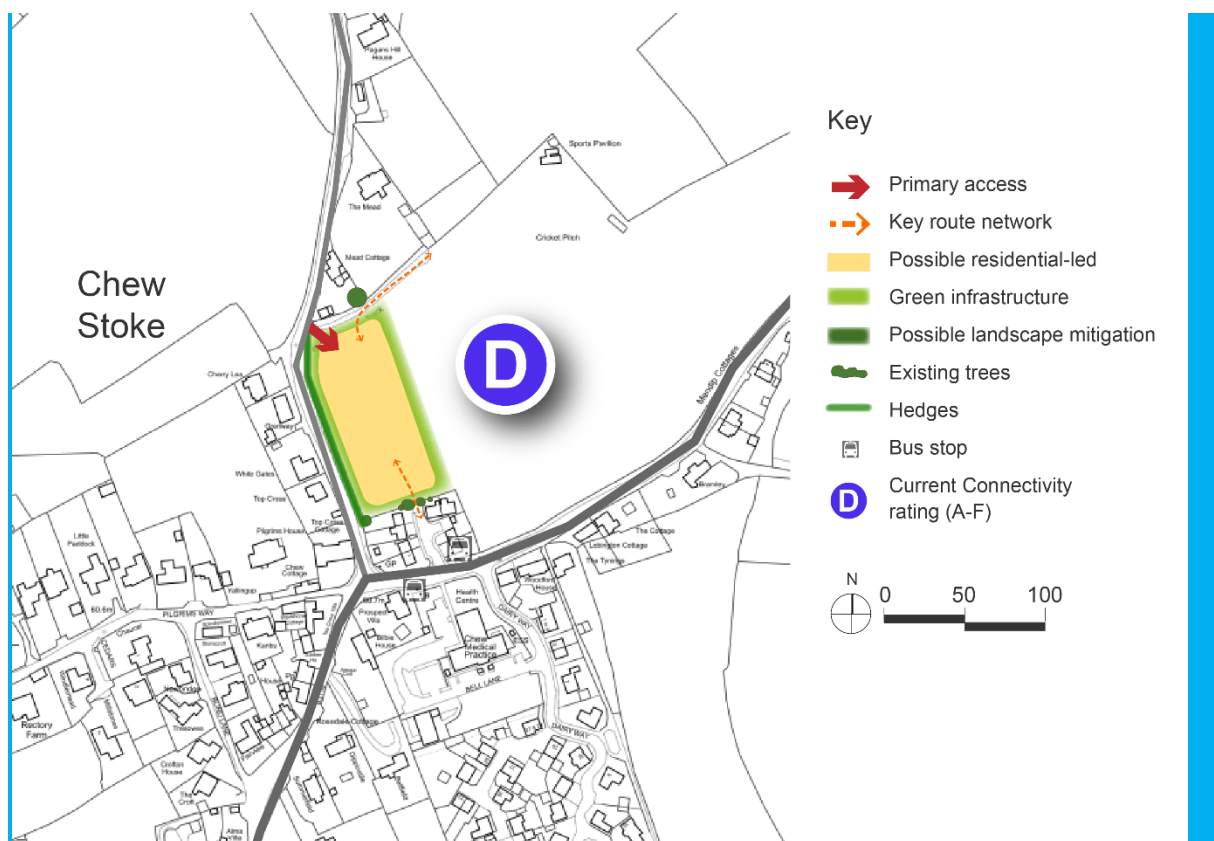


Figure 71: Chew Stoke site option

Category	Details
Opportunities	<ul style="list-style-type: none"> - Opportunity for proportionate growth of approximately 20-30 homes, including an element of affordable housing. - Proximity to schools and health centre - Adjoins existing development - Potential to meet local housing need
Constraints	<ul style="list-style-type: none"> - Washed over by Green Belt - Grade 1 agricultural land (best and most versatile) – allocation would require robust justification and minimisation of land loss. - Low public transport connectivity - Limited primary school capacity
Mitigation	<ul style="list-style-type: none"> - Sensitive design and landscaping - Minimise loss of best and most versatile agricultural land - Improve pedestrian and cycle access
Further Evidence Required	<ul style="list-style-type: none"> - Agricultural land quality assessment - Landscape and visual impact assessment - Access and transport feasibility



Clutton and Temple Cloud

Context

- 8.60 Clutton is a historic village with a rich heritage dating back to the Iron Age. It evolved from a farming community into a centre for coal mining and associated industries, including brickworks, glass manufacture, and haulage. Today, Clutton retains its rural character and distinct identity, supported by an adopted Neighbourhood Plan that sets out a clear vision for the parish to 2035. The plan seeks to maintain the tranquil and rural nature of the area, protect its landscape and biodiversity, and support well-designed housing, low-impact employment opportunities, and improved community facilities. The village has a moderate level of connectivity and a limited but valued range of services and facilities, including a primary school.
- 8.61 A current planning application in Clutton proposes the creation of a school recreation ground with new maintenance access off Broomhill Lane (Use Class F1), alongside residential development for up to 30 dwellings (Use Class C3), including associated access improvements, landscaping, drainage, and public open space. The site lies within the Green Belt, and its consideration will be subject to the Development Management process. However, it is noted that the revised National Planning Policy Framework introduces the concept of 'Grey Belt', which may be relevant in assessing the proposal's alignment with strategic planning objectives.
- 8.62 While the local plan does not seek to pre-judge individual applications, it is important to highlight the value of a coordinated and strategic approach to growth in Clutton. This approach aims to ensure that development contributes positively to local priorities, including affordable housing, community infrastructure, and environmental quality.
- 8.63 Temple Cloud, located immediately to the south of Clutton, functions as a local service centre with a broader range of facilities, including a primary school, healthcare provision, and local shops. It benefits from a strategic location on the A37 corridor and has a comparatively moderate connectivity score. The village plays an important role in supporting the wider rural area, though it faces infrastructure pressures, particularly in relation to air quality, with the A37 designated as an Air Quality Management Area (AQMA).

Additionally, it is important to note that the nearby village of Farrington Gurney is also designated as an Air Quality Management Area (AQMA). Any proposals for development within this broader locality should therefore give due consideration to the cumulative impact on air quality, ensuring that measures are in place to safeguard environmental standards both in Temple Cloud and Farrington Gurney.

Site Option

- 8.64 In Clutton, land to the west of the A37 has been promoted for development. The location aligns with the Neighbourhood Plan's direction of growth and could form a well-integrated extension to the village, with improved crossings of the A37 required. Development at this location could support delivery of the permitted farm shop.
- 8.65 The site could accommodate an initial phase of around 40-50 homes, providing modest growth slightly above the 5% baseline. A more strategic approach could deliver a comprehensively masterplanned extension, phased to align with infrastructure delivery. Later phases would only be released when key requirements are met, including A37 crossing improvements, school and healthcare capacity, and environmental mitigation. A site-specific masterplan and design code would guide delivery, ensuring high-quality design and integration with the existing settlement. Further phases identified west of the A37 (between 320–430 homes) and south of Stowey Road (between 60–80 homes) could be explored, subject to robust assessment, infrastructure capacity and environmental constraints.
- 8.66 In Temple Cloud, the council considers the north of the village, focused on the Upper Bristol Road/A37 corridor, to be the most appropriate location for planned growth given its proximity to bus stops on the A37 and opportunities to connect to existing services. A planning application for 65 dwellings in this area was refused in 2022; however, in light of the increased housing requirement it is considered appropriate to test growth at this location through the Options consultation. The site is being tested for up to 90–120 homes, but the final capacity would likely be lower due to landscape, ecological, and access constraints (notably Temple Inn Lane).

8.67 A larger, strategic option on land further east could deliver a masterplanned scheme with a further capacity for 230-300 homes, phased to ensure infrastructure and environmental capacity is in place. Later phases would depend on measures to address the Air Quality Management Area (AQMA), transport improvements, and provision of community facilities. There is also mapped presence of Potential Priority Habitats Delivery, if confirmed, this would increase the Biodiversity Net Gain (BNG) requirement for the site. This would likely impact the overall capacity. Further ecological evidence will be required to assess habitat quality and ensure compliance with national policy on biodiversity enhancement. The site would be guided by a masterplan and design code to secure connectivity, green infrastructure and locally beneficial outcomes.

8.68 Connectivity scores shown in the site options below are based on the Department for Transport's A–J grading, where A is the highest within B&NES.



Figure 72: Clutton and Temple Cloud site option

Category	Details
Opportunities	<ul style="list-style-type: none"> - Strategic location on A37 corridor - Land promoted in both villages enabling a coordinated approach - Clutton: Initial phase of 40–50 homes west of A37, supporting the farm shop; future phases west (320–430 homes) and south of Stowey Road (60–80 homes) possible - Temple Cloud: North of village site tested for up to 90–120 homes (final number likely lower due to constraints); further east, masterplanned option for 230–300 homes, phased and tied to infrastructure, AQMA, and BNG - Mixed-use and employment potential across both villages
Constraints	<ul style="list-style-type: none"> - Green Belt to the north of Clutton - Air quality concerns along the A37 corridor, including AQMA designation in Temple Cloud and associated issues in Farrington Gurney - Mapped presence of Potential Priority Habitats (Neutral Grassland and Lowland Meadow) in Temple Cloud – if confirmed, this would increase the BNG requirement for the site
Mitigation	<ul style="list-style-type: none"> - Air quality measures - Upgrades to schools, healthcare, and transport - Sensitive design to fit village character
Further Evidence Required	<ul style="list-style-type: none"> - Air quality impact assessment - Transport and access feasibility - Landscape and visual appraisal - Ecological survey to confirm habitat types and inform Biodiversity Net Gain (BNG) calculations



Farmborough

Context

8.69 Farmborough is a moderately sized village located to the west of Bath, inset from the Green Belt. It has a moderate range of services and facilities, including a primary school, village hall, and a community-run local shop, which plays an important role in supporting day-to-day needs. While the village benefits from reasonable connectivity, there are known constraints including access to sustainable transport options.

8.70 The village has demonstrated strong community engagement, including the successful delivery of UK Shared Prosperity Fund-funded projects such as energy efficiency improvements to the Village Sport & Social building. Together with the operation of the community-run shop, this reflects a proactive local approach to sustainability and community-led service provision. Farmborough's location, service base, and community capacity make it potentially suitable for proportionate growth, with potential to support wider infrastructure and placemaking objectives.

Site Option

8.71 A site to the south of Farmborough, accessed from Timsbury Road, has been promoted for development. Although the land lies within the Green Belt, it is well-related to the existing built form and is being considered as a potential location for proportionate growth. The site could accommodate a modest level of housing initially, between 25-35 homes, with the potential for further phases depending on infrastructure capacity and the ability to deliver wider community benefits.

8.72 Any development would need to demonstrate exceptional circumstances for Green Belt release, supported by a robust evidence base including landscape, infrastructure, and sustainability assessments. A key requirement would be the delivery of new green space, with one option under consideration being its integration with the existing Village Hall and community-run shop. This would enhance local connectivity and reinforce the role of these facilities as focal points for village life.

8.73 Two recent permission in principle applications have been submitted for up to nine dwellings each—one on land off Little Lane, where potential for growth is being considered through the local plan, and another on the opposite side of the village between Bath Road and Brookside Drive. While these proposals reflect ongoing development interest, the local plan and parish council support a more strategic and coordinated approach to growth in Farmborough. This aims to ensure that new development delivers meaningful benefits for the community, including affordable housing, infrastructure improvements, and enhanced public spaces, rather than piecemeal schemes that may offer limited wider value.

8.74 Connectivity scores shown in the site options below are based on the Department for Transport's A–J grading, where A is the highest within B&NES.

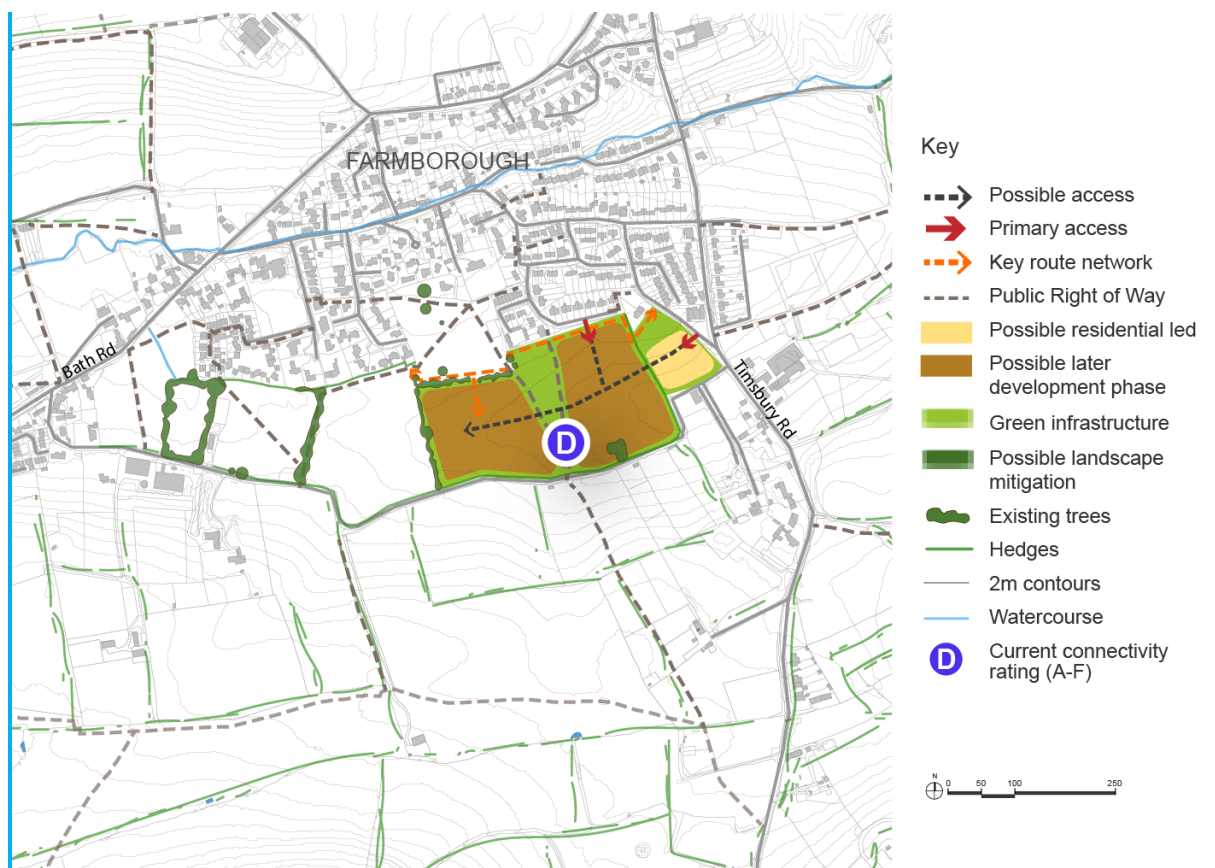


Figure 73: Farmborough site options

Category	Details
Opportunities	<ul style="list-style-type: none"> - Opportunity for proportionate growth of approximately 25-35 homes, including an element of affordable housing. - Potential for further phases (between 70-90 homes) depending on infrastructure capacity - Opportunity to deliver green space linked to community facilities
Constraints	<ul style="list-style-type: none"> - Site lies within the Green Belt - Infrastructure capacity to be assessed
Mitigation	<ul style="list-style-type: none"> - Green Belt assessment under revised NPPF - Sensitive design and landscape integration - Provision of green space linked to Village Hall and community-run shop
Further Evidence Required	<ul style="list-style-type: none"> - Green Belt and landscape impact assessment - Access and transport feasibility - Community infrastructure needs analysis

High Littleton and Hallatrow

Context

- 8.75 High Littleton and Hallatrow form a connected parish located to the south-west of Bath. The area has a strong rural character and a rich heritage, with a mix of historic buildings and green spaces. The villages benefit from a modest range of services and facilities, including a primary school, local shops, and community amenities. Connectivity is moderate, with access to the A39 corridor, though transport pressures and infrastructure capacity remain key considerations.
- 8.76 The parish is covered by the High Littleton and Hallatrow Neighbourhood Plan, which was successfully examined and brought into force in 2025. The Plan sets out a locally driven vision for the area, with a focus on protecting landscape character, enhancing biodiversity, and supporting small-scale development that reflects the needs and aspirations of the community.

Site Option

- 8.77 Land has been promoted for development within the parish, and site assessments have been submitted by the parish council for consideration. These include locations with potential for sustainable growth, subject to further assessment of landscape sensitivity, infrastructure capacity, and ecological constraints. The council considers it appropriate to test options for modest growth in the area, in line with the Neighbourhood Plan's emphasis on locally responsive development.
- 8.78 Due to the high landscape sensitivity around High Littleton, only limited options have been identified. However, there is potential for smaller-scale growth in Hallatrow, which may offer a more appropriate location for proportionate development, subject to further assessment.
- 8.79 A site at Combe Lane in Hallatrow is presented for this consultation for between 15-20 homes. This site is located opposite the recently completed Fox Fields development within the village. Land to the north of Fox Fields was

also considered; however, it was discounted due to the potential loss of Grade 1 agricultural land, which is recognised as a significant constraint.

8.80 Development at Combe Lane would need to be sensitively designed to respect the village's character and landscape setting, with a focus on delivering affordable housing and supporting local needs. Further evidence will be required to assess landscape and visual impact, transport and access feasibility, and infrastructure capacity to ensure that any growth is sustainable.

8.81 Connectivity scores shown in the site option below are based on the Department for Transport's A–J grading, where A is the highest within B&NES.

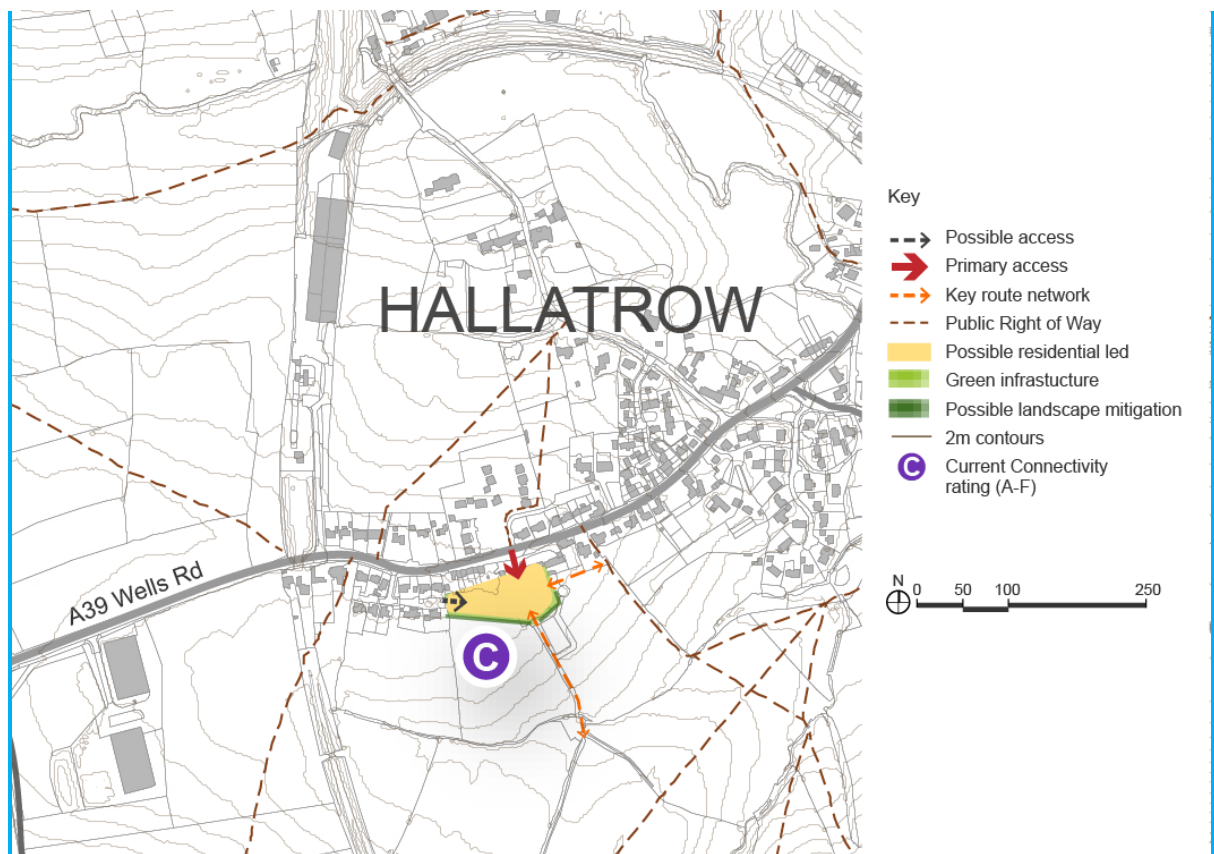


Figure 74: High Littleton and Hallatrow site option

Category	Details
Opportunities	<ul style="list-style-type: none"> - Site capacity of 15-20 homes, encompassing an element of affordable housing. - Integration and improvements to village infrastructure
Constraints	<ul style="list-style-type: none"> - High landscape sensitivity around High Littleton and Hallatrow - Loss of Grade 1 agricultural land north of Fox Fields - Infrastructure capacity to be assessed
Mitigation	<ul style="list-style-type: none"> - Sensitive design and landscaping - Minimise loss of best and most versatile agricultural land - Improved pedestrian and cycle access
Further Evidence Required	<ul style="list-style-type: none"> - Landscape and visual impact assessment - Transport and access feasibility

Timsbury

Context

8.82 Timsbury is one of the larger and more sustainable villages in the district, located to the south-west of Bath. It benefits from a broad range of services and facilities, including a primary school, local shops, and community amenities. The village has a moderate connectivity score and serves as a local hub for surrounding rural communities.

8.83 Known infrastructure constraints in the village include limited GP provision and a cemetery that is nearing capacity. There are also longstanding transport issues associated with North Road, which would need to be addressed as part of any future growth strategy.

Site Option

8.84 Timsbury was previously allocated a site to the east of St Mary's School in the Placemaking Plan. However, this allocation has not yet come forward for development and remains a live option. The site is currently allocated for approximately 20 homes, but evidence suggests it could potentially be expanded to accommodate a total of between 50–70 homes. In light of changes to housing targets, it is appropriate to test an increase in the number of homes on the allocated site, subject to the protection of important views and landscape character.

8.85 In addition to the existing allocation to the east of the village, a new site to the west of Timsbury has been promoted known locally as Emlett Field, Hayswood Road and is presented for consultation. This site is well-related to the existing built form and offers the opportunity to test the potential for larger-scale growth in the village. The site has the capacity accommodate between 160-220 homes, however has been promoted for up to 120 homes.

8.86 Central to the village, a site between Lippiatt Lane and Crocombe Lane has been put forward following discussions with the parish council. The lower parcel is proposed to remain largely as green space, while land off Crocombe Lane is identified as a potential option for housing development. The site could accommodate 70–90 homes; however, the impact on North Road

would need to be investigated and resolved as part of any plans to develop these sites. Improvements would also be required to the access on Lippiatt Lane and Crocombe Lane/Lansdown View to ensure sufficient capacity for the additional traffic generated. This may reduce the number of homes that would be sustainable in this location, noting also that the village primary school is on Lansdown View.

8.87 Together, the identified sites provide a basis for considering a more comprehensive approach to growth in Timsbury. This could support the delivery of new housing, infrastructure improvements, and enhanced connectivity, while helping to address local service pressures. This level of growth would exceed the 5% baseline but it is considered appropriate to test options, given the opportunity to deliver wider benefits. It should be noted that not all site options may be taken forward; the final approach could involve a combination of sites, or a reduced scale of development, depending on infrastructure capacity, environmental constraints, and the outcomes of further assessment and consultation. In preparing the Draft Local Plan, opportunities to provide additional cemetery space and explore potential solutions to GP capacity issues will also be considered, reflecting local infrastructure needs identified through engagement with the parish council and stakeholders.

8.88 Any development would need to be carefully designed to respect the village's landscape setting, respond to infrastructure capacity constraints and mitigate impacts on the conservation area. Access limitations to some sites will also need to be considered particularly those from North Road to the centre of the village which suffers from known transport issues.

8.89 Connectivity scores shown in the site options below are based on the Department for Transport's A–J grading, where A is the highest within B&NES.

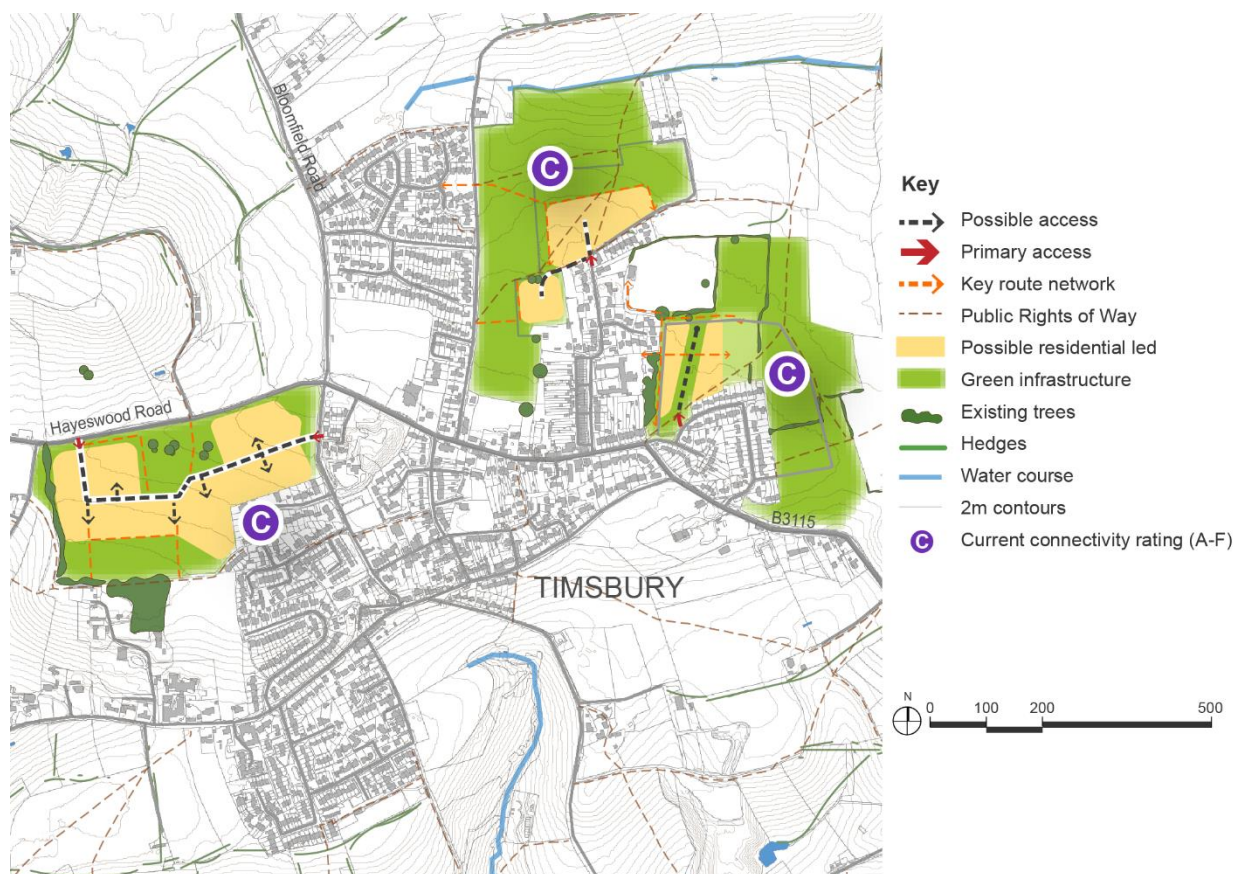


Figure 75: Timsbury site option

Category	Details
Opportunities	<ul style="list-style-type: none"> - East of St Mary's School – Existing allocation for approximately 20 homes; potential for higher numbers subject to landscape protection. Emlett Field – Capacity for up to 160-220 homes (promoted for 120). Lippiatt Lane / Crocombe Lane – Capacity for 70-90 homes; access and traffic constraints may reduce capacity. - Potential for larger-scale growth to support infrastructure and services
Constraints	<ul style="list-style-type: none"> - Conservation Area Limited GP provision - Cemetery nearing capacity - Transport issues on North Road - Narrow access to Lippiatt Lane and Crocombe Lane

Category	Details
	- Landscape sensitivity and key views
Mitigation	<ul style="list-style-type: none"> - Infrastructure planning to address healthcare and burial capacity - Transport improvements, particularly on North Road - Sensitive design to protect key views
Further Evidence Required	<ul style="list-style-type: none"> - Landscape and visual impact assessment - Transport and access feasibility - Cumulative impact assessment of both sites

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 Development Management policies must conform with national planning policy contained in the National Planning Policy Framework (NPPF) and the technical planning practice guidance which supports it. The government intend to prepare National Development Management Policies (NDMP). Once the NDMPs have been approved by government they do not need to be duplicated in local plans. However, uncertainty remains around the scope and preparation timescales for these NDMPs, their coverage and the scope for local planning authorities to define local standards that differ to those in some NDMPs. Therefore, the council is continuing to prepare and consult on options for Development Management policies.

9.3 In the spring 2024 options document we set out options for many Development Management policies. The comments received continue to be carefully considered by the council in progressing towards the Draft Local Plan. In the Draft Local Plan we will set out the council's proposed policy approach and wording in light of the comments received to the spring 2024 consultation, other evidence and government policy. We are not reconsulting on these policy approach options through this document. A more limited range of Development Management policy approach options are set out below, focussing only on new policy areas not presented previously or where entirely new or updated options are now proposed in light of updated evidence or in response to the government's revised NPPF.

9.4 Whilst it was not proposed to update the adopted policies listed in Appendix 1 in the spring 2024 options document due to recent updates in the Local Plan Partial Update, given updates to the NPPF and Planning Practice Guidance (PPG) and potential further updates to national policy, proposed NDMPs and comments received in respect of the spring 2024 options document, all relevant policies

within the adopted Local Plan will be reviewed and may be amended as we progress towards the submission plan.

9.5 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 also be kept under review in preparing the Draft Local Plan.

Housing

Affordable Housing

9.6 With updates to the NPPF 2024 and amendments to PPG: Housing and Economic Needs Assessment, the revised mandatory housing target within B&NES is now around 1,500 homes per year for the Plan period. Given these updated housing requirements, a further Local Housing Needs Assessment (LHNA) has been undertaken. The LHNA 2025 sets out that based on the revised standard method the requirement is for around 27,000 homes over the plan period, with a 54% requirement for market housing and a 46% requirement for affordable housing across Bath and North East Somerset.

9.7 The NPPF 2024 under paragraphs 63 and 64 includes reference to the requirement for Social Rent. With this increased emphasis on delivering Social Rent housing, we have included a further option (additional to that in the 2024 document) within this Options consultation relating to considering wider evidence for proposed policy for affordable housing on larger sites.

H/AH: Affordable Housing (Large Sites)

Proposed Options	
1	<p>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.</p> <p>*Note: that dwellings are 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.</p>
2	<p>Affordable Housing will be required as on-site provision in developments of 10 dwellings* and above (0.5ha and above) in line with the evidence base and as tested through the local plan viability (whole plan) assessment. It is also proposed this will be on a grant free basis.</p> <p>*Note: that dwellings are 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.</p>

Policy H/CL: Co-living Schemes

Background

9.8 We previously consulted on Co-living policy options relating to location and provision, affordable housing, and amenity standards in the spring 2024 options document. We are not reconsulting on options relating to location and provision, affordable housing, and amenity standards, but we are now proposing an additional policy option in relation to student occupancy.

9.9 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. They fall under a sui generis planning use class; schemes may be new build, or conversions of existing buildings.

9.10 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.

9.11 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.

9.12 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, it has been acknowledged that there is currently the potential for an inconsistent approach to co-living planning applications without formal, visible guidance on co-living developments. Therefore, we have produced an interim position statement which will clarify the local plan policies the council will consider when assessing planning applications for co-living proposals, and how they will be applied. The Co-living Position Statement will provide some guidance until a specific policy is adopted in the new local plan.

Student Occupancy

- 9.13 Co-living is not typically restricted to any particular user group; it can serve various demographics including students. As such, co-living has been promoted as an alternative purpose built rented accommodation which could help to meet the housing needs of various groups, including recent graduates and young professionals, as well as alleviate accommodation pressures from increased numbers of students in Bath.
- 9.14 However, the council's strategy for student accommodation is that the future increase in student numbers should be accommodated on campuses and other allocated sites for that purpose. As such, the council have a specific policy (H2A) relating to provision of purpose-built student accommodation (PBSA), which seeks to ensure that PBSA is provided either on-campus, or off-campus only in association with a university via a nomination agreement, or if provided for 2nd or 3rd year students who would otherwise reside in Houses in Multiple Occupation (HMOs) in the city.
- 9.15 In order to meet the needs of 2nd or 3rd year students who would otherwise reside in HMOs, PBSA developments must meet the requirements of such students with regards to type of accommodation. These students generally have a preference to live as a household with friends, at a cost level similar to renting an HMO. Such accommodation is likely to comprise cluster flats with shared facilities, whereas studio accommodation is considered to be too expensive for these students, and is not therefore supported by policy H2A.
- 9.16 As co-living schemes are mostly provided as studios, at a price point significantly higher than student cluster flats and HMOs within the city, co-living accommodation is not considered an appropriate type of accommodation to meet the needs of student occupiers. Co-living schemes are also useful in helping to meet the needs of other groups.
- 9.17 Options as relates to student occupancy are as follows

H/CL: Co-living schemes – Student Occupancy

	Option	Advantages	Disadvantages
1	Policy to restrict the occupation of co-living developments to non-student occupiers, using a planning condition or legal agreement.	<p>Ensures student bedspace needs are accommodated in line with policy H2A.</p> <p>Protects future co-living developments from an overconcentration of student occupiers and ensures they are available to best meet the needs of other groups e.g. recent graduates or young professionals.</p>	<p>Co-living is not typically restricted by user group.</p> <p>Potential missed opportunity to help free up city centre accommodation (including family housing) and meet the need for student beds.</p> <p>A student restriction could prejudice the viability of co-living developments.</p>
2	Policy to restrict the occupation of co-living developments to non-student occupiers, using a planning condition or legal agreement, with some flexibility to provide accommodation for those in part-time or post-graduate education. In these situations, the number of student occupiers will be restricted to a set percentage, in order to ensure a mixed community within the development.	<p>Provides some flexibility in terms of occupancy by different groups.</p> <p>Provides some students who want to rent co-living studios and can afford it the opportunity to do so.</p>	<p>Co-living is not typically restricted by user group.</p> <p>Potential missed opportunity to help free up city centre accommodation (including family housing) and meet the need for student beds.</p> <p>A student restriction could prejudice the viability of co-living developments.</p>
3	Policy to stay silent on student occupancy of co-living development, therefore allowing occupancy of co-living developments by all user groups.	Provides flexibility.	Co-living accommodation is not considered an appropriate type of accommodation to meet the needs of student occupiers.

Policy H/HMO (New policy): Houses in Multiple Occupation (HMO)

Background

9.18 A House in Multiple Occupation (HMO) is a house or flat which is occupied by three or more unrelated people who share facilities such as a kitchen or bathroom. HMOs are an important part of the local housing market, particularly within Bath, providing affordable accommodation for students, professionals, low-income workers and migrant workers among others.

9.19 The council exerts greater planning controls over HMOs in Bath, and in July 2013 introduced a citywide Article 4 Direction to control the future growth and geographic spread of HMOs. Local plan policy H2 sets out criteria to be considered when assessing planning applications for the change of use to a HMO, intensification of existing HMOs, and the provision of new build HMOs. This operates together with the Houses in Multiple Occupation Supplementary Planning Document (HMO SPD), with the aim of encouraging a sustainable community in Bath and the wider district by avoiding an over concentration of HMOs and retaining an appropriately balanced housing mix.

9.20 Evidence produced by the council shows that, following adoption of the HMO SPD in January 2022, HMO creation is being displaced from traditionally high concentration areas to the wider city, where market housing is more affordable. Notably, the intended outcome of the SPD is to avoid overconcentration of HMOs in specific areas. However, concerns persist that the displacement of HMO creation to more affordable housing areas is leading to the loss of affordable housing options for families.

9.21 Paragraph 63 of the National Planning Policy Framework (NPPF December 2024) requires local authorities to assess the size, type and tenure of housing needed for different groups in the community, including families with children, and reflect the results of this assessment in their planning policies. In addition, the LHNA identifies the overall housing need for Market Housing in Bath and

states that 3-bedroom properties represent the largest proportion of housing need in the city.

9.22 Therefore, it is appropriate to propose an option to update policy H2, to include an approach to prohibit the creation of an HMO where it would result in the loss of 3-bed C3 dwellings suitable for owner occupation by families and first-time buyers among others. This policy would restrict the loss of 3-bed class C3 dwellings of a defined gross internal area considered to be an appropriate threshold for indicating that a property would constitute a 'family home'. Coverage of this policy approach is proposed at a citywide level or for the relatively more affordable market housing areas identified in Bath, where the median housing affordability (average income to average house price) ratio is below the median affordability ratio for B&NES. There is scope to monitor affordability ratios through an updated HMO SPD.

9.23 Options as relates to HMOs are as follows

H/HMO: Houses in Multiple Occupation (HMO)

	Option	Advantages	Disadvantages
1	Update policy H2 to include an additional criterion which states that in affordable market housing areas (based on affordability ratios), the creation of an HMO which would result in the loss of a 3-bed C3 dwelling which size is considered suitable for a 'family home' will be prohibited.	Protects dwellings suitable for family housing in affordable market areas.	There could be significant adverse impacts of overly restricting the availability and supply of HMOs, which cater for the housing needs of specific groups (students, professional house sharers, low-income workers, single people relying on housing benefits, etc.)
2	Update policy H2 to include an additional criterion which states that across the City of Bath HMO Article 4 Direction area, the creation of an HMO which would result in the loss of a 3-bed C3 dwelling which size is considered suitable for a 'family home' will be prohibited.	Protects dwellings suitable for family housing in Bath.	There could be significant adverse impacts of overly restricting the availability and supply of HMOs, which cater for the housing needs of specific groups (students, professional house sharers, low-income workers, single people relying on housing benefits, etc.)
3	No change proposed to policy H2.	Reflects the national approach for managing HMOs	Continued dispersal of HMOs and loss of single private dwellings.

Policy H/PBSA: Purpose built student accommodation

Provision and Location

9.24 The council previously tested three ways in which provision of PBSA could be accommodated and controlled within the district: these were to restrict PBSA across the district other than on-campus, to allow PBSA to only be developed on sites specifically allocated for that purpose, including potential locations outside Bath (i.e. Keynsham and Hicks Gate), and to retain LPPU policy H2A as worded, giving educational establishments flexibility to use nomination agreements to bring forward PBSA off campus. We are not proposing to reconsult on these options, but comments received during this the spring 2024 options consultation will be used to help shape a policy in the Draft Local Plan.

9.25 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. Challenges exist in accommodating continued levels of student growth within Bath, and across the district, particularly given the 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 in Bath.

9.26 Although it is appropriate to understand the overall student housing need arising from 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. Both universities are updating their future growth strategies, which will impact on student numbers, and required accommodation. The council continues to work with both universities to understand their projected growth plans and therefore to ascertain more likely future growth in the number of students. This should then form the basis for considering options for providing additional student accommodation. As the universities are historically only able to provide forecasts for the next 5-10 years

this element of future requirements and associated strategy will need to be kept under review.

Policy H/GT: Gypsies, Roma, Travellers and Travelling Show People

9.27 Paragraph 63 of the NPPF 2024 sets out ‘...the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing with care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes.’

9.28 Planning policy for traveller sites (PPTS) was updated in 2024 (definition) and as we understand, government proposes to further update/review the PPTS this year.

9.29 Since the B&NES Reg.18 Options Consultation undertaken in spring 2024, expert consultants have on behalf of B&NES Council undertaken a review of the Gypsies and Travellers Accommodation Assessment (GTAA). In June 2024 the council identified 35 existing gypsy and traveller pitches in Bath & North East Somerset:

- 1 public site (11 pitches);
- 4 private sites with permanent planning permission (9 pitches);
- 1 site that is tolerated for planning

9.30 Table 8 in the B&NES GTAA 2025 sets out the following housing need for gypsy and traveller households for the Plan period:

Figure 1 – Need for Gypsy and Traveller households in Bath & North East Somerset that meet the Planning Definition by year periods

Year Period	Dates	Need
0 – 5	2025-29	10
6 – 10	2030-34	3
11 – 15	2035-39	3
16 – 18	2040-42	2
0 – 18	2025-42	18

9.31 Paragraph 1.20 of the GTAA 2025 sets out a summary of recommendations for addressing housing need from gypsies and travellers as follows:

‘For need arising from public sites the council will need to consider the expansion or intensification of these sites, or for new sites(s), as it is unlikely that this need could be addressed through the provision of pitches on new private sites.

For need arising from private sites the council will need to consider the expansion or intensification of these sites, or to address need through new site/pitch allocations. Where they have been identified the council should also consider the regularisation of sites with temporary planning permission and of unauthorised sites.

The council will also need to carefully consider how to address any potential needs from Undetermined households; from households seeking to move to Bath & North East Somerset (in-migration); or from households currently living in bricks and mortar who may wish to move to a site. In terms of the Local Plan Policies, the council should continue to use or put in place Criteria-Based Local Plan Policies as suggested in PPTS.

Future need from new household formation could also be met through natural turnover of pitches over time, or through enforcing against pitches not found to be occupied by Gypsies or Travellers.’

9.32 Paragraph 1.22 of the GTAA sets out that ‘Due to historic low numbers of encampments, and the existence of public transit pitches (some of which have recently been converted to permanent pitches due to a lack of demand for them as transit pitches), it is not recommended that there is a need for additional formal public transit provision in Bath & North East Somerset at this time.’

9.33 The previous GTAA 2021 highlighted that most of the identified gypsy and traveller needs came from households living on private sites and in the spring 2024 options document it was proposed to meet need through intensifying existing private pitches or sites and take forward a criteria-based policy approach within the local plan. The GTAA 2025 has highlighted the 0-5 year housing need is predominantly from the public site. B&NES Council are currently considering options to meet identified needs from this site and the wider recommendations of the GTAA 2025, together with taking forward a criteria-based policy.

Policy H/HDB: Housing Development Boundaries (HDBs)

Background

9.34 Housing Development Boundaries (HDBs) are designated areas within towns and villages where residential development is considered appropriate in principle. HDBs are defined to support the delivery of housing, including small windfall sites, within the local plan's policy framework, subject to other policies e.g. relating to quality of development, site access etc.

9.35 The towns and villages with a defined HDB and the respective policy frameworks are identified in the table below. Villages washed over by the Green Belt are subject to Policy GB2 and have a defined infill boundary instead of a HDB. In addition, there are a range of smaller villages and hamlets in the district where a HDB or an Infill Boundary is not defined. These settlements are treated as open countryside with regard to the policy framework for residential development.

Locational Policies	
The Policy Framework for the location of new development is as follows:	
Bath	Policies B1, B2, B3, B3A, B3C, B4
Keynsham	Policies KE1, KE2, KE3A & B, KE4
Midsomer Norton, Westfield & Radstock	Policies SV1, SV2, SV3
Paulton, Peasedown St. John	Policy SV1
Timsbury, Camerton, Hallatrow, High Littleton, Farrington Gurney	Policy SV1, and Policy RA1 or RA2
Bathampton, Batheaston, Bathford, Bishop Sutton, Clutton/Temple Cloud, Compton Martin, East Harptree, Farrington Gurney, Farmborough, Hinton Blewett, Saltford, Camerton, Ubley, West Harptree and Whitchurch	Policy RA1 or RA2
Whitchurch	Policy RA5

Housing Development Boundary Review

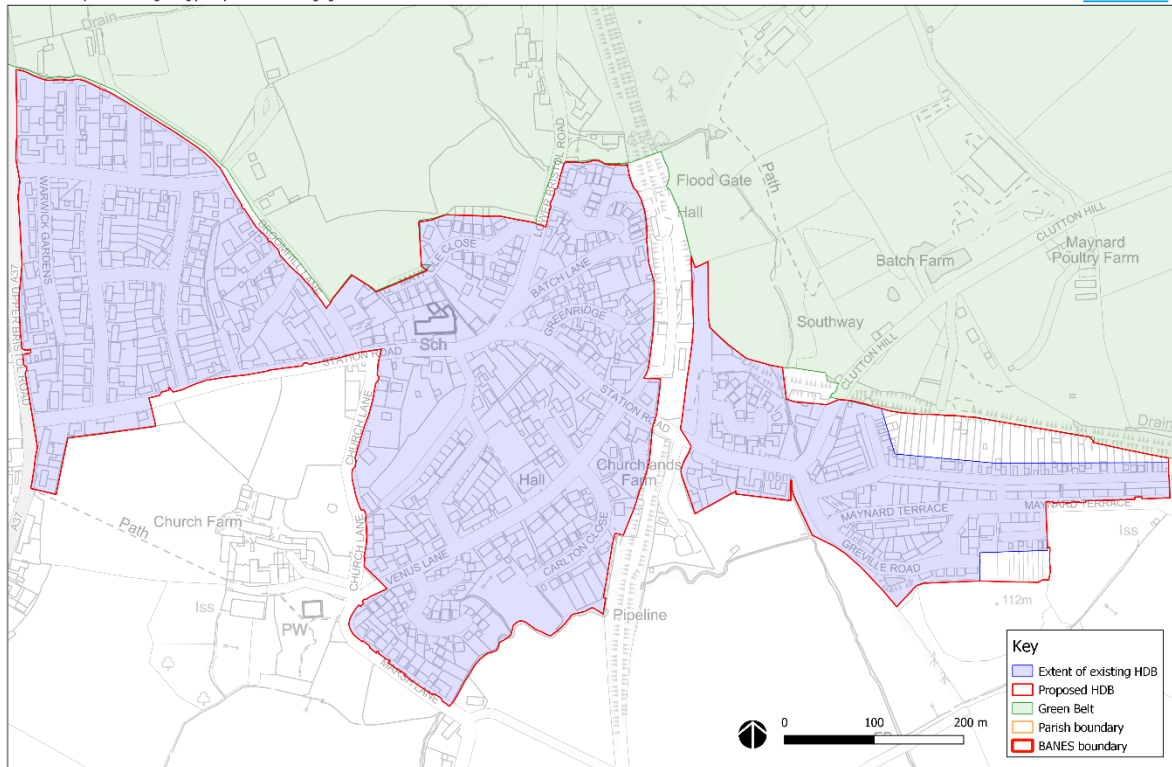
9.36 As part of work on the Local Plan Options, the council has reviewed the HDBs to update the existing boundaries to account for recent housing development, planning consents, potential allocations, and any identified anomalies.

9.37 In addition to this routine review of HDBs, the council is proposing an option to revise the HDB guiding principles which have been developed for consistency in defining boundaries. Currently, the principles state that a HDB should be defined tightly around the housing of a settlement, excluding large residential gardens of properties at the edge of settlements. An option is proposed to amend the HDB guiding principles to define boundaries around the residential curtilage of housing on the edge of settlements, therefore including larger gardens.

9.38 The inclusion of larger gardens within HDBs could enable some small-scale opportunities for additional housing to come forward in villages, subject to other policy controls. Minor incremental change in villages is helpful to maintain rural population levels and therefore, services and facilities, as well as making a modest contribution to meeting overall housing requirements.

9.39 Parish and town councils have been informally consulted on the proposed boundaries and option to amend the HDB guiding principles prior to formal consultation. Parish and town councils were invited to view the proposed HDB boundaries.

9.40 Options as relates to HDB guiding principles are presented below, alongside an example to illustrate how such changes might affect the extent of HDBs.



Map 19: Clutton, HDBs

	Option	Advantages	Disadvantages
1	Amend the HDB guiding principles to define boundaries around the residential curtilage of housing, therefore including larger gardens.	<p>Enables some small-scale opportunities for additional housing to come forward in villages, helping to maintain rural population levels and therefore, services and facilities, as well as making a modest contribution to meeting overall housing requirements.</p> <p>Provides consistency between the HDBs. The current principles do not define what constitutes a 'large garden'. Therefore, there are inconsistencies between the size of gardens included or excluded within the existing HDB of different settlements.</p>	None identified.
2	Retain the existing HDB guiding principles to define boundaries tightly around the housing of a settlement, excluding large residential gardens at the edge of settlements.	None identified.	Lack of consistency between existing HDBs.

Climate Change

Policy XX: Climate Adaptation and Resilience

9.41 The climate is changing and the impacts will be felt into the future, even if CO2 emissions are reduced significantly. Therefore, action on climate change must include preparing for and adjusting to the impacts of climate change.

9.42 In general, the climate change impacts that are expected in Bath and North East Somerset are:

- Warmer, wetter winters
- Hotter, drier summers
- Increase in frequency and severity of extreme weather events

9.43 These impacts give rise to a number of hazards including, but not limited to extreme high temperatures, drought and water stress, flood events, subsidence and soil erosion; and a number of associated risks including impacts to human health, damage and degradation to the built environment or interruption to utility services and impacts to the natural environment reducing resilience and the ability to provide societal benefits.

9.44 Different areas of the region will be affected by climate change in different ways and communities will have varying needs and levels of vulnerability. Development in some areas may exacerbate climate change risks in the surrounding area or elsewhere in the region.

9.45 The principle of the policy is to ensure development within the district is designed to cope with the effects of climate change, both now and in the future, including both the expected and potential climate risks, to ensure development is suitable for its lifetime use and for the future liveability and sustainability of the district. We will also be reviewing a range of policies to ensure they align and are consistent with the climate adaptation and resilience policy requirements and objectives including policies relating to sustainable construction, water efficiency, design, historic environment and infrastructure.

9.46 The proposed policy approach is as follows:

XX: Climate Adaptation and Resilience	Option	Advantages	Disadvantages
A	New development proposals, including proposals for infrastructure, will need to demonstrate that its vulnerability to climate change has been taken into consideration and how it has been designed to be resilient to the effects of climate change over the full lifetime of the development.	New development within the district will be designed and built to be resilient to the effects of climate change.	Viability considerations (to be tested).

Policy XX: Retrofit First

9.47 A key area which generates greenhouse gas emissions in the built environment is the demolition of existing buildings, both the physical demolition itself and the associated waste processes. These emissions are captured in embodied carbon emissions.

9.48 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.

9.49 Unlike the carbon emissions associated with the operation of a building, embodied carbon emissions cannot be addressed by grid-decarbonisation. Therefore, it is considered that a policy to reduce the embodied carbon emissions associated with demolition is required.

9.50 The retrofit first policy approach seeks to prioritise the retention of existing buildings over demolition. It recognises the benefits of re-using existing buildings to avoid wastage of materials and embodied carbon in existing buildings. This avoids the creation of new embodied carbon in replacement buildings and supports the circular economy.

9.51 The proposed policy approach is as follows:

XX: Retrofit First	Option	Advantages	Disadvantages
A	<p>Development should adopt a retrofit first approach, where options for retrofitting and retention of existing buildings are considered before demolition.</p> <p>Where development proposals include substantial or total demolition of existing building(s), applicants must provide evidence to justify the demolition. Applicants must also demonstrate how they will reuse and recycle the materials created through demolition.</p>	<p>Buildings will only be demolished and materials disposed of as a last resort and embodied carbon emissions associated with demolition will be reduced.</p>	<p>Viability considerations (to be tested).</p>

Policy XX: District Heating

9.52 Accelerating the transition to a zero-carbon heat and a zero-carbon electricity system is essential to addressing the climate emergency. It can also bring wider environmental, public health and economic benefits, and improve the security of our energy supply.

9.53 Renewable, low or zero carbon heating and cooling can be provided via district heating. District heating (also known as heat networks) supplies heat from a central source to consumers, via a network of insulated underground pipes carrying hot or ambient temperature water. Heat networks can serve large areas including towns and large parts of cities or supply small clusters of buildings or units, or even a single building, avoiding the need for individual boilers or electric heaters.

9.54 A review of the current policy and further evidence work is currently underway to understand and explore the potential for future heat networks within the district. There is now an opportunity through the local plan to review the current policy and further strengthen the policy to enhance the potential for heat networks in the district.

9.55 Subject to the developing evidence base, we are proposing to update the current policy. The proposed policy approach that could be applied to build upon the adopted approach currently in Policy CP4 is as follows:

Policy XX: District Heating	Option	Advantages	Disadvantages
A	<p>Update the policy to include a requirement that developments will connect to existing district heat networks in the locality. Additionally, where it has been identified that a heat network will provide the lowest cost decarbonisation solution in an area and a B&NES Heat Network Zone has been designated, developments within that zone must be designed around a low temperature heating system and be capable of connection to that network. Where appropriate, proportional contributions to enable a network to be established, completed or extended will be sought.</p> <p>Where a proposed development is expected to generate heat energy from processes or plant (for example from large refrigeration units, data storage, or energy from waste) the development should provide for effective distribution of waste heat to maximise energy recovery and reuse by localised users.</p>	New development will be heated and cooled by reliable low-carbon sources where possible.	Viability considerations (to be tested)

Policy C/RE: Renewable Energy

9.56 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.

9.57 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.

9.58 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.

9.59 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).

National Context

9.60 Paragraph 165 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, and their future re-powering and life extension, while ensuring that adverse impacts are addressed appropriately (including cumulative landscape and visual impacts).
- consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and
- 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.

9.61 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.

9.62 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). As of July 2025, further guidance is anticipated on assessing community support for wind energy and mechanisms for community benefit, such as reduced energy bills for host communities.

Changes since adoption of the LPPU

9.63 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](#).

9.64 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.

9.65 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.

9.66 In addition, draft revisions to National Policy Statements EN-1, EN-3 and EN-5 (April 2025) reinforce the strategic importance of renewable energy infrastructure and support the Clean Power 2030 ambition. These revisions emphasise the need for local planning authorities to proactively support renewable energy development, including onshore wind, and to integrate community benefit mechanisms.

Proposed Target

9.67 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.

9.68 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 of 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.

9.69 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).

9.70 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.

9.71 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.

9.72 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.

9.73 Given this misalignment, we **considered** that linking back to the council's Climate Emergency declaration and emphasising 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.

9.74 Comments were received on the renewable energy target options during the previous consultation, and these will be reviewed and taken into account as we move towards the Draft Plan.

Proposed Approach

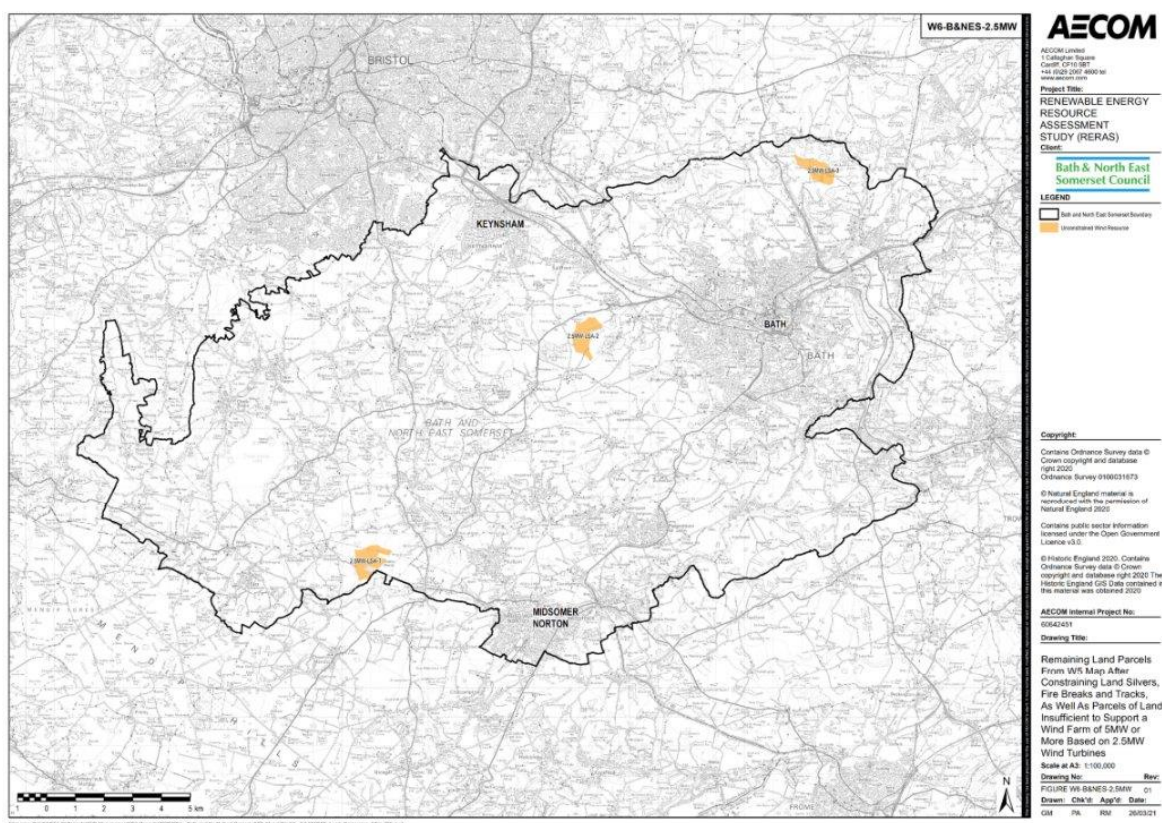
9.75 In the previous Options Consultation, the council sought views on the proposed approach to renewable energy development, including the strategic target and policy direction. However, the consultation did not include the mapping of safeguarded areas for wind energy, which was intended to support interpretation of the policy options.

9.76 To address this, the council is now undertaking a focused re-consultation to provide the missing mapping and enable more informed feedback. This also offers an opportunity to reflect on the comments already received on the renewable energy approach, which will inform the Draft Plan.

9.77 Given that Policy CP3 has recently been reviewed, the policy approach could be regarded as appropriate to take forward into this local plan. **Recent interest from solar PV operators, including the permitted 15MW solar farm at Marksbury Plain, highlights the growing commercial appetite for renewable energy development in the district.**

9.78 The Renewable Energy Resource Assessment Study (RERAS) provides a technical assessment of the potential for renewable energy technologies across Bath and North East Somerset. It identifies potential areas for wind energy and solar PV based on a range of criteria, including turbine size, in line with national policy expectations.

9.79 The RERAS shows that the potential opportunities for large scale wind are limited within the district. To support delivery, the council is proposing an option to safeguard the most technically viable areas for wind energy (as shown in the map below), helping to ensure they are not compromised by other forms of development.



Map 20: RERAS map

9.80 It is important to note that both the safeguarded areas and the broader areas of search are identified as potentially suitable for wind energy. Their inclusion does not imply that planning permission would be granted. All proposals will be assessed against detailed policy criteria, other relevant local plan policies, and national or neighbourhood planning policy.

9.81 Given the sensitivity of some of the identified areas (including National Landscapes), it is not proposed to restrict these locations to large turbines only. A flexible approach to turbine size is preferred, supporting increased renewable energy generation while balancing all considerations.

9.82 In contrast, the RERAs shows that the solar resource is widespread across the district. As such, safeguarding specific areas for solar PV is not considered necessary.

9.83 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 (protecting them from being compromised by other forms of development) – see map above	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.

Policy C/LIF: Low Impact Farming

Background

- 9.84 The NPPF supports sustainable development that responds to the climate and ecological emergencies, promotes rural prosperity, and enables innovative forms of housing and land use. Low impact farming (LIF) offers a regenerative approach to land management that aligns with these goals, delivering environmental, social, and economic benefits.
- 9.85 LIF developments are typically small-scale, land-based enterprises that integrate food production, biodiversity enhancement, renewable energy, and low-carbon living. They are often located in rural areas where conventional development would not normally be permitted, but where the land-based nature of the activity justifies a different planning approach.
- 9.86 Cornwall's Policy AL1 provides a precedent for enabling such development through a robust framework of criteria, management plans, and monitoring. A similar approach is proposed for Bath and North East Somerset, adapted to local landscape character, settlement patterns, and policy priorities.
- 9.87 While the agricultural use of land itself does not usually require planning permission, many LIF proposals include associated development that does. This may include buildings (e.g. cabins, barns), structures (e.g. polytunnels, compost toilets), hard-standings, renewable energy infrastructure, and residential elements. These components often fall outside permitted development rights—particularly for small-scale enterprises—and therefore require planning permission. The proposed policy approach provides a framework for assessing such proposals where they meet the definition of low impact, regenerative development.

9.88 The policy would support proposals that demonstrate:

- A regenerative land management approach (e.g. agroecology, permaculture, agroforestry)
- Self-sufficiency in energy, water, and a significant proportion of food and income
- Low carbon construction and operation
- Biodiversity net gain and ecological restoration
- Positive contributions to the local community and economy
- A binding management plan and monitoring framework

9.89 Proposals would be expected to meet a set of criteria covering location, land use, environmental impact, and social value. Temporary consent may be granted initially, with permanent permission subject to successful implementation and review.

9.90 The policy would not apply to conventional agricultural development or rural housing, but to integrated proposals that meet the full definition of low impact, regenerative development.

Policy Approach

9.91 A criteria-based policy is proposed to enable low impact farming where it can be demonstrated that the development:

- Is land-based and regenerative in nature
- Is the principal residence of those managing the land
- Meets minimum thresholds for food, income, and energy self-sufficiency
- Achieves biodiversity net gain and carbon sequestration
- Has no unacceptable impact on landscape, heritage, or neighbouring uses
- Is supported by a comprehensive management plan and monitoring strategy

9.92 The policy would apply primarily in rural areas outside settlements, including within the Green Belt where very special circumstances would need to be demonstrated.

C/LIF: Low Impact Farming

	Option	Advantages	Disadvantages
1	Introduce a new criteria-based policy for low impact farming	Enables innovative, regenerative rural development aligned with climate and nature goals. Provides a clear framework for applicants and decision-makers. Builds on national and regional best practice.	Requires robust monitoring and enforcement. May be complex to assess. Risk of misuse if criteria are not tightly defined.
2	Do not introduce a specific policy; rely on existing rural exceptions and agricultural policies	Avoids adding complexity to the local plan. Maintains current policy approach.	Misses opportunity to support regenerative land use. Existing policies may not provide sufficient clarity or flexibility.

Nature and Ecosystem Services

Policy N/BNG: Biodiversity Net Gain

9.93 The Government is considering changes to mandatory BNG requirements and also the introduction of a 'medium' development threshold (10-49 units or <1ha). Both are subject to consultation. If changes are implemented there would be some implications to BNG policy and practice. The 'Improving the implementation of Biodiversity Net Gain for minor, medium and brownfield development Consultation document' sets out the government's proposals for change to the mandatory BNG process.

9.94 The main areas for improvement being considered are:

- Reform of existing exemptions and introduction of new exemptions
- Streamlining the small sites metric and considering whether this could apply to medium development (if introduced).
- Relaxation of the biodiversity gain hierarchy and disapplication or amendment to the spatial risk multiplier for minor development
- Delivery of compensation for development on brownfield sites with open mosaic habitat, applicable to all development categories

9.95 In the absence of the planning reform to introduce the medium threshold of development, the biggest effect of these improvements would be the change proposed for exemptions, particularly in relation to self build and custom build developments. These are currently exempt from BNG and has lead to a significant increase in claims of self build or custom build projects, avoiding BNG requirements. The proposed change would remove this exemption and introduce an exemption for single build projects only. The other option being considered which would have implications for BNG outcomes is exempting all minor developments.

Local Plan Policy BNG NE3a

- 9.96 In terms of our existing BNG policy NE3a, and proposals to include a 20% BNG requirement for major developments, the potential changes would have little material impact. A slight re-wording of the policy to either avoid reference to, or clearly differentiate between, threshold types would be needed.
- 9.97 If minor developments were exempted our existing policy requirement for minors within NE3a could be retained, requiring no net loss and appropriate net gain.
- 9.98 The reforming site thresholds working paper sets out the government's considerations for introducing a new medium development threshold for sites between 10 and 49 homes, up to 1.0 ha in size. The 'Improving the Implementation of BNG' consultation then considers whether there should be a specific BNG approach for medium sites through use of the simplified metric which is currently used for minor developments. This would affect BNG outcomes and require slight re-wording of existing policy.
- 9.99 We will continue to keep government policy changes under review in preparing a BNG policy for the submission plan.

Policy N/GI: Green Infrastructure

9.100 We previously consulted on a range of Green Infrastructure policy options which have not substantially changed. Previously we set out options to retain local plan GI policies NE1 and CP7 as existing, or to consolidate NE1 and CP7 into a new GI policy which includes the standards published in the January 2023 Natural England GI Framework. A further option was presented for a consolidated GI policy as above, 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).

9.101 We are not reconsulting on the previous options. However, the following text updates information on the GI Framework proposed to be produced by the council, including links to the local plan.

9.102 The Greener Places Green Infrastructure Framework for Bath and North East Somerset 2025-2035 that is being produced contains five components.

9.103 Greener Places Plan that sets out the case for investment in Green Infrastructure (GI) and the approach to deliver the planned and managed GI that is needed for our communities for their health and wellbeing, for nature recovery, to support growth and adapt to climate change.

9.104 Greener Places Investment & Delivery Plan that sets out priorities including changed practice, process, and projects.

9.105 GI mapping to provide evidence and inform decision making.

9.106 A revised local plan Green Infrastructure policy

9.107 New and revised GI Standards based on national GI Standards, replacing current Green Space Strategy Standards.

Policy N/CELLC: Conserving and Enhancing the Landscape and Landscape Character

Background

9.108 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.

9.109 Placemaking Plan Policy NE2 seeks to protect, conserve and enhance the character and quality of the landscape of the district and within new developments.

9.110 The purpose of Policy NE2A is to protect, conserve and enhance the landscape setting of settlements.

Policy Approach - Proposed Options Policy NE2

9.111 Introduction of the Levelling-up and Regeneration Act 2023 (LURA), Section 245 (Protected Landscapes) and the updated NPPF (Dec 2024) since the previous Options consultation require Policy NE2 to be updated to ensure alignment with national policy. In addition, the policy will benefit from providing clear links with Policy NE2A (Landscape Setting of Settlements) and wider natural environment policy as well as clarifying approaches to both designated (protected) and non-designated landscapes. With proposed updates, 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 align with national policy, reference approach to non-designated landscapes, and link with wider natural environment policy	Adopted policy tested recently at LPPU examination.	None identified.

Policy Approach - Proposed Options Policy NE2A

9.112 Whilst Policy NE2A remains fit for purpose overall and appears effective in use, since the previous Options consultation, work has progressed on a review of the policy. An option is proposed to update the wording of NE2A to strengthen the policy. These amendments would make it a requirement for development proposals within or affecting the mapped Landscape Setting Areas of included settlements to demonstrate how it will conserve and enhance the positive contributions which the Landscape Setting Area and its identified components make to their distinctive character, identity, and sense of place. Additionally, development must seek to conserve identified views to and from landmarks or areas.

9.113 Alongside this, work has progressed on a review of the evidence base of NE2A, including the Landscape Setting Areas assessment methodology. The purpose of this review is to improve clarity and better reflect current guidance and local strategies, and incorporate recommendations from a review relating to the landscape setting of Saltford. The review includes the addition of a landscape setting for six new settlements (See appendix X):

- Chew Magna
- Chew Stoke
- Corston
- Farmborough
- Freshford

9.114 In addition, a review of the Saltford Landscape Setting Area has been undertaken, which was previously assessed in 2015 (See appendix X). The supporting evidence which has informed this review can be found on the council's website.

9.115 As such, the council presents options to retain or strengthen Policy NE2A and to include the Landscape Setting Area amendments to reflect the Saltford review (see chapter 6) and defined setting for the six new settlements added.

9.116 A process of reviewing some of the landscape settings of existing settlements in line with the revised methodology is anticipated in preparation of the Draft Local Plan.

9.117 The revised methodology for assessing Landscape Setting Areas can be viewed on the council's website.

N/CELLC: Landscape Setting of Settlements

	Option	Advantages	Disadvantages
1	Retain policy NE2A as written with amendments to reflect review and defined setting for new settlements added.	Adopted policy is well used by Development Management in determining planning applications.	None identified.
2	Revised policy wording for NE2A with amendments to strengthen the policy as set out in para 9.113 above and the defined setting for new settlements added.	Adopted policy is well used by Development Management in determining planning applications. Opportunity to clarify and strengthen the policy.	None identified.

Green Belt

Policy GB/GB

Background

9.118 Through revisions to the National Planning Policy Framework in December 2024, government has introduced some significant changes to Green Belt policy. The updated framework retains the importance and permanence of the Green Belt but now requires local planning authorities to review Green Belt boundaries through local plans, if the need for development cannot be met elsewhere and is seeking that the strategic release of lower quality Green Belt for development is considered. Identification of areas of lower quality or less important Green Belt includes the introduction of the new concept of 'grey belt'. In addition, revisions to the NPPF set out 'golden rules' relating to the release of land for development. These require that where land in the Green Belt is developed an increased proportion of affordable housing is provided (either 50% or 15% above the proportion required elsewhere in B&NES); necessary improvements to local or national infrastructure are made; and the provision of new, or improvements to existing, green spaces that are accessible to the public.

9.119 In the 2024 options document the council proposed and consulted on options to amend the approach to limited infilling in villages washed over by the Green Belt in order that development demonstrates it provides a form of housing that will help to meet local needs. It is not proposed to reconsult on this option. As a result of the changes to national policy outlined above it is necessary to test and consult on options to ensure the overarching Green Belt policy (currently adopted policy CP8) aligns with national policy and specifically the golden rules relating to development. There is also an opportunity to ensure the provision of new or improvements to existing green spaces help to deliver nature recovery, potentially contributing to delivering a higher level of Biodiversity Net Gain (20%) related to strategic or non-strategic development sites.

Policy Approach Options

GB/GB: Overarching Green Belt Policy (existing CP8)

	Option	Advantages	Disadvantages
1	Amend policy so that it references and includes the 'golden rules' that should be met in progressing development in the Green Belt (either via very special circumstances or through the release of land via the local plan). In referencing the need to provide new or improve existing green spaces a requirement that its role for nature recovery is assessed and maximised, also facilitating achieving 20% BNG related to development proposals.	Accords with the NPPF and further explains how the provision of new/improvements to existing green space 'golden rule' will be applied in B&NES benefitting nature recovery.	None identified
2	Retain existing policy and rely on NPPF for articulating 'golden rules'	None identified	Fails to accord with the NPPF and doesn't incorporate the 'golden rules' into the statutory Development Plan.

Jobs and Economy

Policy J/UI Undesignated Industrial sites Policy

Background

9.120 Reflecting the latest national policy (NPPF 2024) 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. An updated Economic Development Needs Assessment has been undertaken to identify the industrial and warehousing floorspace requirements over the Plan period arising from the increased housing growth requirements. This shows that overall 17-20ha of industrial land and 14-15ha of land for warehousing and logistics is required for the local plan period 2025 -2043. In the context of this increased need it is proposed that 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

9.121 In light of the chronic shortage of industrial and warehouse premises, and the increased requirement for industrial and warehousing floorspace arising from the latest evidence, we propose to strengthen the policy on non-designated industrial sites to provide greater policy protection. In particular we are proposing two options:

9.122 The first option ensures redevelopment of all undesignated sites will not be permitted unless the development is for an industrial or warehousing use (classes E(g)(ii),(iii), B2, B8) or builders' merchants; and would not have an adverse impact on the operation of the remaining premises, site.

9.123 The second option reflects the chronic shortage and acute pressure for redevelopment of industrial / warehousing premises to housing and other higher value uses in the Bath planning area. There is an acute need for industrial / warehousing and logistics space in Bath and there has been a significant loss of industrial floorspace in Bath. Due to environmental constraints including the World Heritage Site and National Landscape designations affecting Bath City, the potential expansion of Bath to enable the provision of sites for industrial / warehousing is limited (although two site options are outlined to provide some new space in chapter 5, Bath).

9.124 It is proposed therefore in this second option that the above policy protection to undesignated (smaller) sites (ie redevelopment only to industrial and warehousing uses (Use Classes E(g)(ii),(iii), B2, B8), or builders merchants applies only in Bath, and the policy approach criteria consulted on in the Options Document 2023 relating to undesignated sites is maintained, as below.

9.125 Where the policy protection in Bath would apply in the second option we will still require evidence on the reason for redevelopment for sites outside Bath as set out in the Options Document in 2024. 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.

9.126 Our proposed policy approach options are outlined as follows:

J/UI: Undesignated Industrial Sites

	Option	Advantages	Disadvantages
1	<p>Light industrial, heavy industrial, warehousing (classes E(g)(ii),(iii), B2, B8), builders' merchants will be acceptable in principle.</p> <p>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.</p>	<p>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.</p>	<p>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.</p>
2	<p>a) The following types of development will be acceptable in principle:</p> <p>Light industrial, heavy industrial, warehousing (classes E(g)(ii),(iii), B2, B8), builders' merchants</p> <p>b) Planning permission will not be granted for development that results in a net loss of employment floorspace on undesignated industrial sites within the Bath urban area.</p> <p>c) Outside the Bath urban area within the rest of the district development involving the net loss of industrial and warehousing/logistics floorspace will need to demonstrate the following:</p> <ul style="list-style-type: none"> - 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; 	<p>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.</p> <p>Smaller scale industrial sites on undesignated sites can provide local employment opportunities. Lower value units can provide opportunities for foundational economy / service uses such as car mechanics, storage and last mile delivery.</p>	<p>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.</p>

	<p>- 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.</p> <p>The criteria relating to ensuring that the development does not adversely affect remaining industrial uses would be retained.</p>		
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Healthy and Vibrant Communities

Policy HVC/TC

Retail Hierarchy and Development

9.127 We are proposing a minor amendment to this Policy Option concerning the Primary Shopping Area designation in Midsomer Norton.

9.128 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.

9.129 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 culture and leisure.

9.130 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.

9.131 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.

9.132 The purpose of designating centres and defining their boundaries is to ensure their successful future functioning as the economic, social and cultural focal points of communities, maintaining and improving their vitality and viability and enabling a compatible mix of uses within them.

9.133 The NPPF states that planning policies should define the extent of Primary Shopping Areas and defines a Primary Shopping Area as an area where retail development is concentrated. The Primary Shopping Area boundary also forms the boundary for applying the sequential test (town centre first) policy for retail proposals.

9.134 The Primary Shopping Area will be the main focus, particularly at ground level, for active uses that attract pedestrians to the centre such as shops and restaurants (refer to the policy option relating to Development within Bath and North East Somerset's town, district and local centres below). The area outside the Primary Shopping Areas, 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, we proposed in the 2024 Options Document that there are locations in Bath where the Primary Shopping Area 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. We also noted that other changes to Primary Shopping Areas may come forward and be included in the Draft Local Plan. Having regard to public realm works in Midsomer Norton at the Island and a new market square replacing the former car park, we are now proposing that the Primary Shopping Area designation within Midsomer Norton Town Centre incorporates the retail frontage at The Island.

Policy approach options

9.135 The approach is to retain the retail hierarchy policy as set out in the Core Strategy policy CP12, however, adapt it to ensure the ‘Development in Centres’ policy makes clear which uses will be permitted in such locations.

9.136 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.

9.137 In the 2024 options document some changes were proposed to the Primary Shopping Areas within Bath City Centre and local centres subject to consultation. We are not consulting on these changes again in this document. As set out above we are now proposing to extend the Primary Shopping Area for Midsomer Norton Town Centre to include “The Island” active frontages i.e. the area incorporating the new market square.

9.138 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 as extensions to Primary Shopping Areas.

	Revised Option	Advantages	Disadvantages
1	Extend the designated Primary Shopping Area within Midsomer Norton Town Centre to incorporate The Island (up to White Hart, and Dog Lovers Café)	Extending the Primary Shopping Area will ensure that active ground floor uses are maintained or provided thereby contributing to ensuring the vitality and viability of Midsomer Norton Town centre.	None identified.

Cultural Infrastructure

Background

9.139 Culture is an integral part of place-shaping and is a key spatial priority for the local plan. It plays a crucial role in creating unique and vibrant places and communities. Culture informs the distinct character of a place; it reinforces a sense of belonging and community identity whilst strengthening community cohesion. Planning for culture is an important part of supporting and creating healthy, vibrant and diverse places. It supports the health and well-being of communities and contributes to the vitality of local centres, bringing social and economic benefits. It also contributes to social and cultural wellbeing, which forms one of the three core objectives of the National Planning Policy Framework (NPPF).

9.140 The physical places where culture is produced and consumed are known as *Cultural Infrastructure*. These places allow people to view, participate in and enjoy culture. Cultural Infrastructure includes community and heritage assets, open spaces and the public realm. It ranges from public squares, theatres, museums, libraries and creative workspaces to mixed use venues, such as community facilities, school halls and public houses. Cultural activity is also facilitated by other uses that contribute to creating a sense of place or support access to Cultural Infrastructure.

Policy Approach

9.141 Planning Policy plays an important role in protecting, maintaining and enhancing existing Cultural Infrastructure, as well as encouraging the provision of new Cultural Infrastructure and enabling better access to existing cultural facilities. This is particularly important in areas of significant growth and development.

9.142 Key relevant existing policies for B&NES include, but are not limited to:

- RA3: Community Facilities and Shops

- LCR1: Safeguarding Local Community Facilities
- LCR2: New or Replacement Community Facilities

Other relevant policies include:

- LCR1a: Public Houses
- LCR5: Safeguarding Sport and Recreational Facilities
- LCR6: New and Replacement Sport and Recreational Facilities
- D10: Public Realm
- CP12: Centres and Retail

9.143 Policy CP12 recognises the important role of culture in town and local centres. Policy LCR2 and CP12 support new or replacement community facilities that are accessible by sustainable transport modes and located in or in close proximity to such centres. Policy RA3 encourages community facilities in rural areas and LCR1 protects land or buildings valued as community facilities. There are also certain areas in the district which act as a greater focus for cultural activity e.g. central Bath and the place-based chapters identify opportunities to enhance this role.

9.144 In the previous Options Document Consultation (Spring 2024), the council consulted on the option to combine Policy RA3 with Policy LCR2 to create one policy relating to the provision of new community facilities and to expand the wording of the policy to explicitly include ***cultural*** and *social* facilities.

9.145 There is scope to further amend adopted policies to better safeguard and encourage Cultural Infrastructure and activity. A review of existing adopted policies is underway to ensure culture is better integrated into the local plan. This review will inform the approach of the Draft Local Plan. Key areas of focus include: Meanwhile and Temporary Uses, Town and City Centre Cultural Facilities, Cultural Quarters, Cultural Provision as Part of New Developments, Affordable, Flexible and Managed Workspace.

9.146 Through the review of policies undertaken it is suggested that the following policies could be amended to better protect existing and facilitate new Cultural Infrastructure and activity:

- Policy CP12: Expand the policy scope to support development in town / city centres where it involves the positive use of vacant properties (particularly heritage buildings) and land for pop-ups or 'Meanwhile' uses for cultural and creative activities during the day and at night-time to stimulate vibrancy and viability and promote diversity in the town / city centre.
- Policy D10: Amend the policy wording to better acknowledge the importance of culture in the public realm.
- Policy LCR1: Amend the policy text to explicitly reference safeguarding Cultural Infrastructure. For example, "Any community facility or public space that makes a positive contribution to the social or cultural life of a community should be retained unless suitable alternative provision is made",

9.147 In preparing the Draft Local Plan, policy wording relating to these amendments will be drafted and proposed. As an alternative to amending the adopted policies referenced above we could seek to prepare separate new policies specifically relating to Cultural Infrastructure and activity. Your comments on the above approaches are welcomed.

9.148 In addition to this, we will consider opportunities to incorporate new Cultural Infrastructure in Place Based Strategies and associated Site Allocation Policies in the Draft Local Plan.

HVC/LGS: Local Green Spaces

Background

9.149 Local Green Spaces (LGS) 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 LGS 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.

107. 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.*

108. Policies and decisions for managing development within a Local Green Space should be consistent with national policy for Green Belts set out in chapter 13 of this Framework.

9.150 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. **National Policy and Practice Guidance outlines some examples of what green areas can be identified as LGS and also sets out a series of exceptions where designating a LGS would not be appropriate – these were outlined in the local plan spring 2024 options document and are not repeated here.**

9.151 In line with national policy, the council's adopted Local Plan (the Placemaking Plan) designated LGS and included a policy protecting them from development

that would prejudice their role as a LGS unless very special circumstances can be demonstrated.

9.152 As the LGS designation is linked to community value which must be demonstrated, the council has sought community nominations for spaces that should be designated and protected from development.

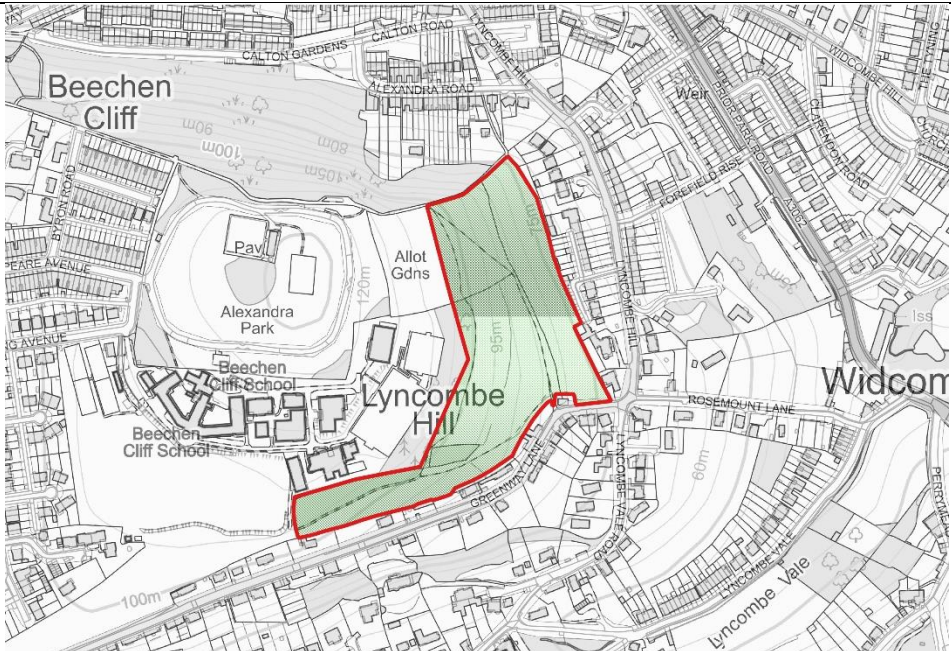
9.153 Following a nominations process in the spring 2024 options document we proposed to designate 26 new LGS. We consulted on these proposed new LGS, as well as the nominated sites not proposed to be designated. In addition, as part of the spring 2024 consultation we provided an opportunity to nominate additional sites for LGS designation.


Why we are reconsulting on this policy area

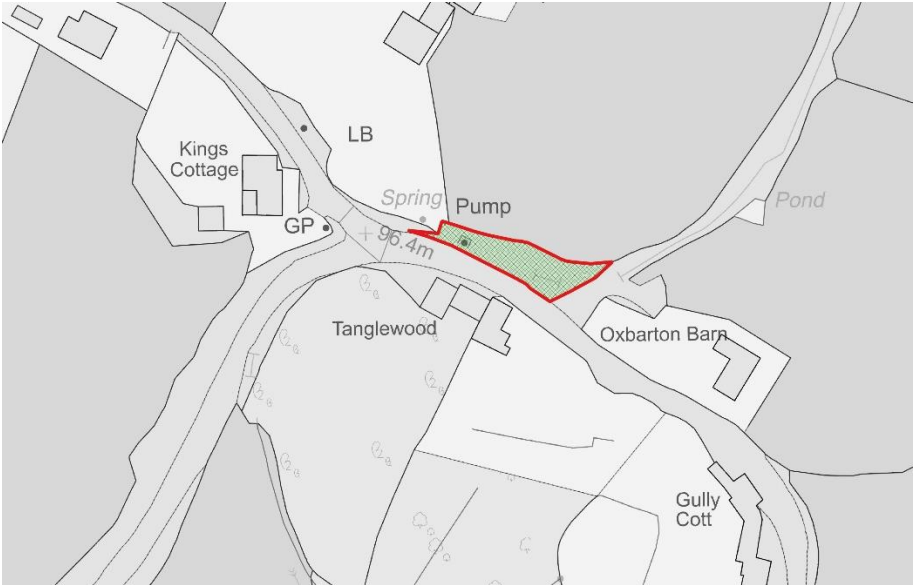
9.154 Through the spring 2024 options consultation and in addition to comments on the proposed LGS designations and those nominated spaces not proposed to be designated, three new nominations had been received.

9.155 The new nominations have been assessed against the NPPF and PPG criteria for LGS with recommendations set out. It is proposed that the three nominated sites should be designated as LGS. Further information on their nomination, reasons why they are proposed to be designated are set out in an updated version of the Local Green Spaces Assessment Topic Paper.

9.156 The three new spaces now proposed to be designated as LGS are set out below and comments invited on them. The landowner of the two sites in Bath is B&NES Council and the landowner of the site in Nempnett Thrubwell is not currently known.

Ward:	Widcombe and Lyncombe
Site name:	Lyncombe Hill Fields
Site number:	
Map 21	

Ward:	Odd Down
Site name:	Workhouse Burial Ground
Site number:	
Map 22:	

Ward:	Nempton Thruwell
Site name:	Land adjacent to Village Pump
Site number:	
Map 23	

Additional Evidence and update on two previously rejected nominations

9.157 Two previously nominated sites were rejected and decided not to be proposed for designation as LGS. As these sites and the reasons for not designating them have already been subject to consultation it is not necessary to re-consult on them as part of this options consultation. However, in light of additional evidence minor updates are set below confirming that the two sites in question will continue to be considered for potential designation in preparing the Draft Local Plan.

Combe Down Allotments

9.158 This nominated site was proposed not to be designated as a LGS in the spring 2024 options consultation because of conflict with an adopted local plan minerals designation and policy.

9.159 NPPF December 2024 outlines policies and decisions for managing development within a Local Green Space should be consistent with national policy for Green Belts set out in chapter 13.

9.160 Development in the Green Belt is inappropriate unless exceptions apply. One such exception is set out under Paragraph 154 h) which amongst other things notes that provided development such as minerals extraction and engineering operations preserves the openness and do not conflict with the purposes of including land within the Green Belt.

9.161 Given the above, further consideration of the nomination of the Combe Down Allotments as a Local Green Space and its relationship with the minerals designation and policy will take place in preparing the Draft Local Plan.

Bath Rugby Playing Fields/Lambridge Wildlife Haven, Lambridge

9.162 At the time of the 2024 options consultation a live planning application (Reference: 23/02212/FUL) was under consideration. Planning Practice Guidance notes amongst other things that it will rarely be appropriate to designate Local Green Space where the land has planning permission for development. Exceptions could be where the development would be compatible with the reasons for designation or where planning permission is no longer capable of being implemented.

9.163 As an update, a new planning application is currently under consideration on this site. Until the planning application has been determined it is not appropriate to designate it as a Local Green Space. Dependent on the outcome of the planning application process this position can be reviewed in preparing the Draft Local Plan.

Policy HD/SCCW: Somersetshire Coal Canal and the Wansdyke

Background

9.164 The Somersetshire Coal Canal and the Wansdyke earthwork are two important linear historic assets in Bath and North East Somerset.

9.165 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.

9.166 The NPPF Section 16 – Conserving and Enhancing the Historic Environment paragraph 196 sets out the context for local policy.

9.167 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.’

9.168 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.'

9.169 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.

9.170 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.

Why we are reconsulting on this policy area

9.171 We previously consulted on this policy area in the spring 2024 options document and a summary of the main issues raised in comments is set out below. Since that time we have undertaken further assessment and evidence work. As a result we are proposing revised policy options and amended creation/diversion areas.

Summary of previous consultation responses

9.172 A summary of the comments received based on frequent topic areas are as follows:

- **Policy HD/SCCW Revitalisation Support vs. Opposition:** Divided opinions on policy amendments for canal restoration, with support for public benefit and opposition citing negative impacts on land and livelihood.
- **Potential for Canal as Community Asset vs. Risk to Personal Enjoyment and Property:** Balance sought between the canal as a community asset for leisure and connectivity, and the protection of individuals' property enjoyment.
- **Preservation of Heritage vs. Modern Development Concerns:** Preservation of the canal's historical significance is valued, yet concerns exist over potential loss of land and negative impacts on local heritage from modern developments.

- **Economic and Community Benefits vs. Property and Environmental Concerns:** Restoration seen as bringing economic and social benefits, with concerns about adverse environmental effects and property values.
- **Recreational Use and Access vs. Loss of Privacy and Tranquillity:** Advocacy for recreational paths contrasts with concerns over privacy and tranquillity for residents near the canal.
- **Nature Conservation and Biodiversity vs. Construction and Expansion Drawbacks:** Project seen as an opportunity for wildlife and biodiversity, though there are reservations about the impacts of construction.
- **Public Engagement and Communication vs. Perceived Exclusivity:** Need for inclusive decision-making emphasized, with concerns over lack of proper community consultation and notification of plans.

Further Work Undertaken and Revised Policy Approach Options

9.173 We are now proposing separate policies i.e. one policy relating to the protection of the heritage asset conserving its significance, and another optional policy relating to its restoration/improvement. The policy approach and optional policy seek to set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets. Section 16 paragraph 203 of the National Planning Policy Framework (NPPF) sets out amongst other things that 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.

9.174 In line with the NPPF, adopted policy HE2 is required to be retained to ensure there is a positive strategy to ensure the Somersetshire Coal Canal which is a heritage asset can be conserved and enjoyed.

9.175 Following further consultation with the Somersetshire Coal Canal Society (SCCS) the proposed diversion at Dunkerton previously consulted on in 2024 is no longer required. Regarding restoration, the SCCS objective at this location was to mitigate the impact of restoration on an existing dwelling by diverting the line through what was historically an open garden area of another dwelling.

9.176 Amendments have also been made to proposed diversions at Radford and Camerton following further assessment. Most notably the Radford diversion has been shifted further north away from neighbouring properties.

9.177 With regards to Camerton the alterations are intended to allow a better transition to the historic route at the eastern end of the diversion. Following further assessment it is noted that this parcel of land has been developed in recent years. The mitigation benefits of the extension are therefore significantly reduced, as such revised plans of the SCCS are to restore the canal on its historic route when funding and the opportunity arises.

Policy Options

Proposed Policy Approach (Protection of the route) - Retain the existing adopted policy HE2, and the protected route currently shown on the policies map.

Explanation - The proposed approach is retaining the adopted Placemaking Plan policy that protects the existing route/heritage asset from other development that would require planning permission. The council is of the view that we should continue to protect the heritage asset and this approach is in line with the NPPF. Furthermore, the Placemaking Plan policy was considered at Examination and the Planning Inspector found the policy approach sound.

Option for consultation (Restoration/ Creation) - Development of a separate policy option which seeks restoration/creation of a diverted route (that will be displayed on the Policies Map). This option is to take account of elements of the existing route which have been lost to development and consider deleting them from the protected route shown on the Policies Map. For example, both buildings and areas of immediate residential/building curtilage would be deleted with other land remaining within the protected route . Any deleted element of the existing route would then be replaced by a diverted route/area which would then be shown on the Policies Map and protected from other forms of development.

An example of the proposed amendment to sections of the policies map is set out below.

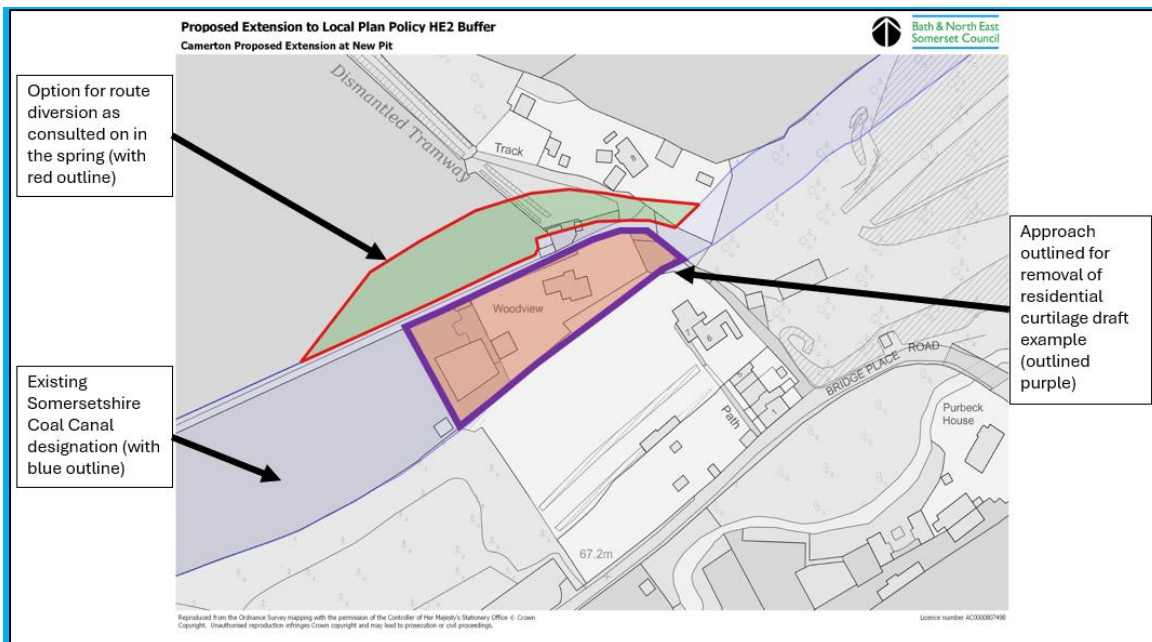


Figure 76: Example of the proposed amendment to sections of the policies map

The diversion areas would be protected from forms of development that would prejudice restoration of the canal. In addition the policy approach would also enable restoration works requiring planning permission to be pursued, but only where such restoration fully considers and addresses the amenity of residents and or landowners. In particular restoration works would require the agreement of landowners before any works take place. Any development/restoration will also need to ensure they do not increase current or future flood risk (in line with Environmental Agency comments) and that they would not harm the heritage asset.

It should also be noted that further assessment is required to identify all areas where development has occurred that could be removed from the protected route and where restoration/creation diversion areas would be proposed. Following this assessment and discussions with landowners as necessary these areas would then be shown on the Policies Map in the Draft Local Plan. Consultation will take place on the draft Local Plan next year.

An early draft of the proposed policy wording is set out below to ensure the issues outlined above are reflected.

DRAFT POLICY WORDING

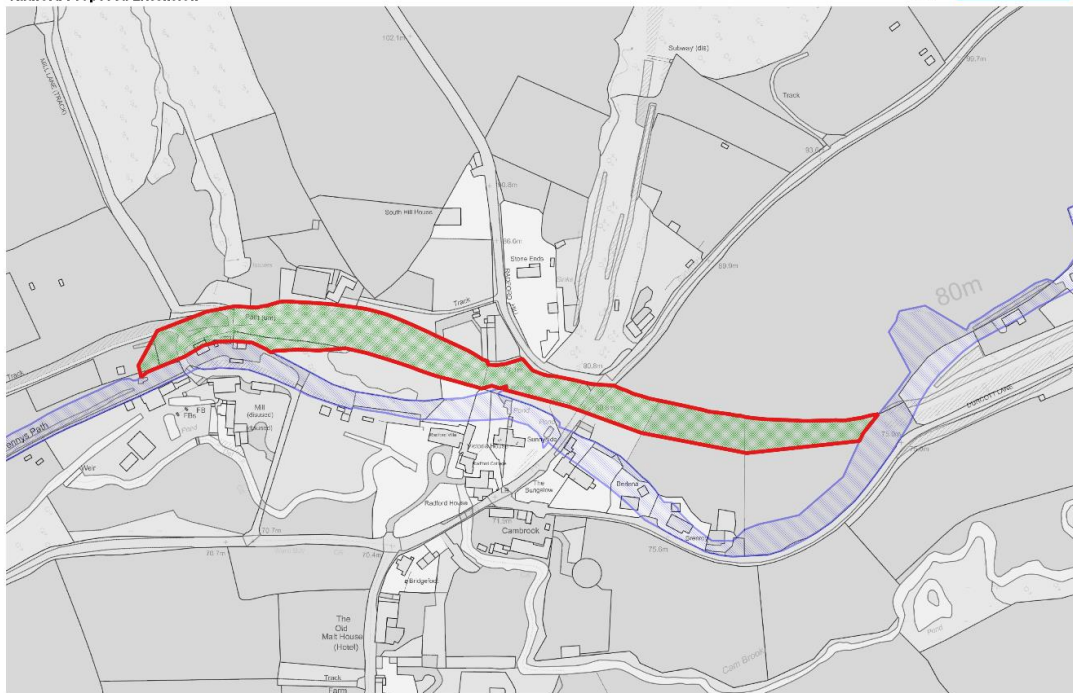
Development seeking to amend/restore elements of the Somersetshire Coal Canal must consider and seek to achieve, in line with the provisions set out under policy HE1:

- the desirability of sustaining and enhancing the significance of the Somersetshire Coal Canal, and ensuring its viable use is consistent with its conservation;*
- the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- the desirability of new development making a positive contribution to local character and distinctiveness;*

Any projects/works associated with the Somersetshire Coal Canal are required to fully consider the amenity of residents and or landowners. In particular restoration works must secure and demonstrate the agreement of landowners before any works take place. Any developments must ensure they do not increase current or future flood risk.

Below are areas of the route subject to diversion that would be displayed on the Policies Map. As set out above some of these diversion/restoration areas have been amended since those shown in the 2024 options document and the proposed diversion at Dunkerton is no longer required:

Proposed Extension to Local Plan Policy HE2 Buffer
Radford Proposed Extension



(Figure 77 – Radford)

Proposed Extension to Local Plan Policy HE2 Buffer
Camerton Proposed Route Expansion



(Figure 78 – Camerton)

Proposed Extension to Local Plan Policy HE2 Buffer
Camerton Proposed Extension at New Pit



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(Figure 79 – Camerton New Pit)

Proposed Extension to Local Plan Policy HE2 Buffer
Combe Hay Proposed Extension



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(Figure 80 – Combe Hay)

Please let us have your comments on our proposed retention of the policy protecting the existing heritage asset and the option of the policy approach proposed for restoration/diversion of the Somersetshire Coal Canal route.

Waste

9.178 The UK is striving to achieve higher levels of recycling and a more circular economy where more of the products we use can be recovered as raw materials. The UK-wide policies on waste are built on a concept known as the waste hierarchy. The waste hierarchy is both a guide to sustainable waste management and a legal requirement, enshrined in law through the Waste (England and Wales) Regulations 2011. The hierarchy gives top priority to waste prevention, followed by preparing for reuse, then recycling, other types of recovery (including energy recovery), and last of all disposal (e.g. landfill).

9.179 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.

9.180 In addressing the council's declared Climate and Ecological Emergency the council is aiming for zero waste and has developed a strategy – Towards Zero Waste 2030 Managing our resources to reduce climate change (approved 2024).

9.181 Having regard to the above strategies and targets, the Joint Waste Core Strategy (JWCS) which was adopted in 2011 by the West of England authorities (Bath and North East Somerset, Bristol City, North Somerset and South Gloucestershire) is largely out of date. It sets out the strategic spatial planning policy for the provision of waste management infrastructure across the sub region plan area and is currently part of the statutory development plan for Bath and North East Somerset when considering development proposals for waste management.

9.182 The JWCS sets out the strategy for dealing with residual waste (that is waste that cannot be recycled/black bag waste) arisings within the area and includes a policy allocating sites across the JWCS plan area for this use. However, the management of residual waste treatment facilities is primarily undertaken by the

private sector and it is recognised by national policy that new facilities need to serve catchment areas large enough to secure the economic viability of the plant. Bath & North East Somerset Council, as part of the West of England Waste Partnership, has agreements with private waste operators for residual waste treatment services at Avonmouth. The existing facilities in Avonmouth and Bristol currently have sufficient capacity to handle the residual waste generated within the partnership area and options in place for the extensions to contracts throughout the local plan period to enable management of residual waste throughout the local plan period.

9.183 Notwithstanding this, two of the sites allocated in the JWCS for residual waste treatment facilities are within the Bath and North East Somerset area, at Broadmead Lane, Keynsham and at Former Fuller's Earth Works, Fosseway, Bath. The Former Fuller's Earth site, Odd Down, Bath is currently operating as a waste recycling facility and has permission for further waste recycling units. The site does not treat residual waste through incineration / energy recovery. There is an option in the Bath section which identifies this site for employment uses under **Odd Down – land to the south west of the Park & Ride**. Waste management facilities are appropriate uses for employment sites accommodating industrial uses (refer below to reference to the National Planning Policy for Waste).

9.184 The Broadmead Lane, Keynsham waste facility site allocation is undeveloped and 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.

9.185 Given the proposed mixed use development at North Keynsham it has been agreed by our West of England partners that residual waste treatment facilities would not be appropriate at the Broadmead Lane, Keynsham site having regard to the site's environmental constraints. Current recycling operations and those subject to planning permission can continue to operate or be developed without the need for a residual waste facility allocation.

9.186 In considering sites and/or areas for new or enhanced waste management facilities the National Planning Policy for Waste 2014 notes a broad range of locations including industrial sites should be considered, looking for opportunities to co-locate waste management facilities together and with complementary activities. It adds that priority should be given to the re-use of previously developed land and sites identified for employment uses; and to consider opportunities for on-site management of waste where it arises.

Policy Approach

9.187 Our proposed approach seeks to reflect the council's aim for zero waste and to drive waste management up the waste hierarchy, recognising the need for a mix of types and scale of facilities. It is therefore proposed that a new policy which reflects the latest policy on waste and sets out criteria for the provision of waste management facilities is introduced within the local plan and will supersede the Joint Waste Core Strategy policies. Ongoing collaboration with our West of England partners on strategic waste management provision in the West of England will also take place.

	Option	Advantages	Disadvantages
1	<p>Support waste management facilities where they demonstrate the application of the waste hierarchy.</p> <p>Policy criteria, including:</p> <ul style="list-style-type: none"> • having regard to physical and environmental constraints on development e.g. existing and proposed neighbouring land uses; • the capacity of existing and potential transport infrastructure to support the sustainable movement of waste; and • the cumulative impact of existing and proposed waste facilities on the living conditions of residents, including any significant adverse impacts on environmental quality. <p>Priority will be given to previously developed land and industrial /employment sites.</p> <p>Opportunities for on-site management of waste where it arises.</p>	<p>To drive waste management up the waste hierarchy, it is recognised that there is a need for a mix of types and scale of facilities. A criteria-based policy provides flexibility and allows for new technologies such as micro waste management facilities.</p>	<p>A reliance on the private sector for delivery of waste management can lead to a lack of control over waste planning, particularly in terms of strategic infrastructure facilities.</p> <p>The council will need to continue to collaborate with our West of England partners on waste management strategic provision.</p>

Reset Local Plan Options Consultation (Reg 18)

Engagement Programme

Overview/Preamble

Following Full Cabinet, on the 25th September, the Local Plan Options Consultation (under Reg 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012) will restart on Friday 3rd October 2025.

Our ambition is to deliver a robust, inclusive consultation which balances traditional methods with a more innovative approach. The Options Consultation will be hosted online at www.bathnesplaces.co.uk/localplan alongside a diverse range of consultation activities to broaden participation and expand our outreach.

Why is the Options Consultation restarting?

The Options Consultation follows the resetting of the emerging Local Plan, at the end of 2024, in response to changes to national planning policy and the government's revised standard method housing figure for Bath & North East Somerset.

The emerging Local Plan will set out a strategy and establish a framework for how areas in Bath and North East Somerset will change and grow up until 2043 and beyond. It will seek to meet the challenges facing the district whilst exploring opportunities to delivery ambitious and transformational change.

Key to this change is sustainable growth and addressing the issues such as affordable homes and connectivity.

Following the decision on the 25th September, the Local Plan Option Consultation is scheduled to take place between the 3rd October and 14th November 2025.

Aims of the consultation programme

As set out above, during the consultation period, we aim to

- Deliver a robust, inclusive consultation;
- Balance traditional consultation methods with a more innovative approach;
- Broaden participation, expand our outreach and diversity of our audience.

Web-platform: 3rd October - 14th November

The Options consultation will be hosted online on our web-platform between 3rd October and 14th November 2025.

Within the platform you will be able to view the site and policy options that are being considered in the emerging Local Plan and submit comments and feedback. We will also make copies of the Options Document available at Council offices and prepare an Executive Summary and easy read version.

Web-platform: www.bathnesplaces.co.uk/localplan

Consultation roadshow: 7th October – 2nd November

We will also be launching a consultation roadshow. Starting on the 7th October it will take place over 20 days at 60 different locations across the district. The roadshow will be formed of pop-up event, drop-ins and workshops to give variety and to be as inclusive as possible.

We have also sought to coordinate the roadshow with other consultations that are taking place in the district including the Bath Movement Strategy and Somer Valley draft Design Code Supplementary Planning Document. Details on the roadshow and how we are delivering a joined-up approach will be available on the [web-platform](#) in due course.

The Big Draw: 7th October – 2nd November

Alongside the Roadshow will be participating in the Big Draw Festival. The festival is celebrating their 25th anniversary and this year's theme is 'Drawn Together', which explores the importance of creativity and collaboration.

How will the 2024 responses be integrated with the 2025 responses?

As set out in May, we recognise that a lot of views were expressed as part of the Options Consultation that took place in 2024, before the Local Plan was reset. These views remain valid and will be taken into account when we prepare the draft the Local Plan.

What will happen after Consultation ends?

Consultation on the Options Document will conclude on the 14th November. All responses will be considered by the Planning Policy team and the issues raised compiled into a consultation report. Work will then begin in earnest on the Draft Local Plan.

How to keep up to date?

For all the latest information, please visit www.bathnesplaces.co.uk/localplan. You can also follow the consultation roadshow and all other consultation activities across multiple social media channels [@bathnesplaces](#).

For corporate updates, please visit www.newsroom.bathnes.gov.uk or follow [@bathnescouncil](#).

Closing remarks

We look forward to seeing you at our consultation events this Autumn. As always, your participation is crucial to prepare a Local Plan that takes account of the needs and aspirations of local residents, communities and stakeholders.

For any queries or further information, please do not hesitate to contact us.

Email us: local_plan@bathnes.gov.uk

Phone us: 01225 394041

Write to us: Local Plan, Lewis House, Manvers Street, Bath, BA1 1JG

Appendix 1: Programme

The programme is summarised below and may be subject to change. Please visit www.bathnesplaces.co.uk/localplan for the latest information.

Table 1: Consultation programme

Start	End	Activity
3 rd Oct	14 th Nov	Local Plan Options Consultation
7 th Oct	2 nd Nov	Consultation Roadshow
7 th Oct	2 nd Nov	Big Draw

Table 1: Consultation roadshow*

Dates	Location
7 th – 8 th October	Bath (central and sub-urban)
9 th - 11 th October	Somer Valley
13 th – 15 th October	Keynsham, Salford, Whitchurch and Hicks Gate
20 th October	Bath (sub-urban)
21 st -22 nd October	Rural villages
24 th – 25 th October	Chew Valley
27 th – 28 th October	Multiple (half term activities)
30 th Oct – 2 nd November	Bath ((central and sub-urban)

**The full roadshow programme and details of events will be published on the web-platform ahead of 3rd October*

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Equality Impact Assessment / Equality Analysis

(Updated September 2025)

Item name	Details
Title of service or policy	Bath and North East Somerset Council Local Plan 2025-2043 Options Consultation (Regulation 18)
Name of directorate and service	Planning Policy
Name and role of officers completing the EIA	Charlotte Clark, Apprentice Planning Officer and Richard Daone, Deputy Head of Planning (Policy)
Date of assessment	September 2025

Equality Impact Assessment (or 'Equality Analysis') is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where equality can be better promoted. Equality impact Assessments (EIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis. **Not all sections will be relevant – so leave blank any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council's website.

1.1 Identify the aims of the policy or service and how it is implemented

Key questions	Answers / notes
<p>1.1 Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> • How the service/policy is delivered and by whom • If responsibility for its implementation is shared with other departments or organisations • Intended outcomes 	<p>Bath and North East Somerset Council's (B&NES) Development Plan, otherwise known as the Local Plan, currently comprises the Core Strategy, Placemaking Plan and the Local Plan Partial Update.</p> <p>Work has started on updating the Council's Local Plan. The new Local Plan will establish the planning framework for managing growth and change in the district until 2043. It will identify potential sites for development, as well as set out a vision, strategy and policies to guide and manage planning decisions. Once adopted, it will be the main tool used to determine planning applications.</p> <p>The Local Plan will align with other Council strategies and plans such as the Economic Strategy, Housing Plan, transport plans and the Council's aim to be carbon neutral and nature positive by 2030. 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.</p> <p>A Launch Document was published for consultation in Autumn 2022. This marked the formal start of the preparation of the Local Plan. B&NES completed a period of consultation on a first Local Plan Options Document (Spring 2024). However, as a result of proposed government revisions to the National Planning Policy Framework and standard method housing figures in 2024, the Council decided to reset the new Local Plan. This is outlined in the Local Plan Reset Document.</p>

This decision was made to enable further consideration of options to accommodate for the additional development now required.

Given the new timetable for the preparation of the new Local Plan, a new Local Plan period has been set for 2025-2043.

This EqlA relates to the **Options Draft** (Regulation 18) of the new **Local Plan 2025-2043**, which outlines the overall vision and issues for the new Local Plan. It sets out a range of options for dealing with issues which the plan needs to address.

There is ongoing engagement and communication on the new Local Plan as it progresses through its different stages until final adoption. The Engagement and Communication Strategy for the new Local Plan is being updated and a new approach is proposed. It will be informed by the previous [Engagement and Communication Strategy](#). This document sets out the opportunities for communities and stakeholders, including seldom-heard groups to be involved in the preparation of the Plan. This is being delivered by the Planning Policy Team with assistance from other services within the Council, including the Regeneration Team. The overall intended outcome of the strategy is to ensure that all communities and stakeholders across the district are involved in the preparation of the Local Plan.

An EqlA was undertaken to inform the Launch Document, the Spring 2024 Options Document, The Local Plan Reset Document and the Engagement and Communication Strategy.

Once adopted, the new Local Plan 2025-2043 will replace the current Local Plan and be implemented by various Council departments, including planning services, as well as other public service providers and the private sector. Intended outcomes from the new Local Plan will be monitored in the B&NES **Local Authority Monitoring Report**.

1.2 Provide brief details of the scope of the policy or service being reviewed, for example:

- Is it a new service/policy or review of an existing one?
- Is it a national requirement?).
- How much room for review is there?

Local authorities are statutorily required to prepare a Local Plan and update as necessary. The preparation of the new Local Plan 2025-2043 is included in the B&NES **Local Development Scheme** (LDS), the Council's formal Planning Policy work programme. Plan-making is a statutory process and follows national regulations.

In late 2024 the government published some important changes to national policy to achieve sustainable growth through the planning system. This included changes to how mandatory housing targets are calculated and how the green belt is defined. As a result, B&NES is required to plan for a significantly larger amount of housing through the Local Plan. The housing requirement has increased from a little over 700 new homes per year to around 1,500. Due to the scale of change and significant implications of the revised National Planning Policy Framework (NPPF), the Council reset the previous work it was doing on the Local Plan to allow further evidence work and assessment of further options to consider the increased levels of development now required.

The Local Plan 2025-2043 is at the options stage. This provides the opportunity for the Council to test different options with local communities, stakeholders and the development industry without a formal commitment to a policy. The Options Document therefore sets out policy approaches for consultation. This will enable the demonstration at examination that 'reasonable alternatives' have been considered in the plan-making process.

The Plan will be subject to examination by a government appointed Planning Inspector to ascertain its 'soundness'. The examining Inspector will need to ascertain that the plan is an appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. Therefore, the options consultation stage in the process is necessary in order to explore various alternative approaches and proposals.

	<p>It is recognised that views have already been expressed as part of the Options Document Consultation that took place in Spring 2024, before the Local Plan was reset. Comments received remain valid and will still be considered in the development of the Draft Local Plan. The new Options Document primarily focusses on options for providing the additional development required. It sets out suggested changes to policy approaches or site options, following the national policy changes. It is necessary to repeat the Options Document (Regulation 18) stage to create a sound plan and ensure everyone has the opportunity to engage in the process of updating B&NES' new Local Plan.</p>
1.3 Do the aims of this policy link to or conflict with any other policies of the Council?	<p>The Local Plan 2025-2043 is being prepared in the context of the National Planning Policy Framework (NPPF) December 2024 and a number of Council strategies. It will also facilitate the delivery of Council objectives. The B&NES Council Corporate Strategy 2023-2027 (adopted July 2023) sets out the Council's overarching strategic plan with the overriding purpose 'to improve people's lives'. The two core policies within the Strategy focus on tackling the climate and nature emergency and giving people a bigger say. To translate the purpose into commitments, three principles have been identified: preparing for the future, delivering for local residents and focussing on prevention.</p> <p>The Local Plan aligns with Council priorities as it aims to help deliver for local residents and give people a bigger say in how the district will grow and change until 2043. There is a focus on prevention to tackle inequalities and improve local areas, as well as preparing for the future in terms of working towards a resilient, sustainable economy that is fair, green, creative and connected. The Options Document is an important step in updating the Local Plan and giving people a bigger say, as it serves as a consultation document outlining different policy and site options; it invites the public and stakeholders to provide feedback and help shape the Draft Local Plan.</p>

2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
2.1 What equalities training have staff received to enable them to understand the needs of our diverse community?	Equality, Diversity and Inclusion training is mandatory for the B&NES workforce.
2.2 What is the equalities profile of service users?	<p>The B&NES Local Plan 2025-2043 covers the full B&NES Council local authority area. The most up to date data for the B&NES area (including Equalities data) can be found at: https://beta.bathnes.gov.uk/strategic-evidence</p> <p>The B&NES Local Housing Needs Assessment (LHNA) January 2024 Draft includes data relating to the housing needs of different groups, including older people and disabled people.</p>
2.3 Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?	<p>During the initial Options Document consultation in Spring 2024, some equality data was collected. This will continue to be collected as we progress with consultation on the new Options, Publication and Submission Drafts of the new Local Plan to measure performance and implement improvement in relation to equality and diversity.</p> <p>The equality data collected during the Options Document in Spring 2024 will inform the engagement for the Options Document consultation in October 2025, which aims to increase outreach. More information will be outlined in the EQIA for The Engagement and Communication Strategy.</p>
2.4 What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	In line with the Engagement and Consultation Strategy for the Local Plan 2025-2043 (informed by the B&NES Statement of Community Involvement (SCI) for Planning 2022), consultation will continue to take place with a wide range of stakeholders, including targeted engagement with SCI seldom-heard groups to inform the development of the Options Document (Reg.18) of the new Local Plan.

2.5 If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?

There is ongoing engagement and communication on the new Local Plan as it progresses through its different stages until final adoption. [The Engagement and Communication Strategy](#) for the new Local Plan sets out the opportunities for communities and stakeholders, including seldom-heard groups to be involved in the preparation of the Plan. The Strategy is currently being updated and is being delivered by the Planning Policy Team, with assistance from other services within the Council, including the Regeneration Team. The overall intended outcome of the strategy is to ensure that all communities and stakeholders across the district are given the opportunity to be involved in the preparation of the Local Plan.

There will be a variety of opportunities to provide feedback. The Options Document and consultation will be published in an accessible format on the [Participatr website](#), with a link from the B&NES website and the option to download a PDF version. The websites will include contact details for further accessibility requirements. An easy read version will be made available and copies of the document will be made available at One Stop Shops. Translation and Interpretation services will be provided on request or where a need is already known.

Equalities data and feedback will continue to inform how we measure performance and improvement in relation to equality and diversity.

3. Assessment of impact: 'Equality analysis'

Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:

- Meets any particular needs of equalities groups or could help promote equality in some way.
- Could have a negative or adverse impact for any of the equalities groups

The B&NES Local Plan 2025-2043 – Options Document

The Options Document represents an early stage in the preparation of the Local Plan. Throughout the preparation process the equalities impact of the Local Plan will be carefully considered. At the Options stage the EqIA is primarily focussed on identifying and referencing the opportunities for the Local Plan to address equalities issues and the needs of people with protected characteristics. The Options Document includes options relating to a range of policy areas, including Housing, Climate Change, Nature and Ecosystem Services, Green Belt, Jobs and Economy, Healthy and Vibrant Communities and Minerals and Waste. It also outlines Spatial Options and the fundamental principles that will guide the strategy across B&NES for accommodating new housing, employment development and supporting infrastructure, whilst addressing climate, nature and health and well-being needs.

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 impact 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.

Key questions	Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.1 Issues relating to all groups and protected characteristics	Opportunities for the Local Plan to address equalities issues and the needs of people with protected characteristics include the following key areas:	

	<ul style="list-style-type: none"> -Housing Affordability and the Economy -Climate and Ecological Emergencies -Health and Well-being -Transport and Connectivity -Culture and Community Identity <p>Development Management Policy Options</p> <p>In the previous Options Document (Spring 2024), the Council consulted on a range of policy areas. This was outlined in the previous Equalities Impact Assessment (January 2024).</p> <p>Comments from the previous consultation will still be considered as the Local Plan progresses.</p> <p>This Options Document primarily focuses consultation on new policy areas not presented previously or proposed changes to policy approaches since the last consultation, following national policy changes.</p> <p>This Options Document includes consultation on the following policy areas where there is an opportunity to promote equality and address equalities issues:</p> <ul style="list-style-type: none"> - Proposals to support wider affordable housing delivery within B&NES to benefit all. 	
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	<p>- Housing policy options support a balanced housing mix that meets the needs of different local communities, including those who require affordable housing, families with children, older people, students, young professionals, disabled people, service families and the Traveller community. Housing policy options ensure these needs are reflected in planning policies.</p> <p>-Proposed policy approaches to address the Climate Emergency recognise that climate change affects different areas and communities differently. Policy options seek to ensure climate adaptation and resilience, whilst managing the impacts of climate change to ensure communities are not disproportionately affected.</p> <p>-Proposed policy approaches to address the Climate Emergency support renewable and sustainable energy, which has environmental, public health and economic benefits to all. It helps improve the security of energy supply and reduce energy costs.</p> <p>-Policy approaches that seek to address the Nature Emergency have opportunities to support inclusive design access for all. Relevant natural environment policies propose access for all to green</p>	
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	<p>infrastructure, as well as nature recovery opportunities. This has environmental, social and economic benefits for everyone, as well as positively impacting health and wellbeing.</p> <p>- Healthy and Vibrant Communities policy options contribute toward creating sustainable, inclusive and healthy places with access to facilities and reduced travel need. Policy options help create inclusive and accessible public realm with access to green space which has health and wellbeing benefits for all.</p> <p>Spatial Policy Options This Options Document proposes new site options to respond to the additional need for development and the revised housing requirement set out in the latest national planning policy changes based on the government's revised standard methodology.</p> <p>- Affordable housing delivery within residential development to be sought in accordance with policy. - Opportunities for a mix of housing, including to meet the needs of different groups in the community. - Opportunities to support sustainable energy and therefore, residents with rising energy costs.</p>	
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	<ul style="list-style-type: none"> - Opportunities to support inclusive design and to ensure access for all to green infrastructure and nature recovery opportunities. - The public realm and facilities should provide inclusive design to support access for all and achieve healthy, inclusive, and safe places. - Consider sustainable transport opportunities and transport requirements for managing development to support accessibility for all, including older people and disabled people. - Improve connectivity and access to attractive walking, wheeling and cycling infrastructure, as well as reliable public transport to increase inclusive travel options. 	
3.2 Sex – identify the impact/potential impact of the policy on women and men.	<p>To provide the planning policy framework to support:</p> <ul style="list-style-type: none"> - The delivery of inclusive design. - The location and design of development that is accessible to all and secure by design, including open space, the public realm and transport infrastructure. 	As the Local Plan progresses towards the Draft Local Plan, the equalities impact of proposed policies will be identified and considered with reference to appropriate equalities data.
3.3 Pregnancy and maternity	<p>To provide the planning policy framework to support:</p> <ul style="list-style-type: none"> - The delivery of inclusive design. 	As the Local Plan progresses towards the Draft Local Plan, the equalities impact of proposed policies will be identified and considered with reference to appropriate equalities data.

	<ul style="list-style-type: none"> - Inclusive design access for all and accessibility standards help meet the access needs of not only older and disabled people, but the whole community, including pregnant & breastfeeding/feeding parents & parents with pushchairs. - The location and design of development that is accessible to all and secure by design, including open space, the public realm and transport infrastructure. 	
3.4 Gender reassignment – identify the impact/potential impact of the policy on transgender people	<p>To provide the planning policy framework to support:</p> <ul style="list-style-type: none"> - The delivery of inclusive design. - The location and design of development is accessible to all and secure by design, including open space, the public realm and transport infrastructure. 	As the Local Plan progresses towards the Draft Local Plan, the equalities impact of proposed policies will be identified and considered with reference to appropriate equalities data.
3.5 Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental impairments and mental health)	<p>To provide the planning policy framework to support:</p> <ul style="list-style-type: none"> - The delivery of inclusive design. - Inclusive design access for all, together with accessibility and space standards help to meet the need of disabled people. - Options include accessibility standards for adaptable and accessible housing and wheelchair housing. - The location and design of development is accessible to all including open space, 	As the Local Plan progresses towards the Draft Local Plan, the equalities impact of proposed policies will be identified and considered with reference to appropriate equalities data.

	<p>the public realm and transport infrastructure.</p> <ul style="list-style-type: none"> -The delivery of affordable housing. -Sustainable/renewable energy which will help support residents with rising energy costs. 	
3.6 Age – identify the impact/potential impact of the policy on different age groups	<p>To provide the planning policy framework to support:</p> <ul style="list-style-type: none"> - The delivery of affordable housing, including for younger and older people. - The location and design of development is accessible to all and secure by design, including open spaces, the public realm and transport infrastructure. <p>The risks of digital exclusion particularly for older people will be considered within consultation.</p>	As the Local Plan progresses towards the Draft Local Plan, the equalities impact of proposed policies will be identified and considered with reference to appropriate equalities data.
3.7 Race – identify the impact/potential impact on across different ethnic groups	<p>To provide the planning policy framework to support:</p> <ul style="list-style-type: none"> -The delivery of affordable housing. -Provision of sustainable/renewable energy and lower energy/zero carbon homes which will support residents with rising energy costs. <p>The Housing policy options provide a range of policy options to ensure that that the housing needs of different groups in the community are reflected in planning</p>	As the Local Plan progresses towards the Draft Local Plan, the equalities impact of proposed policies will be identified and considered with reference to appropriate equalities data.

	policies, including the Traveller community.	
3.8 Sexual orientation – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people	Opportunities to consider proposed policy and equality considerations have been highlighted above and proposed actions are set out under Section 4.	As the Local Plan progresses towards the Draft Local Plan, the equalities impact of proposed policies will be identified and considered with reference to appropriate equalities data.
3.9 Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?	Opportunities to consider proposed policy and equality considerations have been highlighted above and proposed actions are set out under Section 4.	As the Local Plan progresses towards the Draft Local Plan, the equalities impact of proposed policies will be identified and considered with reference to appropriate equalities data.
3.10 Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	Opportunities to consider proposed policy and equality considerations have been highlighted above and proposed actions are set out under Section 4.	As the Local Plan progresses towards the Draft Local Plan, the equalities impact of proposed policies will be identified and considered with reference to appropriate equalities data.
3.11 Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement but is a local priority).	<p>To provide the planning policy framework to support including:</p> <ul style="list-style-type: none"> - The delivery of affordable housing. - Opportunities to provide sustainable/renewable energy and lower energy/zero carbon homes which will support sustainable energy and residents with rising energy costs. <p>The risks of digital exclusion particularly for people on lower incomes will be considered within consultation.</p>	As the Local Plan progresses towards the Draft Local Plan, the equalities impact of proposed policies will be identified and considered with reference to appropriate equalities data.

<p>3.12 Rural communities* identify the impact / potential impact on people living in rural communities</p>	<p>To provide the policy framework to support:</p> <ul style="list-style-type: none"> -The delivery of affordable housing, including in rural communities to help increase the social sustainability of rural areas and relieve difficulties for an aging population. -The creation of vibrant, inclusive rural communities where different groups of people can live, work and thrive, supported by accessible services and strong social infrastructure. -Increased rural connectivity by delivering a network of safe, accessible walking, cycling and wheeling routes, improving public transport and digital infrastructure. This will reduce the barrier to business growth, home working, access to services and support social and economic inclusion. 	<p>As the Local Plan progresses towards the Draft Local Plan, the equalities impact of proposed policies will be identified and considered with reference to appropriate equalities data.</p>
<p>3.13 Armed Forces Community ** serving members; reservists; veterans and their families, including the bereaved. Public services are required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).</p>	<p>The Housing policy options provide a range of policy options to ensure that the housing needs of different groups in the community are reflected in planning policies, including those who require affordable housing, families with children, older people, students, disabled people, service families the Traveller community and the Armed Forces Community.</p>	<p>As the Local Plan progresses towards the Draft Local Plan, the equalities impact of proposed policies will be identified and considered with reference to appropriate equalities data.</p>

<p>3.14 Care Experienced***</p> <p>This working definition is currently under review and therefore subject to change:</p> <p>In B&NES, you are 'care-experienced' if you spent any time in your childhood in Local Authority care, living away from your parent(s) for example, you were adopted, lived in residential care, or a or a special guardianship arrangement.</p>	<p>-The Housing policy options provide a range of policy options to ensure that that the housing needs of different groups in the community are reflected in planning policies, including those who require affordable housing.</p>	
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*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

** The Equality Act does not cover armed forces community. However, the Armed Forces Bill (which came in on 22 Nov 2022) introduces a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

***The Equality Act does not cover care experienced people. B&NES adopted this group as a protected characteristic in March 2024 alongside over 80 other Local Authorities. Although we have data for care leavers and children/young people who are currently in the care of B&NES we do not have wider data on disadvantage experienced through being in care.

4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
The Engagement and Communication Strategy for the B&NES Local Plan 2025-2043 to continue to include equality considerations within consultation processes.	Consultation to meet the statutory requirements set out in the Town and Country Planning Regulations and Bath and B&NES Statement of Community Involvement for Planning 2022.		Planning Policy Team with support from the Regeneration Team	On-going
Accessible format of the Options Document and consultation online with opportunities for feedback.	The Options Document and consultation will be published in an accessible format on the Participatr website. There will be a link to the consultation platform from the B&NES website and contact details will be provided to request further accessibility requirements. There will be a variety of opportunities to provide feedback.		Planning Policy Team with support from the Regeneration Team	Options Document Consultation Oct/Nov 2025
Equality data collection and feedback.	Equality data collection and feedback to continue to inform how we measure performance		Planning Policy Team	Different consultation stages of the Local

	and improvement in relation to equality and diversity.			Plan 2025-2043.
Identified opportunities within the Reg. 18 EqIA to address equalities issues and the needs of people with protected characteristics within policy development for the Publication Draft of the new B&NES Local Plan 2025-2043.	Lead policy officers to consider equality considerations within policy development for the Publication Draft of the new B&NES Local Plan 2025-2043.		Planning Policy Team	2025/2026
Viability testing to consider impact of development requirements in the B&NES Local Plan on wider planning obligations and any equality impacts.	Viability testing of proposed policy.		Planning Policy Team	2026

5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team (equality@bathnes.gov.uk), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

Signed off by: Louise Morris

(Head of Planning and Building Control)

Date: 01.09.2025

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Bath & North East Somerset Council			
MEETING/ DECISION MAKER:	Cabinet		
MEETING/ DECISION DATE:	25 SEPTEMBER 2025	EXECUTIVE FORWARD PLAN REFERENCE:	
		E	3649
TITLE:	The Movement Strategy		
WARD:	All		
AN OPEN PUBLIC ITEM			
List of attachments to this report:			
Appendix 1: Equality Impact Assessment			

1 THE ISSUE

- 1.1 Transport accounts for over 30% of carbon related emissions within Bath and North East Somerset Council, impacting the Council goal to achieve Net Zero by 2030. Following the Journey to Net Zero Strategy in 2020, a Circulation Plan, now named a Movement Strategy was identified to recognise Bath's historic layout and constrained road network. The Movement Strategy proposes a shift away from years of car dependency by improving alternatives such as walking, wheeling, cycling and public transport. This will not only reduce transport emissions and congestion but also enhance the quality of life for everyone who lives in, works in, or visits the city.

2 RECOMMENDATION

The Cabinet is asked to;

- 2.1 Approve the development of a Movement Strategy.**
- 2.2 Agree the strategic objectives for the Movement Strategy.**
- 2.3 The objectives are creating a great quality place, improve travel choices and reduce private vehicular traffic.**
- 2.4 Approve proceeding to public consultation from Tuesday 14th October to Friday 28th November.**

3 THE REPORT

3.1 In 2020, Bath & North East Somerset Council pledged to introduce a circulation plan as a standalone project as part of the Journey to Net Zero (J2NZ) document. Since then, this commitment has evolved into a comprehensive Movement Strategy. Why do we need a Movement Strategy?

- (1) Transport accounts for over 30% of Bath's carbon emissions and nitrogen dioxide emissions from transport has been linked to over 300 premature deaths a year in the West of England
- (2) 36% of trips happen entirely within the city—many are short and could be walked, wheeled or cycled
- (3) Public transport is often delayed by traffic, making it less reliable. Only 62% are satisfied with bus reliability and punctuality within B&NES

3.2 It's not just about congestion, but about how people move, how space is shared, and how we can shape a more sustainable, inclusive future for Bath.

3.3 Currently, around 294,000 trips are made each day on the Bath transport network, comprising journeys within the city, to and from Bath, and through Bath. With the expected population growth in the region over the next 10 years, if no intervention is made, forecasts suggest an increase of 21,000 additional daily trips (7% growth). When considered alongside the wider West of England region, congestion is estimated to cost the regional economy approximately £800,000 per day, driven by lost productivity, longer journey times, and reduced reliability across the transport network.

3.4 A Movement Strategy is required to reimagine how we use, and view, our streets. It should aim to rebalance the city's transport network to better serve residents, businesses and visitors, while supporting our climate goals. The objectives underpinning the Movement Strategy reflect the Council's Corporate Strategy:

- (1) Create a high-quality place – this aligns with the Corporate Strategy to provide healthy lives and places. This involves working with health and other partners to tackle inequalities, promote healthy places, and support people to live healthier lives
- (2) Improve travel choices – this aligns with the Corporate Strategy to provide more travel choices, making it easier for people to walk, wheel and use public transport to reduce transport emissions.
- (3) Reduce vehicular traffic volumes – this aligns with the Corporate Strategy to create clean, safe and vibrant neighbourhoods. This would be achieved by working with local communities to promote civic pride and preventative approaches.

3.5 A Movement Strategy is necessary to provide the framework for delivering the Journey to Net Zero ambitions. The Strategy should identify measures, specifically for the city of Bath, that will help to significantly reduce transport-related emissions.

- 3.6 The Council will consult on a draft Movement Strategy, alongside the Local Plan, from Tuesday 14th October to Friday 28th November. The aim of the consultation will be to listen to residents. The consultation is proposed to be conducted jointly with the Local Plan public consultation to make it easier for a wide range of people to have their say.
- 3.7 Following the public consultation the Movement Strategy will be revised to reflect the comments made and adopted in 2026.

4 STATUTORY CONSIDERATIONS

- 4.1 Each of the interventions within the Movement Strategy will adhere to the appropriate statutory considerations. There are no specific statutory considerations associated with the Movement Strategy itself.

5 RESOURCE IMPLICATIONS (FINANCE, PROPERTY, PEOPLE)

- 5.1 Project Budget: The Movement Strategy has an approved budget of £230k, of which £100k is from WECA grant, while the remaining £130k is reinvestment funding from the BANES Clean Air Zone.
- 5.2 This has been allocated as below:
- (1) £130k on consultancy support, this included transport modelling, writing of the technical report and designing the public facing report.
 - (2) £15k for consultation materials such as leaflets, postal drop offs, and public consultation boards.
 - (3) £85K for BANES staff time.

6 RISK MANAGEMENT

- 6.1 A full risk assessment will be provided following consultation.

7 EQUALITIES

- 7.1 The Movement Strategy recognises the proposed transport interventions will consider the equality impact throughout their development. Further details can be seen in the attached the EqIA.

8 CLIMATE CHANGE

- 8.1 The Movement Strategy sets out a shift away from decades of car dependency by prioritising sustainable travel options such as walking, wheeling, cycling, and public transport. This shift is designed to reduce transport-related carbon emissions and congestion, while also improving air quality and enhancing the overall quality of life for residents, workers, and visitors.
- 8.2 Once implemented, the strategy will directly support the Council's commitment to achieving net zero carbon emissions by 2030. By reducing reliance on private vehicles and encouraging low-carbon modes of transport, the strategy will help to lower one of the largest contributors of local emissions. In doing so, it will also increase our climate resilience, making the city better prepared for the environmental challenges ahead.

9 OTHER OPTIONS CONSIDERED

- 9.1 An alternative to delivering the Movement Strategy would be to take no action. However, this option was rejected as Bath and North East Somerset Council declared a climate emergency in 2019. Without a plan in place, future growth would likely lead to increased congestion and rising transport emissions, undermining the Council's environmental commitments.
- 9.2 The Movement Strategy analysis confirmed that with no action taken, there will be a 7% increase in total car journeys over a 10-year period, resulting in additional transport related emissions.
- 9.3 The Movement Strategy represents the next critical step in achieving the carbon reduction targets set out in the Journey to Net Zero. It provides a proactive and coordinated approach to managing transport demand, reducing emissions, and supporting sustainable development within Bath.

10 CONSULTATION

- 10.1 This report has been approved by the Section 151 Officer and Monitoring Officer.

Contact person	Carli van Niekerk, Strategic Transport Projects Manager Samantha Taylor, Senior Engineer – Strategic Transport Projects
Background papers	None
Please contact the report author if you need to access this report in an alternative format	

Equality Impact Assessment / Equality Analysis

(Version 4)

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Item name	Details
Title of service or policy	The Movement Strategy for Bath
Name of directorate and service	Sustainable Communities - Place Shaping
Name and role of officers completing the EqlA	Krzysztof Fedorczuk - Assistant Engineer, Strategic Transport Projects
Date of assessment	05/08/2025 – 04/09/2025

Equality Impact Assessment (or 'Equality Analysis') is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on people and different groups within our community. The main aim is to identify any adverse impacts (i.e. discriminatory or negative consequences for a particular group or sector of the community, and to identify areas where equality can be better promoted). Equality impact Assessments (EqIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EqIA) or Equality Analysis. **Not all sections will be relevant – so mark N/A any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council's website following relevant service lead approval.

1.1 Identify the aims of the policy or service and how it is implemented

Key questions	Answers / notes
<p>1.1 Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> How the service/policy is delivered and by whom If responsibility for its implementation is shared with other departments or organisations Intended outcomes 	<p>The Movement Strategy for Bath proposes a new way of thinking about how everyone moves around Bath and how we can rebalance the use of our streets. It sets a blueprint for understanding how space can be used differently, and how to balance competing demands to deliver this transition in a sustainable way to provide an equitable network across the city. It underpins how we aim to develop Bath's transport network over the next 10 years.</p> <p>The strategy focuses primarily on the city of Bath but recognises the impact on the whole of B&NES. It highlights the key issues facing our transport network, noting the need to reallocate road space to better balance competing demands. It sets out our vision for the transport network and how it could work for Bath's communities, businesses and visitors.</p> <p>This strategy is being delivered by the Place Shaping service, with input from various teams across the council including, but not limited to,</p> <ul style="list-style-type: none"> Highways

	<ul style="list-style-type: none"> • Regeneration • Transport Strategy and Public Transport • Behavioural Change • Green Transformation • Sustainable Economy • Public Health <p>Its implementation will occur over a 10-year period until 2035 and will be delivered by multiple teams across the council.</p>
<p>1.2 Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> • Is it a new service/policy or review of an existing one? • Is it a national requirement?). • How much room for review is there? 	<p>While built on pre-existing transport projects/policies such as the City Region Sustainable Transport Settlement programme and the Active Travel Masterplan, the Movement Strategy for Bath can be continually reviewed and updated as/when necessary to help maintain the course for decarbonising our transport system, protecting and enhancing the historic fabric of Bath, and delivering a practical, equitable and sustainable network for all transport modes in Bath.</p> <p>It aims to:</p> <ul style="list-style-type: none"> • Provide more travel choices • Deliver clean, safe and vibrant neighbourhoods • Provide support for vulnerable adults and children • Deliver for our children and young people • Enable healthy lives and places • Improve access to good jobs • Enhance cultural life and our World Heritage Site designations <p>The Movement Strategy for Bath stems from the Climate Emergency declared in March 2019, which recognises that transport accounted for 29% of carbon emissions in B&NES, the Climate Emergency Action</p>

	<p>Plan¹ and the adopted Journey to Net Zero² policy document, which identifies how transport will respond to and support delivery of the targets set out in the Climate Emergency and provides a holistic approach for meeting the transport needs of those living, working and visiting Bath from 2020 onwards.</p> <p>One of the Journey to Net Zero commitments was to develop “<i>a traffic circulation map [since renamed the Movement Strategy - Bath] as a standalone project... This will identify the main roads where arterial bus routes are prioritised and car traffic is expected to remain, and the residential streets that we want to be quieter, with future projects aiming to deliver this plan incrementally</i>”. The Movement Strategy for Bath delivers on this.</p>
1.3 Do the aims of this policy link to or conflict with any other policies of the Council?	<p>The Movement Strategy - Bath links to our Climate Emergency Action Plan, Journey to Net Zero, Active Travel Masterplan³, as well as our Corporate Strategy⁴ and its policies to lead the UK in climate and nature action, building a sustainable future for Bath and North East Somerset - net zero, nature positive by 2030, and to listen to and work with residents to act on their concerns, in addition to its 3 core ambitions of preparing for the future, delivering for local residents, focusing on prevention, and 9 priorities which include:</p> <ul style="list-style-type: none"> • The right homes in the right places • More travel choices • Clean, safe and vibrant neighbourhoods • Support for vulnerable adults and children • Delivering for our children and young people • Healthy lives and places • Good jobs • Skills to thrive

¹ <https://www.bathnes.gov.uk/read-our-climate-strategy-and-action-plan>

² <https://www.bathnes.gov.uk/document-and-policy-library/journey-net-zero-final-report>

³ <https://www.bathnes.gov.uk/active-travel-masterplan>

⁴ <https://www.bathnes.gov.uk/document-and-policy-library/corporate-strategy-2023-2027>

- Cultural life

There may arise conflicts with existing and future policies, such as the Hedge and Shrub Maintenance policy if hedges and shrubs impede active travel and public transport, and with Movement Strategy for Bath levers such as the Coach Parking Strategy, which may be at odds with our Regeneration Masterplans, and more. We will aim to resolve these tensions for each intervention proposed separately, with the relevant officer teams at the earliest opportunity, and look to use our corporate strategy and adopted doughnut economics model to find a way forward.

2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
2.1 What equality focussed training have staff received to enable them to understand the needs of our diverse community?	All officers involved have received mandatory equality, diversity and inclusion training.
2.2 What is the equality profile of service users?	The strategy focuses primarily on the city of Bath, but recognises the impact of any changes in Bath on North East Somerset and in neighbouring authorities, therefore there is a wide range of equality profiles to consider, including local demographics of Bath residents, North East Somerset residents, as well as of those travelling into and through the city, including visitors and commuters.
2.3 Are there any recent customer satisfaction surveys to refer to? What were the results? Are there	<p>The Voicebox survey is a resident survey aimed at obtaining residents' views on a range of topics to help shape and improve local services. In 2023, the survey reported that:</p> <ul style="list-style-type: none"> • 63% of respondents strongly agreed or agreed with the statement 'I am willing to walk more often instead of travelling by car'.

any gaps? Or differences in experience/outcomes?	<ul style="list-style-type: none"> • 53% of respondents strongly agreed/agreed with the statement “I am willing to use public transport more often instead of travelling by car”. • 28% of respondents strongly agreed or agreed with the statement ‘I am willing to cycle more often instead of travelling by car’. • The third most chosen to the question of ‘Which of the things, if any, do you think needs the most improving’ was public transport (359 responses) • In response to ‘Which of the things below would you say are most important in making somewhere a good place to live’, the top five most chosen options included access to green nature and spaces (430 responses) and public transport (336 responses).
2.4 What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	No public engagement has taken place so far but is planned to occur in October and November 2025, alongside the Local Plan Options consultation. Stakeholders and the general public will be consulted in this period.
2.5 If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equality considerations within this?	<p>We want to hear from as many different people as possible during this consultation. To do this, we’ll use:</p> <ul style="list-style-type: none"> · Social media adverts · A short video explaining what it’s all about · A dedicated website (Participatr) where people can get involved · Help from ward councillors and parish councils · Two events with key organisations we’ve identified · Seven roadshow events across Bath over 20 days, where we’ll chat with people passing by · Five drop-in sessions where anyone can come and talk to us · Three public health workshops, working alongside the Local Plan team <p>We’ll make sure all materials are easy to understand and accessible, and there will be plenty of ways for people to share their views.</p>

3. Assessment of impact: 'Equality analysis'

Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:

- Meets any particular needs of equalities groups or could help promote equality in some way.
- Could have a negative or adverse impact for any of the equality groups

Key questions	Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.1 Issues relating to all groups and protected characteristics	<p>The strategy will benefit everyone by offering better travel options.</p> <ul style="list-style-type: none"> • People without cars, especially those on lower incomes, will have cheaper and more reliable ways to get around using public transport, walking, wheeling, or cycling. • Those who want or need to stay active will benefit from safer and easier walking and cycling routes. • These improvements will make it easier for everyone to reach jobs, schools, healthcare, and social events. 	<ul style="list-style-type: none"> • Some people may feel they have less access or independence, especially if parking is reduced. • Vehicles like ambulances, taxis, and delivery cars will still be allowed. • All changes will follow the latest design rules and involve local consultation. • The goal is to use road space in a smarter, safer, and more eco-friendly way. • Some car space will be reallocated to improve bus stops, bus lanes, and pavements for people with wheelchairs, prams, and others.

<p>3.2 Sex – identify the impact/potential impact of the policy on women and men.</p>	<p>National Travel Survey data highlights that women in the UK:</p> <ul style="list-style-type: none"> • Take an average of 56 local bus journeys per year, which is 30% higher than men at 43 trips per year⁵. • Men are three times more likely to cycle compared to women • Women are more likely to make multi-stop trips (trip-chaining) with multiple purposes with different modes of travel⁶. • A lack of time, travelling with children, the need to take multiple non-direct journeys, personal safety concerns (such as walking in the dark) and road safety concerns are some of the biggest barriers faced by women⁷. <p>By choosing the best routes for walking, cycling, buses, and cars—and following the latest safety guidelines—we can make travel safer for women. For example, walking and cycling paths and bus stops will be placed where they're visible from nearby homes and will be well-lit.</p> <p>The Movement Strategy aims to redesign Bath's transport system to make it easier for people to combine different types of trips (like going to work, then shopping), feel safer, and have</p>	<p>Women may feel unsafe using public transport or walking and cycling routes, especially if they worry about harassment or personal safety. This can stop them from using these travel options and lead to unfair access.</p> <p>The strategy aims to make public transport and active travel safer and more appealing for women through better lighting, using routes overlooked by housing, safer waiting areas and more, so they feel comfortable using them at any time of day or year.</p>
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⁵ <https://www.gov.uk/government/statistical-data-sets/nts03-modal-comparisons>

⁶ <https://www.sustrans.org.uk/media/2878/2878.pdf>

⁷ <https://www.sustrans.org.uk/media/2878/2878.pdf>

	more chances to travel around Bath using walking, cycling, or public transport.	
3.3 Pregnancy and maternity	The Movement Strategy for Bath supports adding features like seating to help pregnant people and parents with babies. It also aims to make travel easier for families with young children by creating safer, more accessible spaces for pushchairs and offering convenient travel options.	Changes to roads, public transport, or walking and cycling paths might raise safety concerns for pregnant people or parents with children. That's why special safety measures will be added where needed. The strategy will also ask for feedback from pregnancy and maternity groups, as well as local health organisations like the Royal United Hospital and Integrated Care Board, to make sure the consultation is inclusive and meets everyone's needs
3.4 Gender reassignment – identify the impact/potential impact of the policy on transgender people	2021 research found that 37% of respondents had faced physical or verbal attacks on public transport in the prior five years, more often than not, tied to their gender or sexuality ⁸ . The Movement Strategy - Bath aims to improve safety and perceived safety through safer waiting areas (well lit, glass bus shelters, CCTV, overlooked locations and more), allowing everyone to feel safer in taking public transport regardless of their gender identity.	None identified as of yet.

⁸ https://www.systra.com/uk/expert_insights/queer-mobility-improving-public-transport-inclusivity/#:~:text=Public%20transport%20truly%20can%20lead,a%20journey%20worth%20taking%20together.

	<p>A study in the UK found that 34.4% of trans adults had attempted suicide at least once and almost 14% of trans adults had attempted suicide more than twice⁹.</p> <p>By creating safer, overlooked, well-lit active travel routes, transgender people can feel safer in walking, wheeling and cycling. Active travel also contributes towards physical activity, proven to be associated with benefits to mental health. Physical activity can reduce the risk of depression, improve psychological wellbeing. Moreover, Active Travel modes are the least stressful and can be very helpful in terms of stress management¹⁰.</p>	
<p>3.5 Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration of physical, sensory and mental health needs/differences)</p>	<p>The strategy aims to make travel easier and safer for everyone, including people who don't drive. It will still keep important routes open for vehicles and parking for Blue Badge holders.</p> <p>For disabled people who don't drive, good public transport can help them live full and social lives by making it easier to get to work, shops, and leisure activities.</p> <p>By designing spaces that meet different needs and improving public areas, the strategy will create a more welcoming and practical environment that supports both physical access and</p>	<p>Changes to roads, public transport, or walking and cycling paths might raise safety concerns for disabled people. That's why special safety measures will be added where needed.</p> <p>The strategy also recognises that some people may face challenges in understanding or accessing information.</p>

⁹ https://www.ilga-europe.org/sites/default/files/trans_country_report_-_engenderedpenalties.pdf

¹⁰ <https://www.sustrans.org.uk/media/4464/4464.pdf>

	<p>overall well-being. It also recognises that walking and cycling can have a positive effect on mental health</p>	<p>Therefore, we aim to use clear communication, offer accessible venues, and provide information in different formats.</p> <p>Disabled people and disability groups will be invited to share their views to make sure the consultation is fair and inclusive for everyone.</p>
<p>3.6 Age – identify the impact/potential impact of the policy on different age groups</p>	<p>Older individuals will benefit from improved, more accessible active travel infrastructure including pavements, and better public transport waiting areas with lighting, seating etc.</p> <p>Children can benefit from interventions that create a safer travel environment such as 20mph zones, school streets, road safety and traffic calming.</p> <ul style="list-style-type: none"> Road crossings do not give older people enough time to cross safely. Pelican crossings assume that pedestrians walk at a pace of at least 1.2 metres per second (2.7 miles per hour) but 76 % of men and 85 % of women over 65 walk more slowly than this.¹¹ 	<p>The Movement Strategy for Bath will change how road space is used, which might make it harder for older people if they need to walk more or further.</p> <p>However, walking and cycling paths will follow national safety standards to make them safe and easy for people of all ages and abilities.</p> <p>The strategy understands this challenge and will include things like easy walking routes to bus stops and transport hubs where different travel options connect.</p>

¹¹ Encouraging older people to engage in active travel such as cycling or walking could have health benefits and reduce isolation. • Only 8% of men over 65 and 3% of women over 65 ever cycle³. This is low compared to rates of older people cycling in other European countries. • Road crossings do not give older people adequate time to cross safely⁴. Pelican crossings assume that pedestrians walk at a pace of at least 1.2 metres per second (2.7 miles per hour) but 76 % of men and 85 % of women over 65 walk more slowly than this.

	<ul style="list-style-type: none"> • Children can also struggle to keep up with signal timings and misjudge vehicle speeds above 20mph¹². • Older people in rural areas don't have sufficient access to public transport. Just 20% of those aged 70-74 living in rural areas use public transport weekly, compared to 38% of those who live in an urban setting. • 18% of those over 65 living in rural areas don't use public transport because none is available, compared to 2% of those living in urban areas¹³ <p>Public transport is not meeting the needs of many older people.</p> <ul style="list-style-type: none"> • The most frequent reasons for not using public transport among those 65 and over are that it's not convenient and does not go where you want.¹⁴ <p>Encouraging older people to engage in active travel such as cycling or walking could have health benefits and reduce isolation.</p>	<p>This will help make walking and cycling more appealing and easier to combine with other ways of getting around.</p>
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¹² <https://roadsafetygb.org.uk/news/study-claims-children-cannot-judge-speeds-above-20mph-1334/>
<https://roadsafetygb.org.uk/news/speeds-greater-than-20mph-pose-crossing-risk-for-children/>

¹³ Older people in rural areas don't have sufficient access to public transport. Just 20% of those aged 70-74 living in rural areas use public transport weekly, compared to 38% of those who live in an urban setting. • 18% of those over 65 living in rural areas don't use public transport because none is available, compared to 2% of those living in urban areas

¹⁴ https://www.ageuk.org.uk/siteassets/documents/reports-and-publications/reports-and-briefings/active-communities/rb_june15_the_future_of_transport_in_an_ageing_society.pdf

	<ul style="list-style-type: none"> • Only 8% of men over 65 and 3% of women over 65 ever cycle. • This is low compared to rates of older people cycling in other European countries due to gaps in investment in the UK compared to European countries¹⁵. • The introduction of e-bikes has been found to further support the elderly in active travel¹⁶ • 1.45 million of those 65 and over in England find it difficult to travel to hospital, whilst 630,000 of those 65 and over find it difficult or very difficult to travel to their GP. • It is the eldest elderly who find it the hardest - less than half of people over 80 find it easy to travel to a hospital.¹⁷ <p>The strategy aims to improve active travel and public transport links to key destinations such as schools, the Royal United Hospital, and local GP surgeries.</p>	
3.7 Race – identify the impact/potential impact on across	<p>In the UK, in the 5 years to March 2019:</p> <ul style="list-style-type: none"> • White people made the highest percentage of trips by car or van out of all ethnic groups (63%) 	It is acknowledged that consideration will need to be paid to racial abuse and hate crime, and safety issues will need to be considered in implementation.

¹⁵ <https://betterbike.org/wp-content/uploads/2013/12/Making-Cycling-Irresistible-Lessons-from-Europe-Pucher-2008.pdf>

¹⁶ Leger et al, S. (2019). "If I had a regular bicycle, I wouldn't be out riding anymore": Perspectives on the potential of e-bikes to support active living and independent mobility among older adults in Waterloo, Canada. *Transportation Research Part A: Policy and Practice*, 123, 240-254.

¹⁷ https://www.ageuk.org.uk/siteassets/documents/reports-and-publications/reports-and-briefings/active-communities/rb_june15_the_future_of_transport_in_an_ageing_society.pdf

different ethnic groups	<ul style="list-style-type: none"> Black people made the lowest percentage of trips by car or van (40%) 19% of trips by black people are made by local bus journeys – the highest percentage out of all ethnic groups for this type of transport White children had the longest trip to school (2.5 miles on average), and Asian children had the shortest (2.0 miles on average) White and Asian children were more likely to travel to school by car, while black children were more likely to travel by bus¹⁸. Avon and Somerset Police data across a 3-month period in 2025 shows over half of total hate crimes recorded were race based hate crimes. <p>By supporting safe and improved active travel routes and infrastructure, and more reliable, safer public transport services as alternatives to the car, the Movement Strategy for Bath will provide better travel options for not only the white British group, but also all ethnic minorities.</p>	
3.8 Sexual orientation – identify the impact/potential	<ul style="list-style-type: none"> 2021 research found that 37% of respondents had faced physical or verbal attacks on public transport in the prior 	It is acknowledged that consideration will need to be paid to homophobic bullying and hate crime, and safety issues will need to be considered in implementation.

¹⁸ <https://www.ethnicity-facts-figures.service.gov.uk/culture-and-community/transport/travel/latest/>

<p>impact of the policy on lesbian, gay, bisexual, heterosexual, questioning people</p>	<p>five years, more often than not, tied to their gender or sexuality¹⁹.</p> <ul style="list-style-type: none"> • Another study found that half of LGBTIQ+ people had experienced depression, and three in five had experienced anxiety²⁰. • Official data underscores this trend, as Home Office figures show hate crimes based on sexual orientation in England and Wales rose from 15,835 to 22,839 between the years 2019 to 2024²¹. <p>The Movement Strategy for Bath aims to improve safety and perceived safety through safer waiting areas (well lit, glass bus shelters, CCTV, overlooked locations and more), allowing for all users to feel safer in taking public transport regardless of their sexual orientation.</p>	
<p>3.9 Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?</p>	<p>None identified as of yet.</p>	<p>None identified as of yet.</p>

¹⁹ https://www.systra.com/uk/expert_insights/queer-mobility-improving-public-transport-inclusivity/#:~:text=Public%20transport%20truly%20can%20lead,a%20journey%20worth%20taking%20together.

²⁰ Stonewall LGBT in Britain – Health Report

²¹ https://www.systra.com/uk/expert_insights/queer-mobility-improving-public-transport-inclusivity/#:~:text=Public%20transport%20truly%20can%20lead,a%20journey%20worth%20taking%20together.

<p>3.10 Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.</p>	<ul style="list-style-type: none"> Home Office statistics show that between March 2023 – March 2024, there were 10,484 hate crimes recorded by the police as linked to religion in England and Wales – a 25% increase compared to the prior 12-month period²². Avon and Somerset Police data across a 3 month period in 2025 shows just over 6% of total hate crimes recorded were religion/belief hate crimes. <p>The Movement Strategy for Bath aims to improve transport and accessibility across the whole of Bath, to all key locations including places of worship.</p>	<p>None identified as of yet.</p>
<p>3.11 Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status</p>	<p>The Movement Strategy for Bath aims to make travel safer and more affordable for everyone. It helps reduce the need to own a car by offering better and cheaper travel options.</p> <p>A recent Transport for the North (UK) study found the costs of car use and ownership to society tower over the costs of other modes contributing around £50bn worth of cost to the North in 2023, and the benefits of other modes outperform car use benefits significantly. This is expected to increase to £60bn by 2050.²³</p>	<p>The Movement Strategy - Bath recognises that the cost of owning a motor vehicle can be a barrier to some people. Active travel and public transport can provide cheaper, safe, reliable alternatives to car travel.</p>

²² <https://www.gov.uk/government/statistics/hate-crime-england-and-wales-year-ending-march-2024/hate-crime-england-and-wales-year-ending-march-2024>

²³ <https://www.transportfornorth.com/wp-content/uploads/TfN-Travel-Choice-Project-Summary-1.pdf>

can influence life chances (this is not a legal requirement, but is a local priority).		
3.12 Rural communities* identify the impact / potential impact on people living in rural communities	The Movement Strategy for Bath understands that rural areas often don't have many transport options. It aims to improve key walking, cycling, and public transport routes into the city centre, while still keeping key roads open for vehicles that need to pass through, into and out of Bath.	Rural areas often don't have good public transport, which can make walking, wheeling and cycling less useful. That's why it's important to connect these areas with existing transport services. The strategy will look at new ideas like community transport and travel hubs to better meet the needs of people living in rural communities.
3.13 Armed Forces Community ** serving members; reservists; veterans and their families, including the bereaved. Public services are	<p>The Movement Strategy - Bath aims to make traveling around, to/from and through Bath easier, safer and more accessible in several ways.</p> <p>In accordance with the Armed Forces Covenant, those who served the country and their families should face no disadvantage compared to other citizens in the provision of public and commercial services, with special consideration for those who have given the most such as the injured and the bereaved²⁴.</p>	None identified as of yet.

²⁴ <https://www.armedforcescovenant.gov.uk/about-the-covenant/>

required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).	The most recent census data shows 3.6% or 5,858 people in B&NES are Armed Forces Veterans ²⁵ .	
3.14 Care Experienced *** This working definition is currently under review and therefore subject to change:	The Movement Strategy for Bath aims to provide a blueprint to deliver more affordable, safer, travel choices for all, reducing/removing the financial burden of car-ownership and reducing car dependency. Furthermore the strategy also supports those which require a car and the aim of the strategy is to reduce future congestions expected from growth.	None identified as of yet.

²⁵ <https://www.ons.gov.uk/peoplepopulationandcommunity/armedforcescommunity/bulletins/ukarmedforcesveteransenglandandwales/census2021#uk-armed-forces-veterans-england-and-wales-data>

<p>In B&NES, you are 'care-experienced' if you spent any time in your childhood in Local Authority care, living away from your parent(s) for example, you were adopted, lived in residential, foster care, kinship care, or a special guardianship arrangement.</p>		
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*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

** The Equality Act does not cover armed forces community. However, the Armed Forces Bill (which came in on 22 Nov 2022) introduces a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

***The Equality Act does not cover care experienced people. B&NES adopted this group as a protected characteristic in March 2024 alongside over 80 other Local Authorities. Although we have data for care leavers and children/young people who are currently in the care of B&NES we do not have wider data on disadvantage experienced through being in care.

4. Bath and North East Somerset Council Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issue Identified	Action Proposed	Progress Milestones	Officer Responsible	By when
Potential adverse impact on rural communities due to transport changes.	Conduct targeted engagement with passers-by to understand specific transport needs.	Hold community forums; analyse feedback; incorporate into strategy updates.	Samantha Taylor-Sehmbi Krzysztof Fedorczuk	28/02/2026
Lack of disaggregated data for some protected characteristics in transport usage.	Aim to improve data collection methods to capture usage by age, disability, ethnicity, etc.	Work with officers and keep up to date on new data/survey tools; train staff; analyse new data for trends.	Samantha Taylor-Sehmbi Krzysztof Fedorczuk	28/02/2026
Need for ongoing review and flexibility in strategy to address emerging equality issues.	Establish EqIA review process for Movement Strategy.	Create review framework; schedule assessments; publish updates.	Samantha Taylor-Sehmbi Krzysztof Fedorczuk	28/02/2026

5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equality Team (equality@bathnes.gov.uk), who will publish it on the Council's website. Keep a copy for your own records.

Signed off by: Sophie Broadfield, Executive Director of Sustainable Communities
Director or nominated senior officer)

(Divisional

Date: 08/09/2025

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