

Priston Parish Council considered the B&NES Local Plan Options document (2024) at its meeting on 25 March 2024 and decided to respond as detailed in the following pages. Using the B&NES web site the comments listed have been entered and transmitted to B&NES. Submission numbers follow each comment

Banes Local Plan Options Document Comments

This is a very large document, (PDF 454 pages), with numerous sections on which opinions and comments are requested.

Understand the Options Consultation Stage:

The Local Plan takes years to prepare, and its progress is governed by national regulations. You can find out more about the stages it goes through on our [Local Plan website pages](#). This stage, [the Options consultation \(Regulation 18\)](#), presents policy in development:

- **Site Options** offer possible plans to bring forward new development to meet our housing and employment needs
- **Policy Options** describe how we are refining our approach to issues such as climate change, protecting our heritage and building vibrant, well-connected communities.

Answer online

This is the simplest and quickest way to respond, and will help us to analyse your comments most effectively, to build up a picture of how all of our stakeholders feel. Just complete the online form which appears directly below the Site or Policy Option you're interested in.

Main Web page for comments: <https://beta.bathnes.gov.uk/local-plan-options-consultation>

The Plan section by section and what we might comment on, web links will take you to the page, page number is the page in the PDF hard copy:

Everywhere we might want to comment is with **RED** text, not all sections are considered for comment.

The Plan

1 Introduction **No comments**

What is a Local Plan and why do we prepare it?

PDF Page 6

Web: <https://beta.bathnes.gov.uk/local-plan-options/what-local-plan-and-why-do-we-prepare-it>

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

PDF Page 10 to 22

Web: <https://beta.bathnes.gov.uk/local-plan-options/issues-and-challenges-facing-communities>

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 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 well-being** 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 Site of Bath and National Landscapes
- Align the timely provision of **transport, health, education, social, cultural and green infrastructure** with development

2.27 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 need to be set out in the Draft Local Plan. The definition will draw from and reflect the spatial priorities for the Local Plan, and also other strategies including the One Shared Vision, which focuses on delivering places and communities that are fair, green, creative and connected. Through consultation on the options document you can comment on the proposed spatial priorities of the Local Plan and also the definition of sustainable and healthy places.

Q: Do you agree with the scope of the spatial priorities outlined above?

Paragraph 2.24,

No. We think the priorities should give more strength to the risk of nature loss in assessing potential sites (not relying only on

mitigation) and that the “affordability” approach is not context specific enough.

Nature loss – the approach to site options does not take into account the relative stock of nature in assessing site A vs site B. This is a significant omission. Whilst it is not simple to measure nature stock we believe that much more weight should be given to this assessment for every site option. There are multiple indicators that could and should be used to assess relative nature risk between sites.

Without such indicators the plan risks irreversibly depleting nature across BANES. Post development mitigation measures and a rule on BNG are not sufficient.

We would prefer

a) that nature wealth is assessed as a matter of course for every potential site (using whatever indicator makes most sense for that specific site – to reflect best practice in biodiversity enhancement practice across the world and

b) that as a matter of spatial priority there is an assumption of “protect nature” that prioritises building in existing conurbations before – as a very last resort – proposing to build over our natural spaces.

Affordability – This is a vitally important aspect to take into consideration but the way it is assessed is much too crude. A broader concept of ‘accessibility’ would need to look on a context specific basis. Demography and therefore needs vary across different areas – and therefore what is “accessible” varies across different areas.

For the Local Plan we would prefer to see a less crude measure of accessibility that takes into account demographic context in each place.

The weighing up of different priorities in the Local Plan is inherently complex. Measuring nature/biodiversity as well as accessibility is also complex. Embracing these complexities is necessary in the development of the local plan and we strongly urge strengthening both aspects in how priorities are applied in this plan.

Q: What do you think are the key elements of a sustainable and healthy place?

Paragraph 2.24, Key elements:

- a) Socially positive – reduced inequality, affordability, adapted to changing demographics e.g longer lives**
- b) Environmentally positive – improved biomass, soil, biodiversity**

Both of these aspects need to be carefully assessed and are context specific. What is “affordable” varies by area and by demography. We would prefer to see a context specific assessment around “accessibility” that takes into account different social contexts.

Can you suggest other ideas we should consider?

Put significantly more weight on measuring and identifying, and therefore being able to protect, nature wealth.

a) that nature wealth is assessed as a matter of course for every potential site (using whatever indicator makes most sense for that specific site – to reflect best practice in biodiversity enhancement practice across the world and

b) that as a matter of spatial priority there is an assumption of “protect nature” that prioritises building in existing conurbations before – as a very last resort – proposing to build over our natural spaces.

Look at context specific accessibility not just affordability

c) that affordability is seen assessed in a context specific way i.e. takes into account local demographics. What is accessible for different populations in different places varies wildly – a crude affordability metric is not sufficient

The first preference for further development should always be greater density within existing urban areas.

Do you have any evidence or documentation that you would like to upload, to support your answer?

Creating new conurbations on such green land is only going to accelerate nature depletion at a time when the UK is already one of the most nature depleted countries in the world.

The Natural England report of Sept 2023 details this depletion:
<https://naturalengland.blog.gov.uk/2023/09/29/state-of-nature/>

Submission reference number LPO2024-1783792

3 Key Requirements in Bath and North East Somerset

PDF page: 22 to 35

Web: <https://beta.bathnes.gov.uk/local-plan-options/needs-our-local-plan-must-address>

Jobs and Employment

3.4 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 and Professional, Scientific & Technical sectors.

Need for Housing

3.10 The overall need for housing in B&NES is for 725 new homes per annum

3.16 The plan period runs from 2022 to 2042. Some additional housing is already planned to be built on sites with planning permission and sites allocated for development in the current adopted 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.

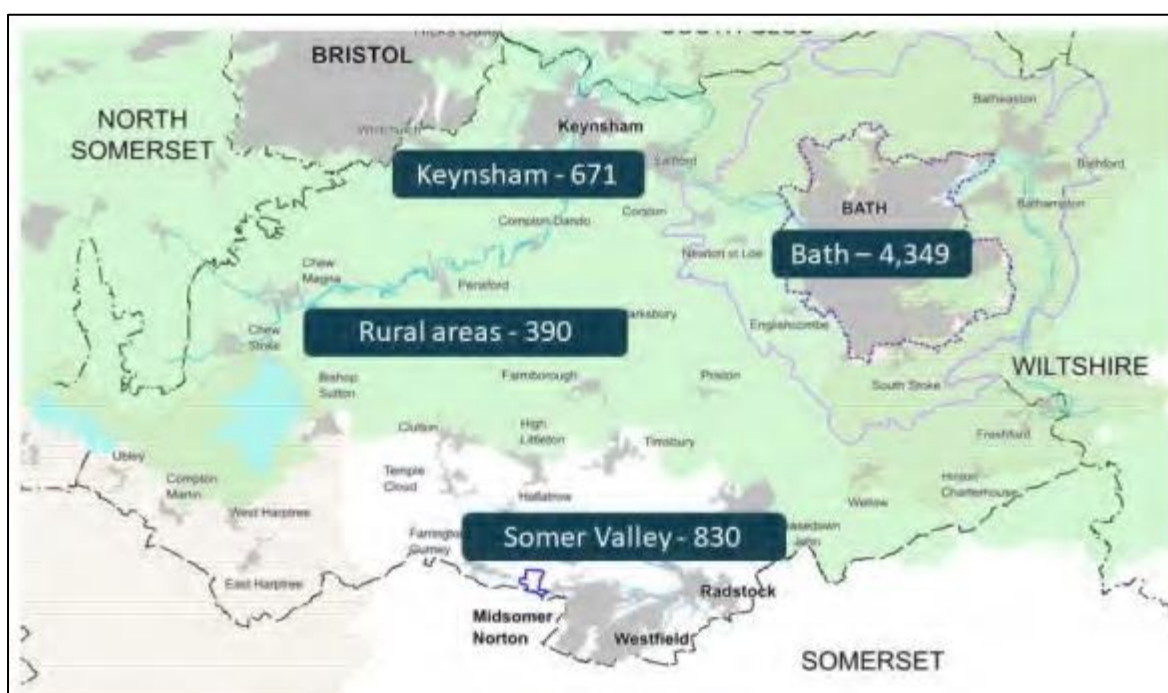


Figure 3: Map showing existing housing commitments

3.17 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. Small sites permissions have reduced over the past two years and therefore this is taken into account in the future allowance. 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.

Need arising from neighbouring authorities

3.23 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.

Climate Change

3.24 In 2019, B&NES Council declared a climate emergency, setting the ambition to lead the district to carbon neutrality by 2030. 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.

Nature Recovery

3.35 It is estimated that we need an additional 86.25 ha of accessible greenspace across Bath and North East Somerset for the new homes (not accounting for the increase in the student population and unmet housing needs in neighbouring authorities) if we are to meet the accessible greenspace standard of 3ha per 1,000 population.

Needs for Health and well-being

3.40 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 92 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.

Transport Requirements

3.46 Our vision includes a presumption against building new roads for general traffic and increasing traffic capacity to deliver Local Plan growth. This is in line with LPPU Policy ST7
....

3.54 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",

Key needs discussion question

Question 1

Do you have any comments on the key requirements identified for the Local Plan to respond to, including housing need? Are there any extra needs which you think we should include?

Housing must also adequately consider a changing demographic with people living longer, local increase in student age residents and national falling birth rate.

Nature preservation must also feature as well as nature recovery.

Affordability should be expanded as a concept to “accessibility” i.e. taking into account local demographics.

Can you suggest other ideas we should consider?

Whilst new roads may not be in the plan, improved quality of movement is needed. Provision of extra Park and Ride locations, simple frequent inter village and town transport is needed.

When small conurbations are expanded there should be a prerequisite to extend local infrastructure first – schools, healthcare, dentists, transport etc. The incremental enlargement of small conurbations without first improving infrastructure is inherently unsustainable.

Do you have any evidence or documentation that you would like to upload, to support your answer?

No

Submission reference number LPO2024-1784037

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

PDF Page 36 – 53

Web: <https://beta.bathnes.gov.uk/local-plan-options/introduction-spatial-strategy>

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 well-being needs.

Spatial Strategy Principles

4.4 The factors or principles that are particularly important in shaping the choice of locations for future development are summarised as:

- Sustainable transport connectivity
- Climate change and nature
- Flood risk
- Historic environment
- Green Belt impact
- Local food production/agricultural land
- Infrastructure provision – challenges and opportunities

Sustainable Transport Connectivity

4.6 Analysis has also been undertaken of broader connectivity of different areas across Bath and North East Somerset by sustainable means of transport

Climate change and nature

4.7 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 above) and how our new and existing buildings continue to be decarbonised. While considering the challenges and opportunities for reducing our emissions, we must also plan for the 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.

Flood Risk

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.

Historic Environment

4.12 In addition to the quality of its landscape Bath and North East Somerset has an historic environment that is of international and national significance. ... 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

4.13 More than two-thirds of B&NES currently lies within the designated Bristol-Bath Green Belt.

4.15 The Green Belt will be a further important influence on the location of development in the District. Development of land currently within the Green Belt may 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....

Local food production/agricultural land

4.16 Enabling local food production has a number of important benefits... 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.

Infrastructure provision – challenges and opportunities

4.17 It is crucial that new development is served by the timely provision of necessary supporting infrastructure e.g. schools, health and social care facilities, utilities, green infrastructure 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

Discussion question

What do you think of the spatial strategy principles set out in this chapter (paragraphs 4.3 to 4.19), and their relative importance? Is there anything else you think we should include? Please give reasons for your answer.

Paragraph 4.13

Overall the principles are correct. Whilst housing is a priority need, Green Belt changes will probably impact most on Climate Change and Nature, Flood Risk and Historic Environment and therefore Green Belt should be higher priority on the list. Building over natural areas is an irreversible move.

Paragraph 4.19

We think the principles should give more strength to the risk of nature loss in assessing potential sites (not relying only on mitigation) and that the “affordability” approach is not context specific enough.

Nature loss – the approach to site options does not take into account the relative stock of nature in assessing site A vs site B. This is a significant omission. Whilst it is not simple to measure nature stock we believe that much more weight should be given to this assessment for every site option. There are multiple indicators that could and should be used to assess relative nature risk between sites.

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The weighing up of different priorities in the Local Plan is inherently complex. Measuring nature/biodiversity as well as accessibility is also complex. Embracing these complexities is necessary in the development of the local plan and we strongly urge strengthening both aspects in how priorities are applied in this plan.

Submission reference number LPO2024-1784134

Sub-areas within B&NES

4.20 The District comprises a range of settlements many of which are spatially and functionally related to each other.

Bath and Environs

4.22 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... Opportunities for outward expansion of the city need to be explored, but are also constrained by the quality of the environment and designations. The villages that lie within the hinterland of the city are also of special character and development opportunities are similarly limited. Options for development and which needs should be met and how are considered further in chapter 5.

Bath to Bristol Corridor and South East Edge of Bristol

4.23 Settlements within the transport and river corridor that connects Bath and Bristol, most notably Keynsham and Saltford, but also other villages closer to Bath are well to related to each other and accessible by public transport

Somer Valley

4.27 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

Rural Areas

4.31 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

4.32 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.**

Location Options

4.34 Through the HELAA a broad range of opportunities or sites across Bath and North East Somerset have been considered;.....

4.36 The location options illustrated on the map are also listed in the table below.

Location Option	Appx. housing capacity
North Keynsham	1,500
Hicks Gate	1,000
South Saltford	800
East Radstock	500 – 1,000
North Radstock	400 – 1,000
East of Whitchurch village	500
West and East of A37, Whitchurch	500
West Saltford	500
Farrington Gurney (north)	500
Farrington Gurney (south)	500
West Keynsham	100 – 300
Peasedown St John	200
East of Whitchurch village	150
West of A37, Whitchurch	150
Central Keynsham	40 - 100

4.37 A further option for strategic development in an area to the West of Bath has also been considered. As set out in the Bath chapter (chapter 5) it is considered, at this stage that this option is unlikely to be included in the Draft Local Plan as assessment shows that development would be very likely to cause substantial harm to the World Heritage Site.

Location Option	Housing capacity
West of Bath	500 – 1,000

4.38 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.

Question 1: The role of sub-areas

What role should different sub-areas play in accommodating new development and supporting infrastructure?

The identified sub-areas should be primarily considered for new developments.

We prefer a default to developing existing conurbation densities rather than developing over green spaces.

Question 2: Approach to distributing development to meet housing need

What approach to distributing development across B&NES should we follow?

The sub-areas should be rated for their current population density, job opportunities, transport links, amenities such as, schools, medical services (doctors and dentists) retail outlets (shopping). They will then show those that must be developed by including new facilities compared to those that may have their present infrastructure overloaded by new developments.

They should also be rated for natural asset wealth.

Do you have any evidence or documentation that you would like to upload, to support your answer?

No

Submission reference number LPO2024-1784226

5 Bath area overview

PDF Page 54 – 84

Web <https://beta.bathnes.gov.uk/local-plan-options/site-allocations-bath-and-its-environs>

Bath and its Environs – no comments

The Capacity of the City – no comments

Site Options – no comments

Site Allocations – no comments

Bath Spa University at Newton Park

5.87 The campus lies in the Green Belt where development potential is constrained

5.89 No material changes are proposed to the existing policy

Question 1: Retaining the existing policy at Bath Spa Newton Park Campus

Do you have any comments on this approach?

Newton Park is an important green space. The existing policy should be retained. It may be enhanced by making the space more freely available to the general population (open parkland).

Submission reference number LPO2024-1783792

West of Bath

5.90 One of the locational options that has been considered to help address the development needs of Bath is land to the west of the city... This area could have potential to provide housing that is more affordable, new office or industrial buildings, or potentially to relocate the existing Newbridge Park and Ride, thereby freeing up the existing site for other forms of development.

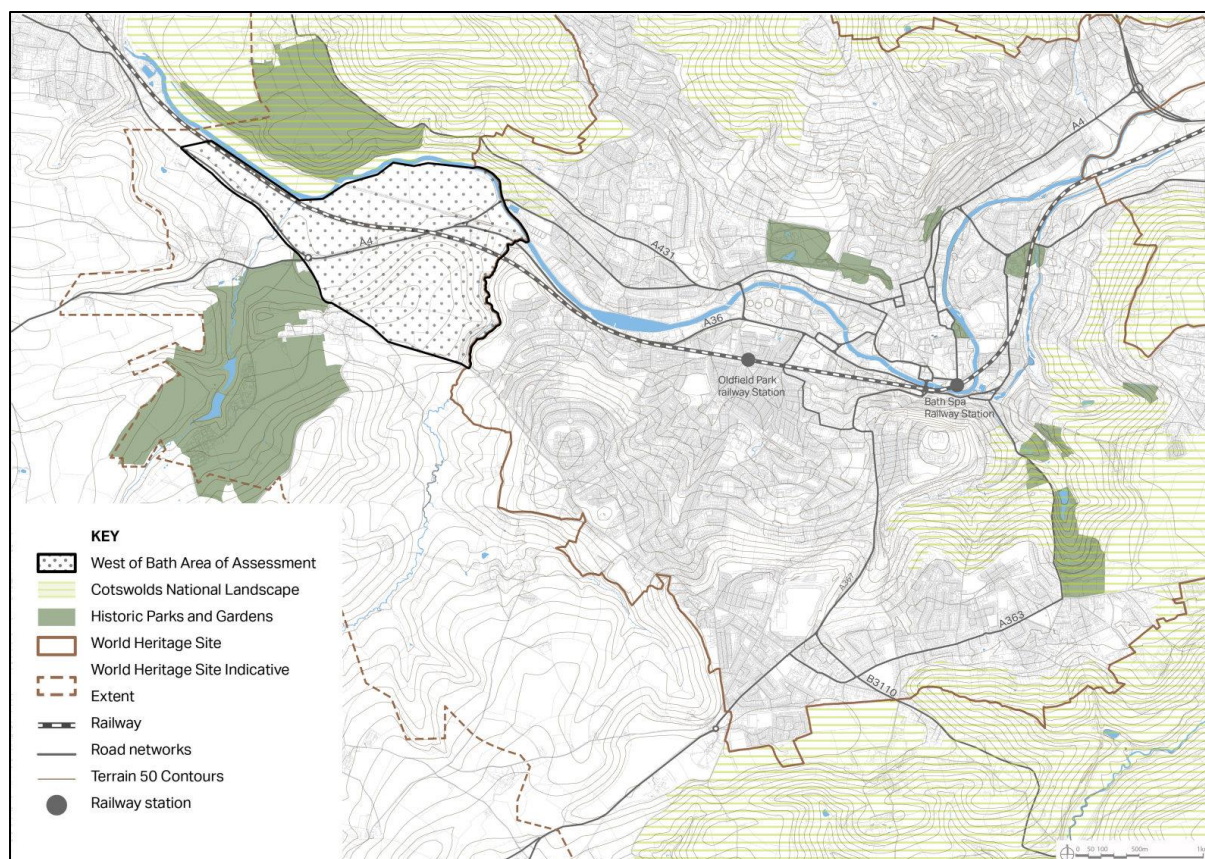


Figure 14: Map showing West of Bath area for the LUC assessment into potential impacts of development

5.92 Whilst development to the West of Bath could have public benefits, the assessment by LUC shows that it is very likely to cause substantial harm to the World Heritage Site (WHS) and its setting and that this harm cannot be satisfactorily mitigated. It would also cause harm to the setting of the Cotswolds National Landscape.

Green Belt

5.97 In addition to identifying substantial public benefit and whether this outweighs harm to the WHS and its setting, this location also lies within one of the most important areas of the Green Belt

5.98 Exceptional circumstances would need to be demonstrated in order to justify removing the land from the Green Belt. Whilst such 'exceptional circumstances' are site specific this broadly means demonstrating that reasonable alternatives outside the Green Belt have been considered and rejected and that harm to the Green Belt is outweighed by the benefits of development.

Question 1

Do you consider that development in this area could provide substantial public benefits that might outweigh the substantial harm to the World Heritage Site? If so, what are these public benefits?

NO, additionally this site is liable to flooding over a large area

Question 2

Do you consider that these public benefits also demonstrate 'exceptional circumstances' that justify removal from the Green Belt? If so, please explain why, and what 'reasonable alternatives' you think we should consider.

NO

Question 3

Are there specific sites or areas in the West of Bath location that you think we should consider?

No – it seems to make more sense to concentrate on Salford and Keynsham

Submission reference number: LPO2024-1784352

South of Burnett, adjacent to the A39

PDF Page 82

5.99 This location has been identified as a potential long-term opportunity for a standalone development or new community that could help to address objectively assessed needs either towards the end of the Local Plan period or beyond the plan period as part of a longer-term spatial strategy.

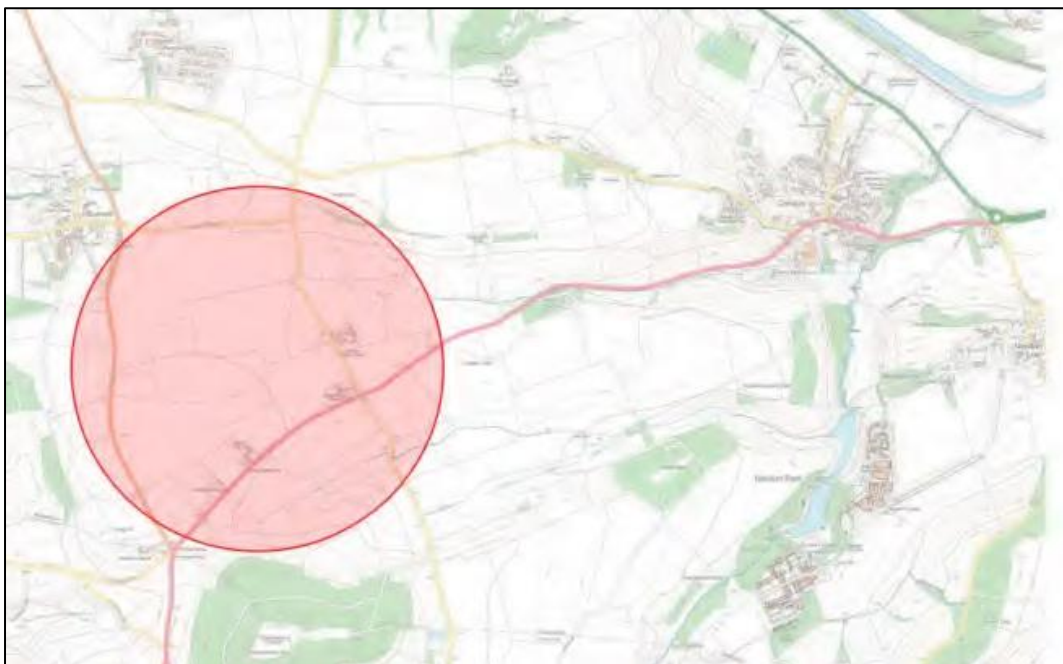


Figure 15: Broad area of search south of Burnett

Site analysis

Opportunities

- The area provides a potential opportunity for a small new settlement/community and employment.
- It lies relatively close to Bath on the A39 bus corridor that could potentially be improved.
- It could contribute to the longer term growth strategy for B&NES.

Constraints

- Currently poor connectivity to the A4/Bristol-Bath strategic corridor as the main public transport corridor which is the current focus for investment.
- Stantonbury Hill and its setting - scheduled ancient monument.
- The area lies within the Green Belt.
- There are some existing hedgerows and plantations within the area which should be protected.
- A high-pressure gas pipeline cuts across the area.
- A 33kV overhead powerline cuts across part of the area.
- The area is separated from existing towns and facilities

Mitigation required

- Woodland screening to the west to mitigate impacts on the Chew Valley.
- An appropriate response to the setting of Stantonbury Hill.

Further investigation or evidence

- Heritage assessment of the potential impacts on Stantonbury Hill and its setting.
- This location may raise issues under HRA and SAC bat surveys may be required

Question 1

Do you think we should explore the potential for longer-term development in this location? Please explain your reasons.

No (see above for reasons but essentially a) depletion of nature b) many other places that are less destructive)

This area has been the site of very significant investment into nature and nature wealth. The farmers are recognised as forward thinking stewards of nature – with a 40 year plan for nature recovery across the entire site.

It would cause significant and irrecoverable nature loss to build over this land. We cannot see how the biodiversity net gain could possibly be delivered by removing so much space which is currently natural habitat.

Furthermore it would act as a powerful disincentive to other tenant farmers to be more active in nature recovery – it is a disincentive for land stewardship just at the time when we need to encourage it.

In short it looks like we lose a lot more than we gain. Especially when there are many, many other sites over the geography where development could take place without such a significant risk of nature loss.

Delivering this site will also involve substantial creation of new infrastructure including water, waste water, roads and power services as well as social infrastructure.

Stantonbury hill is a major archaeological site on the Wansdyke that stands out clearly and dominates the landscape. No amount of mitigation by woodland or other means can satisfactorily protect the site. It dominates the views in all directions and this has led scholars to believe that Stantonbury was the prime reason for building Wansdyke as far south where it is. A site of national importance such as this should not be compromised in any way.

Submission reference number LPO2024-1784406

6 Bath to Bristol corridor and south east edge of Bristol

Web: <https://beta.bathnes.gov.uk/local-plan-options/bath-bristol-corridor-strategy-overview-and-key-issues>

PDF page 85-164

This section not considered.

7 Somer Valley: Vision, Strategy and Options

Web: <https://beta.bathnes.gov.uk/local-plan-options/somer-valley-strategy-overview-and-key-issues>

PDF Page 165-169

Strategy Overview and Key Issues

7.4 There has been significant population growth in the Somer Valley between the 2011 and 2021 censuses with 36,546 people recorded in the 2011 Census, which increased to 52,264 residents in 2021

Transport

7.6 The Somer Valley has a dispersed settlement pattern, an undulating topography and is physically distant to other key settlements such as Bristol and Bath. Somer Valley has relatively limited dedicated cycle infrastructure and no railway provision and therefore, to

access rail services residents need to travel to Bath, Bristol or Frome. There is a lack of bus connections between the east and west of the Somer Valley, poor services in more rural areas and lack of connections between villages

Duty to co-operate

7.7 ...we are engaging with Somerset Council to discuss strategic cross-boundary matters such as housing provision, transport and other infrastructure.

Key Issues

... employment land requirement can be provided through existing commitments i.e. sites with planning permission or allocated in the adopted Local Plan for employment development. These existing commitments will need to be reviewed in preparing the Draft Local Plan.

Restructuring of the local economy has resulted in some businesses closing and an increase in out-commuting.

The Somer Valley area has had significant housing development over the adopted Local Plan period from 2011. However, that has been delivered on a piecemeal basis with little infrastructure provision resulting from and needed to serve development.

Midsomer Norton and Radstock town centres have limited footfall due to the lack of diversity in retail offers, as well as a lack of an attractive food and beverage offer.

There is a lack of sustainable and active travel links in the area, and steep topography creates a constraint to active travel. Access to public transport is patchy, and within some areas access is very limited. Bus provision has been reduced in recent years.

The A37 is a major road that runs through several towns and villages and creates a severance barrier in these communities.

The Somer Valley has a rich mining heritage, but it could be better promoted and curated.

There is a lack of wayfinding which impacts residents and visitors ability to access the countryside.

Priorities and Objectives

Facilitate opportunities to enable existing businesses to be retained and new employers attracted to the Somer Valley, in both established and emerging sectors, and generate a range of jobs that will mean local residents have access to and can thrive in good work

Provide homes to help meet need, including the provision of homes that are affordable, and a mix of homes to meet the varying accommodation needs of the population, including homes for older people.

New development should complement the Radstock Town Centre Regeneration Action Plan and the Midsomer Norton Heritage Action Zone aiming to increase footfall to these town centres.

The Local Plan Partial Update removed the allocation at South Road car park for a supermarket. Opportunities for the use of the site will be reviewed alongside the wider regeneration of Midsomer Norton Town Centre.

New development should complement the Somer Valley Rediscovered Project to provide greater opportunities for people to engage with and enable nature recovery.

The Somer Valley has health and wellbeing needs that the built and natural environment can play a role in addressing. The Somer Valley has high levels of childhood obesity, people living in poverty, and levels of physical inactivity, and poor adult mental health. It is also an area with lower levels of active travel.

New development should complement the Somer Valley Links project to provide a greater choice of transport via sustainable and active travel (walking, cycling, wheeling and public transport).

WECA have allocated funding to explore the feasibility of mine water heat recovery form district heating.

Question 1: Somer Valley key issues, priorities and objectives

Do you agree with the issues, priorities and objectives for the Somer Valley? Is there anything else you think we should investigate or include?

Yes we agree

We are concerned that development on the outer fringes of BANES (by Somerset) will lead to significantly increased pressure on local infrastructure (transport, schools, health) from non BANES residents who work and live in the environs of Bath.

For areas where the boundary for BANES does not encompass the “whole” area (such as Midsomer Norton) is it possible to have a place strategy that covers the whole place?

Submission reference number LPO2024-1784844

Opportunities

Transport Opportunities

7.9 The area can be improved in terms of active travel, currently there is a high level of out community and limited active travel links. Dedicated cycle links can be improved and a network of quiet lanes identified. The extension of e-bike and scooter rental could be provided within the Somer Valley. Development should be located in areas with access to shops and services allowing people to live locally.

7.10 The public transport system is being enhanced through the Somer Valley Links project. Through this project bus infrastructure is being improved including the provision of mobility hubs and bus priority lanes. Zero emission buses will help to achieve net zero targets and cleaner air.

Green Infrastructure Opportunities

7.11 Green infrastructure is a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, and communities. To enhance and extend the network green infrastructure should be central to the design of new developments, and development proposals should demonstrate strong links to the wider green infrastructure network.

7.12 Some of the site options set out in this chapter include reference to ‘Strategic Green Infrastructure Opportunities’, which are located outside of the area shown for potential development. These indicate areas where the Council consider that green infrastructure could be provided or improved to meet Natural England green infrastructure standards, and may also offer nature based solutions to address issues such as flooding and nature recovery. New and enhanced green infrastructure will either be funded by development in the area, or through other mechanisms to be explored as we prepare the Draft Local Plan.

Question 1: Somer Valley opportunities

Do you agree with this assessment of the opportunities for development in the Somer Valley? Is there anything else we should include? Please give reasons for your answer.

We are concerned that development on the outer fringes of BANES (by Somerset) will lead to significantly increased pressure on local infrastructure (transport, schools, health) from non BANES residents who work and live in the environs of Bath.

For areas where the boundary for BANES does not encompass the “whole” area (such as Midsomer Norton) is it possible to have a place strategy that covers the whole place?

Submission reference number LPO2024-1784889

Site Options

PDF 169 - 211

Web: <https://beta.bathnes.gov.uk/local-plan-options/somer-valley-site-options>

Peasedown

Not considered as options all south of bypass

North Radstock

PDF 178- 188:

Web: <https://beta.bathnes.gov.uk/local-plan-options/north-radstock>

7.33 Land immediately to the north of Radstock currently consists of agricultural fields, mostly on the plateau above the town. Bath Old Road, a historic route, runs through the area of search and has a few homes dotted along it. Trinity Church School sits at the southern edge with access to Woodborough Lane. The area is close to Radstock town centre in the south and is bordered by countryside to the north and east. The A367 runs along the western edge of the area of search with the small settlement of Clandown immediately beyond.

7.34 Landscape character is an important attribute in this area given that it sits above the rest of the town and forms part of the green setting of Radstock and the Conservation Area. The landscape and visual impacts of any new development would therefore need to be minimised and mitigated by integrating new development within a robust landscape planting framework and ensuring it blends in with the existing hillside that continue to provide a green setting for Radstock..

7.35 A single Scheduled Ancient Monument lies to the north-west of the area, comprising Camerton Romano-British town and associated prehistoric and early medieval monuments... .

Site Options

7.38 Site options are presented below that could provide up to 1,000 new homes in total, as well as supporting facilities and green infrastructure. The site options have the potential to create a new neighbourhood with a connection to the A367 and direct access to Radstock town centre via the Bath Old Road. It is a residential and landscape led development

Option A

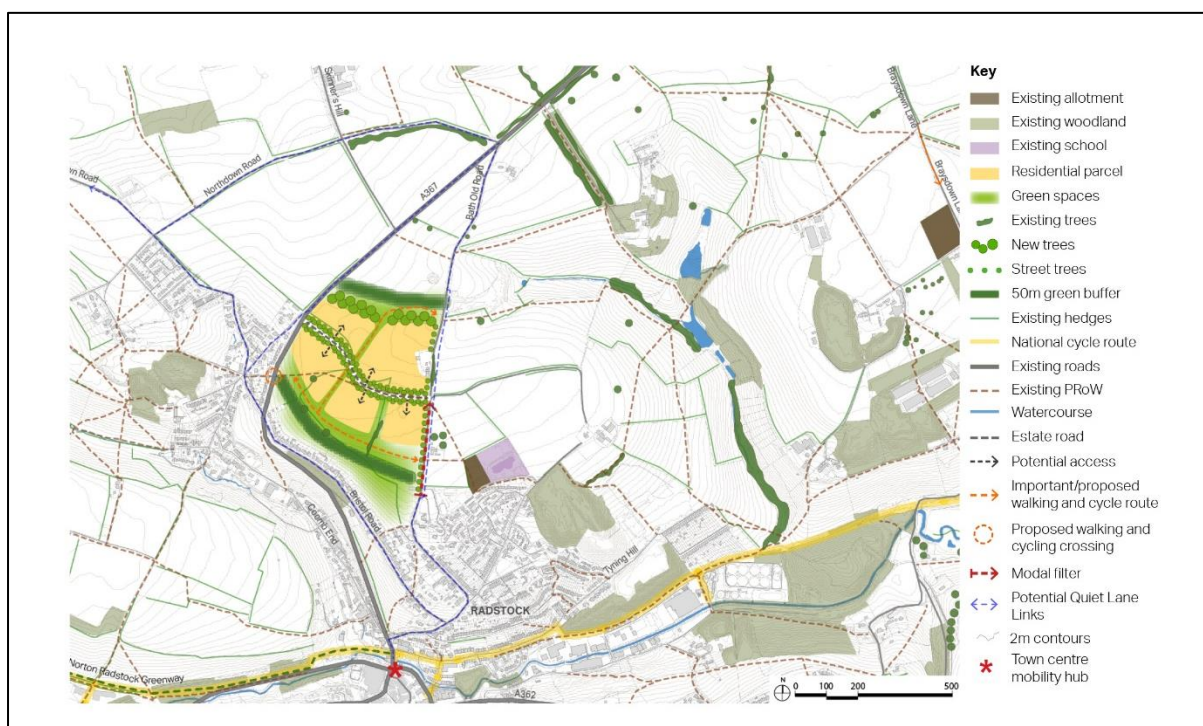


Figure 49: Indicative Concept Plan - North Radstock Option A (400 homes)

7.42 The development will extend to the west of the Bath Old Road, with a direct link to Radstock town centre along both the existing Public Rights of Way and routes through the new development.

North Radstock Option A	Description
Opportunities	<p>Approximately 400 homes, of which an element would be affordable housing.</p> <p>The speed of traffic on Bath Old Road could be reduced and new pavement provided. There is potential for a quiet lane.</p> <p>Improved access to Trinity School.</p> <p>Improved access to the countryside and surrounding public rights of way.</p> <p>Green Space Provision and Allotments</p> <p>Connections to the 174 bus along the A367</p>
Constraints	<p>Hillside location with landscape value and close to the Conservation Area.</p> <p>Bath Old Road is used as a rat run and does not have pavement access.</p> <p>Nearby is Camerton Romano settlement which is a Scheduled Ancient Monument.</p> <p>Safeguarded existing sport and recreational facilities (Roundhill Recreational Ground)</p>
Mitigation required	<p>Landscaping and green infrastructure. Additional access to Trinity School. Provision of on-site green space (including provision for local food growing) Mitigation if Roundhill Recreation Ground is lost.</p>
Further evidence required	<p>Archaeological assessment.</p> <p>Detailed Landscape Assessment</p> <p>Heritage Assessment</p>

Option B

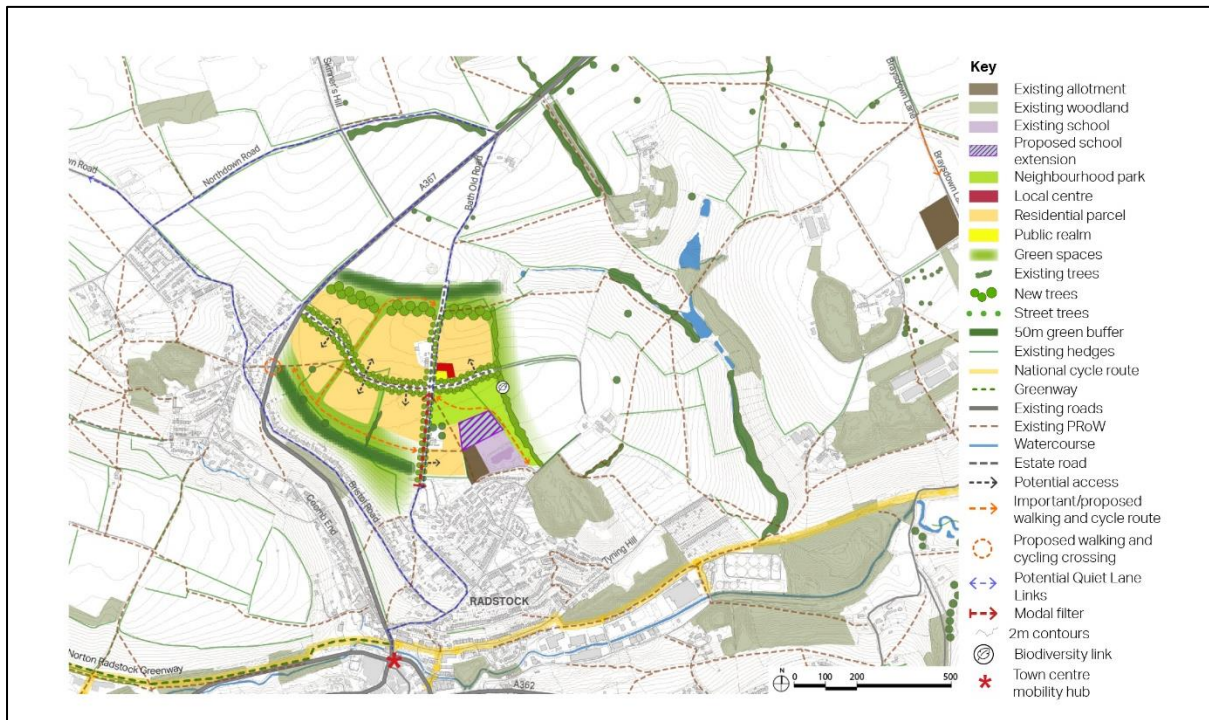


Figure 50: Indicative Concept Plan - North Radstock Option B (600 homes)

7.44 In addition to option 1, in this option would extend development to the east of Bath Old Road with open space along the north of the residential parcels wrapping around to the east to connect to a new central green space. Located close to the new local centre, the new green space is positioned to maximise accessibility.

7.45 A greater quantum of development allows for additional facilities such as a local centre.

North Radstock – Option B	Description
Opportunities	<p>Approximately 600 homes, of which an element would be affordable housing.</p> <p>The speed of traffic on Bath Old Road could be reduced and new pavement provided. There is potential for a quiet lane.</p> <p>A larger quantum of development can provide new community facilities.</p> <p>Improved access to Trinity School.</p> <p>Improved access to the countryside</p> <p>Green Space Provision and Allotments</p> <p>New local centre</p> <p>Connections to the 174 bus along the A367</p>
Constraints	<p>Hillside location with landscape value and close to the Conservation Area.</p> <p>Bath Old Road is used as a rat run and does not have pavement access.</p> <p>Nearby is Camerton Romano settlement which is a Scheduled Ancient Monument.</p>

	Proximity to the Conservation Area
Mitigation required	Landscaping and green infrastructure. Additional access to Trinity School. Provision of on-site green space (including provision for local food growing) Mitigation if Roundhill Recreation Ground is lost.
Further evidence required	Archaeological assessment Detailed landscape assessment Heritage Assessment

Option C

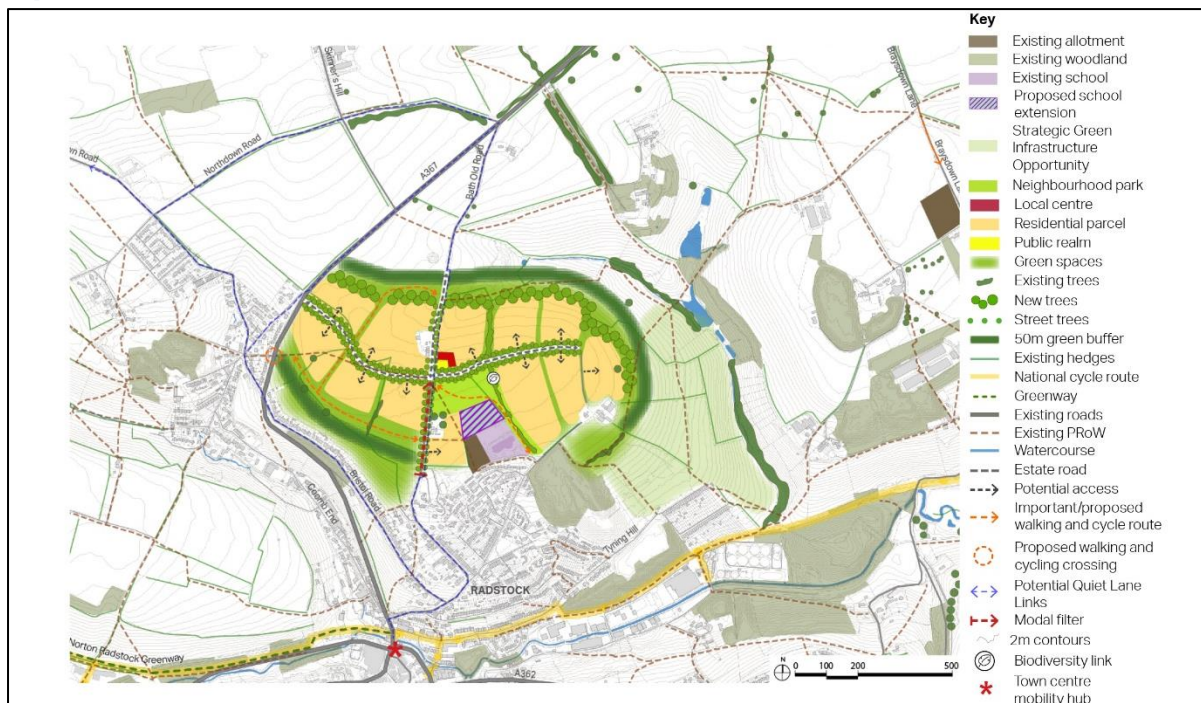


Figure 51: Indicative Concept Plan - North Radstock Option C (1,000 homes)

7.46 In addition to option A and B development proposed is maximised under this option to provide a total of around 1,000 homes.....

North Radstock – Option C	Description
Opportunities	<p>Approximately 1,000 houses of which an element would be affordable housing.</p> <p>The speed of traffic on Bath Old Road could be reduced and new pavement provided. There is potential for a quiet lane.</p> <p>A larger quantum of development can provide new community facilities.</p> <p>Improved access to Trinity School.</p> <p>Improved access to the countryside and. strategic green infrastructure opportunities.</p> <p>Green Space Provision and Allotments</p> <p>New local centre</p> <p>Connections to the 174 bus along the A367</p>

Constraints	Hillside location with landscape value and close to the Conservation Area. Bath Old Road is used as a rat run and does not have pavement access. Nearby is Camerton Romano settlement which is a Scheduled Ancient Monument. Proximity to the Conservation Area
Mitigation required	Landscaping and green infrastructure. Additional access to Trinity School. Provision of on-site green space (including provision for local food growing). Retention of Roundhill Recreation Ground.
Further evidence required	Archaeological assessment. Detailed landscape assessment Heritage Assessment

Do you prefer Option A, Option B or Option C?

Please explain the reasons for your opinion on these options

Can you suggest alternatives that you think we should consider?

Option A

The idea of making Radstock more of a town is appealing from an amenity perspective, but there are significant concerns about the impact on green spaces from the proposals.

With that in mind we prefer option A - but with the proviso that there should be improved amenities for village residents beyond Radstock e.g. better transport links, more school places, more health provision and especially more dental clinics (NHS dentists).

The Camerton Romano settlement (to both the south and north of the A367) is extremely adjacent to the proposed site and must be protected.

Submission reference number LPO2024-1784926

East Radstock – no comments

Farrington Gurney North – no comments

Farrington Gurney South – no comments

All not reviewed

Non-strategic Sites – no comments

Smaller sites not considered

8 Rural Areas: Vision, Strategy and Options

PDF Page 212 - 222

Web: <https://beta.bathnes.gov.uk/local-plan-options/rural-areas-overview>

Strategy Overview and Key Issues

8.1 Home to over 37,000 residents, rural B&NES is a diverse group of towns, villages, and hamlets with distinct characteristics and landscapes which accounts for over 90% of the district's land area.... Poor public transport and digital connectivity also act as barriers to business and home working, contributing to social isolation and unequal access to essential goods and services. 78% of rural residents commute to work by car, and alongside high transport emissions, highlights the need for more local employment and sustainable travel options for our rural communities.

8.2 The lack of affordable housing in our rural communities threatens the vitality of local businesses and the social sustainability of our towns and villages.

Place Profile

8.3 Set amongst high quality natural environments, the villages and hamlets of the rural areas of the district provide an attractive and often peaceful environment in which to live and work.

8.4 Large parts of the rural areas are designated as Green Belt, and much are within the Cotswolds or Mendip Hills National Landscapes.

8.5 The current approach to rural development, as delineated in the Placemaking Plan and Core Strategy, categorises our villages as follows:

RA1 Villages: Non-Green Belt villages boasting primary schools and, crucially, at least two of the following essential amenities within the village - a post office, community meeting space, and convenience store. Policy RA1 required allocation of sites to deliver around 50 dwellings in each village.

RA2 Villages: Non-Green Belt villages that fall outside the RA1 scope, characterised by site allocations to deliver around 10-15 dwellings in each village.

Priston is a GB2 village:

GB2 Villages: Villages washed over by the Green Belt, where development is restricted to infill only.

Key Issues

8.6 It is becoming increasingly evident that the current strategy is leading to the relative dispersal of development across a wide range of settlements.

8.7 Many of these issues have been picked up from feedback received to the Launch Consultation and Phase 1 Workshops:

- Lack of affordable housing to meet local needs that may impact on the social sustainability of the rural areas and exacerbate difficulties for an ageing population.
- For much of the rural area poor access to public transport affects the functionality of the rural economy and leads to isolation for those without access to private transport.
- Access to community and social facilities, services and shops.
- Importance of maintaining and enhancing the character and local identity of our rural areas and communities.
- Reliance of the rural economy based on farming, the self-employed and small businesses that require support to flourish.
- Potential opportunities to diversify the rural economy e.g. centred around local food production, sustainable rural and eco-tourism, renewable energy, or the natural resources sector.

8.8 Some of these issues can be addressed through development, either Local Plan-led or by communities through Neighbourhood Plans. However, there are some issues that won't be addressed through new development but will be addressed through other policies in the Local Plan or initiatives undertaken by the Council or by other stakeholders.

8.9 The Government has also announced its commitment to [Unleashing rural opportunity](#), these include ways in which the planning system can enable the rural economy to grow. Through this the Government has consulted on possible changes to permitted development rights which support agricultural development and rural diversification. This will look at changes to the current rules to make agricultural development more flexible for farmers so they can improve their existing agricultural buildings to make them more productive. The paper also outlines the ways in which the Government is seeking to support the building of more homes for local people to buy where local communities want them.

8.10 The council's Economic Strategy is also seeking to support the diversification of the rural economy and realising opportunities to facilitate moves towards a greener economy, including growth in environmental services and natural resources sectors, as well as sustainable rural and eco-tourism. Improvements in digital infrastructure and changing work practices also creates opportunities to diversify and enhance the rural economy. A stronger rural economy, providing opportunities for local residents to access good jobs, is a vital component of more sustainable rural communities, alongside efforts to retain and improve local services and facilities.

Proportionate Growth:

8.11 Central to these issues is the need for proportionality to growth, ensuring that development aligns with the unique characteristics and needs of individual communities.

8.12 These challenges underline the necessity for a more adaptable and nuanced approach to rural development, which not only empowers local communities but also ensures that development is commensurate with the distinct needs and characteristics of our rural villages and settlements. It is with these considerations in mind that the Rural Strategy introduces the two complementary pathways to address these issues while fostering sustainable growth and development.

Pathway 1: Community-Led Growth

8.13 Under this pathway, local communities take the lead in shaping and advancing their growth initiatives.

Pathway 2: Local Plan-Led Growth

8.14 As communities contemplate the pursuit of their growth proposals, it is essential to maintain efforts in preparing the new Local Plan to ensure the certainty of delivering new developments, especially housing and employment opportunities.

8.15 Taking these steps is vital to:

- Positively plan and reduce the possibility of speculative developments
- Facilitate the development of new affordable, market, and specialised housing to meet the needs of rural communities.
- Support existing services and facilities.

8.16 In opting for a Local Plan-led/site allocation approach to rural growth and development, there are several inherent benefits that prioritise the holistic well-being of our villages. Unlike speculative large site development, which can introduce unforeseen challenges for essential functions like schools, transport, and community facilities, a Local Plan provides a structured and comprehensive framework.

8.17 Pathway 2 focuses on a Local Plan-led approach that provides a clear direction for growth and change, adhering to the NPPF's principles of sustainable development. This approach is essential in helping to meet our overall housing, job, and infrastructure requirements and provides certainty for both communities and developers. The principle of "proportionality" is central to this approach, ensuring that growth aligns with the unique needs and character of each community.

8.18 Pathway 2 focuses on guiding new development in rural areas by identifying relatively sustainable villages. Instead of adhering to the rigid distinctions of RA1 and RA2 villages, a more flexible and proportionate approach will be taken.

8.19 The strategy for rural growth is based on an assessment of a village's sustainability, considering factors such as connectivity through sustainable modes of transportation (public transport, walking, cycling and wheeling) and the availability of essential services and facilities.

8.20 In conjunction with this approach, place profiles have been prepared for our villages and parishes. These profiles incorporate an analysis of past growth since the start of the Core Strategy plan period, demographics, connectivity, facilities audit, and other key issues. The outputs of this work are outlined in a Topic Paper (published alongside the Options document) and the associated identification of relatively sustainable villages for consideration are set out in the Options document.

Question 1: Priorities for rural growth

Do you think the priorities for managing rural growth (that it should be *proportionate*, *community-led* and *Plan-led*) are sound and

effective? Are there any other factors we should consider? Please give reasons for your answer.

We prefer Pathway 2 with the addition of Local Community consultation

Submission reference number LPO2024-1784949

8.21 Options are set out below showing the relatively sustainable villages and what proportionate growth nominally of 5% over the plan period could mean in terms of additional housing numbers, based on the number of dwellings existing in the village. There are also options relating to growth either being focused at the most sustainable of these villages (highlighted in bold) or across all of the identified villages.

8.22 The villages identified as relatively sustainable compared to others are proposed to become the focus of attention for some rural growth. Our commitment is to engage with the community and parish council in these villages to explore the potential for modest growth, its location and the associated benefits that such development could bring e.g. meeting local housing needs or providing employment opportunities, helping to keep villages viable and sustainable. This modest development would be on large sites that would then be allocated for development in the Draft Local Plan and would be additional to any small windfall sites (often sites for one or two dwellings) that might come forward within the Housing Development Boundary for each village. Opportunities outlined in the Housing and Economic Land Availability Assessment (HELAA) will be considered as a starting point for potential locations while also working closely with community representatives as the plan progresses to ensure that any development aligns with their aspirations while preserving the distinct character and vitality of each rural area.

8.23 It should be noted that Options relating to the villages of Saltford, Whitchurch, Farrington Gurney, Paulton and Peasedown St John are being addressed in the Place Based sections of this document.

8.24 Should other villages wish to be considered for further growth then there is the opportunity for them to respond through this consultation.

8.25 The Council is also considering the potential for a new settlement to the south of Burnett, adjacent to the A39. It is proposed that this site is consulted on as a longer term option in the options document, with the potential to provide housing, employment space, and other uses, outside of the Local Plan period.

Village Options

8.26 Village options are set out in the table below:

(This is a few selected from the full table, Priston is not listed)

Village	5% Growth	Opportunities	Constraints
Farnborough	28 dwellings over the Plan Period	Moderate connectivity score Moderate range of services & facilities	Village inset from the Green Belt. Allocation of greenfield site(s) for development adjoining the village would require exceptional circumstances to be demonstrated to remove the land from the Green Belt. Limited Primary School capacity
Timsbury	59 dwellings over the Plan Period	Moderate connectivity score Broad range of services & facilities Some Primary School capacity identified	The northern edge of the village is in the Green Belt

Question 1: Approach to rural development locations

Do you agree with this approach to potential development locations in rural areas? Do you think we should aim to concentrate new development in *the most sustainable villages* (marked with an asterisk * (i.e. Bathampton, Batheaston, Bathford, Freshford)), or spread it across *all* identified villages? Please give reasons for your answer.

A: Not fully. We agree with the concept of supporting economic diversification and that the preference should be for community led approaches. But the definition of "sustainable" is far too narrow (i.e. just connectivity and availability of essential services). 'Sustainability' should be expanded to include environmental sustainability. The "nominal" 5% number seems crude at best. In our view any

development numbers should be calculated on a village by village basis not a blanket 5% basis.

Question 2: Assessment of priority villages

Is our assessment of these priority areas appropriate and effective? Is there anything else you think we should consider? Please give reasons for your answer.

A: Not quite. The definition of "sustainable" is far too narrow (i.e. just connectivity and availability of essential services). 'Sustainability' should be expanded to include environmental sustainability.

The "nominal" 5% number seems crude at best. In our view any development numbers should be calculated on a village by village basis not a blanket 5% basis.

Timsbury is identified as a priority village leading to a nominal increase of 59 dwellings. For that level of uplift the amenities should be improved - better transport, better healthcare availability etc. As noted we prefer the idea to concentrate development into existing areas but recognise that the "sustainability" of Timsbury should be framed not just by connectivity and amenities, but also by environmental sustainability. The village is surrounded by green spaces and farmland. The location of any new housing would need to be especially carefully selected.

Conversely Farmborough is not identified as a priority village even though it has seen an uptick dwelling numbers. At 28 the nominal number would further create demand for better amenities - specifically transport links, health, dentists and schooling.

Submission reference number LPO2024-1784980

9 Development Management Policy Options

PDF : Page 222 - 414

Web: <https://beta.bathnes.gov.uk/local-plan-options/introduction-development-management-policy>

9.1 Development Management policies set out local standards and criteria against which planning applications for the development and use of land and buildings are assessed.

(I have only included some of this section that I think may be of interest)

Housing

Policy H/AH: Affordable Housing – no comments

Large Sites – no comments

First Homes – no comments

Small Sites

(PDF Page 227)

9.16 It is proposed to take forward the requirement for affordable housing on small sites within designated rural landscapes, given nationally protected landscape national policy as relates to major development and limited opportunities to bring forward affordable housing within these sensitive landscapes.

Housing (Small Sites)	Option	Advantages	Disadvantages
A	Residential developments on small sites from 5 to 9 dwellings within the Cotswold National Landscape and Mendip Hills National Landscape should provide either on site provision or an appropriate financial contribution towards the provision of affordable housing with commuted sum calculations. The target level of affordable housing for these small sites will be viability tested through the Local Plan viability assessment to support the Draft Local Plan.	Delivery of affordable housing to meet the needs of local rural communities within the National Landscapes.	Would need to consider tenure mix and management of small numbers of affordable housing units.

B	Residential developments on small sites from 2 to 9 dwellings within the Cotswold National Landscape and Mendip Hills National Landscape should provide either on site provision or an appropriate financial contribution towards the provision of affordable housing with commuted sum calculations. The target level of affordable housing for these small sites will be viability tested through the Local Plan viability assessment to support the Draft Local Plan.	Delivery of affordable housing to meet the needs of local rural communities within the National Landscapes.	Would need to consider tenure mix and management of small numbers of affordable housing units.
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Web: <https://beta.bathnes.gov.uk/local-plan-options/policy-hah-affordable-housing-small-sites>

Question 1

Do you prefer Option A or Option B?

We recommend option B.

We believe even the smallest number of dwellings should contribute to affordable housing provision.

Submission reference number LPO2024-1785044

Viability – no comments

Policy H/RS: Affordable Housing Regeneration Schemes

Community Led Housing

PDF page 242

Web: <https://beta.bathnes.gov.uk/local-plan-options/policy-clh-community-led-housing-rural-exception-sites>

Community Led Development Exceptions Sites	Options	Advantages	Disadvantages
A	Do not take forward specific policy on exception sites for community-led development with planning applications being determined in line with National Policy and Guidance and the Development Plan.	Reflects national policy.	Does not consider Bath and North East Somerset specific requirements.
B	Take forward a criteria-based policy on exception sites for community-led development within B&NES.	Provides a criteria-based policy on exception sites for community-led housing within Bath and North East Somerset.	Reiterates national policy.

Question

Do you prefer Option A or Option B?

We recommend option B.

We believe this option will result in the construction of more affordable housing.

Submission reference number LPO2024-1785159

Policy H/SH: Specialist Housing and Homes for Older People Design – no comments

PDF page 244

Policy H/EC: Affordable Housing Requirements within Older Person and Specialist Housing (including Extra Care) – no comments

PDF Page 246

Policy H/AS: Accessible Homes and Residential Space Standards – no comments

PDF Page 248

Policy H/HM: Housing Mix – no comments

PDF page 255

Policy H/BtR: Build to Rent Developments – no comments

PDF page 257

Policy H/CL: Co-living Schemes – no comments

PDF page 262

Policy H/PBSA: Purpose built student accommodation – no comments

PDF page 266

Policy H/SBCHB: Self and Custom Housebuilding – no comments

PDF page 271

Policy H/GT: Gypsies, Roma, Travellers and Travelling Show People – no comments

PDF page 274

Policy H/M: Moorings – no comments

PDF page 276

Climate Change – no comments,

PDF pages 277 - 293

Web: <https://beta.bathnes.gov.uk/local-plan-options/climate-change>

Policy C/RD: Sustainable Construction for New Residential Development – no comments

National Policy changes – no comments

Policy C/NRB: Sustainable Construction for Non-Residential Buildings – no comments

Policy C/EC: Embodied Carbon – no comments

Policy C/RE: Renewable Energy – no comments

Nature and Ecosystem Services

PDF pages 294 –

Web: <https://beta.bathnes.gov.uk/local-plan-options/nature-and-ecosystem-services>

Policy N/SHS: Sites, Habitats and Species – no comments

Policy N/BNG: Biodiversity Net Gain – no comments

Policy N/GI: Green Infrastructure – no comments

Policy N/OS: Open Spaces – no comments

Policy N/TWC: Trees and Woodland Conservation – no comments

Policy N/CELLC: Conserving and Enhancing the Landscape and Landscape Character

PDF 310

Web: <https://beta.bathnes.gov.uk/local-plan-options/policy-ncellc-landscape-character-and-setting-settlements>

9.219 Placemaking Plan Policy NE2 seeks to protect, conserve and enhance the character and quality of the landscape of the District.

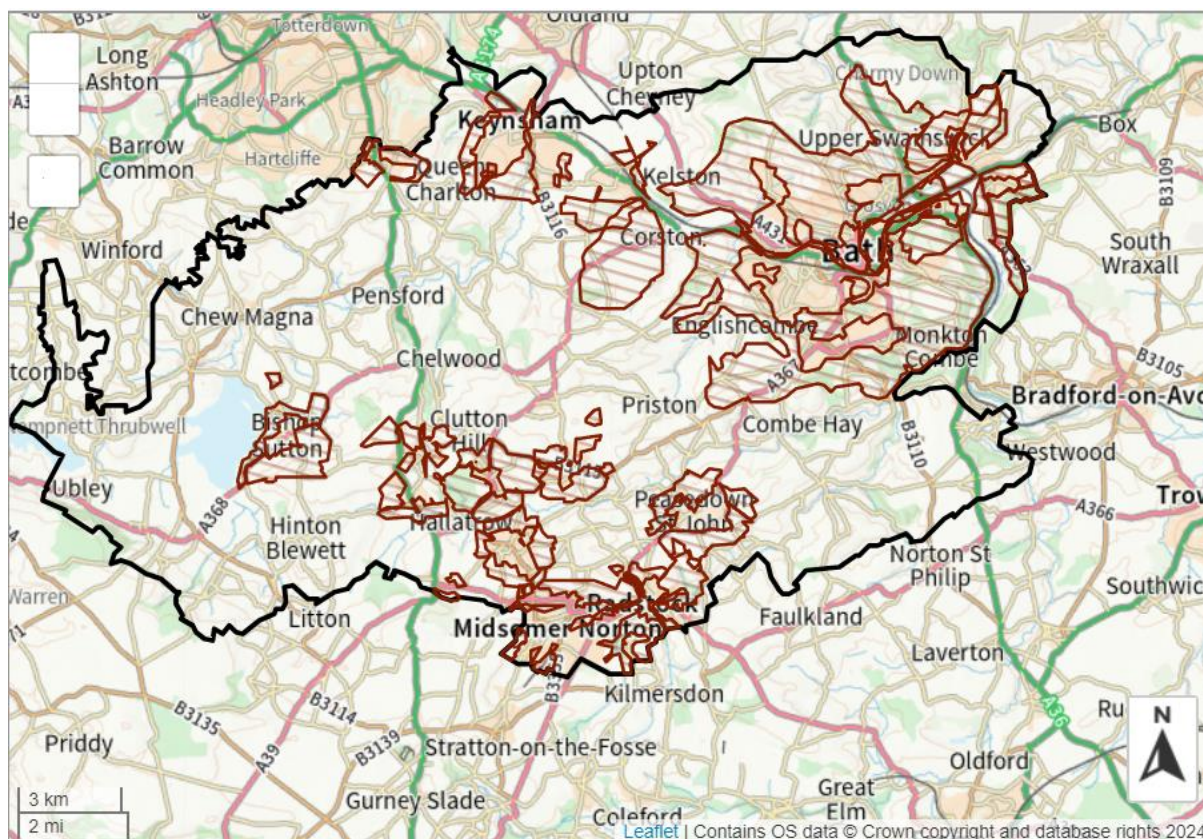
9.220 The purpose of Policy NE2A is to protect, conserve and enhance the landscape setting of settlements.

9.221 Policy NE2B provides specific control over the enlargement of residential curtilages. Such enlargement can, depending on the circumstances, have a detrimental effect on the special landscape qualities and character of the area and lead to 'suburbanisation' of the countryside.

9.222 The detailed background and evidence relating to the policy is set out in the Natural Environment Topic Paper.

Policy Approach - Proposed Options Policy NE2

9.223 Policy NE2 remains fit for purpose. The current policy accords with national policy and local strategies, however, changes could be incorporated to ensure the policy has clear links to wider natural environment policy, including reference to non-designated landscapes. The policy remains fit for purpose



Landscape setting of settlements (Policy NE2)

N/CELLC: Conserving and Enhancing the Landscape and Landscape Character	Option	Advantages	Disadvantages
A	Retain policy NE2 with amendments to reference non-designated landscapes.	Adopted policy tested recently at LPPU examination.	None identified.

Question 1: Policy NE2

Do you think it is appropriate to retain this policy, with slight amendments, to include reference to non-designated landscapes? Please give your reasons.

Yes, it is important to ensure that any development should be sensitive to its location

Question 2: Policy NE2A and map

Do you think all of the current settlement settings and boundaries on the map are justified and effective? If not, would you change any existing settings, or identify and add new ones? Please give your reasons.

There needs to be a careful balance of protecting the existing greenbelt, through the inclusion of the existing settlement settings and boundaries around existing villages, however, BANES has identified that many houses need to be built, including affordable houses, and in some instances, it makes sense to construct new houses in close proximity to existing villages, which suggests that some of the existing settlement setting and boundaries need to be reviewed.

Question 1: Policy NE2B

NE2B can be retained as it is adequate.

Submission reference number LPO2024-1785252

Policy N/FRSD: Flood Risk Management and Sustainable Drainage

PDF 312

Web <https://beta.bathnes.gov.uk/local-plan-options/policy-nrfsd-flood-risk-management-and-sustainable-drainage>

9.227 The NPPF requires for new development to be in sustainable locations, at the least risk of flooding, taking into account vulnerability to flooding...

9.228 Existing Policy CP5, in line with the NPPF, seeks to avoid inappropriate development in areas at risk of flooding and directing development away from areas at highest risk.

9.229 Placemaking Plan Policy SU1 covers sustainable drainage systems (SuDS), which are a key component of managing surface water. ...

9.230 The detailed background and evidence relating to the following options is set out in the [Natural Environment Topic Paper](#).

Policy approach options

N/ FRSD: Flood Risk Management and Sustainable Drainage	Option	Advantages	Disadvantages
A	Rely on the existing policy approach supplemented by national planning policy.	The existing approach is well understood and implemented by Development Management in determining planning applications.	<p>Increased local concern relating to surface water runoff presented by developments when using the existing policy.</p> <p>Regarding major schemes the up take in natural/open water SuDS is limited as it is often achieved in underground infrastructure with small ponds implemented.</p> <p>The management of rainwater has not been considered holistically due to the fragmented ownership of its management.</p>
B	Requiring that SuDS are constructed for the disposal of surplus rainwater, regardless of the size of new developments, and that there should be no net increase in rainwater discharged to combined sewers.	<p>Opportunity to link the implementation of SuDS with Green/ Blue Infrastructure and BNG within wider site design. Options for Urban Greening which are being explored can provide links to better SuDS design.</p> <p>The revised GI Strategy will evidence where new or enhanced GI is required to address water management. The GI Policy if revised will reference the NE Green Infrastructure Framework standards including the Urban Greening Factor that seeks to retain and ideally increase more permeable surfaces.</p>	Whether there is sufficient evidence for justification regardless of the size of new developments.

		Will ensure that developments are not worsening water quality and thereby not increasing pressure on in-river ecology.	
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Question

Do you prefer Option A or Option B?

We recommend option B.

The on site management of surplus rainwater will prevent the existing rainwater collection systems from being over stressed with the increased number of houses being built. The collection of onsite rainwater can also be used to charge WC cisterns and garden irrigation.

Submission reference number LPO2024-1785275

Policy N/ES: Ecosystem Services – no comments

Policy N/EN: Ecological Networks & Nature Recovery – Local Nature Recovery Strategies – no comments

Green Belt

Web; <https://beta.bathnes.gov.uk/local-plan-options/green-belt>

PDF 320

Background

9.246 The National Planning Policy Framework (2023) has introduced some changes in the way that Green Belt should be considered. Through the LPPU we have recently reviewed adopted policies relating to Green Belt against the revised NPPF and consider that they remain consistent with National Policy. As such no changes are proposed to policies CP8, GB1 and GB3.

9.247 Policy GB2, in relation to infilling in villages washed over by the Green Belt, was updated through the LPPU and while we consider that the policy is consistent with national policy the Options document gives the opportunity for the approach to be tested further in response to comments made during engagement in preparing the Options document.

Policy Approach Options

9.248 The comments received highlight the importance of making sure that new developments provide smaller homes that meet the local demand or need, rather than

building large or detached houses which often do not meet local need and may change the character of villages. In relation to Policy GB2, an option is therefore set out where the policy requires applications for infill development to demonstrate that they're offering housing that meets the specific needs of the local area, based on robust evidence. To meet this requirement, a parish would need to carry out a survey to understand the housing needs within their village. If they don't do this, applicants would have to rely on a broader District-wide assessment called the Local Housing Needs Assessment.

GB/GB: Infilling in the Green Belt (existing GB2)	Option	Advantages	Disadvantages
A	Retain policy as existing.	Accords with the NPPF in that limited infilling in villages within the Green Belt is not regarded as inappropriate development, infill boundaries have been defined in the LPPU in consultation with parish councils for all villages washed over by the Green Belt.	None identified
B	Amend policy to require that applications for infill development to demonstrate that they're delivering housing that meets the specific needs of the local area	Helps maintain village character. Development meeting existing needs.	May be seen as too restrictive

Question

Do you prefer Option A or Option B?

We recommend option B.

We believe this option will result in the construction of more appropriate housing, which will meet the specific village requirements for housing.

Submission reference number LPO2024-1785312

Jobs and Economy - all not considered

PDF page 322 - 330

Web: <https://beta.bathnes.gov.uk/local-plan-options/jobs-and-economy>

Policy J/O: Office Development and Change of Use

Policy J/I Strategic Industrial Locations and Locally Significant Industrial Sites Policy

Policy J/UI Undesignated Industrial sites Policy

Policy J/EM: Employment and Skills

Healthy and Vibrant Communities – all not considered

PDF page 331 - 358

Web: <https://beta.bathnes.gov.uk/local-plan-options/healthy-vibrant-and-inclusive-communities>

Policy HVC/TC

Policy HVC/TCD- Development within Bath and North East Somerset's Town, District and Local Centres

Policy HVC/LS Dispersed Local Shops

Policy HVC/H: Health and Wellbeing

Health Impact Assessments

Hot Food Takeaways

HVC/CF: Community Facilities

HVC/PS: Safeguarding Land for Primary School Use

HVC/PSC Primary School Capacity

HVC/C Safeguarding Land for Cemeteries

HVC/A Protecting Allotments

HVC/B: Broadband

HVC/LGS: Local Green Spaces

Consultation/ Methodology

Heritage and Design

Web: <https://beta.bathnes.gov.uk/local-plan-options/heritage-and-design>

PDF 359 -

Policy HD/EQ: Environmental Quality – not considered

Policy HD/WHSS: World Heritage Site and its Setting – not considered

Policy HD/HE: Historic Environment – not considered

Policy HD/SCCW: Somersetshire Coal Canal and the Wansdyke

Web: <https://beta.bathnes.gov.uk/local-plan-options/policy-hdsc cw-somersetshire-coal-canal-and-wansdyke>

PDF Page 363 -368

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

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

9.362 The NPPF sets out the approach to considering impacts to designated heritage assets under paragraph 205 notes the following:

‘When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.’

9.363 Paragraph 206 further notes the following:

‘Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.’

9.368 The boundary of the Somersetshire Coal Canal and the Wansdyke is displayed on the policies map. Development that would harm the assets within the defined boundary for Policy HE2 area is restricted through the policy. However, consultation with the Somersetshire Coal Society has indicated some developments have taken place which will present significant challenges to the successful restoration of the Somersetshire Coal Canal to navigation.

9.369 The Somersetshire Coal Society's current focus is the conservation of the Combe Hay Lock Flight and the restoration of the canal profile and stonework structures leading to the Paulton / Timsbury terminus with the objective of restoring the western terminus of the canal to water.

9.370 Several locations already protected from development (as defined by policy HE2 on the Policies Map) have been highlighted as having potential for expansion. The expansions are required to allow for diversions from the historic route where the original canal line has been blocked by recent developments.

9.371 This approach seeks to offer a solution which allows the canal to be restored to navigation while minimising the impact of that restoration on landowners/homeowners. The expansions indicated below are proposed to be shown on the Policies Map accompanying the Draft Local Plan and are situated at the following locations (expansions highlighted in red with the existing route shown in blue):

Proposed Extension to Local Plan Policy HE2 Buffer
Camerton Proposed Route Expansion

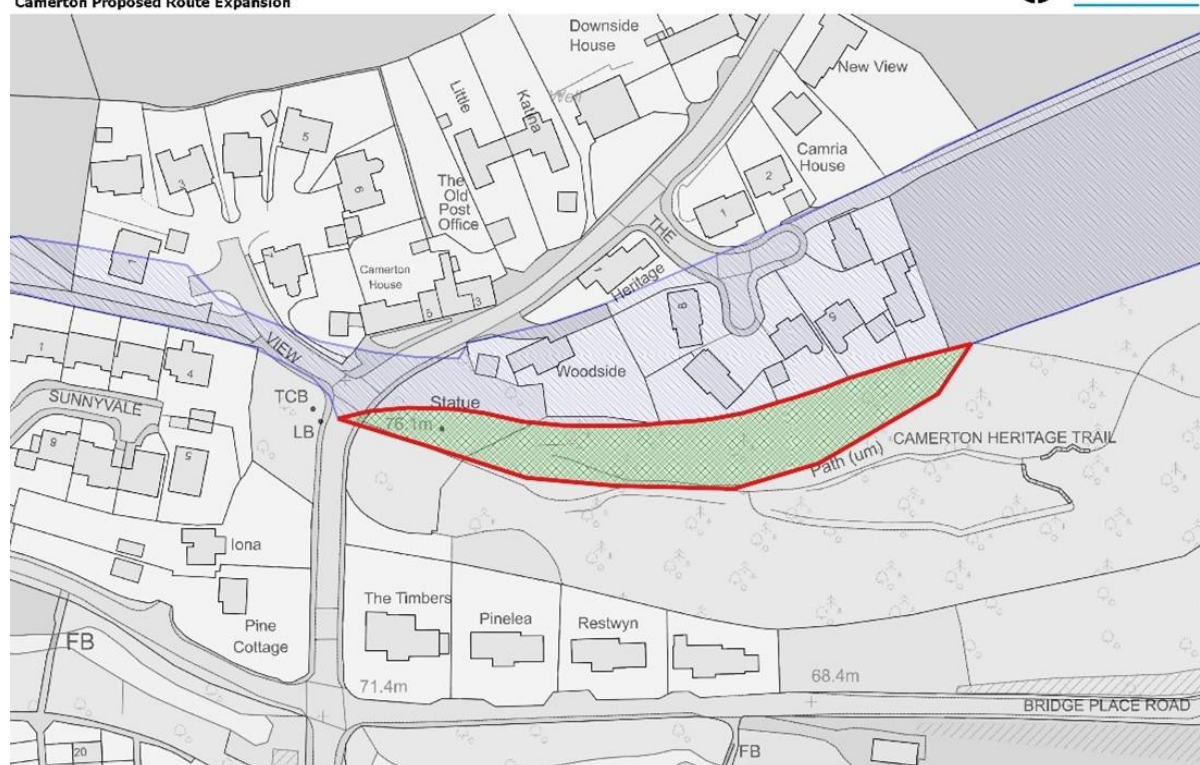


Figure 67: Proposed amendment to the Policies Map - Camerton

Question 1: Encouraging enhancements for heritage assets

Should we re-word Policy HE2 to also encourage development or improvements which would sustain or enhance, or better reveal, the significance of the Wansdyke or Somersetshire Coal Canal?

Yes, We would support improvements which would sustain or enhance or better reveal the existing canals, but there needs to be

careful consideration to the 'reconstruction' of the parts lost to development already and diversions from the historic route.

Question 2: Proposed expansions to support restoration of the Somersetshire Coal Canal

Do you agree with our proposed expansions to the Somersetshire Coal Canal route? Are the proposals indicated in the maps (*Figures 66 to 70*) effective and justified, in your opinion? Please give reasons for your answers.

Yes. We would support expansions of protected areas.

Submission reference number LPO2024-1785337

Policy HD/GUDP: General Urban Design Principles – not considered

Policy HD/LCD: Local Character and Distinctiveness – not considered

Policy HD/UF: Urban Fabric – not considered

Policy HD/SS: Streets and Spaces – not considered

Policy HD/BD: Building Design – not considered

Policy HD/A: Amenity – not considered

Policy HD/IBD: Infill & Backland Development – not considered

Policy HD/L: Lighting

PDF page 380

Web page: <https://beta.bathnes.gov.uk/local-plan-options/policy-hdl-lighting>

Background

9.413 The NPPF makes it clear that planning policies should limit the impact of light pollution from artificial light. Section 15 – Conserving and enhancing the natural environment sets out amongst other things the following:

'Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.'

9.414 National Planning Policy Guidance (NPPG) includes further guidance on the factors that are relevant in considering the implications of light pollution, including ecological impact.

9.415 Placemaking Plan Policy D8 sets out the general principles that apply to all proposals for artificial lighting.

HD/L: Lighting	Option	Advantages	Disadvantages
A	Retain policy D8 with amendments	<p>Adopted policy presents no issues or concerns arising from development management officers in its implementation.</p> <p>Controlling light pollution will provide benefits to the environment and greenhouse gas emissions. It will also present opportunities to reduce harm to humans' health and wellbeing and wildlife benefiting nature recovery.</p>	None identified.

Question 1: Policy D8

Do you think it is appropriate to retain this policy, with slight amendments, to address requirements for all new external and public space lighting to have minimal blue light content, and to specify a general requirement for a colour temperature requirement in ecologically sensitive areas, and within protected landscapes? Please give your reasons.

Yes. We would support these amendments.

Question 2: Environmental Zones

Should we consider defining Environmental Zones for the district? Please give your reasons.

Yes. We think a defining of Environmental zones, for example into village boundary and open countryside, would help to define what is

acceptable levels of lighting and what is not an acceptable level of lighting within a residential village setting.

Question 3: Dark sky status

Should B&NES and/or City of Bath consider applying for dark sky status?

We suggest some areas of BANES could be considered as a dark sky status, such as countryside villages, but not the city of Bath.

Question 4: Blue light free care spaces

Could/should B&NES aspire to become blue light free within its care spaces?

Yes. We support the aspiration of BANES becoming blue light free within its care space, there is sufficient research into the negative effects of blue light on the health of elderly eyes, general sleep and health.

Submission reference number LPO2024-1785371

Policy HD/AOSF: Advertisements & Outdoor Street Furniture – not considered

Policy HD/PR: Public Realm – not considered

Policy HD/DC: Design Codes – not considered

Sustainable Transport

Policy ST/HS – not considered

Policy ST/AT – not considered

Policy ST/RMD – not considered

Pollution, Contamination and Safety – not considered

Policy PCS/NV: Noise and Vibration – not considered

Policy PCS/AQ: Air Quality – not considered

Policy PCS/BHS: Bath Hot Springs – not considered

Minerals and Waste – none of the following considered

Minerals

Policy MIN/M: Strategic Approach to Minerals (Existing CP8A)

Policy MIN/MSA: Mineral Safeguarding Areas (Existing M1)

Policy MIN/MA: Mineral Allocations (Existing M2)

Policy MIN/RF: Aggregate Recycling Facilities (Existing M3)

Policy MIN/WW: Winning and Working of Minerals (Existing M4)

Policy MIN/MD: Minerals development: environmental enhancement through restoration

MIN/HC: Conventional and Unconventional Hydrocarbons (Existing M5)

Waste

I/I: Infrastructure Provision (existing CP13)

Appendix 1 – Policies retained from Local Plan Partial Update, Placemaking Plan and Core Strategy

Appendix 2

Proposed Safeguarded Strategic and Locally Significant Industrial Sites

Appendix 3: Proposed Changes to District and Local Centre Designations

End of document

PDF page 453

Web <https://beta.bathnes.gov.uk/glossary-planning-terms-and-abbreviations>