

Bath and North East Somerset Council
Local Plan 2025 – 2043

Options Consultation (Reset)
October 2025

Topic Paper: Local Green Spaces
Assessment Report

Bath & North East
Somerset Council

Improving People's Lives

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1 Background

- 1.1 The council is preparing a new local plan which will establish the planning policy framework for the district until 2043. The new Bath and North East Somerset (B&NES) Local Plan (2025-2043) will contain a vision, strategy and policies to guide and manage how the district grows and changes over the next 18 years. Once adopted, it will be the main tool used to assess and decide planning applications for new development.
- 1.2 The [Launch Document](#) (autumn 2022) marked the formal start of preparing the new B&NES Local Plan. It set out the central aims for the local plan including ‘delivering high quality development that supports vibrant, healthy, successful communities, and addresses inequalities’. Following this, the council consulted on a [Local Plan Options Document \(Spring 2024\)](#).
- 1.3 As a result of proposed government revisions to the National Planning Policy Framework (NPPF) and standard method housing figures in late 2024, the council decided to reset the new local plan, as outlined in the [Local Plan Reset Document](#). This decision was made to enable further consideration of options to accommodate the additional development now required. Given the revised timetable for the preparation of the new local plan, a new local plan period has been set for 2025-2043.
- 1.4 During the consultation on the Local Plan Options Document (Spring 2024), the council consulted on sites for Local Green Spaces (LGS) designation. The previous [Local Green Space Topic Paper](#) set out the assessment of the sites nominated by communities and recommendations for LGS designation. As part of the Options Consultation (2024), three new nominations for LGS designation were received.
- 1.5 The purpose of this topic paper is to present the three new nominations received as part of the Options Consultation (2024). It sets out their assessment against the NPPF criteria and the Planning Practice Guidance (PPG) and outlines the new recommendations for LGS designations.

2 Consultation and Engagement Responses

- 2.1 A summary of feedback and responses to consultation at the Launch stage and Options (2024) stage are set out in the following reports: [Local Plan 2022-2042 Launch Consultation – Finding Report](#) and [Local Plan Options 2024- Representation Summary Report](#). These documents highlighted that overall respondents were supportive of the local plan priorities and objectives. In terms of healthy communities, respondents asked for more environmentally friendly approaches to housing. Respondents also highlighted the importance of protecting green spaces.

3 Current Position, Consultation and Methodology

- 3.1 In the previous Local Plan Options Document (Spring 2024), the council consulted on 69 nominations for new Local Green Space (LGS) designations. 26 of these sites were recommended for designation. All nominations received were assessed against the NPPF criteria for LGS and the National Planning Practice Guidance (PPG). The assessment and recommendations for LGS designations received prior to the Options Consultations (Spring 2024) is set out in the previous topic paper [Topic Paper: Local Green Spaces Assessment Report \(2024\)](#).
- 3.2 The main issues raised in comments received in response to the 2024 Options Consultation on LGS are summarised below:
- **Community Engagement and Value:** Combe Down allotments and other local green spaces seen as crucial community assets, demonstrated by petitions and proposals for community management; valued for recreational, aesthetic, historical significance; challenge in balancing development with community desires.
 - **Environmental Conservation and Biodiversity:** Strong desire to protect local green spaces for wildlife habitats, food security, and biodiversity; encouraging protective designations to balance ecological safeguarding with urban development; allotments valued for conserving underground minerals and supporting biodiversity.
 - **Planning and Policy Challenges:** Noted complexities in planning and policy frameworks protecting local green spaces; the procedural need for more in-depth examination and transparency; a call for stronger policies to protect valuable community assets like the Combe Down allotments against developmental pressures.

- **Potential for Future Development and Alternatives:** Concerns expressed about new developments impacting green spaces; suggestions to use brownfield sites for development as an alternative to affecting green belt/spaces; necessitates rethinking urban development in light of climate change and biodiversity loss.

- **Resource Management and Sustainability:** Emphasis on sustainable resource management, citing the allotments' role in preserving Bath stone resources and contributing to ecosystem services; advocates for sustainable land use policies incorporating environmental stewardship with heritage conservation.

- **Health and Wellbeing Implications:** Acknowledgement of the mental and physical health benefits provided by local green spaces; viewed as essential for community well-being, physical activity, and social inclusivity by offering natural settings for rest and community connection.

- 3.3 The council is not responding to the comments received as part of the Options Consultation (2024) at this stage. These comments will continue to be carefully considered in preparing the Draft Local Plan. The council is also not seeking further comments on the sites that were previously presented, unless stakeholders consider that circumstances have changed and they wish to present new information.
- 3.4 As the local green space designation is linked to community value, which must be demonstrated, the council has sought community nominations for spaces that should be designated and protected from development. As set out above as part of the Options Consultation (2024), the council provided the opportunity to nominate additional sites for LGS designation. Three new nominations for LGS designation were received.
- 3.5 This topic paper sets out the assessment of the three new nominated sites against the NPPF criteria for LGS and the PPG and provides recommendations for designation.

4 Policy HVC/LGS: Local Green Spaces

Background

- 4.1 Local Green Spaces (LGS) that are of demonstrable importance to local communities can be designated and protected from development. The National Planning Policy Framework (NPPF) Section 8 provides guidance for local green space designation. Relevant paragraphs concerning LGS Designation are as follows:

105. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.

107. The Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;*
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- c) local in character and is not an extensive tract of land.*

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108. Policies and decisions for managing development within a Local Green Space should be consistent with national policy for Green Belts set out in chapter 13 of this Framework.

- 4.2 National Policy makes clear that blanket designation of all green space is not appropriate. Proposed designations must be supported by evidence that the green area is special to the local community. National Policy and Practice Guidance outlines some examples of what green areas can be identified and designated as LGS. It also sets out a series of exceptions where designating a LGS would not be appropriate. This is set out below.
- Education sites – The NPPF places great weight (para 100 (a)) on the need for Schools and Colleges to expand/alter. Because of this, local green space designations within school ground including playing fields are very unlikely to be suitable for designation.
 - Highway Land/Verges - Land adjoining the highway is subject to permitted development rights and may need to be utilised or reconfigured for highway works and is therefore not suitable for designation.
 - Sites with planning permission – A green space within a site with extant planning permission (within the red line) cannot be designated until the development is complete.
- 4.3 Planning Practice Guidance (PPG) cites examples of what green areas can be identified as LGS. For example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis.
- 4.4 Land cannot be excluded because there is an existing planning designation, although national guidance recommends that the bar is higher for land within the Green Belt/ National Landscape, or with another national designation i.e. the added value of the designation needs to be clearly demonstrated over and above the existing designation. On this basis it is very unlikely that land within the Green Belt/National Landscape or within a nationally designated Historic Park & Garden would be suitable for designation.
- 4.5 Land that is designated as Local Green Space is protected from development, unless very special circumstances are demonstrated, through a Local Plan policy – in B&NES this is through adopted policy LCR6A.

5 New nominations

- 5.1 The council received three new nominations for Local Green Space (LGS) designation as part of the previous Options Consultation (2024) which have been assessed.
- 5.2 The assessment and recommendation for new Local Green Space designation is set out below.

Bath

Odd Down

Ward	Odd Down
Site name	Workhouse Burial Ground
Site number	
Landowner	B&NES Council
Nominated By	Jacky Wilkinson
Map	
Description of green space	The site is approximately 1.57 acres and consists of a grassed area. It is the last resting place of 3,192 people who died in the Bath Union Workhouse between 1858 and 1899.
Existing Planning Designations	• Bath World Heritage Site • Safeguarded Land for Sport and Recreational Facilities (LCR5)
In reasonably close proximity to the community it serves	The site is close to housing.

Demonstrably special to a local community and holds a particular significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of wildlife	Summary of submission: The reasons for nomination are set out below: Historic Significance - The land has been widely recognised as a historic site and it is clearly important to the local area, and to the wider Bath community. Recreational Value - It is covered by Policy LCR5 as a sports field, but this does not recognise its social and historic value.
Local in character and not an extensive tract of land	The site is local in character and well contained.
Exceptions	None.
Landowner support/objection	No comments received.
Recommendation	The land displays historical significance to the local community. It is therefore recommended to designate it as a Local Green Space for its historical value to the local community.

Widcombe and Lyncombe

Ward	Widcombe and Lyncombe
Site name	Lyncombe Hill Fields
Site number	
Landowner	B&NES Council
Nominated By	Friends of Lyncombe Hill Fields CIC
Map	
Description of green space	The site is approximately 10.3 acres. It is made up of five fields of pasture and hedgerows and is crossed by three public footpaths.
Existing Planning Designations	• Bath World Heritage Site • Bath Conservation Area • Green Belt (CP8) • Landscape setting of Settlement (NE2A) • Nature Recover Network Woodland Strategic Network (NE5) • Nature Wetland Strategic Network – Partially (NE5) • Strategic Nature Conservation Interest (NE3) • UK Priority Habitat (NE3)
In reasonably close proximity to the community it serves	The site is close to housing.

Demonstrably special to a local community and holds a particular significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of wildlife

Summary of submission:

Historic Significance

- This area of Lyncombe and Widcombe was granted to Bath Priory by King Edgar in the year 970. In the Domesday Book of 1086, the area is named as 'Lincome' and in subsequent centuries it had its manorial centre at Lyncombe Hall in Lyncombe Vale. In 1539, the Priory was dissolved by Henry VIII, along with all such religious institutions in England, and the land was passed to the ownership of the Crown. By the beginning of the 17th century, Hugh Sexey had bought the manor outright and, when he died in 1610, the trustees of the estate sold property from the various estates.
- Historic maps show that the field boundaries and hedgerows of Lyncombe Hill Fields have been unchanged for more than 200 years. Two trees are graded as Ancient by the Woodland Trust – an Ash and a Common Lime.

Recreational Value

- The main leisure activities taking place on site are walking, viewing the city and picnicking.

Tranquillity Value

- The site overlooks Bath city centre and is bounded by two busy roads and Beechen Cliff School. It is very popular with walkers, joggers, nature lovers and dog walkers. Since the pandemic there has been a dramatic increase in visitors. It is a route taken by pupils to and from Beechen Cliff Comprehensive School. The three very muddy public footpaths have been improved by the introduction of 20mm hardcore. The views from the fields are dramatic and far ranging. Simple wooden benches have been strategically placed to make the most of these views. The mission of the licence holders is to enhance the diversity of the wildlife and encourage public access.

Wildlife

- The space is not designated as a Site of Special Scientific Interest (SSSI), Site of Nature Conservation Interest (SNCI) or a Local Nature Reserve. However, it has significance as a semi-improved limestone meadowland within 10 minutes' walk of the city centre. The existing hedgerows are at least 200 years old and are comprised of Ash, Field Maple, Sycamore, Hazel, a Wych Elm, Grey Willow, Spindle, Holly, Hawthorn, Blackthorn and Elder. The mowing regime for the fields is designed to enhance the wildflower species. Bats are observed in the summer using detection equipment. Over 40 species of birds have been observed. Some birds breed on site, including Blue Tit, Great Tit, Nuthatch, Spotted Woodpecker. Mammals include field Voles, Badgers and Foxes.

Beauty

- The site is unusual because it looks like farmland, which it was in the past, but it is semi-wild in lots of places. There are areas of scrub in each of the irregularly shaped fields.

Local in character and not an extensive tract of land	The site is local in character and well contained.
Exceptions	None.
Landowner support/objection	No comments received.
Recommendation	The land presents numerous wildlife and tranquillity benefits and displays historical significance to the local community. It is therefore recommended to designate it as a Local Green Space for its wildlife, tranquillity and historical value to the local community.

Wider District

Nemptnett Thrubwell

Ward	Nemptnett Thrubwell
Site name	Land adjacent to Village Pump
Site number	
Landowner	Uknown
Nominated By	Nemptnett Thrubwell Parish Council
Map	
Description of green space:	The land is an open area situated between a highway and a field.
Existing Planning Designations:	• Green Belt (CP8) • Landscape Setting of Settlement (NE2A) • Nature Recover Network Woodland Strategic Network (NE5) • Nature Wetland Strategic Network – Partially (NE5) • Strategic Nature Conservation Interest (NE3) • UK Priority Habitat (NE3)
In reasonably close proximity to the community it serves	The site is close to housing.

Demonstrably special to a local community and holds a particular significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of wildlife	Summary of submission: Historic Significance • The site of the old village pump and water source. Recreational Value • It is used as informal stopping place on walks by locals, as well as visiting walkers and cyclists. In the process of having a bench installed. People enjoy seeing if the pump works. Tranquillity Value • Although adjacent to a road, there is little traffic which is appreciated by locals and visitors alike. Wildlife • It is currently informally managed for wildflowers. Improvements to vegetation will be enacted by the proposed Green Spaces Group. Beauty • Attempts are being made to improve the flowers and it has a pleasant outlook.
Local in character and not an extensive tract of land	The site is local in character and well contained.
Exceptions	None.
Landowner support/objection	No comments received.
Recommendation	The land is close to, and compatible with the National Trust land holding to the south of the river which presents wildlife benefits for designation. The land also presents features of value for its beauty. It is therefore recommended to designate it as a Local Green Space for its wildlife, beauty and recreational value to the local community.