Bath & North East Somerset Council

Improving People's Lives

Local Plan Options Document 2025

Chapter 9 - Development Management

Contents

Formatting Note:

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

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	Affordable Housing will be required as on-site provision in developments of 10 dwellings* and above (0.5ha and above) in line with percentages set out in the LHNA and as tested through the local plan viability (whole plan) assessment. It is also proposed this will be on a grant free basis. *Note: that dwellings 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.
2	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. *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.

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.	Ensures student bedspace needs are accommodated in line with policy H2A. 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.	Co-living is not typically restricted by user group. Potential missed opportunity to help free up city centre accommodation (including family housing) and meet the need for student beds. A student restriction could prejudice the viability of co-living developments.
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.	Provides some flexibility in terms of occupancy by different groups. Provides some students who want to rent co-living studios and can afford it the opportunity to do so.	Co-living is not typically restricted by user group. Potential missed opportunity to help free up city centre accommodation (including family housing) and meet the need for student beds. A student restriction could prejudice the viability of co-living developments.
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:	**Policy**
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.

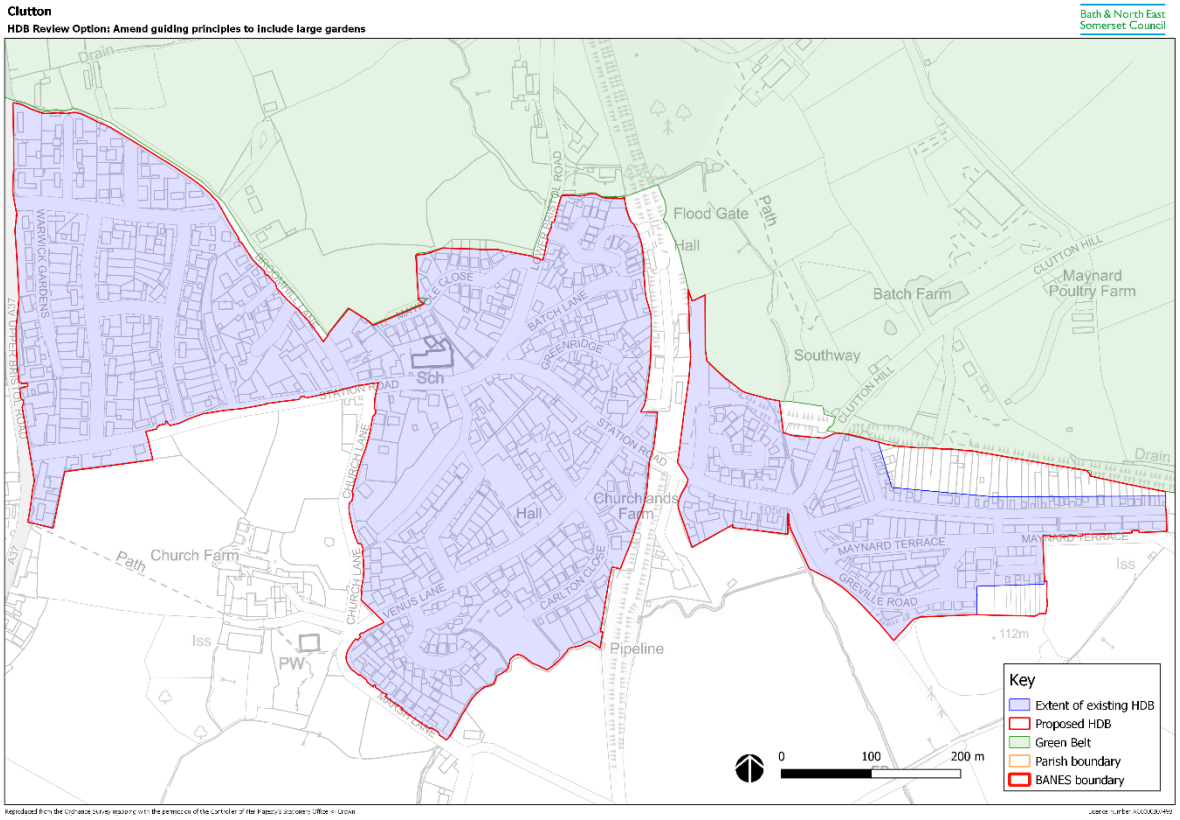
9.38 The inclusion of larger gardens within HDBs could enable some small-scale opportunities for additional housing to come forward in villages, subject to other policy controls. Minor incremental change in villages is helpful to maintain rural population levels and therefore, services and facilities,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

9.39 A set of draft boundaries have been prepared following the review and are presented in this document (See Appendix 6) and are available for comment. In addition, an alternative set of draft boundaries has been prepared to illustrate how the option to amend the HDB guiding principles might further affect the extent of HDBs (See Appendix 7).

9.40 Further detail is set out in the Housing Development Boundary (HDB) Review Topic Paper.

9.41 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.

9.42 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.	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. 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.	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 C/AR: Climate Adaptation and Resilience

9.43 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.

9.44 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

9.45 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.

9.46 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.

9.47 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.

9.48 The proposed policy approach is as follows:

	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 C/RF: Retrofit First

9.49 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.

9.50 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.

9.51 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.

9.52 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.

9.53 The proposed policy approach is as follows:

C/RF: Retrofit First	Option	Advantages	Disadvantages
A	Development should adopt a retrofit first approach, where options for retrofitting and retention of existing buildings are considered before demolition. 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.	Buildings will only be demolished and materials disposed of as a last resort and embodied carbon emissions associated with demolition will be reduced.	Viability considerations (to be tested).

Policy C/DH: District Heating

9.54 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.

9.55 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.

9.56 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.

9.57 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	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. 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.	New development will be heated and cooled by reliable low-carbon sources where possible.	Viability considerations (to be tested)

Policy C/RE: Renewable Energy

9.58 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.

9.59 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.

9.60 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.

9.61 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

9.62 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.

9.63 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.

9.64 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

9.65 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.

9.66 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.

9.67 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.

9.68 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

9.69 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.

9.70 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.

9.71 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).

9.72 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.

9.73 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.

9.74 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.

9.75 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.

9.76 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

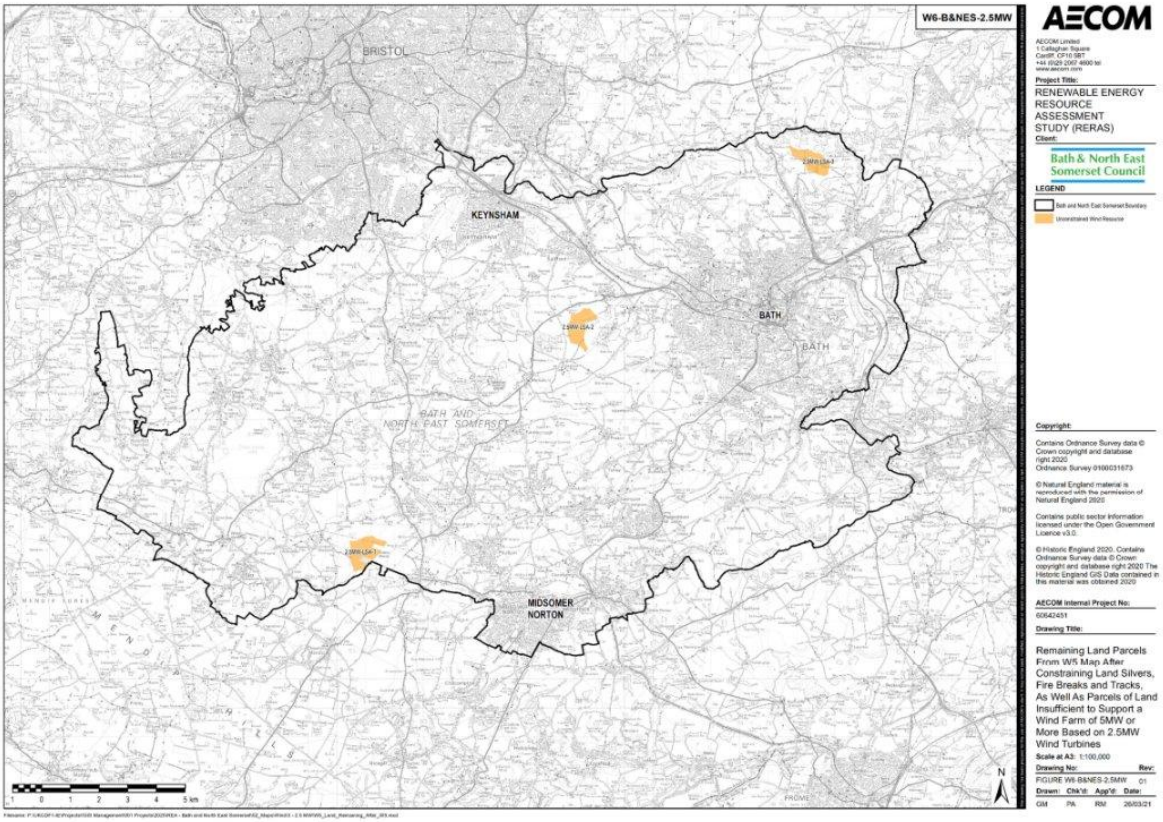
9.77 In the previous Options Consultation, the council sought views on the proposed approach to renewable energy development, including the strategic target and policy direction. However, the consultation did not include the mapping of safeguarded areas for wind energy, which was intended to support interpretation of the policy options.

9.78 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.

9.79 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.

9.80 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.

9.81 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

9.82 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.

9.83 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.

9.84 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.

9.85 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

9.86 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.

9.87 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.

9.88 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.

9.89 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.

9.90 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

9.91 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.

9.92 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

9.93 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

9.94 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

9.95 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.

9.96 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

9.97 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

9.98 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.

9.99 If minor developments were exempted our existing policy requirement for minors within NE3a could be retained, requiring no net loss and appropriate net gain.

9.100 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.

9.101 We will continue to keep government policy changes under review in preparing a BNG policy for the submission plan.

Policy N/GI: Green Infrastructure

9.102 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).

9.103 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.

9.104 The Greener Places Green Infrastructure Framework for Bath and North East Somerset 2025-2035 that is being produced contains five components.

9.105 Greener Places Plan that sets out the case for investment in Green Infrastructure (GI) I 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.

9.106 Greener Places Investment & Delivery Plan that sets out priorities including changed practice, process, and projects.

9.107 GI mapping to provide evidence and inform decision making.

9.108 A revised local plan Green Infrastructure policy

9.109 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

9.110 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.

9.111 Placemaking Plan Policy NE2 seeks to protect, conserve and enhance the character and quality of the landscape of the district and within new developments.

9.112 The purpose of Policy NE2A is to protect, conserve and enhance the landscape setting of settlements.

Policy Approach - Proposed Options Policy NE2

9.113 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

9.114 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.

9.115 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 8):

- Chew Magna
- Chew Stoke
- Corston
- Farmborough
- Freshford
- Pensford

9.116 In addition, a review of the Saltford Landscape Setting Area has been undertaken, which was previously assessed in 2015 (See appendix 8). The supporting evidence which has informed this review can be found on the council's website.

9.117 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.

9.118 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.

9.119 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

9.120 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.

9.121 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

9.122 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

9.123 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:

9.124 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.

9.125 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).

9.126 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.

9.127 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.

9.128 Our proposed policy approach options are outlined as follows:

J/UI: Undesignated Industrial Sites

	Option	Advantages	Disadvantages
1	Light industrial, heavy industrial, warehousing (classes E(g)(ii),(iii), B2, B8), builders' merchants will be acceptable in principle. 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.	This would assist in meeting the forecast need for industrial and warehousing /last mile logistics uses and facilitating the forecast job growth within the Plan period. This reflects the priorities of the Economic Strategy, supports the growing economic sectors and aligns with housing growth.	We recognise that a change of use of one Class E use to another is not development which requires planning permission. It is in some cases beyond the planning system to resist the loss of Class E light industrial uses to other Class E uses.
2	a) The following types of development will be acceptable in principle: Light industrial, heavy industrial, warehousing (classes E(g)(ii),(iii), B2, B8), builders' merchants 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. 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: - 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;	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. . 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.	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.

	- marketing evidence to enable the determination of whether there is genuinely no demand to continue in its current planning use; and marketing for one year based on a protocol to be set out. The criteria relating to ensuring that the development does not adversely affect remaining industrial uses would be retained.		

Healthy and Vibrant Communities

Policy HVC/TC

Retail Hierarchy and Development

9.129 We are proposing a minor amendment to this Policy Option concerning the Primary Shopping Area designation in Midsomer Norton.

9.130 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.

9.131 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.

9.132 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.

9.133 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.

9.134 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.

9.135 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.

9.136 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

9.137 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.

9.138 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.

9.139 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.

9.140 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

9.141 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).

9.142 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

9.143 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.

9.144 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

9.145 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.

9.146 In the previous Spring 2024 Options Document Consultation , 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.

9.147 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.

9.148 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",

9.149 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.

9.150 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

9.151 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.

9.152 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.

9.153 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.

9.154 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.

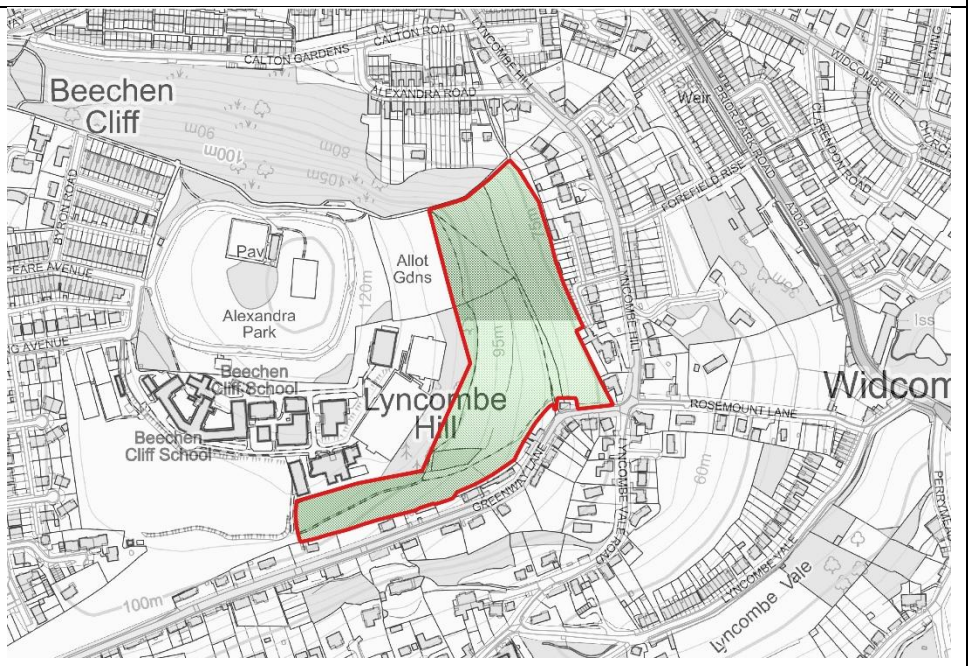
9.155 Following a nominations process in the Spring 2024 Options Document we proposed to designate 26 new LGS. We consulted on these proposed new LGS, as well as the nominated sites not proposed to be designated. In addition, as part of the spring 2024 consultation we provided an opportunity to nominate additional sites for LGS designation.

Why we are reconsulting on this policy area

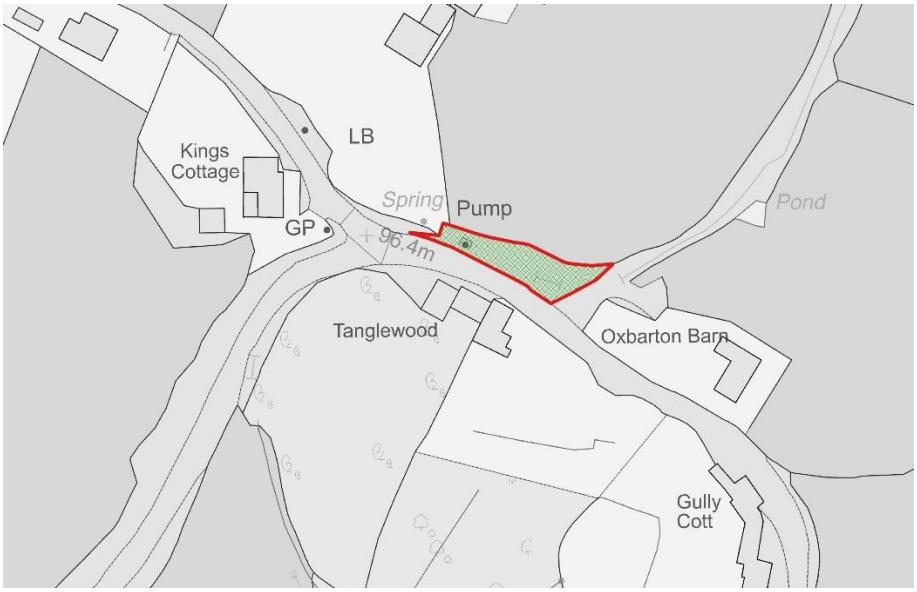
9.156 Through the Spring 2024 Options Consultation and in addition to comments on the proposed LGS designations and those nominated spaces not proposed to be designated, three new nominations had been received.

9.157 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.

9.158 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:	Nemptnett Thrubwell
Site name:	Land adjacent to Village Pump
Site number:	
Map 23	

Additional Evidence and update on two previously rejected nominations

9.159 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

9.160 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.

9.161 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.

9.162 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.

9.163 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

9.164 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.

9.165 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

9.166 The Somersetshire Coal Canal and the Wansdyke earthwork are two important linear historic assets in Bath and North East Somerset.

9.167 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.

9.168 The NPPF Section 16 – Conserving and Enhancing the Historic Environment paragraph 196 sets out the context for local policy.

9.169 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.'

9.170 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.'*

9.171 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.

9.172 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

9.173 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

9.174 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

9.175 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.

9.176 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.

9.177 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.

9.178 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.

9.179 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.

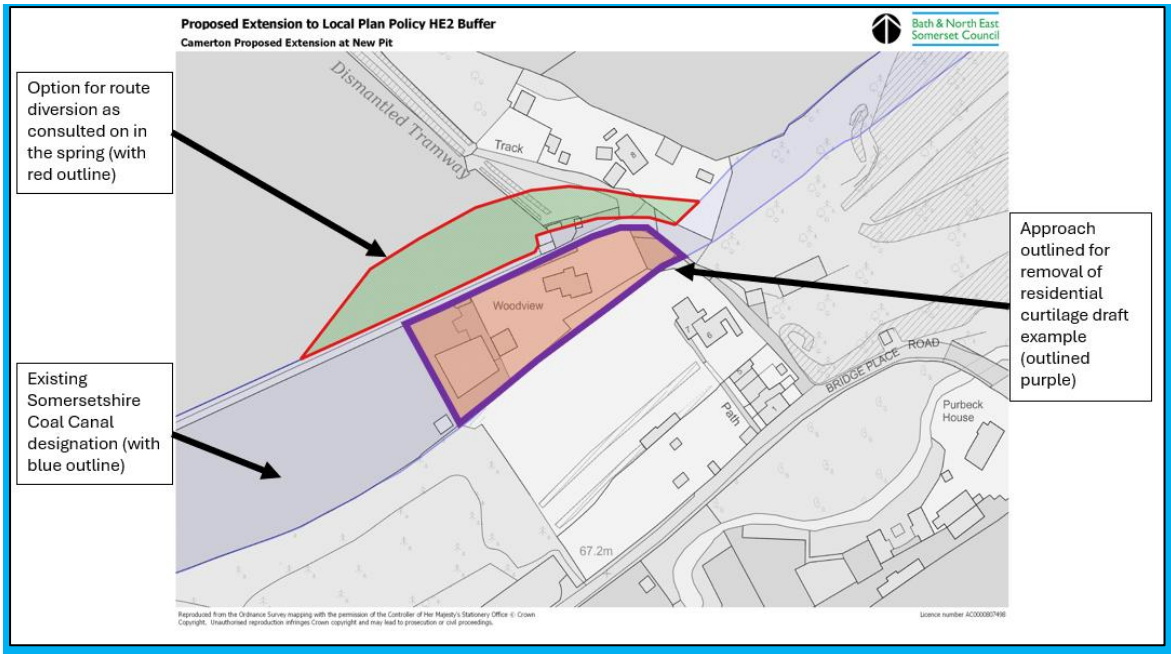


Figure 76: Example of the proposed amendment to sections of the policies map

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.

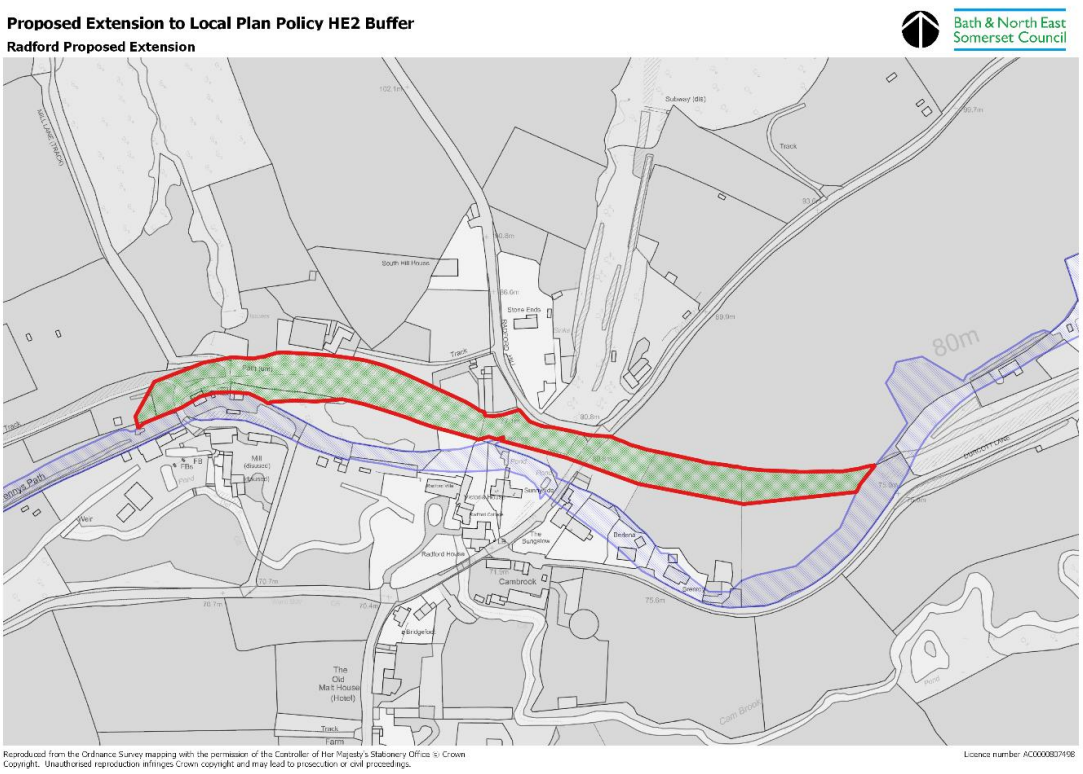
DRAFT POLICY WORDING

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;*

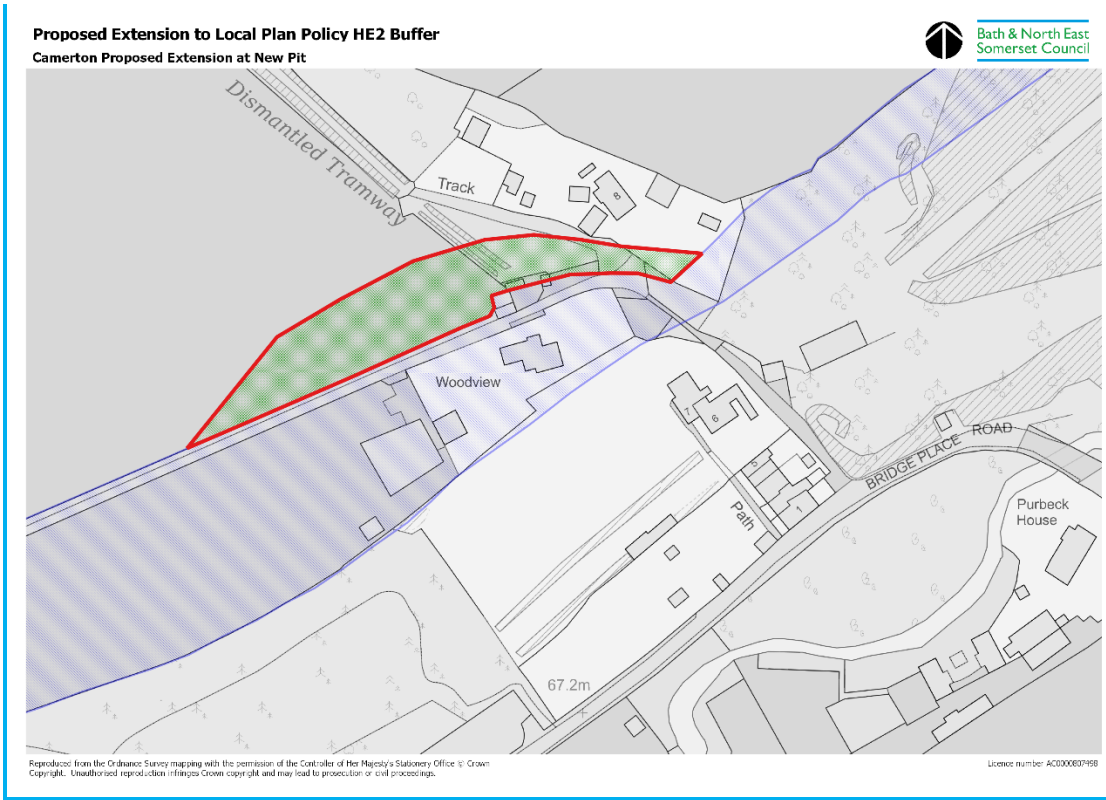
Any projects/works associated with the Somersetshire Coal Canal are required to fully consider the amenity of residents and or landowners. In particular restoration works must secure and demonstrate the agreement of landowners before any works take place. Any developments must ensure they do not increase 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 Spring 2024 Options Document and the proposed diversion at Dunkerton is no longer required:

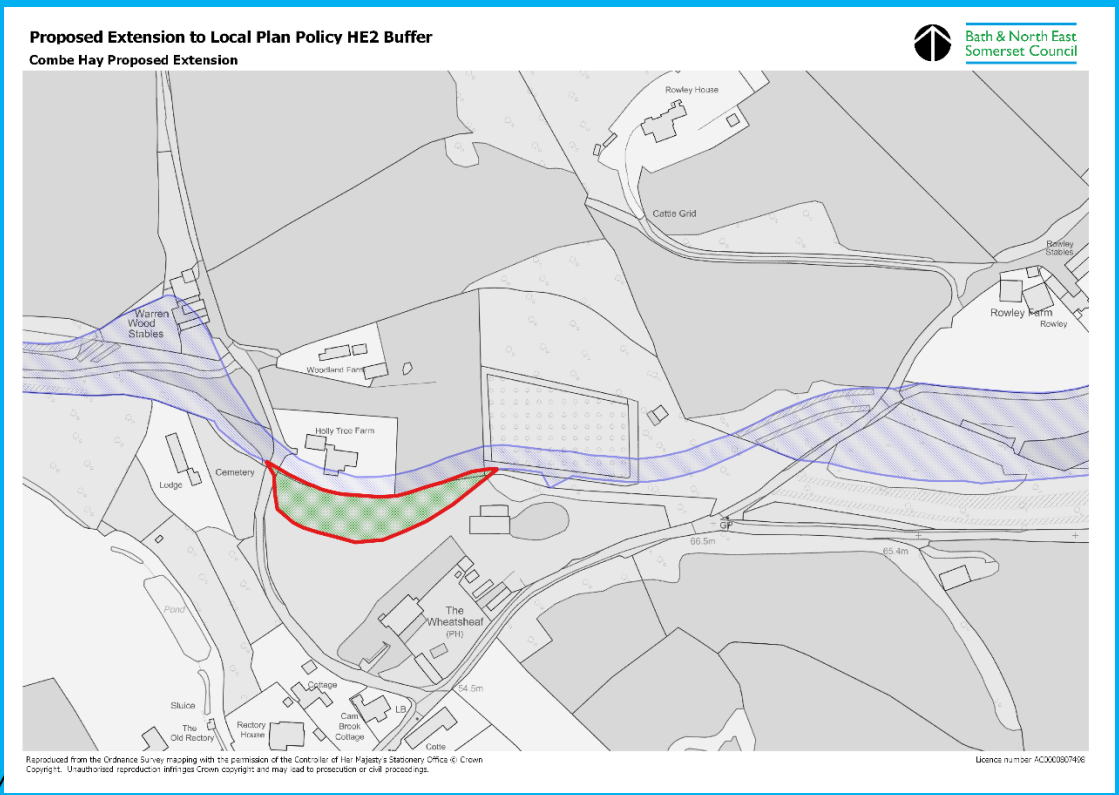


(Figure 77 – Radford)

(Figure 78 – Camerton)



(Figure 79 – Camerton New Pit)



(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

9.180 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).

9.181 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.

9.182 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).

9.183 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.

9.184 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.

9.185 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).

9.186 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.

9.187 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.

9.188 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

9.189 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	Support waste management facilities where they demonstrate the application of the waste hierarchy. Policy criteria, including: • 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. Priority will be given to previously developed land and industrial /employment sites. Opportunities for on-site management of waste where it arises.	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.	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. The council will need to continue to collaborate with our West of England partners on waste management strategic provision.