

Bath and North East Somerset Council

Local Plan 2025 – 2043

Options Consultation

October 2025

Topic Paper: Infrastructure

Contents

1. Background	3
2. Engagement Responses	4
3. Evidence	8
4. Next Steps	18

1. Background

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

1.2 National Planning Policy Guidance stresses the importance of working alongside infrastructure providers in plan making. It states:

“At an early stage in the plan-making process strategic policy-making authorities will need to work alongside infrastructure providers, service delivery organisations, other strategic bodies such as Local Enterprise Partnerships, developers, landowners and site promoters.

A collaborative approach is expected to be taken to identifying infrastructure deficits and requirements, and opportunities for addressing them. In doing so they will need to:

- *assess the quality and capacity of infrastructure, and its ability to meet forecast demands. Where deficiencies are identified, policies should set out how those deficiencies will be addressed”*

1.3 The purpose of this Topic Paper is to explain the ongoing consultation that has taken place with infrastructure providers and our approach to addressing the infrastructure needed to support growth in the Bath and North East Somerset (B&NES) Local Plan. The Topic Paper also summarises responses to the Launch Document consultation and the Options Document 2024.

1.4 It is important to note that as we are at an early stage of preparing the growth strategy and have not yet confirmed the sites to be allocated for development, the infrastructure needed to support growth is not yet fully known.

1.5 The delivery and timing of infrastructure required as part of new development is a critical issue, particularly for local communities when talking about future

development. An Infrastructure Delivery Plan (IDP) will be prepared and will be a key part of the evidence base that supports the Draft Local Plan. The IDP will focus on the key strategic infrastructure requirements to support growth in the area, as well as funding mechanisms and arrangements for delivery.

2. Engagement Responses

Launch Document Consultation

2.1 The Launch Document Consultation highlighted the need for infrastructure to support communities. Many respondents raised concerns around the capacity of local infrastructure, particularly in relation to healthcare, education, and community facilities. There were requests for more investment in these areas to ensure that local communities have access to the services they need.

2.2 In addition to the Launch Document consultation, a series of workshops were held with community representatives and other stakeholders to discuss key issues and priorities of the new B&NES Local Plan. These sessions included workshops around Bath and its environs, Keynsham and Saltford, Whitchurch Village, Somer Valley, rural areas of the district, and also consultation with seldom heard groups.

2.3 Feedback identified the issues summarised below:

- Throughout the engagement process, residents highlighted how the local plan could be used to create healthier communities. Residents identified the need for reduced car use, supported by increased public and active transport infrastructure, to reduce pollution and increase physical activity. Green space was repeatedly identified as an important feature across B&NES, with residents appreciating the positive impact, access to green space can have on mental wellbeing.

- The food environment was frequently raised in various workshops. In particular, residents identified a need for more community food growing space, including allotments and orchards. The need for further community spaces was also a recurrent theme.
- Children and young people were identified as being particularly in need for safe spaces for play and to socialise, as one consultee stated; “there is less and less to do for children and young people in the area”. The deterioration and loss of play area was repeatedly noted as having a significant impact on local children and families. It was recognised that that play areas would benefit from further investment and improvement, and that opportunities should be taken to make them more accessible and inclusive.

Local Plan Options 2024 Consultation

2.4 This section provides a summary of comments from various stakeholders in respect of infrastructure issues within the previous Local Plan Options Document 2024. It covers key themes such as climate change, sustainable transport, green infrastructure, flood risk, healthcare provision, and utilities.

2.5 Overall, the responses highlighted the critical need for detailed evidence, cross-agency collaboration, and clear delivery mechanisms to achieve sustainable development across the district.

Summary of Representations on the Options Document 2024

Challenges in Infrastructure Delivery and Spatial Strategy

- Concerns were raised about pressure on existing services, particularly in areas where infrastructure has not kept pace with housing growth.
- Parish councils and local groups stressed the importance of timely infrastructure provision, including utilities, healthcare, and education, to support sustainable communities.

Support for Climate Change and Green Infrastructure

- Several respondents, including the National Trust and Sustrans, expressed strong support for the Local Plan's emphasis on tackling climate change, protecting nature, and enhancing green infrastructure. They highlighted the importance of sustainable transport connectivity, nature corridors, and natural flood management measures such as wetlands and flood meadows.
- The requirement to integrate green infrastructure delivery across all scales of development, including small rural sites, was emphasised, with calls for improved resourcing and protocols to support effective implementation.
- Respondents highlighted the need to safeguard locally important green infrastructure outside strategic networks, and the role of local food production. The importance of green infrastructure strategies and nature-based flood management was also highlighted.

Healthcare Infrastructure and Developer Contributions

- The NHS and related bodies emphasised the critical need to prioritise healthcare infrastructure in the Local Plan. They advocated clear policies requiring developer contributions to fund health services and facilities necessitated by new housing. The importance of early and ongoing collaboration between the Council, NHS, and developers was identified to ensure healthcare capacity aligns with population growth. Proposed approaches were suggested, including mitigation options such as financial contributions, on-site infrastructure, or land provision, and ensuring that contributions towards health facilities are factored into viability assessments.

Flood Risk Management and Climate Resilience

- The Environment Agency provided commentary on the need for the Local Plan to incorporate current and future flood risk considerations, including those driven by climate change. They stressed application of the sequential test for site allocations, integration of nature-based solutions, and maintenance or upgrading of existing flood defences. Specific flood risk management schemes, such as the Bath Flood Risk Management Scheme and the Bristol Avon Flood Strategy were highlighted as essential components. The importance of safe access and egress, especially in flood-prone villages, and the need for sustainable drainage systems (SuDS) was also noted.
- Storm overflow management in Bath and the necessity for infrastructure to address sewage and water efficiency challenges were also raised.

Transport Connectivity and Sustainable Travel

- Transport infrastructure and connectivity received significant responses. Respondents requested the prioritising of sustainable transport modes (walking, cycling, wheeling, and public transport) to reduce carbon emissions and improve public health. National Highways emphasised the need for detailed transport impact assessments with particular regard to the Strategic Road Network.
- There were calls for detailed transport data and analysis to inform policy decisions and to address transport carbon emissions.

Other Infrastructure Considerations

- Additional infrastructure issues were raised including concerns about utility service capacity and the need for sustainable energy provision.

3. Evidence

- 3.1 An integral part of preparing the new Local Plan Options has been to develop effective working relationships with key infrastructure providers. Ongoing engagement with infrastructure and service providers is critical to ensure that the impact of new development is assessed comprehensively and key items of infrastructure, and where necessary safeguarded land, essential for the delivery of the Local Plan are identified.
- 3.2 An Infrastructure Delivery Plan (IDP) will be prepared to accompany the Draft Local Plan. It will identify the strategic site allocations and other sites and include an assessment of the individual and cumulative impacts on existing and planned infrastructure (for example the cumulative impact of new developments on existing schools' capacity) and the associated need for new and improved infrastructure provision.
- 3.3 The IDP will seek to identify how existing infrastructure requirements in the area can be addressed. The IDP will also identify funding sources based on viability evidence and evidence from infrastructure providers. The phasing and delivery of infrastructure will also be considered in the development of the IDP. Opportunities for forward funding infrastructure provision will be explored.
- 3.4 The IDP will also consider cross-boundary infrastructure issues arising from the ongoing Duty to Co-operate discussions, as well as committed development and the emerging Local Plans of our neighbouring authorities.
- 3.5 The focus of the IDP is on the infrastructure measures and schemes necessary to deliver the new Local Plan. However, the council also recognises that these will develop over time and existing projects may evolve, or new schemes may be identified. The IDP is an iterative process.

3.6 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 the Options document are explored further.

3.7 As part of the preparation of the Local Plan Options, we have consulted key infrastructure providers and met with representatives. We have provided key infrastructure providers with details of the proposed overall level of housing need within the district over the plan period, having regard to existing commitments, and identified the potential growth areas. As the council is at the Options stage and the draft allocations have not been finalised, responses from providers have generally been at a high level. However, stakeholder engagement with providers will be ongoing throughout the preparation of the draft Local Plan. It is important that infrastructure providers can plan and align their own strategies and budgets to integrate with the development proposed through the Local Plan. This can only be achieved through the continual development of close working relationships and through early and ongoing dialogue.

3.8 Details of the context and a summary of responses from key infrastructure providers is set out below:

Water Supply

- 3.9 The management of water supply is undertaken by Wessex Water for the Bath area, and Bristol Water (now part of Pennon Group) for the rest of the district. The Environment Agency manages resources through a Catchment Abstraction Management Plan (CAMS) for the River Avon
- 3.10 Bristol Water's principal water sources are the Mendip Lakes (Chew, Blagdon and Cheddar) and the Gloucester-Sharphess canal. The Bristol Water Resources Management Plan (WRMP) 2025 – 2080 identifies a range of measures to manage supply, including water demand reduction strategies, leakage reduction and a new reservoir Cheddar 2. This will serve a wider area than the Bristol Water catchment alone. Wessex Water's principal water sources are boreholes and springs that tap into the chalk and limestone aquifers of Wiltshire and Dorset (approximately 75%) and 25% from reservoirs in Somerset. The Wessex Water WRMP addresses similar issues regarding water management measures and leakage reduction.
- 3.11 Bristol Water has advised that there are unlikely to be any significant constraints in relation to water supply for the potential growth areas. Wessex Water have not objected to the level of growth with regards to water supply.

Sewage Infrastructure

- 3.12 Wessex Water provides sewerage services for the district. Sewers take wastewater for treatment at Water Recycling Centres (WRC). There are areas (principally the more rural locations) of B&NES not connected to the mains sewer network, these areas have alternative provision such as septic tanks or package treatment works. New development may also be serviced by an alternative provider under the New Appointments and Variations (NAV) mechanism. The NAV market enables developers to choose an alternative water and sewerage undertaker for a specific geographical area.
- 3.13 Wessex Water has systematically reviewed the emerging Options, highlighting the WRC catchments, their capacity and planned upgrades

together with likely requirements for expansion of capacity to accommodate additional growth. A summary by broad location of options is listed below:

Bath area

Bath - West of Bath, Batheaston, Bathford and Corston

- 3.14 These areas are in the catchment of the Saltford WRC. It is likely that the cumulative scale of development within the catchment could trigger the need for additional capacity improvements. Potentially some of the Saltford growth areas could also be served by Saltford WRC.

Bristol to Bath Corridor and Whitchurch

Keynsham and Saltford

- 3.15 Keynsham and Saltford are served by the Keynsham WRC. Expansion is needed at this WRC to accommodate growth in capacity. Wessex Water have raised concerns about the impact of the Keynsham WRC on the North Keynsham Option regarding the potential loss of amenity due to odour and flies. Discussions will continue regarding assessment, potential mitigation and solutions.

Hicks Gate and Whitchurch

- 3.16 Hicks Gate and Whitchurch are on the edge of the Avonmouth WRC catchment. Expansion is currently taking place at this WRC however based on potential growth if available capacity at Avonmouth WRC is exceeded, further upgrades to the works would be required. As Avonmouth WRC serves Bristol and the surrounding area, housing growth in Bristol City Council and South Gloucestershire also needs to be taken into account.

Somer Valley

Midsomer Norton, Radstock and Westfield

- 3.17 The growth areas within these settlements lie within the Radstock WRC catchment. Wessex Water note that the potential substantial scale of

growth across the catchment identified would require additional capacity at the WRC. Future expansion may require land purchase.

Peasedown and Timsbury

- 3.18 Peasedown and Timsbury are currently served by Cam Valley WRC. Cam Valley WRC has limited capacity. It is likely that work would be required at the WRC to provide additional capacity based on the scale of potential growth identified within the catchment. The South Peasedown Option lies on the boundary of two WRC catchments: Cam Valley WRC and Shoscombe WRC. If the growth option was to proceed, further investigation will be required to conclude which WRC it would be best connected to. Shoscombe WRC is a small works with limited additional capacity. Increasing capacity at the site would likely require additional treatment and site expansion.

Rural Areas/ Somer Valley

Clutton, Farrington Gurney, High Littleton, Paulton and Temple Cloud

- 3.19 These villages lie within the Paulton WRC catchment. Further expansion would likely to be required to serve potential development. Any expansion of Paulton WRC is quite constrained.

Chew Magna, Stowey-Sutton

- 3.20 The Chew Valley settlements are served by Chew Stoke WRC. This is a small works near capacity. Improvements may be needed which would need to be reviewed.

Farmborough

- 3.21 Farmborough is served by a small works serving the village. It has limited spare capacity. It is possible that works would be needed at the WRC to increase capacity based on the upper level of development referenced in the Options document. This would need to be reviewed if the development proceeds. There are constraints to expansion at this WRC.

Sewage Connections

- 3.22 Wessex Water outline the availability and suitability of local sewer connections, restrictions due to existing infrastructure, and the need for further investigations on how to serve developments, in particular large growth areas such as West of Bath.

Health Facilities

- 3.23 We have had regular meetings with Bath and North East Somerset, Swindon and Wiltshire Integrated Care Board (BSW ICB) and NHS Property Services (NHS PS) who are an agency/landlord representing the ICB in planning and estates matters. We have also met with the Royal United Hospital NHS Foundation Trust (RUH) Estates department and planning consultant.
- 3.24 The NHS PS and ICB responded in summary with the following comments:
- The development of Single Neighbourhood Providers based on existing Primary Care Networks (PCNs) is a key aspect of the NHS Ten Year Health Plan, to develop integrated services locally, focusing on the specific needs of the local population.
 - The Ten-Year plan describes how the NHS will work at neighbourhood level through multidisciplinary teams. These teams will comprise a range of staff, in addition to GPs, including speciality and associate specialist doctors, pharmacists, district nurses, community geriatricians, dementia workers and allied health professionals such as physiotherapists and podiatrists/ chiropodists, joined by social care and the voluntary sector. To address the pressure that acute services are under, there will be a focus on moving some intermediate health care services (for example, screening and testing) out of hospitals and into primary care facilities.

- Successfully transforming the way services are delivered, and redesigning patient care requires making more efficient use of the existing estate alongside ensuring that any new health infrastructure provided supports this new model of primary care provision.
- From an estates' perspective, delivering the NHS Ten Year Health Plan means the ICB will need to look to work together as partners with primary care, and community providers and local authorities to consider how they deliver, modernised integrated primary and community care that accommodates a wider range of healthcare services, built around the needs of the local population.
- We recognise our existing GP surgeries have some potential capacity issues, and we acknowledge any future models will require maximising existing assets and considering how any new facilities can respond to this new way of integrated working.
- There are 23 GP practices within six Primary Care Network (PCN) in B&NES. There are existing deficits in overall GP floorspace capacity across all PCNs.
- When the site allocations are confirmed the ICB will be able to give a more accurate estimate of the potential infrastructure requirements and implications for each of the Plan Areas.

3.25 The council will need to work closely with the ICB to ensure a coordinated approach to planning healthcare infrastructure that considers and resolves the potential issues with funding, phasing of development, and site availability. Financial contributions will be required from developers.

3.26 In terms of locations of growth, the ICB /PS had the following comments.

Bath

- 3.27 Significant investment is required to provide additional primary care capacity within Bath and the surrounding areas to cater for the housing growth expected from existing commitments and the potential site allocations to the west of Bath.

Keynsham, Saltford, Hicks Gate, Whitchurch

- 3.28 The Keynsham PCN currently has an overall space deficit for provision of primary care services to the existing residential population. There is a lack of spare capacity in the locality that could accommodate additional primary care provision for new housing growth. There would be a need for developer contributions towards the capital costs of primary care facilities delivery. Based on the scale of growth, a new primary care facility may be expected. There are also cross boundary issues in this area.

Somer Valley

- 3.29 There is a lack of spare capacity in the locality that could accommodate additional primary care provision for new housing growth. There would be a need for developer contributions towards the capital costs of primary care facilities delivery. The strategic site options in this area could deliver significant growth. Therefore, a new primary-care facility may be required. There are also cross boundary issues in this area.

Rural Areas

- 3.30 It is noted that a significant proportion of Bath and North East Somerset is rural, and several of the potential growth locations will also impact on practices that serve rural areas.
- 3.31 PCNs covering rural areas have very limited capacity to absorb new patients. Within rural locations the impact of a small number of new homes will often have a more significant impact compared to urban practices. This is because premises within the existing estate often do not have the flexibility to

accommodate the increase in size needed to provide additional services, including the wider range of services now required in primary care.

- 3.32 Once the site allocations have been finalised, the council will work with the ICB to explore appropriate solutions for growth that will impact on rural premises. For example, due to the challenges of practices operating at scale in rural locations, mitigation measures may be required to enable the PCN to deliver additional primary care services from a hub location, while the nearest GP to a development provides only core services. This approach still allows for care to be provided closer to home, but recognises that provision of the full, wider range of primary care services needs to be from an operationally viable (for the NHS and system partners perspective) location.

Acute Care

- 3.33 In terms of acute care, the RUH has advised that it is looking at providing diagnostic and other services at a more local level including combined with primary care facilities. An Estates Strategy is in development.

Education Provision

- 3.34 B&NES Council has a statutory duty to ensure sufficient schools are available for our area to provide primary, secondary and sixth form education and also Special Education Needs and Disability (SEND) places.
- 3.35 In line with current government strategy, rather than being direct providers of school places via Community schools, local authorities are now commissioners of school places via a range of providers that include Academies, Free Schools, Foundation schools, Trust schools, Voluntary Aided schools, Voluntary Controlled schools and Community schools.
- 3.36 The Options Document outlines potential requirements for new primary and secondary schools that would be needed within the Options growth areas, however the exact number of places will relate to housing mix and the available capacity in nearby schools.

3.37 The Options Document notes that the cumulative impact of development of sites on primary and secondary school places will need to be assessed in preparing the Draft Local Plan, to ensure there is sufficient capacity.

3.38 The Options Document also considers where pupils would require transportation to the nearest secondary school at a cost to the Council due to either lack of safe access to a Secondary School or where pupils would not be able to reach school using active modes of travel.

Flood risk and Drainage

3.39 We have met with the Environment Agency (EA) and discussed the approach to the Strategy Flood Risk Assessment for the Local Plan and application of the sequential approach to ensure, as far as possible, residential development is not proposed in areas of flood risk. The EA have provided updated details of flood defence future requirements within the current IDP.

Energy

3.40 We have held discussions with National Grid Electricity Distribution (NGED) regarding grid capacity. NGED has responded that, provided sufficient notice is given of growth locations and sites coming forward, the implications for the grid can be factored into forecasting, and any required upgrades can be scheduled into the general reinforcement programme. This would ensure that by the time developments are coming forward, sufficient capacity will be in place.

Sustainable transport

3.41 Sustainable transport connectivity and potential linkages have been particularly important in shaping the choice of locations for future development, and facilitating sustainable means of transport is important in seeking to minimise carbon impact and address the climate emergency.

Information on the approach to transport is set out for each area in the Options Document and in preparing the Draft Local Plan specific transport infrastructure improvements required will be identified. This needs to take account of and mitigate both the impacts of individual sites that will be proposed for allocation, as well as cumulative impacts. Again, cross boundary impacts will be taken into account.

Green Infrastructure and Community Facilities

3.42 The Council's Climate and Nature Team are preparing a new Greener Places, Green Infrastructure Framework for Bath and North East Somerset 2025 – 2035. The Local Plan will reflect this to ensure that the vision, principles and outcomes of the Framework are incorporated into allocations. Issues such as community facilities (including play areas and sports facilities) which are necessary for development to be acceptable in planning terms, and to meet the policy requirements in the Local Plan will also be identified as part of the site allocation process within the draft Local Plan and will be subject to specific development management policies and requirements.

4. Next Steps

4.1 Following the consultation period for the Reset Options Document, the feedback received (alongside comments on the 2024 Options Document) will inform the next stages of preparation of the Local Plan and the preparation of the full Infrastructure Delivery Plan (IDP). The IDP will identify the specific infrastructure projects required as well as the phasing of infrastructure delivery, the costs and the available funding. The policy allocations will also set out the site requirements, such as new schools and other facilities where necessary. It is crucial that new development is served by the timely provision of necessary supporting infrastructure.