

Bath and North East Somerset Council
Local Plan 2025 – 2043

Options Consultation
October 2025

**Topic Paper: Identifying Strategic
Development Location Options**

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1. Introduction

- 1.1 This Topic Paper summarises the process by which the location options for strategic development that are identified in the Reset Local Plan Options document (autumn 2025) have been derived. It updates the Topic Paper that was published as part of the options document consultation in 2024. As such it seeks to ensure there is a clear audit trail by outlining in one place the broad sieving process that has been undertaken. In so doing it includes links to the consideration and assessment of alternatives in other documents (e.g. the Sustainability Appraisal and Area of Search Assessments) and does not repeat those assessments here.

2. Launch Document Consultation and Spring 2024 Options Document Consultation

- 2.1 Feedback and responses to the Launch Document consultation are set out in the [Local Plan 2022-2042 Launch Consultation – Findings Report](#). [The Local Plan Options 2024 – Representation Summary Report](#) summarises the key issues raised in responses to the spatial priorities of the Local Plan, needs of the district and strategy approach set out in the spring 2024 options consultation. These comments are not responded to at this stage and will continue to be considered in progressing preparation of the Draft Local Plan.

3. Local Plan Spatial Priorities and Spatial Strategy/Location Assessment Principles

- 3.1 In 2024 government published changes to national policy and revised standard method figures of housing need. The housing need figure for Bath & North East Somerset (B&NES) more than doubled, from around 720 to around 1,500. The Local Plan Options document published and consulted on in spring 2024 was based on identifying location options for meeting the need of around 720 dwellings per annum, or about 14,500 over a twenty-year period. As a result of the government changes referenced above the Council reset its Local Plan preparation to enable further evidence work to be undertaken and options for the substantial additional development required to be identified and assessed.
- 3.2 As set out in both the 2024 and 2025 Local Plan Options documents it is important that the options for development (and specifically the sites that are subsequently allocated in the Draft Local Plan) work towards achieving the spatial priorities of the Local Plan. At this stage it is not proposed to change the spatial priorities from those that were set out in the previous Options document. The spatial priorities of the Local Plan are therefore as follows:

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

The Plan will:

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

In doing so, our plans for development must:

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

3.3 Chapter 4 in the Local Plan Options document notes that the spatial priorities are not necessarily locationally specific and as such are not particularly useful in considering potential locational options. Therefore, in order to help facilitate this process spatial strategy or site assessment principles are set out. These principles link back to the spatial priorities (as summarised in the table below) and cover the main constraints and opportunities typically used in considering location or site alternatives. Since the 2024 options document the site assessment principles have been restructured and refined in order to ensure they comprehensively cover constraints and opportunities and the Local Plan spatial priorities – this is reflected in table 1 below.

Table 1: Spatial Strategy/Site Assessment Principles relationship to Local Plan Spatial Priorities

<i>Spatial Strategy/Site Assessment Principle</i>	<i>Local Plan Spatial Priority</i>
<i>Climate change and nature</i>	a) Carbon neutral by 2030; b) Nature recovery; e) Landscape setting
<i>Sustainable transport connectivity</i>	d) Reduce need to travel unsustainably and improved connectivity
<i>Flood risk</i>	a) Climate resilience; c) Health & well-being
<i>Local food production/agricultural land</i>	a) Carbon neutral by 2030; c) Health and well-being
<i>Biodiversity and nature recovery</i>	b) Nature recovery
<i>Landscape character impact (including designated landscapes)</i>	e) Landscape setting
<i>Historic environment</i>	e) Heritage assets and landscape settings
<i>Green Belt</i>	e) Landscape settings; f) Green infrastructure
<i>Infrastructure provision</i>	f) Timely provision of infrastructure
<i>Ground conditions</i>	f) Timely provision of infrastructure (indirect); c) Health & well-being (indirect)
<i>Existing land use</i>	e) Landscape settings; f) Green infrastructure; c) Health & well-being
<i>Air Quality</i>	c) Health & well-being; d) Reduce need to travel unsustainably and improved connectivity
<i>Local character and community identity</i>	e) Landscape settings; c) Health & well-being; f) Green infrastructure

- 3.4 It is worth noting that consideration of alternative locations/sites against the above principles may not result in them being sieved out as potential options at this stage e.g. against Green Belt or other impacts. In some instances, as set out below, they will be presented as options due to sustainability or other benefits. In preparing the Draft Local Plan further assessment will be undertaken to determine whether identified benefits are considered to outweigh harm and therefore, that the site should be allocated for development in the Draft Local Plan. As part of this process further consideration of Green Belt impact, in the context of revised national policy set out in the 2024 NPPF will take place (see next steps in section 7 below).

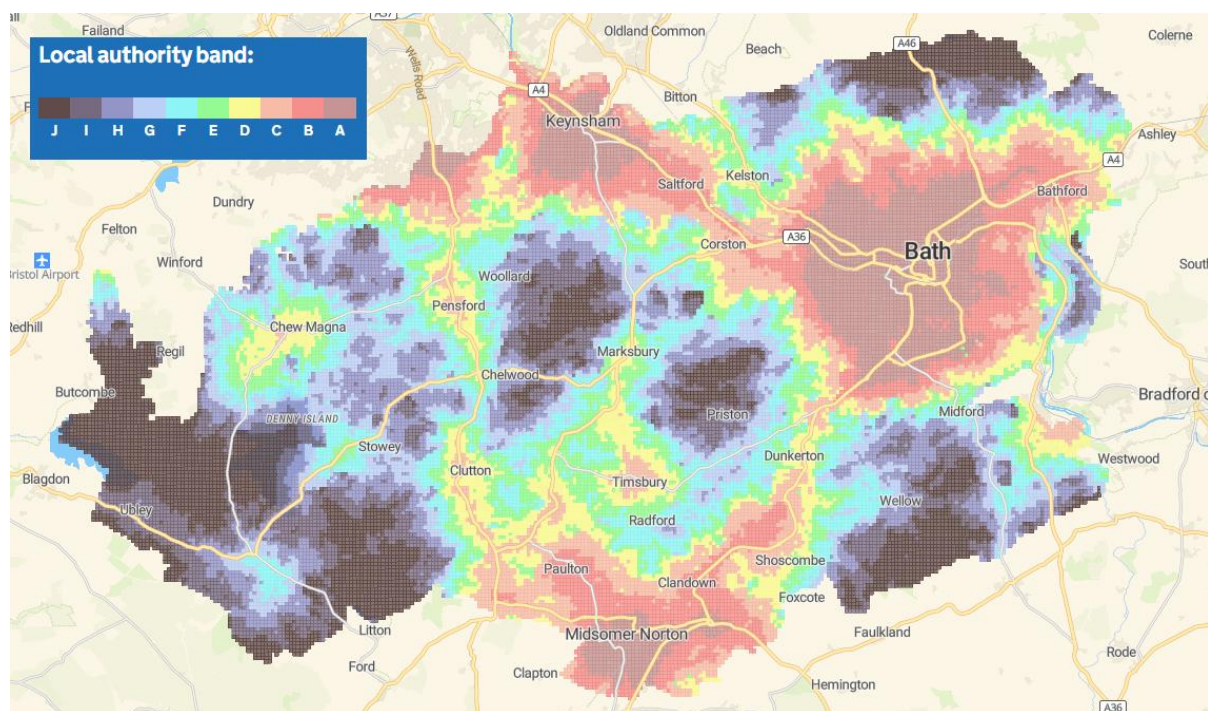
4. HELAA Opportunities

- 4.1 The starting point in identifying locations or sites to be considered is the Housing and Employment Land Availability Assessment (HELAA). The HELAA comprises sites that have been submitted to the Council by landowners/promoters, developers and communities, as well as sites proactively suggested by the Council. Proactive sites are those located close to (within 400 metres) of the edge of the relatively more sustainable settlements (see below) where they have not been submitted by third parties. The identification of potential locations or options for strategic development is based on HELAA sites or groupings of HELAA sites. [The Draft HELAA report will be published here](#)
- 4.2 All of the HELAA sites have been assessed as to whether they are technically suitable for housing or employment development; whether the site is available for development; and whether development is likely to be achievable during the Local Plan period. Those sites that are assessed as being not suitable or not available for housing or employment development are sieved out early in the process and have not been considered further.
- 4.3 Those HELAA sites that remain have been subject to a high-level GIS based quantitative constraints assessment through the Sustainability Appraisal. This assessment does not seek to assess the potential significance of sustainability effects for each of the sites, but rather is intended to indicate potential high-level constraints and opportunities that should be scrutinised further in assessment of growth options. As such it has informed the next stages of the process outlined below and will also inform subsequent assessment moving towards the Draft Local Plan.

5. Settlements Identification

- 5.1 In addition to sieving out unsuitable and unavailable HELAA sites at an early stage the spatial strategy approach of the Local Plan seeks to focus the identification and testing of options for strategic (or non-local) development on the most sustainable settlements. The most sustainable settlements are considered to be those with a range of employment opportunities, services and facilities that can be accessed through sustainable modes of transport i.e. walking, cycling, wheeling and public transport. Analysis and mapping of sustainable transport connectivity to employment and services & facilities mapping has been undertaken – the methodology is further explained in the [Transport Topic Paper](#). The analysis of connectivity underpinning the 2024 options used the Transport Accessibility Framework prepared by the West of England Combined Authority (WECA) which assessed the sustainable connectivity of 800 metre hexagons across the District. Since that time the Department of Transport (DfT) has developed and published a national connectivity tool. The tool is similar to the WECA Framework but is based on an analysis of 100 metre squares. This tool has been used to identify the comparatively better sustainably connected settlements – see map below. The map below shows the results of the analysis, with those areas in red/orange having the best sustainable transport connectivity, through the green/blue and then black areas having the poorest connectivity.

Figure 1: [Department for Transport \(DfT\) National Connectivity Tool](#) outputs for Bath & North East Somerset.



- 5.2 Those settlements with better sustainable transport connectivity are the main focus for considering location/site opportunities for strategic development i.e. Bath, Keynsham/Saltford, Whitchurch, Midsomer Norton, Radstock and Peasedown St John. In addition, improvements to sustainable transport connectivity that have been identified and are being actively progressed have also been taken into account. For example, as set out in chapter 7 (Somer Valley) of the options document, this results in the identification of Farrington Gurney as a settlement where strategic development opportunities should be considered. In summary this is because Farrington Gurney has a 'moderate' range of local services and facilities; lies on a public transport corridor linking it to Bristol and Wells; is subject to improvements identified through the WECA Somer Valley Links Project; will be close to employment at the Somer Valley Enterprise Zone; and walking and cycling links to Midsomer Norton can potentially be improved.
- 5.3 In addition to being used to identify the better sustainably connected settlements the DfT connectivity tool has also been used to assess the comparative connectivity of the location options considered for strategic development. The sustainable connectivity of each location option has been assessed and graded from A to J, with A being the best connected locations through to J as the worst. In preparing the Draft Local Plan it is anticipated that the connectivity information will also be used to inform the modelling of the transport carbon impact of each of the options.

6. Identifying Strategic Development Options

- 6.1 Focussing on the most sustainable settlements identified above, utilising HELAA sites or groupings of HELAA sites that are suitable and available, land or locations surrounding and adjacent to each settlement have been assessed. The locations have been assessed against the spatial strategy or site assessment principles outlined in the Options document and referenced in table 1 above. The results of this assessment are set out in the table or spread sheet as an Appendix to this Topic Paper – [it can be found here](#). The assessment process results in some areas/locations being sieved out and therefore, not considered or identified as location options within the Options document.

6.2 The assessment of land against the spatial strategy/site assessment principles and resultant sieving out of some locations has been informed by the following documents:

- HELAA – the assessment of suitability and achievability has identified constraints and opportunities that inform other assessments, as well as the Options document itself
- Area of Search Assessments - for Keynsham/Saltford, Midsomer Norton, Radstock, Peasedown St John, Farrington Gurney and Whitchurch areas formed of HELAA sites/groupings of HELAA sites were assessed. The table below outlines the criteria used in these assessments and also shows how these criteria are linked to the spatial strategy/site assessment principles set out in the Options document and outlined above. The Area of Search Assessments, which are [published here](#), inform why some land/locations have been sieved out at this stage and not presented as options in the Local Plan Options document
- Sustainability Appraisal (SA) – through the SA land surrounding the most sustainable settlements has been assessed in relation to the likely significant effects of development against the sustainability objectives. Through the SA some areas are sieved out as not being reasonable alternatives or options.
- Bath - the assessment of land cells around Bath in terms of whether they should be progressed and considered for potential strategic development is also outlined in the Bath Topic Paper (published alongside the spring 2024 Options document).

Table 2: Spatial strategy principles relationship to Areas of Search Assessment criteria

Spatial Strategy/Site Assessment Principle	Areas of Search Assessment criteria
<i>Climate change and nature</i>	• Green and Blue infrastructure • Presence of ecological designations • Priority habitats and significant linear features for protected species movement • Nature Recovery and BNG
<i>Sustainable transport connectivity</i>	• Existing levels of connectivity • Potential future levels of connectivity • Access feasibility • Potential for site to enhance sustainability
<i>Flood Risk</i>	• Flood Risk
<i>Local food production/agricultural land</i>	• Geological constraints (includes agricultural land grade)
<i>Biodiversity and nature recovery</i>	• Priority habitats and significant linear features for protected species movement • Nature Recovery and BNG
<i>Landscape character impact</i>	• Landscape/townscape
<i>Historic Environment</i>	• Heritage
<i>Green Belt</i>	• Green Belt
<i>Infrastructure provision</i>	• Green and Blue Infrastructure • Utilities: gas, water sewage, drainage and electricity • Site size and ability to deliver community infrastructure
<i>Ground conditions</i>	• Geological constraints
<i>Existing land use</i>	Not applicable
<i>Air Quality</i>	Not applicable
<i>Local character and community identity</i>	• Landscape and townscape • Ability to deliver community infrastructure

- 6.3 It is also worth noting that a potential option that requires 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. At this stage it not considered that new settlements are deliverable within the current Local Plan period. In the reset Local Plan Options document, a methodology for assessing and identifying potential locations for a new settlement is outlined. This may also be an issue that WECA explores further through the preparation of the Spatial Development Strategy.

7. Next Steps

- 7.1 The issues raised in responses to both the 2024 Options consultation and the reset Local Plan Options document will be carefully considered in progressing the Local Plan. In addition, further assessments of the location options will be undertaken in preparing the Draft Local Plan and identifying which sites will be proposed for allocation. These assessments include, but are not limited to:
- Green Belt: Stage 1 and Stage 2 Green Belt assessments will be undertaken in accordance with revised national policy set out in the NPPF 2024 and the associated Planning Practice Guidance. These assessments will need to consider the contribution of land to the Green Belt purposes; whether land meets the definition of grey belt; impact of site options on the Green Belt and whether in releasing land for development the purposes (taken together) of the remaining Green Belt across the area of the plan would be undermined; as well as assessment of potential boundary revisions
 - Further analysis of the environmental constraints and opportunities set out above (including flood risk through the Strategic Flood Risk Assessment and application of the sequential approach)
 - Considering the opportunities to deliver employment land as part of the mix of uses
 - Exploring wider opportunities to deliver other benefits and local infrastructure
 - Investigating deliverability, including viability, the implications of the government's 'golden rules' in respect of land currently in the Green Belt and delivery timescales