

Local Plan Options Document 2025

Chapters 1 to 4 - Introduction and Spatial Strategy

Foreword by Cllr Kevin Guy

As Leader of Bath and North East Somerset Council, I'd like to welcome you to the B&NES Local Plan Options Consultation.

You may have heard that central government has set new, mandatory housing targets for all councils. In doing so, the target for Bath and North East Somerset has more than doubled. In response, we've reset our Local Plan preparation and are reconsulting on our revised Options Report.

So, from the 3rd October, you can have your say on how we shape the future of our communities over the next 20 years.

As your local Council, we are not NIMBYs. We know that there's a housing affordability crisis in our area, but we also know that development has to come with the right services, infrastructure and employment opportunities to create sustainable communities. We want to see the right homes built in the right places.

We believe growth should be focused on strategic sites, not scattered randomly across the district. That way, we can deliver change that benefits our existing communities – for example by leveraging funding to improve local facilities for all residents.

Planning is a highly regulated system. The Options consultation has to test all “reasonable alternatives” for development. Our officers have been busy assessing many sites that have come forward from the private sector. This consultation contains all the sites we need to test. There may be sites that are not suitable options. That's why we need local evidence. We need to hear from you about which sites are the most sustainable. We need to make sure that your voices are heard in this process.

We also want to challenge the idea that Bath cannot provide housing that local people need. We want to prove that Bath can be an exemplar for sustainable development which also enhances and protects our heritage.

To be clear – this Local Plan is an opportunity for ambitious, transformational change, but we need to work with partners and residents to build a rigorous body of evidence in the process.

It's vital that we hear from you about how you want your local area to develop over the next 20 years. Please do respond to the consultation and please help us reach as many people as possible.

We look forward to hearing from you.



Councillor Kevin Guy

Leader of Bath and North East Somerset Council

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Formatting Note:

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

1. Introduction

What is a local plan and why do we prepare it?

- 1.1 The local plan will establish a strategy and framework for how communities and places in Bath and North East Somerset will change and grow over the next 15-20 years. It sets out planning policies that will shape any development that requires planning permission. The plan identifies the need for new homes, jobs, and the services and infrastructure required up-front to support them. It provides strong guidance to developers and the council on where this development should happen and what form it will take. It is about ensuring that we maintain and create sustainable, vibrant and healthy places and communities.
- 1.2 Change and development will happen whether we prepare a local plan or not. We are preparing a local plan so that we can shape the location and form of future development and help ensure that it is better supported by the timely provision of necessary infrastructure. Without a local plan, speculative development will take place in less sustainable areas, and in an unplanned way. We also prepare a local plan in order to protect what is special about Bath and North East Somerset, including its unique, high quality and renowned natural, built and historic environment.
- 1.3 This local plan covers the whole of Bath and North East Somerset and will establish the planning framework for the district from 2025 to 2043. It will contain a vision, strategy and policies to guide and manage growth and change; and will be the basis for how planning applications for new development are decided. It will also play a crucial role in delivering the council's corporate priorities, including improving people's lives, tackling the climate and ecological emergencies, and preparing for the future in terms of the economy, responding to housing need and addressing inequalities. The local plan will be reviewed around every 5 years and updated where necessary.

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

How do we prepare the Local Plan?

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

Preparation of the Local Plan

Stage 1: Launch	October 2022	Launch Document published and consulted on, to commence the preparation of the Local Plan.
Stage 2: Evidence Gathering, Engagement and Options Formulation	October 2022 – January 2024	Extensive gathering and analysis of data, evidence and information on key issues has been carried out. Engagement has been carried out with community representatives and key stakeholders across the district. Policy and site options have been formulated.
Stage 3. Options Document Consultation	February 2024 – March 2024	Consultation on the previous Options Document.
Stage 3A. Reset Options Document Consultation	October 2025 – November 2025	Consultation on this reset Options Document
Stage 4: Preparation of Draft Plan and Targeted Engagement	October 2025 – May 2026	Having taken account of responses received from consultations, and further analysis of evidence, the council will prepare a Draft Plan. Additional targeted engagement with key stakeholders will also be carried out.
Stage 5: Draft Plan Consultation	May 2026 – July 2026	A Draft Plan will be published, and consultation on this document will be carried out for a period of at least 6 weeks. The local planning authority may make changes to the Draft Plan following the consultation, and may decide to carry out further consultation if any resulting changes are considered to be significant.
Stage 6: Submission and Examination	Autumn 2026	The final Draft Plan will be submitted to the Government along with the supporting evidence base, following which an independent Inspector will be allocated to assess the soundness of the Plan.
Stage 7: Hearings	Early 2027	The independent Inspector will hold an Examination into the soundness of the Plan. The Examination hearings will include evidence from anybody who wishes to make a submission on any of the key issues or questions highlighted by the Inspector. The Inspector will consider all of the evidence and representations made through the Draft Local Plan consultation process.
Stage 8: Inspector's Report	Summer 2027	The Inspector will assess whether the local plan has been prepared in accordance with legal and procedural requirements, and whether it is sound. The Inspector will publish their recommendations in a Report. If the Inspector has not recommended adoption, the council can adopt the Plan in line with any 'main' modifications as suggested by the Inspector.
Stage 9: Adoption	Autumn 2027	The council will adopt the Plan at a full council meeting.

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

1.7 Once approved by the council, the Draft Local Plan will also be subject to formal consultation. Both the Draft Local Plan and comments received on it will be submitted for examination by a government appointed Planning Inspector. The Inspector will be examining whether the local plan is sound. As defined in national policy the tests of soundness comprise:

- Positively prepared: **comprise a strategy that at least meets identified needs**
- Justified: **based on proportionate evidence**
- Effective: **deliverable over the plan period and based on effective joint-working on cross boundary strategic matters**
- Consistent with national policy: **as set out in the national planning Policy Framework and other government statements**

1.8 Once it has been examined and subject to the Inspector's conclusions, the local plan can then be adopted. Once it is adopted, the local plan becomes the statutory framework for determining planning applications. As the local plan progresses through its stages of preparation it will start to carry greater weight in determining planning applications. However, only limited weight can be given to it at the Draft Local Plan stage and more significant weight given to it once it has been examined by an Inspector.

What opportunities are there to be involved?

1.9 The council is committed to giving people a bigger say and we have engaged with community representatives in preparing the reset Options document. This reset Options document is published for consultation over a six-week period, from 3rd October to 14th November. We are encouraging all residents and stakeholders to comment on the options we have presented. This is a major opportunity to have your say and help influence future change. There will be a range of in-person and web-based events to explain and discuss the Options during the consultation period. Please make sure you submit your comments by 13th November.

1.10 We will continue to work with communities and other stakeholders in progressing towards a Draft Local Plan, particularly those places where development may be focussed. Once prepared and approved by the council in spring next year (2026), the Draft Local Plan will also be published for consultation for a period of at least six weeks. As such, there will be a further opportunity to submit comments on the Draft Local Plan. The comments received and the Draft Local Plan itself are then submitted for examination by a Planning Inspector. Those individuals and organisations that object to the Draft Local Plan will have the opportunity to participate in the examination.

Structure of this Options Document

1.11 The Options Document comprises chapters which set out:

- The issues and challenges facing the area;
- The overall priorities of the local plan (what it is seeking to achieve);
- The development needs which should be planned for;
- The approach to a district-wide strategy;
- Chapters setting out options for growth and change in specific parts of and places in the district; and
- A chapter setting out options for a limited range of policies that would apply across the whole of Bath and North East Somerset in determining planning applications. This document only outlines new policy options that were not presented for consultation in the previous [Options Document \(Spring 2024\)](#)

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

- 2.1 The local plan will set out a strategy and planning policy framework to help guide and shape future development and change, whilst also enabling greater climate and environmental resilience and protecting and enhancing our high quality natural, built and historic environment and key assets. In guiding change, the plan will be seeking to address key issues and challenges facing Bath and North East Somerset and its communities.
- 2.2 New development can provide an opportunity to shape and improve places e.g. by providing infrastructure needed by existing communities and creating environments that promote health and wellbeing. The place we live in can fundamentally influence our health and wellbeing, and shaping our communities in this way provides an opportunity to influence and establish positive behaviour, healthier lifestyle habits and inclusive communities. Planning for climate and environmentally resilient places will also help to reduce health risks.
- 2.3 The key issues and challenges facing Bath and North East Somerset and its communities are summarised below and alongside the council's corporate priorities they have shaped the spatial priorities for the local plan – that is the outcomes we are seeking to achieve. The spatial priorities for the local plan were outlined in the spring 2024 Options Document. It is not proposed that these should be changed at this stage, and they are outlined again at the end of this chapter. The spatial priorities will drive the site allocations, policy framework and therefore, what the local plan will achieve.

Key issues and challenges facing communities

2.4 Through research and engagement with community representatives and stakeholders, the identified key issues and challenges facing the district are summarised below.

Housing Affordability and the Economy

2.5 Across Bath and North East Somerset we know that housing affordability is a key issue. Many residents are finding it difficult to access decent housing, either to buy or rent, because prices are so high. Evidence shows that the impact of high house prices is exacerbated by average median workplace wages in Bath and North East Somerset being lower than those nationally. As a result, across Bath and North East Somerset the average house price is around twelve times the average workplace earnings and in Bath it is nineteen. The lack of housing that is affordable for residents and workers not only affects people's quality of life, but it also directly impacts our economy. The provision of additional affordable housing in B&NES is a major factor influencing the overall level of additional homes needed, caused by a combination of high market prices (both purchase and rental) and insufficient supply in recent decades.

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

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

be addressed to create a prosperous and sustainable economy for the benefit of our residents.

Climate and Ecological Emergencies

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

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

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

- Increase the extent of land and waterways managed positively for nature across Bath and North East Somerset
- Increase the abundance and distribution of key species across Bath and North East Somerset
- Enable more people to access and engage with nature

2.11 Further information is set out in the council's Ecological Emergency Action Plan.

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

2.12 The district has outstanding landscape character, including the Cotswolds National Landscape and Mendip Hills National Landscape. It also supports nationally and internationally important heritage assets including Bath, which is a double-inscribed UNESCO World Heritage Site comprising two World Heritage Sites: the City of Bath (1987) and the Great Spa Towns of Europe (2021). The district contains many areas of wildlife significance, including internationally important bat sites in and around Bath and at Compton Martin, and the internationally important bird site at Chew Valley Lake. Access to the countryside and the natural environment, which can sometimes be challenging, is highlighted by residents as being important for quality of life, and health and wellbeing, including physical and mental health.

Health and Wellbeing

2.13 Bath and North East Somerset remains one of the least deprived local authorities in the country, ranking 269 out of 317 for overall deprivation.

However, there are inequalities within the district, communities that experience deprivation (both Twerton West and Whiteway fall within the most deprived 10% nationally), and patterns of rural poverty are growing. Life expectancy is 9 years lower for men and 5 years lower for women in the most deprived areas of Bath and North East Somerset than in the least deprived areas. Inequalities is a concern that has been raised by communities, including in relation to an ageing population and people living longer with multiple health and social care needs.

2.14 Whilst the health of people in Bath and North East Somerset is generally better than the England average, residents still have important health and wellbeing needs that the built and natural environment can play a role in addressing. There are significant levels of obesity amongst both children and adults in Bath and North East Somerset, meaning that whilst obesity is below the national average more adults in the district are overweight than not. Large numbers of both children and adults are not physically active. Residents also self-report higher rates of anxiety and loneliness compared to the England average. We also have an aging population with a relatively high proportion of people aged over 55 that is projected to increase during the local plan period.

Transport and Connectivity

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

Culture and Community Identity

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

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

B&NES Council Corporate Priorities

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

2.19 In order to define and show how we will deliver the overriding purpose the council has two core policies, three principles and nine priorities. The core policies and principles which will shape our local plan are outlined below.

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

Three principles as follows:

- Preparing for the Future – we will work towards a resilient, sustainable economy that is fair, green, creative and connected
- Delivering for Local Residents - we will continually improve frontline services across our communities, whilst protecting the most vulnerable
- Focusing on Prevention - we will invest in prevention across all services to tackle inequalities and improve local areas

2.20 The spatial priorities of the local plan reflect the council's Corporate Priorities and seek to address the key issues and challenges outlined above. It is clear that a transformative approach to plan-making is required to help deliver against these priorities and the council's commitments.

Key B&NES Strategies and Delivery Plans

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

Strategy / Delivery Plan	Status	Owner
Corporate Strategy	Adopted	B&NES
Climate Emergency Strategy	Adopted	B&NES
Climate and Nature Strategy	In development	B&NES
Health and Wellbeing Strategy and Implementation Plan	Adopted	Health and wellbeing Board
West of England Local Growth Strategy	In development	West of England Mayoral Combined Authority
Economic Strategy	Adopted	Future Ambition Board
Business and Skills Plan	In development	B&NES
Greener Places Plan (incorporating Green Infrastructure Strategy)	In development	B&NES
Integrated Care Strategy	Adopted	BSW Together
Children and Young People Plan	Adopted	Health and wellbeing Board
Bath Swindon Wiltshire Implementation Plan	Adopted	BSW Together
Health Improvement Framework	In development	B&NES
Cultural Development Plan	In development	B&NES
School Organisation Plan	Adopted	B&NES
Childcare Sufficiency Assessment	Adopted	B&NES
Ecological Emergency Action Plan	Adopted	B&NES
Climate Emergency Action Plan	Adopted	B&NES
Joint Local Transport Plan 4 (JLTP4)	Adopted	West of England Mayoral Combined Authority
West of England Transport Vision	In development	West of England Mayoral Combined Authority
Journey to Net Zero Transport Plan	Adopted	B&NES
Movement Strategy for Bath	In development	B&NES
Housing Delivery Plan	Adopted	B&NES
Transport Delivery Plan	In development	B&NES
Creating Sustainable Communities in North East Somerset	Adopted	B&NES
Active Travel Masterplan	Adopted	B&NES
Tree and Woodland Strategy & Action Plan	In development	B&NES
Contaminated Land Strategy	Adopted	B&NES
Bath Air Quality Action Plan	Adopted	B&NES
Farrington Gurney & Temple Cloud Air Quality Action Plan	Adopted	B&NES
Air Quality Strategy	In development	B&NES

Doughnut Economics Model

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

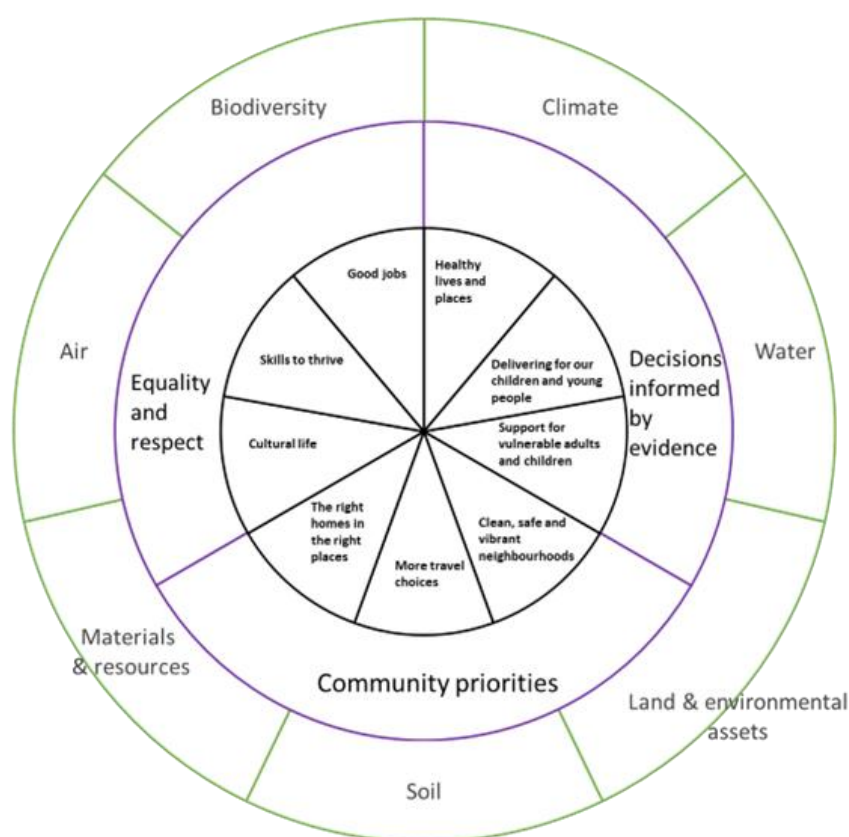


Figure 1: Bath and North East Somerset decision making wheel

2.23 The Doughnut Economics Model and the social foundations and environmental limits set out in the decision-making wheel are closely reflected and incorporated into the Sustainability Appraisal of the Local Plan. Local Plans are statutorily required to be subject to a Sustainability Appraisal in order that the sustainability effects of the plan can be understood, assessed and demonstrated against a wide range of sustainability objectives, as well as identifying how negative effects can best be mitigated. At this stage of the local plan preparation process a Sustainability Appraisal is particularly valuable in understanding the sustainability effects of different alternatives or options and therefore, fundamentally informs decision making moving forward to the Draft Local Plan. Preparation of the local plan is also informed by assessment and tools that enable us to understand the comparative carbon emissions impact of different options. This is important in helping to ensure the local plan tackles the climate and ecological emergencies.

Spatial Priorities for the Local Plan

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

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

The Plan will:

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

In doing so, our plans for development must:

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

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

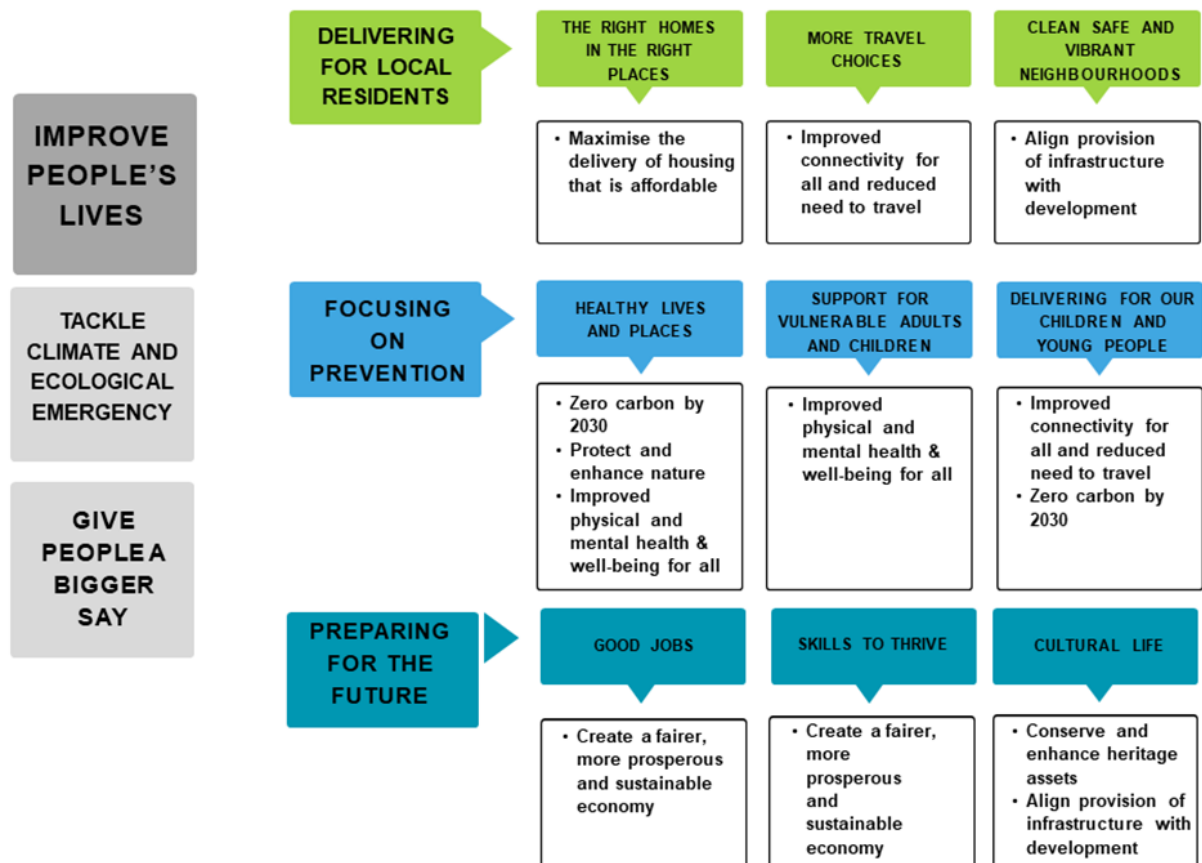


Figure 2: Diagram showing relationship between local plan spatial priorities and the Corporate Strategy

2.26 The spatial priorities underpin and will be delivered through the local plan site options and policy approaches set out in the chapters that follow. They are also unpacked in various parts of this Options Document and in the evidence base, including through Transport Vision and Objectives. The approach to transport is set out in greater detail in each place section. It is fundamentally aimed at improving connectivity by sustainable transport modes within and between existing places, and supporting additional development - by setting a transport vision with and for our district, then planning for delivering the necessary components to realise the vision. Investment to secure the up-front delivery of infrastructure including that to improve sustainable transport connectivity is necessary to unlock new housing and employment development.

2.27 As set out above the overarching priority of the local plan will be to plan for development in a way that delivers sustainable and healthy places. What we mean by sustainable and healthy places will be set out in the Draft Local Plan. The local plan is a key means to delivering successful place-shaping, enabled by early infrastructure investment and delivery. Where necessary the council will also look to use its Compulsory Purchase Order powers to help shape places and achieve both our and communities' objectives.

3. Key Requirements in Bath and North East Somerset

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

- a) Forecast job growth in key economic sectors and the associated need for employment space in order to help foster a prosperous, greener and fairer economy
- b) The need for housing as established by the government to address existing and projected changes in the population and to respond to the needs of different groups
- c) Measures to help tackle the climate emergency that can be facilitated through the local plan
- d) The urgent need for and to facilitate nature recovery and enhancement across the district
- e) The needs of health and wellbeing and the role places can have influencing health outcomes
- f) Transport requirements that are pivotal in making the district more sustainable and delivering other societal benefits by enabling movement and connectivity for all by public transport and active travel (walking, cycling and wheeling)

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

West of England Growth Strategy

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

Bristol and Bath Growth Zone

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

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

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

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

The Bristol to Bath Corridor

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

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

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

Bath City Centre

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

3.11 As well as strengthening the visitor offer, Bath City Centre will have a wide range of new employment sites that come forward in the next decade – located near a wide range of housing, the long-term vibrancy of this unique city is assured. Over the next decade, with investment for growth, we anticipate new businesses will locate in the city, strengthening the employment offer and contribution the city makes to national growth.

Somer Valley Growth Zone

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

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

3.14 Within this zone the priority objectives will focus on:

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

Jobs and Employment Space

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

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

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

3.17 For the local plan and in the context of the Economic Strategy, evidence has been prepared examining trends and forecasts in economic sectors and the space requirements to be addressed through the local plan. It notes that the district has experienced relatively weak economic performance over the 20-year historic period compared to both the West of England and national averages and it is likely that a lack of supply of suitable employment sites and premises has contributed to this position (including industrial, warehousing and offices). It reports of firms unable to locate or expand in the area, and some companies having to relocate outside the Bath and North East Somerset area in order to find suitable accommodation. The response to the evidenced requirement for employment space to accommodate key sectors as outlined below will be developed through preparing the local plan.

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

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

3.20 The increased jobs will be accommodated in many different ways and not all will be in sectors requiring traditional employment (office, industrial and warehousing) space. The updated evidence provides an indication of the amount of additional employment (office, industrial and warehousing) floorspace that would need to be provided in order to help deliver and accommodate the additional 25,000 jobs. These figures are set out in the table below and should not be treated as a target, but as a starting point in ensuring the local plan helps to facilitate sustainable economic growth and increased productivity.

Employment Type	Bath (Floorspace - sqm / Land - ha)	Keynsham & Saltford (Floorspace - sqm / Land - ha)	Somer Valley (Floorspace - sqm / Land - ha)	Rural (Floorspace - sqm / Land - ha)	B&NES Total (Floorspace - sqm / Land - ha)
Offices	74,000– 79,000 / 9– 10	12,000– 13,000 / 2	7,000 / 0.8	9,000– 10,000 / 1.2	102,000– 109,000 / 13–14
Industrial	15,000– 19,000 / 4–5	8,000 / 2	14,000– 17,000 / 3–4	33,000– 34,000 / 8–9	70,000– 78,000 / 17– 20
Warehouse & Logistics	23,000– 25,000 / 5	16,000– 17,000 / 3	15,000– 16,000 / 3	18,000– 19,000 / 4	72,000– 77,000 / 15

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

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

3.22 In terms of office floorspace the evidence notes that it is also possible additional floorspace will be released to the market as a result of workplace transition following the rapid increase in hybrid working following the Covid-19 pandemic. However, there still remains a degree of uncertainty over the long-term trend. Market evidence also indicates a strong preference for high quality modern space in locations accessible by public transport and with excellent amenity provision for workers.

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

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

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

Need for Housing

3.26 The Economic Strategy also highlights that the lack of availability and affordability of housing is a key issue affecting Bath and North East Somerset and that this also impacts on the performance of our economy and wider sustainability issues. In order to underpin the local plan an assessment of housing needs across the district has been undertaken. This study is known as a Local Housing Needs Assessment (LHNA) and it has been updated in light of the government's increased figure of housing need. The context for assessing and meeting local housing needs is also set by the National Planning Policy Framework (NPPF).

3.27 The overall need for housing in B&NES set by the government's standard method is for around 1,500 new homes per annum, or around 27,000 over the eighteen-year local plan period. This figure is derived from calculations by the government, which is based on increasing the existing housing stock by 0.8% per year and adjusted upwards to take account of the affordability (or unaffordability) of housing in B&NES. This is known as the 'standard method' housing figure. The standard method figure can vary year on year reflecting changes in the existing housing stock and if the level of housing affordability changes e.g. if house prices rise or fall or incomes change.

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

3.29 The LHNA shows that a significant proportion of projected population growth and therefore, overall need for new housing is comprised of projected growth in the student population.

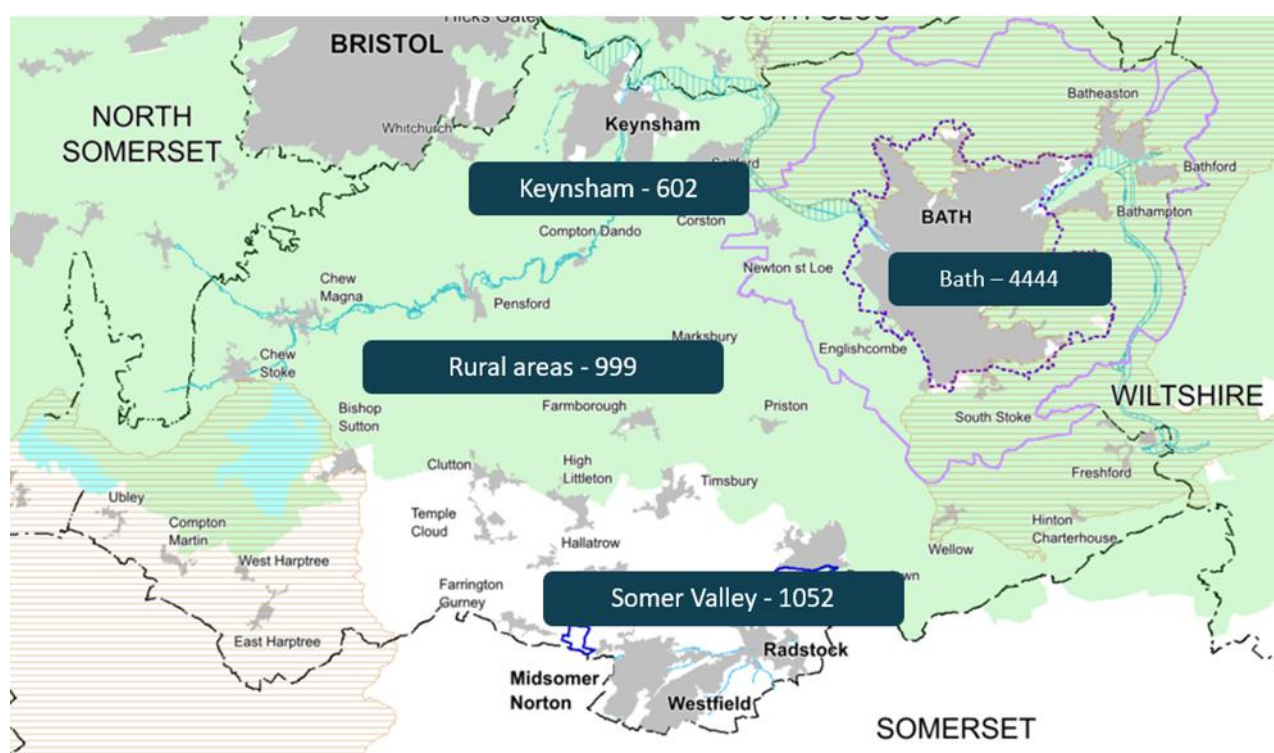
3.30 The accommodation requirements of students are different to those of the rest of the population and for those aged 18-23 (primarily undergraduate students) are typically provided through student bedspaces e.g. in the form of Purpose Built Student Accommodation (PBSA). Given the significant projected student population growth and specific accommodation requirements we are considering options as to how this form of accommodation can best be provided. The provision of additional student bedspaces in PBSA would count towards meeting overall housing need (based on a government established ratio of 3.13 student bedspaces is equivalent to one dwelling).

3.31 Based on population projections the LHNA suggests a growth in the student population aged 18-23 of around 7,300. This would equate to around 370 student bedspaces per year. Although it is appropriate to understand the overall student housing need arising from the projected growth of student population based on long term trends, it is also important to ensure alignment with the future growth aspirations of the University of Bath and Bath Spa University. The council continues to work with both universities to understand their projected growth aspirations 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.

3.32 The LHNA also provides more detail on the size, type and tenure of housing that is needed, including information on the need for affordable housing (key findings are summarised in paragraphs 3. to 3.24 below).

3.33 The plan period runs from 2025 to 2043. Some additional housing is already planned to be built on sites with planning permission and sites allocated for development in the current adopted B&NES Local Plan which runs until 2029. Sites with planning permission or allocated are known as existing commitments. Homes to be delivered on the existing commitments are deducted from the housing requirement to calculate the number of homes required to be planned for

on new sites through the local plan. The spatial distribution of homes to be provided by existing commitments is illustrated in the map below.



Map 1: Spatial Distribution of existing commitments

3.34 In preparing a local plan we are able to make an allowance for housing likely to be delivered on small windfall sites, that is sites that will provide less than ten homes and will be granted planning permission without being specifically allocated for development. A windfall allowance over the plan period has therefore been calculated. Up until 2029 and for the remainder of the adopted plan period the existing figures from the published housing trajectory have been used. Beyond 2029 a realistic and relatively cautious approach has been taken based on past rates of delivery. Policy changes, including options to review Housing Development Boundaries for the towns and villages, may also affect likely small windfall site delivery. The small windfall sites allowance will be kept under review in light of annual monitoring of housing delivery and permissions. Further detail is set out in the Housing Topic Paper.

Overall housing requirement	Around 27,000
Existing Residential Commitments (including small sites with planning permission)	4,887
Expected Small Windfall sites (excluding small sites with planning permission)	2,210
Sub -Total	7,097
Housing to be planned for on new allocations (includes accommodation for students)	Around 19,900

3.35 It is not just important to plan for the overall amount of housing that is needed.

The LHNA identifies that there is a significant need for housing that is more affordable in Bath and North East Somerset and this corroborates evidence underpinning the council's Economic Strategy. Affordable housing, as set out in the NPPF, has two main components i.e. housing that is needed for households that cannot afford market rents or prices to purchase, plus those households that can afford market rents but aspire to own their own home but cannot afford to do so. Based on both components the total future need for affordable housing in Bath and North East Somerset is significant at around 12,300 dwellings, representing around 46% of total general housing need in the district (split as 67% of housing need in the City of Bath and 38% of total housing need in North East Somerset).

3.36 Typically, the need for affordable housing of those that cannot afford to rent or buy will be met by either social rented accommodation or shared ownership homes (where the household buys a part share in the property). For those that can afford market rent but aspire to home ownership their need is typically met by either shared ownership or a discounted market housing product. The government is now placing an increased emphasis on the delivery of social rented accommodation in order to address the needs of those least able to access the housing market. The LHNA provides more detailed information

around the different types of affordable housing need in both Bath and the rest of the district. This shows that in Bath 45% of overall future housing need is from those households that cannot afford to rent or buy and 21% is from those that can afford to rent but aspire to home ownership. The equivalent proportions for the rest of the district are 34% and 4% respectively.

3.37 With regards to the type and size of housing that is required across the district the LHNA provides useful information split between the City of Bath and the rest of Bath and North East Somerset. More detailed information for specific places or parishes can be gathered through Local Housing Needs Surveys. The LHNA identifies the largest proportion of housing that is needed is for 3 bed houses (around 32% of overall housing need) in both the city and the rest of the district. There is also significant need for smaller dwellings, 1 and 2 bed flats and houses, (around 18% and 24% of overall housing need respectively) for smaller households e.g. younger people and older people looking to downsize.

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

Need arising from neighbouring authorities

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

3.40 At this stage and with the exception of Bristol City Council the neighbouring authorities to Bath and North East Somerset have confirmed they are seeking to meet their objectively assessed need for housing within their respective administrative areas. As such there is no request to help meet any of their unmet need. Through the preparation of its local plan, Bristol City Council have confirmed that they have capacity to provide around 1,925 dwellings per annum, or 34,650 over their local plan period. This capacity does not fully meet their locally derived housing need of 2,503 per annum or 45,054 over the local plan period. Bristol City Council, therefore, formally wrote to B&NES Council and also their other neighbouring authorities of North Somerset Council and South Gloucestershire Council in October 2023, to request that we explore whether we could accommodate a proportion of their unmet locally derived need of 10,404 homes. B&NES Council response to this request will be carefully considered through the preparation of our Local Plan. Under the government's December 2024 revised standard method housing need figure for Bristol City Council the amount of unmet need has increased.

Climate Change

3.41 The Climate Emergency Strategy sets out the four strategic priorities, which are to: decarbonise buildings; decarbonise transport; increase renewable energy generation; and decarbonise the council's own operations. Planning should facilitate retrofit of existing buildings to improve energy efficiency, net zero new build developments, and increased renewable energy generation and storage to support our climate change ambitions.

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

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

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

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

Nature Recovery and Green Infrastructure

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

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

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

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

Figure 3: Diagram showing WENP nature recovery ambitions adjusted for B&NES

3.48 New development will need to play its part in delivering these ambitions and the council is considering requiring 20% Biodiversity Net Gain (BNG) on sites that meet a specified threshold. It should be noted that the government is consulting on a proposal to simplify the BNG requirements relating to development sites of 10 to 49 dwellings or up to 1 hectare to help facilitate small-medium enterprises (builders) deliver housing.

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

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

3.51 The West of England LNRS has now been approved and will guide and inform action for nature recovery. The areas mapped that 'could become, of particular importance for biodiversity' within the LNRS will also be used to define areas recognised as being of Strategic Significance within formal BNG calculations.

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

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

3.54 In planning for additional development we also need to assess and ensure likely significant adverse effects on European protected species and habitats are

avoided or appropriately mitigated. This is addressed through a Habitats Regulations Assessment (further information is set out in paragraph 4.15).

Needs for Health and wellbeing

3.55 The places where we live and work have a significant impact on how easy it is for people to live healthy lives, and influence our health outcomes. Therefore, the local plan offers an opportunity to shape development to create health promoting and inclusive places. Work is underway to explore how the plan can best enable the delivery of strategic greenspaces to deliver for nature and people.

3.56 There is a clear emphasis throughout national policy and guidance on health and wellbeing in planning and placemaking. The NPPF states that planning policy should promote health and wellbeing. Paragraph 96 outlines that this should be achieved through promoting social interaction, making spaces safe and accessible, and creating places that enable and support healthy lifestyles. National guidance recognises health as a cross-cutting issue, which connects with and can be promoted by many policy areas within the Local Plan.

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

Transport Requirements

3.58 Transport systems and networks are essential in enabling everyday mobility and access and they need to become increasingly sustainable and inclusive to address climate emergency and social equity issues. The choices that are made through the local plan are integral to the sustainability of our district as a whole, including influencing where development is located, and how we enable more sustainable travel choices for our existing and future communities. Our district requires mobility of people, goods and services to fulfil the needs of the population who live, work and visit B&NES. This demand for mobility will increase as a result of housing and employment growth to be facilitated through the local plan. This presents a core challenge to accommodate this increased mobility need whilst supporting progress towards our Climate and Ecological Emergency commitments.

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

- 3.60 We recognise there are a range of challenges and opportunities for transport across the district, and that there is significant variation in levels of connectivity and car reliance. We also recognise that the planning process can only directly apply to new development, or redevelopment, limiting the scope of influence of the Local Plan. However, it is clear that to accommodate housing and employment growth sustainably, we must enable people currently making trips by car to choose a more sustainable alternative.
- 3.61 Addressing the wide range of transport issues and opportunities people face across our district requires a holistic approach, delivered through the local plan and a range of transport plans and programmes, including with the West of England Combined Authority as the strategic transport authority and the facilitators of significant transport investment from central government to support growth.
- 3.62 We have embarked on a programme of transport strategy, scheme identification and modelling as part of the local plan process. This Options Consultation is a key stage in this process to test and further refine our emerging transport vision for Bath & North East Somerset, for existing and new communities. This will be via mapping the outputs of the adopted Creating Sustainable Communities strategies for North East Somerset to the community and other stakeholders. Following this, we will develop the transport vision, strategy and evidence base further as we progress towards the submission and Examination of the Plan.
- 3.63 We are also investigating strategic approaches to enhancing sustainable transport across the district. This includes improving the function of the Park and Ride sites to be “Transport Interchanges”, providing a greater range of travel options than car to bus, and into-out of city centre. We have also developed, consulted on and adopted an Active Travel Masterplan for the district, to provide people with improved opportunities to travel by walking, wheeling and cycling. The transport evidence base will also help set the vision for public transport across the district, including for bus, rail and future mass transit as key components of shifting medium and longer length trips within and outside of Bath & North East Somerset.

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

Introduction

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

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

Spatial Strategy Principles

4.3 The spatial strategy or approach to meeting development needs is underpinned by and will seek to achieve the spatial priorities of the local plan (outlined in chapter 2). Through the local plan, the council is seeking to plan for and facilitate the delivery of housing that is more affordable and allied to that, ensuring Bath and North East Somerset remains economically prosperous and that the economy becomes greener, more sustainable and fairer. Development must respond to the priorities and needs identified by government, as well as local

needs and along with supporting infrastructure must progress our transition towards carbon neutrality and climate resilience, protect and enhance nature and promote healthy lives e.g. through minimising the need to travel by car and enabling movement by walking, cycling and public transport.

4.4 The factors or principles that are particularly important in shaping the choice of locations for future development and which potential options have been and will be assessed against are summarised as:

- Climate change and nature
- Sustainable transport connectivity and minimising journey distances: distance to main centres of employment, services and facilities; existing connectivity and potential to improve connectivity to areas of employment, services and facilities
- Flood risk
- Local food production and agricultural land
- Biodiversity and nature recovery: protect priority habitats and species and facilitate nature recovery
- Landscape character impact (including designated landscapes)
- Historic environment: protect and enhance the significance of designated and non-designated heritage assets
- Green Belt: impact on openness and the national purposes (updated to also consider the implications of revised national policy including the newly introduced concepts of grey belt and 'golden rules' – see para 4.19 below)
- Infrastructure provision: infrastructure solutions and barriers relating to key infrastructure including health, education, transport and energy and energy storage
- Ground conditions including land contamination and stability
- Existing land use: protecting other important land uses/community assets e.g. recreational space
- Air Quality: protecting the health of existing and future residents
- Local character and community identity: impact on local character, distinctiveness and identity

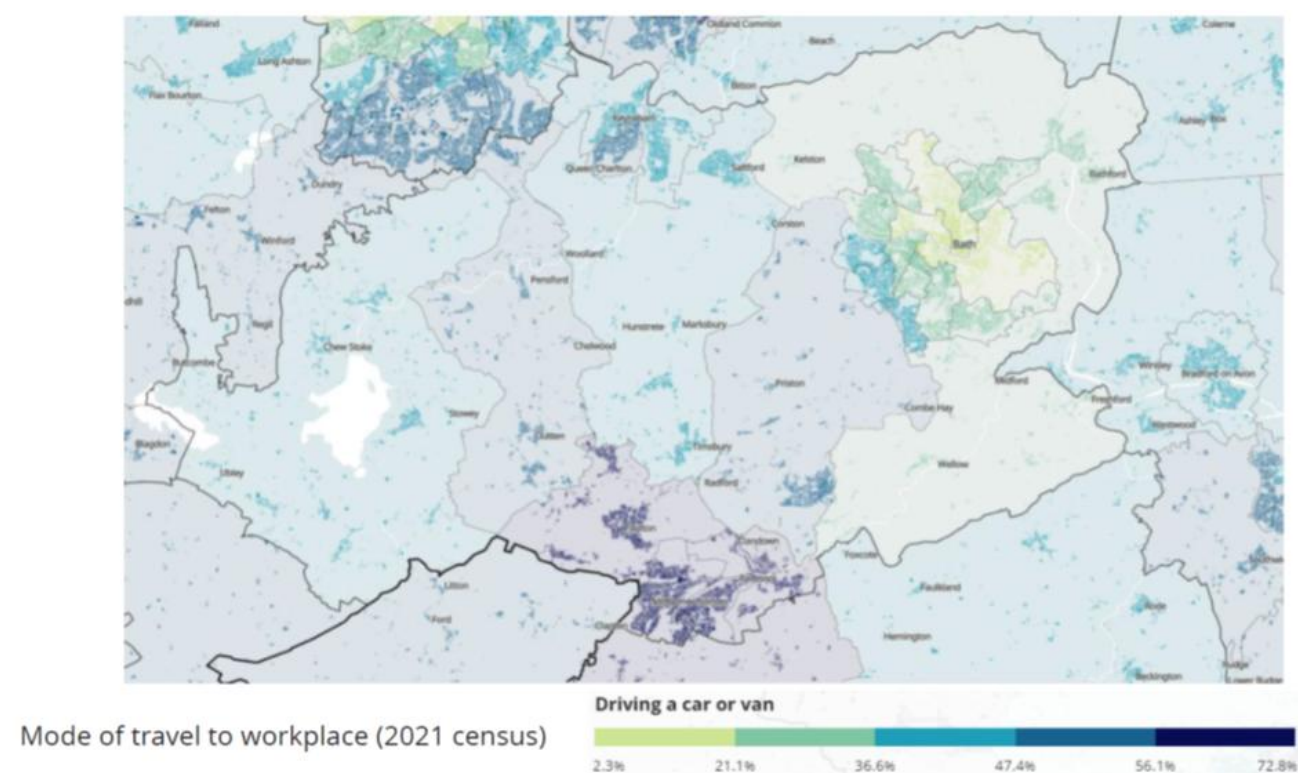
4.5 These factors are broadly similar to those outlined in the spring 2024 options document. However, they have been refined to reflect a more nuanced basis for assessing potential locations or sites for development.

Climate change and nature

4.6 Tackling the climate and ecological emergencies remains a top priority for the council. It is critical that any new development aligns with our aims to tackle these emergencies. This will include how development is located and designed to promote accessible, sustainable transport (as set out below), how our new and existing buildings continue to be decarbonised and how development makes a positive contribution to nature recovery. While considering the challenges and opportunities for reducing our emissions, we must also plan for the effects of changes in the climate that we are already seeing and will continue to see. Flooding (see below), overheating and other extreme weather events will increase in frequency and severity. Considering these climate risks is critical to the spatial strategy in order to minimise the potential climate impact in the locations of development. There is potential for the plan to guide strategic provision of greenspace that can provide climate resilience, nature recovery and access to greenspace.

Sustainable Transport Connectivity

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

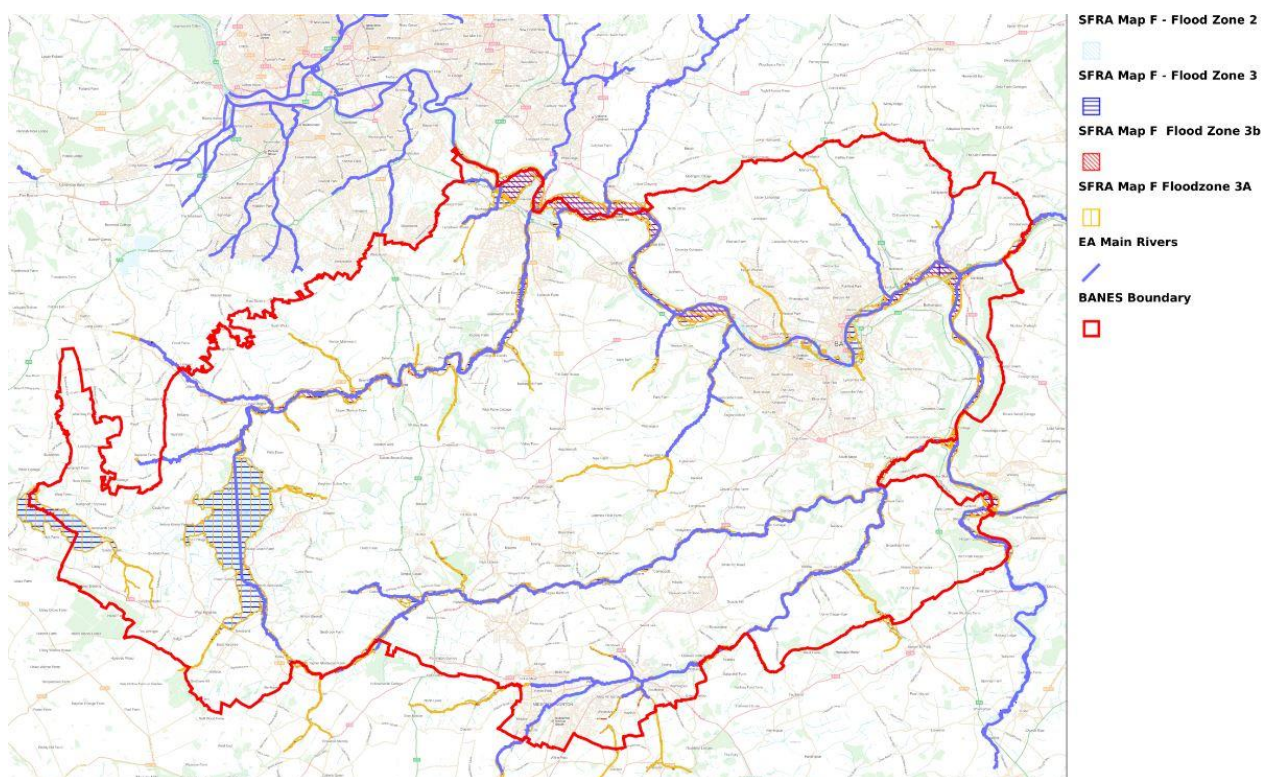


Map 2: Extract from 2021 census showing mode of travel to work by car

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

Flood Risk

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



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

Local food production/agricultural land

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

Biodiversity and nature recovery

4.13 In 2020 we declared an ecological emergency recognising the severity of the degradation of the natural environment and loss of wildlife, the consequences of this, and the urgent need to take action to restore nature. Protecting habitat and supporting nature's recovery (including through Biodiversity Net Gain) are important objectives for the council. Opportunities to better facilitate nature's recovery have been identified through the West of England LNRS (see also paragraphs 3.49 to 3.51) and will be supported by new and amended planning policy. The need to both protect priority habitats and species and facilitate nature recovery influence the spatial strategy, locations for development and opportunities to plan for strategic greenspaces which deliver for nature and people.

4.14 The West of England LNRS identifies the following areas:

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

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

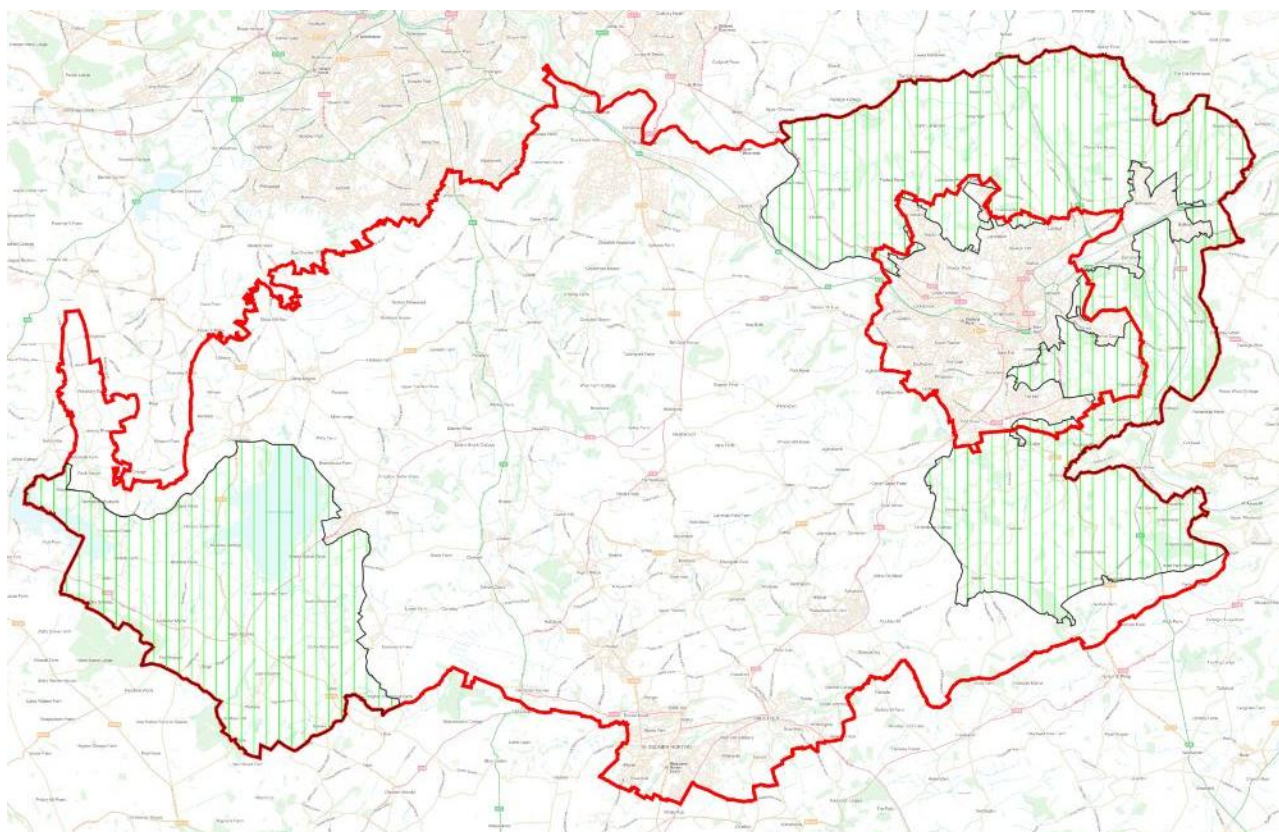
4.16 The likely effects of the spatial strategy and locations for development on European protected species and habitats must also be assessed through a Habitats Regulations Assessment. A Habitats Regulations Assessment comprises two phases, a Screening Assessment to identify whether there are likely to be significant adverse effects as a result of development or at this stage of local plan preparation options for development, and if there are, a full Appropriate Assessment. Given the scale of growth that needs to be planned for because of the government's figure of housing need it is likely that a full Appropriate Assessment will be needed to identify the impacts of development and mitigation measures. In preparing the Draft Local Plan the council will consider and liaise with Natural England on the selection of locations for development and the approach to addressing issues or effects that are identified through the Appropriate Assessment. The approach currently being considered would involve:

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

Comments are invited on the emerging proposed approach.

Landscape character impact

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



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

Historic environment

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

Green Belt impact

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

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

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

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

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

4.23 The Green Belt will be an important influence on the location of development in the district. It is clear that development of land currently within the Green Belt will need to be considered through the local plan in order that the evidenced need for further housing and employment development (see chapter 3) can be met. To understand and consider the impact of potential development on the Green Belt an assessment of the extent to which different parcels of land serve the five purposes is being undertaken. This represents stage 1 of strategically assessing and reviewing the Green Belt and also undertaking a high-level assessment of grey belt potential. This work is being undertaken covering the Bristol-Bath Green Belt across different local authority boundaries through a West of England Strategic Green Belt Assessment. The assessment work is ongoing and will inform the Draft Local Plan. Following the Strategic Green Belt Assessment a more detailed and granular (stage 2) assessment of the impact of development on more specific areas of the Green Belt within Bath and North East Somerset will also be required, including the identification or provisional identification of grey belt land.

Infrastructure provision

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

4.25 More detailed work on infrastructure requirements and delivery will be needed as the local plan progresses and the potential location options that are presented in this document are explored further. In addition to understanding the infrastructure requirements relating to individual development locations it will also be crucial to consider cumulative impact of development across a wider area both within and outside Bath and North East Somerset e.g. in relation to education and school places; health facilities; and transport. Solutions will therefore need to address both location-specific and cumulative impacts. At this stage the cumulative impact of development and infrastructure investment and provision required has not been undertaken because the choice of which development locations will be progressed has not yet been made. This work will be undertaken in collaboration with key infrastructure providers and agencies and will influence whether and how the need for additional development can be met.

4.26 The council's GI (Green Infrastructure) Strategy is being updated and will guide delivery of the council's GI policy and prioritising areas requiring investment, including the opportunity to plan for strategic parks or larger accessible green spaces to serve existing and new communities and provide multiple benefits.

Ground conditions

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

Existing land use

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

Air Quality

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

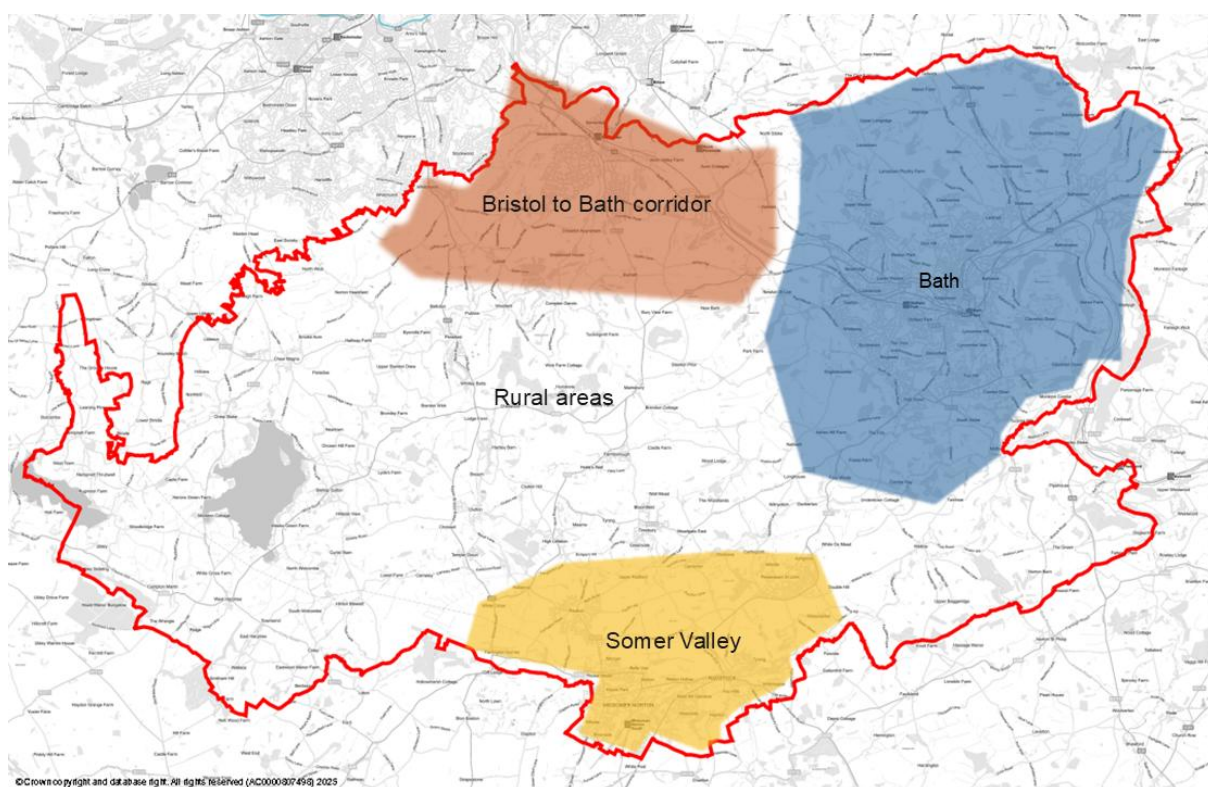
4.30 Local air pollution levels, air quality management areas and other air quality information have been used to inform the process. Where necessary it may be that more detailed information relating to specific areas and development use classes is required including prior to planning permission being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

Local character and community identity

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

Sub-areas within B&NES

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



Map 7: Map showing locations of sub-areas within B&NES

Bath

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

4.34 There is substantial pressure for development arising from housing and economic needs within the city, where land supply is limited and at a premium. Brownfield sites need to be re-developed where possible and at optimum densities in order to ensure such land is used efficiently, but in a way that respects the city's sensitive context. Most of the significant brownfield sites have been redeveloped or are already committed for development and therefore, relatively few substantial new brownfield sites are available for development. Within this context the use of land within Bath needs to be carefully assessed and the needs which should be met must be prioritised. Opportunities for outward expansion of the city for both housing and employment space need to be explored and are set out in the Bath chapter. The villages that lie within the hinterland of the city are also of special character and development opportunities are limited. Options for development and which needs should be met and how are considered further in chapter 5. As is currently the case it is likely that residents in nearby settlements in key transport corridors linking to Bath will look to the city as their main urban centre and employment destination. The quality of sustainable transport connections to these settlements needs to be enhanced in order to enable sustainable movement.

Bristol to Bath Corridor

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

4.36 The comparatively good public transport links are an important characteristic of this part of the district. However, it should be noted the main highway routes also suffer from congestion, especially at peak times. Therefore, investment is needed to further improve public transport services and active travel links. The potential opportunities are discussed in chapter 6.

4.37 Land on the south east edge of Bristol and in the transport corridor linking Bath and Bristol lies within the Green Belt. Strategically this is an important part of the Green Belt in separating the two cities and the settlements that lie in between. The physical separation of not only Whitchurch village from Bristol, but also Keynsham from Bristol, and Keynsham and Saltford village are of great importance to the respective communities. In considering locations for development the need to retain, strengthen and enhance green infrastructure corridors is crucial. As set out above and in the context of revised national policy (including the new concept of grey belt) land can only be released from the Green Belt for development through a local plan and only if justified by 'exceptional circumstances'. Potential locations for development in this part of the district, both for housing and employment space, as well as opportunities to provide high quality green infrastructure are considered in chapter 6.

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

Somer Valley

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

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

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

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

Rural Areas

4.43 A significant proportion of Bath and North East Somerset is rural in nature. The rural areas are made up of several areas of attractive and distinct landscape and settlement character (e.g. the Chew Valley), as well as the Mendip Hills and Cotswolds National Landscapes. Spatially and functionally some villages are linked. This means that the rural areas can be further sub-divided based on character and/or spatially and functionally, further detail is set out in chapter 8.

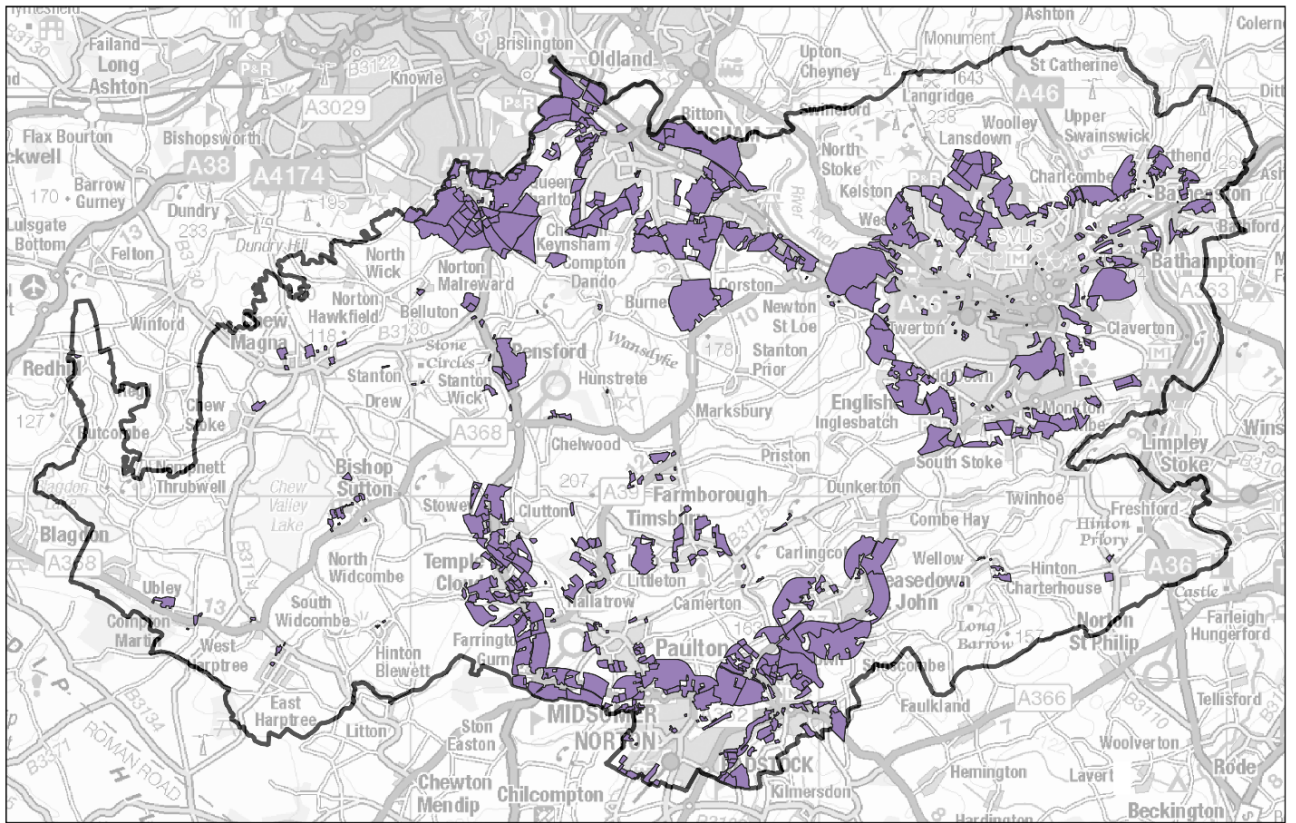
4.44 Areas of strategic importance for nature recovery have been identified through the Local Nature Recovery Strategy and through the work of the Bristol Avon Catchment Partnership, and West of England Nature Partnership. The high quality of the environment and opportunities to access the countryside, as well as the strong sense of community identity in villages, are important to local communities. The connectivity by public transport from villages to larger urban centres is variable and is poor in some of the smaller villages, which also lack services and facilities that can be accessed by walking, cycling or wheeling.

4.45 As is the case across the district as a whole there is a lack of affordable housing available in order to help meet local needs. Some housing development in villages can provide much needed affordable housing, as well as help to keep services and facilities viable and operating. However, it is important that any development in the rural areas meets the needs of those communities, respects locally distinctive character and is primarily focussed on those villages that are better connected through sustainable means of transport and have better access to key services and facilities. Provision of additional employment space to provide increased local job opportunities in the rural areas and potentially reduce out-commuting also needs to be considered, including in conjunction with housing development. This is further explored in Chapter 8.

Location Options

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

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

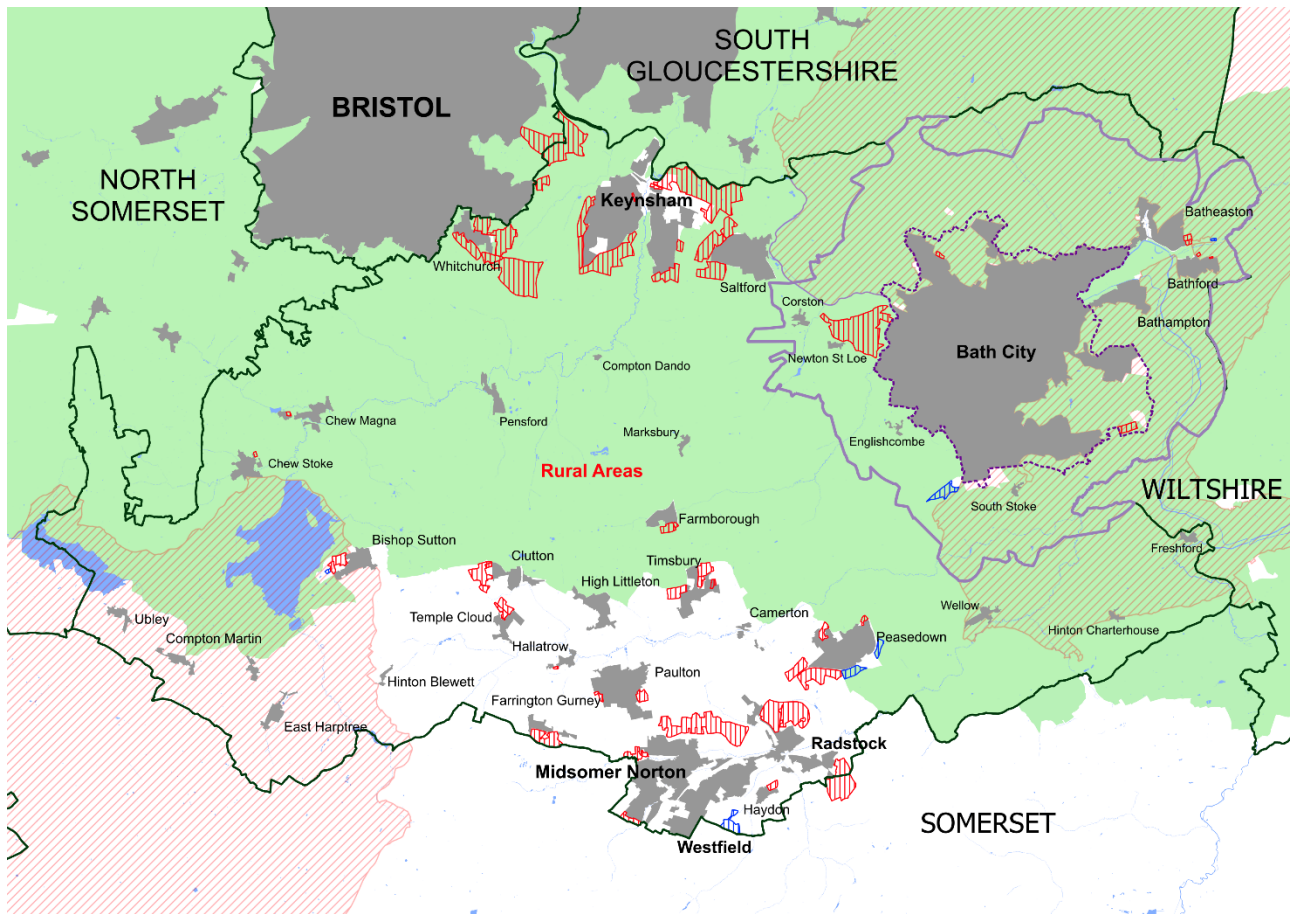


Map 8 – HELAA map

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

4.49 HELAA sites that lie elsewhere in the district, perform poorly against the spatial strategy principles or are otherwise constrained have not been identified as options. It should be noted that only locations or opportunities for strategic development (rather than smaller, more local sites) are shown on this map.

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



Map 9: Map showing locations of strategic site options

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

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

4.53 Only strategic site options are individually listed in the table below. In addition, a range of smaller, non-strategic site options are referenced in the place-based chapters and the capacity of these sites also need to be included in identifying the total housing that could be delivered through the options presented. In total they could theoretically provide between 17,630 and 23,930 new homes against a requirement to allocate land for at least 19,900 to meet the government's figure of housing need.

4.54 Further information on the wider sustainability effects of the location options below is set out in the Sustainability Appraisal (available separately on the council's website) and in preparing the Draft Local Plan we will also be considering the carbon impact of the different options. The performance of locations in terms of sustainability and carbon impact also gives a useful indication as to how well they align with the Doughnut Economics Model. It should also be noted that the table below does not include brownfield sites within Bath, smaller 'non-strategic' sites that could be allocated in the Somer Valley (see chapter 7) or at the most sustainable villages (see chapter 8). These sites, alongside the location options below, would also contribute to meeting the need for new homes.

Location Option	Existing housing commitments	New sites - appx. housing capacity	New sites - appx. employment space provision
Bath	4,293		
West of Bath*		900 – 1,950	
Non-strategic sites, including Purpose Built Student Accommodation		780 - 800	
<i>Odd Down</i>			2-5ha
Bristol to Bath Corridor	602		
Hicks Gate*		1,200 – 1,550	
North Keynsham*		1,900 – 2,400	
West/South West Keynsham		1,000 – 1,300	
South East Keynsham		–350 - 500	
Non-strategic sites in Keynsham		–230 – 300	
West Saltford (north of A4)*		300 - 350	
West Saltford (south of A4)*		650 - 850	
South Saltford		350 - 450	
(West Whitchurch (Whitchurch Option 1)		350 - 450	
East Whitchurch: Horsecworld and Woollard Lane (Whitchurch Option 2)		1,000-1,300	
North Whitchurch: Staunton Lane (Whitchurch Option 3)		350 - 400	
South East Whitchurch (Whitchurch Option 4) *		1,950 – 2,500	
Stockwood Lane		300 - 400	
Somer Valley	1,052		
South Peasedown (south of the by-pass)		550 - 700	
South west Peasedown (north of Bath Road, A367)		250 - 300	
<i>Bath Business Park extensions</i>			7ha
North Radstock		1,250 – 1,550	
Writhlington		950 – 1,150	
<i>Westfield Industrial Estate extension</i>			6ha
North of Midsomer Norton*		1,000	
Farrington Gurney South		400 - 500	
Somer Valley (non-strategic sites)		950 – 1,200	
Rural Areas (non-strategic sites incorporating possible longer term phases)	999	670 – 2,030	

Table 2: summary of site capacity ranges

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

4.55 The location options summarised in the table above are explored in greater detail in the place-based chapters that follow. Each of the options could play a role in helping to meet the identified overall housing and employment development requirements. We are seeking your comments on each of these location options and whether you consider they represent a good opportunity to address our need for housing and/or employment opportunities. Some of the location options were also presented in the spring 2024 options document. Comments previously submitted on these options will continue to be carefully considered by the council. These comments do not need to be re-submitted, however, any additional comments in the context of new information are welcomed. The new or extended options presented in this document are clearly indicated in the place-based chapters to help focus review and responses.

4.56 Some of the location options listed and assessed (alongside other smaller non-strategic sites referenced in paragraph 4.53 above) will together comprise a district-wide approach or strategy in meeting development needs. As set out above the cumulative impacts of development and associated infrastructure requirements have not been assessed at this stage and therefore, it is not certain which development locations could be brought forward in combination with others. It is also clear that as set out in each place-based chapter, substantial infrastructure investment will be needed to enable development to come forward. The district-wide strategy will be set out in the Draft Local Plan published later in the year.

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

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

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

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

New Settlement Methodology

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

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

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

Opportunities

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

Constraints

- Requires extensive upfront investment for infrastructure which could impact the viability of the development.
- Given significant infrastructure requirements and complex process of bringing one forward it is likely that a new or substantially expanded settlement would have long lead in times and will not deliver housing or other uses in the short to medium term.

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

Methodology for identifying locations for a new settlement

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

What do we mean by a new settlement?

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

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

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

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

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

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

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

4.69 Following this initial methodology to identify potential locations, it will be necessary to devise a secondary sifting process which would ascertain how any identified locations perform when tested against the spatial priorities for the local plan and an assessment of their deliverability, particularly in relation to willing landowners.