Retail & Town Centres Topic Paper

Bath & North East Somerset Local Plan

ON BEHALF OF BATH & NORTH EAST SOMERSET COUNCIL

August 2026

Contents

1. Introduction

1.1 This report has been prepared by Nexus Planning ('Nexus') for Bath & North East Somerset Council ('B&NES') to provide further information, analysis and advice on retail and town centre land use issues associated with the preparation of the new Local Plan for Bath & North East Somerset. It follows a Retail & Town Centres Briefing Note prepared by Nexus for B&NES in September 2025 which covered issues such as retail and town centre trends along with the main retail and town centre land use implications of the various potential options for residential development allocations in the new Local Plan.

1.2 As the preparation of the new Local Plan progresses to the next stage of consultation on a draft Local Plan document, the main focus of this report is to examine whether there is a need for the new plan to alter existing development plan policy towards retail and town centre issues in light of any material change in circumstances. This covers the period since the previous (retail land use related) development plan evidence base studies in 2018 and 2021 and the adoption of the Local Plan Partial Update ('LPPU') in January 2023.

1.3 As a consequence, this current report is split into the following three topic areas:

a. The provision and analysis of additional evidence base data on retail and town centre land use issues including changes in the land use profile of centres in the development plan 'town centre' hierarchy; the progress which has been made towards implementing strategies and allocations in the current development plan; plus recent planning permissions associated with changes in retail and Class E floorspace.

b. Taking into account the contents of part (a) above, along with further updates to retail expenditure forecasts, we assess how retail land use needs can be met within the new Local Plan via: existing floorspace in the defined 'town centre' hierarchy; the ability for existing development plan allocations and commitments to accommodate identified needs; along with the potential need to identify new centres and main town centre land use provision in the new Local Plan' strategic allocations.

c. Provision of advice on retail and town centre planning policies in the new Local Plan, including: which existing strategic and development management policies should remain unaltered in the new Local Plan; which existing policies may require requirement; along with the need for new policies to address the content and recommendations of this report.

1.4 As noted above, this current report follows a Retail & Town Centres Briefing Note in September 2025. At the time of that 2025 report it was intended that this second stage of evidence base gathering and analysis would include gathering new and up-to-date information on shopping and spending patterns across the B&NES administrative area, followed by an assessment of the quantitative and qualitative need for retail floorspace. Having reflected upon the outcome of the Local Plan Options Consultation in Autumn 2025, along with the need to ensure that evidence for the new Local Plan is proportionate, the Council has decided not to pursue gathering new shopping/spending patterns data, along with new detailed assessments of need. Instead, it is considered that the structure, outlined in paragraph 1.3 above, provides a proportionate approach to addressing the requirements of the current version of national planning policy[1].

1.5 The remainder of this document is structured as follows:

a. Section 2 provides an updated set of evidence base data on retail and town centre issues, including:

[1] The 2024 version of the National Planning Policy Framework (as amended in February 2025), which is the version of national policy being used to prepare and examine the contents of the new B&NES Local Plan.

1. Updated land use data for the main centres in the development plan 'town centre' hierarchy;
2. The progress which has been made towards the implementation of existing development plan strategies and allocations associated with retail land uses and town centres;
3. A review of current commitments and proposals for changes in retail floorspace provision across B&NES.

b. Within Section 3 we outline our assessment of the key components of a retail and town centres strategy for the new Local Plan, which takes into account:

1. The broad components of needs for retail land uses across the main settlements in the B&NES administrative area and how these needs should be planned for in the new plan;
2. A spatial assessment of the retail and town centre land use needs associated with the proposed new strategic development areas in the new Local Plan; and
3. Advice on the content of strategic and development management policies in the new Local Plan for retail and town centre land uses.

c. A summary of the contents of this document, including its key recommendations, can be found in Section 4.

2. Background, Context & Evidence Base Data

2.1 A key contributor to the assessment of retail land use needs, as part of a wider town centres strategy, is an understanding of current provision (and how it has evolved in recent years) along with commitments/strategies for new/changing retail provision. These lines of assessment will provide an opportunity to understand:

a. How retail land uses are making a contribution to the overall land use profile of defined 'town centres', along with other service and leisure uses.

b. The amount of existing floorspace in defined 'town centres' which is available to accommodate existing and future needs.

c. The trends in retail floorspace provision (influenced by the grant of planning permissions) across the B&NES administrative area since the previous retail and town centre evidence base studies in 2018 and 2021, along with the adoption of the LPPU in early 2023.

d. Current unimplemented committed/pipeline retail floorspace development.

2.2 As a consequence, this section is divided into separate sub-sections which address the above topics.

The existing 'town centre' hierarchy in Bath & North East Somerset

2.3 A useful indicator of the overall need for retail floorspace across the B&NES administrative area is the amount of floorspace in defined 'town centres' which is occupied by retail land uses. This provides clear market signals regarding the demand for retail space and, therefore, provides an indication of how the existing floorspace stock is being used to meet commercial needs. Whilst this assessment of 'town centre' floorspace will need to be set against proposals for new/remodelled/reduced retail floorspace outside of defined centres (which is also an indicator of commercial and overall need), the amount of town centre space occupied by retail uses is an obvious gauge of market demand.

2.4 For the purposes of this report we have reviewed the diversity and change in the land use profile for retail and service uses in the four main 'town centres' (Bath, Radstock, Keynsham and Midsomer Norton) along with the smaller local centres in Bath. In order to provide this review we have utilised survey data from B&NES and Experian.

Bath city centre

2.5 Table 2.1 below outlines the retail and service land use profile of Bath city centre between 2018 and 2025. This provides the ability to understand the change in uses in the city centre between the date of the previous assessment of quantitative and qualitative needs in 2018 and the current situation. The data shows that:

a. Overall, there has been very little change in the number of units occupied by retail and service units between 2018 and 2025: 891 and 871 respectively.

b. The number of units occupied by convenience goods retailers has remained constant and currently comprises 8.4%. This is slightly below the current national average of 9.5%.

c. There has been a significant fall in the number and proportion of units occupied by comparison goods retailers in the city centre. In 2018, there were 342 occupied units, which has now dropped to 280 units. In proportionate terms, the change is from 38% in 2018 to 32% in 2025. The proportion of comparison goods retailers in the city centre remains above the national average (25.8%), although the difference between the two has narrowed over the period 2018-2025.

d. Within the service sectors, the number and proportion of retail service uses has remained constant between 2018 and 2025 whilst there has been a small fall in the amount of financial and business service uses. The fall in financial and business uses mirrors the national trend, although the fall in Bath city centre has not been as pronounced as the fall nationally.

e. The one sector to experience a notable increase over the period 2018-2025 has been the leisure services sector. The number of units occupied by leisure service uses has increase from 260 in 2018 to 290 in 2025, leading to a situation where leisure services are now the largest retail/service sector in the city centre. This change mirrors national trends, with leisure services[2] now occupying one third of all surveyed units in the city centre (which is above the comparable national average).

Table 2.1: retail and service land use **unit** composition of Bath city centre, 2018-2025

Land use	**2018 Units (no.)**	**2018 %**	**2018 UK Average %**	**2025 Units (no.)**	**2025 %**	**2025 UK Average %**
Convenience retail	71	8.0	9.2	72	8.4	9.5
Comparison retail	342	38.4	29.7	280	32.2	25.8
Retail service	75	8.4	14.9	75	8.6	16.0
Leisure service	260	29.2	24.34	290	33.3	26.8
Financial and business service	56	6.3	10.0	49	5.6	7.8
Vacant	86	9.7	11.6	103	11.8	14.0
Total	**891**	**100**	**100**	**871**	**100**	**100**

Source: Experian GOAD

2.6 Table 2.1 above also shows that the number of vacant retail and service units in the city centre has increased between 2018 and 2025, from 86 to 103. The rise is vacancies is relatively modest and the current proportion of vacant units (11.8%) remains below the national average of 14.0%. In terms of vacant floorspace, Table 2.2 below indicates that vacancies accounted for 214,600sq ft (19,900sq m) of ground floor space in the city centre. This is a large increase in vacant floorspace since 2018 (when the figure was 125,900sq ft (11,700sq m)). It should be noted that at the time of the most recent survey, the former Debenhams unit at Southgate remained vacant, although this has now recently been re-occupied by Marks & Spencer who have relocated from Stall Street. The current proportion of vacant retail and service floorspace in the city centre (12.1%) remains below the national average (14.2%) although the increase in the proportion of vacant space has outstripped the rise in vacant (retail and service) floorspace nationally.

2.7 It is also to be noted that the former Jolly's department store on Milsom Street was vacant at the time of the most recent land use survey. This unit will soon be re-occupied by Morleys who plan to re-open a Jolly's-branded store in 2027[3].

[2] i.e. cafes, restaurants, drinking establishments, cinemas.
[3] https://jollysbath.co.uk/

2.8 In relation to occupied retail and service floorspace, the trends between 2018 and 2025 generally mirror the number of occupied units. It is notable that the leisure service sector is also the largest sector in terms of occupied floorspace and, unlike the amount of occupied units, the amount of floorspace occupied by leisure services (38.2%) is much larger than the second-highest sector (comparison goods retailers, at 30.0%).

Table 2.2: retail and service land use **floorspace** composition of Bath city centre, 2018-2025

Land Use	2018 Floorspace (sq ft gross)	2018 %	2018 UK Average %	2018 Floorspace (sq ft gross)	2018 %	2018 UK Average %
Convenience retail	180,300	10.2	15.4	189,600	10.7	15.4
Comparison retail	675,000	38.2	34.0	533,700	30.0	28.6
Retail service	79,500	4.5	6.9	75,600	4.3	7.3
Leisure service	605,500	34.3	25.4	679,200	38.2	27.9
Financial and business service	99,900	5.7	7.5	83,200	4.7	5.9
Vacant	125,900	7.1	10.2	214,600	12.1	14.2
Total	**1,767,000**	**100**	**100**	**1,776,800**	**100**	**100**

Source: Experian GOAD

Keynsham town centre

2.9 Keynsham is the second largest town centre in B&NES in terms of the amount retail and service floorspace and third largest (behind Midsomer Norton) in terms of the number of retail/service units. Over the period 2018-2025, Tables 2.3 and 2.4 show that the following trends have occurred:

a. There has been a small increase (from 12 to 14) in the number of convenience goods retailers in the centre, whilst the amount of floorspace occupied by this type of business has remained static. The proportion of convenience goods retailers in the town centre (10.3%) is now slightly above the national average (9.5%).

b. There have been notable falls in the number of comparison goods retailers and financial/business services in the town centre. The number of comparison goods retailers has fallen from 43 in 2018 (32.6% of all units) to 35 units in 2025 (25.7% of all units). The proportion of units occupied by comparison goods retailers remains in line with the national average, although the fall in demand for non-food stores is a point to be noted in the overall assessment of need for retail floorspace. The number of financial/business service uses (and occupied floorspace) in the town centre has fallen significantly (from 17 to 9, almost a 50% reduction), which is in line (but more severe) than the national trend for this type of service use.

c. In line with national trends, the number and proportion of retail and leisure service uses in Keynsham town centre has increased between 2018 and 2025. These two sectors occupy around half of all surveyed units in the town centre and around 40% of all surveyed floorspace. One notable feature is the proportion of retail service uses in the centre (23%) which is well above its comparable national average (16%).

Table 2.3: retail and service land use **unit** composition of Keynsham town centre, 2018-2025

Land Use	2018 Units	2018 %	2018 UK Average %	2025 Units	2025 %	2025 UK Average %
Convenience retail	12	9.1	9.2	14	10.3	9.5
Comparison retail	43	32.6	29.7	35	25.7	25.8
Retail service	25	18.9	14.9	32	23.5	16.0
Leisure service	30	22.7	24.34	34	25.0	26.8
Financial and business service	17	12.9	10.0	9	6.6	7.8
Vacant	5	3.8	11.6	12	8.8	14.0
Total	**132**	**100**	**100**	**136**	**100**	**100**

Source: Experian GOAD

Table 2.4: retail and service land use **floorspace** composition of Keynsham town centre, 2018-2025

Land Use	2018 Floorspace (sq ft gross)	2018 %	2018 UK Average %	2025 Floorspace (sq ft gross)	2025 %	2025 UK Average %
Convenience retail	59,500	20.8	15.4	59,800	20.7	15.4
Comparison retail	79,300	27.7	34.0	70,900	24.5	28.6
Retail service	40,200	14.0	6.9	40,500	14.0	7.3
Leisure service	70,800	24.7	25.4	75,200	26.0	27.9
Financial and business service	30,500	10.6	7.5	15,900	5.5	5.9
Vacant	6,500	2.3	10.2	26,700	9.2	14.2
Total	**286,800**	**100**	**100**	**289,000**	**100**	**100**

Source: Experian GOAD

2.10 Tables 2.3 and 2.4 also show that the amount of vacant units and floorspace in Keynsham town centre has experienced a considerable increase between 2018 and 2025. Importantly, the proportion of vacant units (8.8%) and floorspace (9.2%) remains below their respective national averages, due to a low starting point for vacancies in 2018. Therefore, whilst there is not any cause for current concern over the level of demand for retail and service floorspace in Keynsham town centre, we would recommend that the Council continues to monitor vacancies in order to assess whether the trends over the last several years continue.

2.11 Overall, the trends across occupied and vacant retail and service floorspace/units in Keynsham town centre over the past several years have mirrors national trends. There is nothing particularly unique or concerning regarding the mix of retail and service uses in the centre, although the centre's popularity for retail service uses (health/beauty, opticians, travel agents, etc) is to be noted.

Midsomer Norton town centre

2.12 As noted above, Midsomer Norton town centre is similar in size to Keynsham town centre and is the second largest centre in B&NES in terms of the number of retail and service uses. Table 2.5 below shows that the proportion of units occupied by comparison goods retailers is in line with (and slightly higher than) the national average, which is the opposite of the situation in 2018 when the proportion of this type of retailer was below the national average.

2.13 The comparison goods retail sector in Midsomer Norton is the only sector to have a proportion of uses which is broadly in line with its comparable national average. The proportion of units occupied by convenience goods retailers and leisure service uses is below average, whilst retail and financial/business services are above average. This situation remains the same as the land use mix for the town centre recorded in 2018. The below-average proportion of leisure service uses is notably different to the other main town centres in B&NES, whilst the ability of the financial/business service sector bucks the (national) trend.

Table 2.5: retail and service land use **unit** composition of Midsomer Norton town centre, 2018-2025

Land Use	2018 Units	2018 %	2018 UK Average %	2025 Units	2025 %	2025 UK Average %
Convenience retail	12	7.5	9.2	10	6.4	9.5
Comparison retail	45	28.0	29.7	41	26.3	25.8
Retail service	28	17.4	14.9	32	19.8Btw	16.0
Leisure service	34	21.1	24.34	33	20.5	26.8
Financial and business service	22	13.7	10.0	20	12.8	7.8
Vacant	20	12.4	11.6	20	12.8	14.0
Total	**161**	**100**	**100**	**156**	**100**	**100**

Source: Experian GOAD

2.14 Table 2.6 indicates that the number of vacant units in the town centre has remained relatively static over the past several years (20 units), with the number of units and the associated amount of vacant floorspace below their respective national average levels. Between the two surveys the Argos unit became vacant, which had a material influence on the amount of vacant floorspace within the town centre, although this unit has now been re-occupied by a gym .

Table 2.6: retail and service land use **floorspace** composition of Midsomer Norton town centre, 2018-2025

Land Use	2018 Floorspace (sq ft gross)	2018 %	2018 UK Average %	2025 Floorspace (sq ft gross)	2025 %	2025 UK Average %
Convenience retail	44,200	18.3	15.4	41,100	16.5	15.4
Comparison retail	77,100	31.9	34.0	62,400	25.0	28.6
Retail service	21,400	8.9	6.9	27,600	11.1	7.3
Leisure service	53,600	22.2	25.4	65,400	26.2	27.9
Financial and business service	28,000	11.6	7.5	34,000	13.6	5.9
Vacant	17,400	7.2	10.2	18,900	7.6	14.2
Total	**241,700**	**100**	**100**	**249,400**	**100**	**100**

Source: Experian GOAD

2.15 Within the past 12 months, B&NES has prepared a new masterplan for Midsomer Norton town centre. The masterplan, whose salient contents are described in the next section of this report, sets out a vision and series of opportunities/future improvements for the town centre. The four main areas of the town centre covered by the masterplan include:

a. High Street North. The proposals for the area on the north side of the High Street are primarily about public realm, with the particular aim of improving the connections through and to the Sainsbury's car park and ensuring that there is clear and direct links to surrounding sites. The main elements of this area comprise the Hollies Gardens, Sainsburys car park and the B&NES staff car park.

b. High Street South. This area includes the potential to rejuvenate existing historic buildings and add new development as well as to improve the car park and public realm with trees and rain garden planting. The main elements of this area include Old Brewery, Gasworks, South Road car park and South Road frontages.

c. Excelsior Terrace. The junction of Excelsior terrace with the High Street and the series of adjacent secondary streets form an important node in the Town Centre. The proposals in the masterplan for this area are aimed at improving the connectivity between the two parts of the High Street and enhancing the links out towards the Leisure Centre and Town Park.

d. High Street East. The High Street East area comprises three sites which may present opportunities in the future including a combination of town centre homes and an improved High Street frontage with active town centre uses where it is currently lacking. The content of this part of the masterplan is not formally promoting redevelopment; rather, it is aiming to ensure that if proposals do come forward they deliver the best possible outcomes for the High Street and support its long-term vitality. The sites in this area are in separate ownership and may come forward at different times. As a consequence, the masterplan aims to establish a coordinated framework to ensures any future development is well-integrated, both with each other and with the wider town centre. The three main elements of this area are: (a) the Lidl site; (b) the Poundland retail store; and (c) the former Argos site.

Radstock town centre

2.16 Radstock is the smallest of the four main town centres in the District which has experienced a small increase in the number of retail and service uses since 2018. The centre has experienced small reductions in the number of retail units in the centre (loss of 3 uses) alongside a larger increase in the number of service uses (increase of 8 uses between 2018 and 2025). Service uses account for 58% of all surveyed units in the town centre, with the proportion of retail services (29%) thirteen percentage points above the national average (16%). The proportion of convenience and comparison goods retailers in the centre are both slightly below their respective national average levels.

2.17 Table 2.8 below shows that there have been some relatively large changes in the mix of occupied floorspace in Radstock between 2018 and 2025. The most noticeable is the fall in convenience goods floorspace, following the closure of the Radco supermarket. The demolition of the building has not translated into a rise in the amount of vacant floorspace, as the former Radco building has been demolished pending progress being made on the redevelopment of the wider site (see below for further details).

2.18 Alongside the significant loss of convenience goods floorspace, there have been material increases (since 2018) in the amount of comparison goods retail, leisure service and retail service floorspace. A significant contributor to these changes has been the redevelopment of the former Charltons timber yard site on Frome Road which now accommodates a DIY and hardware store, a gym, a vet and a Subway food outlet. These changes in floorspace mean that the proportions of comparison goods retail, leisure service and retail service floorspace are well above their respective national averages, whilst the proportion of convenience goods floorspace is now below average (due to the lack of a large grocery store in the centre). The proportion of vacant floorspace in the town centre is just over half the national average level.

Table 2.7: retail and service land use **unit** composition of Radstock town centre, 2018-2025

Land Use	2018 Units	2018 %	2018 UK Average %	2025 Units	2025 %	2025 UK Average %
Convenience retail	6	12.5	9.2	4	7.7	9.5
Comparison retail	12	25.0	29.7	11	21.2	25.8
Retail service	11	22.9	14.9	15	28.9	16.0
Leisure service	10	20.8	24.34	13	25.0	26.8
Financial and business service	1	2.1	10.0	2	3.9	7.8
Vacant	8	16,7	11.6	7	13.5	14.0
Total	**48**	**100**	**100**	**52**	**100**	**100**

Source: Experian GOAD

Table 2.8: retail and service land use **floorspace** composition of Radstock town centre, 2018-2025

Land Use	2018 Floorspace (sq ft gross)	2018 %	2018 UK Average %	2025 Floorspace (sq ft gross)	2025 %	2025 UK Average %
Convenience retail	46,300	43.2	15.4	7,800	9.2	15.4
Comparison retail	17,500	16.3	34.0	29,300	34.4	28.6
Retail service	9,200	8.6	6.9	13,400	15.7	7.3
Leisure service	21,000	19.6	25.4	27,300	32.0	27.9
Financial and business service	400	0.4	7.5	700	0.8	5.9
Vacant	12,900	12.0	10.2	6,700	7.9	14.2
Total	**107,300**	**100**	**100**	**85,200**	**100**	**100**

Source: Experian GOAD

2.19 As noted above, the former Radco retail store has been demolished following the grant of planning permission[4] for the redevelopment of the wider site. The planning permission for the site includes provision for the following: (a) a full planning permission for 1,795sq m of retail floorspace, 722sq m of office floorspace, 28 dwellings and associated car parking and landscaping works; and (b) outline planning permission for 26 dwellings and associated works.

2.20 Following the grant of planning permission in March 2021, a series of conditions have been discharged (during 2021) and a non-material amendment approved in 2022. However, since those events, redevelopment of the site has not progressed. The implications of the closure of the Radco store and the planning permission for redevelopment of the site are discussed in the next section of this report.

District and local centres

2.21 In addition to a review of the retail and service land use profile of the four main town centres, a review of the district and local centres across Bath has also been undertaken. B&NES undertakes regular surveys of the district and local centres in the city and the results for each centre 2019, 2024 and 2025 are summarised at Appendix A to this report. Land uses have been arranged into the following categories: convenience goods retail, comparison goods retail, retail service uses, food/drink service uses, health-related uses, vacancies and other uses which sit outside of these other categories.

2.22 Table 2.9 below provides a summary of all centres for 2019, 2024 and 2025.

[4] 18/05623/OUT

Table 2.9: summary of land use profile of district and local centres in Bath – 2019, 2024 & 2025

Category	2019 (average % of surveyed units per centre)	2024 (average % of surveyed units per centre)	2025 (average % of surveyed units per centre)
Convenience goods retail uses	17%	16%	17%
Comparison goods retail uses	24%	24%	23%
Retail service uses	27%	25%	23%
Food/drink service uses	15%	19%	19%
Health-related uses	5%	5%	6%
Vacant units	7%	6%	6%
Other uses	5%	6%	6%

Notes: data taken from Appendix A and B&NES surveys of local and district centres in Bath

2.23 The main characteristics and trends from the survey data are as follows:

a. Whilst direct and detailed comparisons with the national average figures for the four main town centres cannot be undertaken, it is to be noted that local and district centres in the city have a high proportion of convenience (grocery) goods uses. This has remained constant over the past several years, with this category of use comprising around one fifth of all units.

b. There has been a shift in the proportion of retail and food/drink service uses over recent years, with a decline in former being compensated by an increase in the latter.

c. Whilst smaller scale local and district centres are not traditionally recognised as significant location for comparison goods retailers, around one quarter of units in Bath's local/district centres are occupied by this category of use. This may well demonstrate the importance of smaller scale centres in the city for a wider range of retail/service uses given the unique function of the city centre has a more specialist and higher end location which is influenced by higher value tourism/visitor orientated uses.

d. Overall, the proportion of vacant units across district and local centres in Bath remains reasonably low. This is a clear sign of the popularity of commercial and other floorspace within the defined centre boundaries and the continued relevance of these centres for the local communities that they serve. Looking beyond these average figures, there are a small number of local centres with high vacancy rates: London Road, Camden Road, Combe Down and Twerton.

Major retail and other main town centre land use commitments and proposals

2.24 At the time of the 2018 retail study there were not any significant retail floorspace proposals or commitments which required inclusion in the assessments of quantitative capacity for convenience and comparison goods floorspace. Since that time the following planning permissions associated with existing/proposed retail floorspace has been granted:

a. The former Radco site, Radstock town centre. As noted in paragraph 2.19 above, a hybrid planning permission has been granted for the redevelopment of the former Radco supermarket site on the western side of Radstock town centre. The site has been cleared ready for development and a number of pre-commencement conditions have been discharged, although construction has yet to commence.

b. The Homebase site, Bath. Planning permission has been granted for the redevelopment of the former Homebase site on the western edge of the city centre for a residential-led mixed use development. Previous proposals for this site[5], including for a large replacement Sainsburys supermarket, have not been progressed.

c. Co-op, Scala, Moorland Road district centre. In recent years, the existing Co-op foodstore at Moorland Road district centre in Bath has been partially redeveloped and reduced in size in order to: (a) allow for the construction of student residential accommodation, other residential (9 units); and (b) a reduced size Co-op store (circa 740sq m net sales).

2.25 In addition to the above planning permissions, there have been a combination of recent changes and proposed changes to retail provision across Bath, Midsomer Norton and Keynsham. These include:

a. Bath:

1. There is a current proposal[6] for a new Lidl foodstore at Lambridge on the eastern side of Bath. At the time of preparing this report, this application remains undetermined. A previous application for a similar development[7] was withdrawn by the applicant prior to B&NES reaching a decision.
2. Following the closure of the large Debenhams department store at Southgate in the city centre, Marks & Spencer has relocated its full-time (comparison and convenience goods) store from Stall Street to the former Debenhams unit. The new M&S store opened in February 2026, with the former M&S unit currently vacant.
3. Following the closure of the Jolly's department store in February 2025, Morleys have announced that its intends to open a new branch of their store portfolio in 2027 in this large unit on Milsom Street (under the name Jolly's). Whilst full details for the retail offer of the store have yet to be announced, it is understood that this will continue to be a comparison goods led retail store.

b. Keynsham:

1. The Council has recently resolved to grant planning permission for a new ALDI foodstore on Bath Road (A4) in Keynsham.
2. Alongside the current ALDI proposal application, a further foodstore planning application has now been submitted. This is an application[8] by Lidl for a new store at the Jewson site in Ashmead Industrial Estate to the north of Keynsham.

c. Midsomer Norton:

1. There is a current planning application for a Lidl store on Radstock Road in Midsomer Norton. It is understood that should planning permission be granted for this new foodstore then Lidl would close their existing town centre store in Midsomer Norton town centre. At the time of preparing this report, the planning application remains undetermined.

2.26 Alongside current/recent permissions and proposals, it is also important to revisit the contents of the current development plan insofar as it relates to retail land use and floorspace provision. In relation to the main settlements, the development plan provides for the following:

[5] Which benefitted from an unrestricted retail floorspace use.
[6] 25/01403/FUL
[7] 23/02212/FUL
[8] Planning application reference: 26/02094/FUL

a. As part of the overarching development strategy for **Bath**, the following aspects are included for retail land uses:

    1. Ensure that the primary shopping area successfully absorbs Southgate into the trading patterns and character of the city centre by not making provision for a further large scale comparison retail project
    2. Enable small to medium sized comparison retail development that improves the shopping offer and enhances the reputation of the city centre.
    3. Protect and where possible enhance the vitality and viability of District and local centres.
    4. Focus additional convenience retail floorspace (beyond existing commitments) within and on the edge of existing centres before considering out-of-centre sites that might improve the spatial pattern of provision across the city.
    5. Enable the provision of neighbourhood retail services at Ensleigh, Warminster Road, Foxhill, and associated with the Strategic Site Allocation adjoining Odd Down.
    6. Retail uses are also included in the following site allocations: Manvers Street, Bath Quays North, Green Park Station & Sydenham Park[9], Roseberry Place[10].

b. For **Keynsham**, this main focus of the current plan is maintaining and supporting the health of the town centre, with Policy KE2 indicating that the centre can benefit from “some larger retail units to provide space for high quality, national retailers which complement the existing successful independent retailers”. In addition to the general strategy for the town centre, the opportunities associated with the Fire Station site are highlighted, along with the provision of small scale retail floorspace (500sq m) as part of the Somerdale mixed use development.

c. Within the **Somer Valley** section of the development plan, Policy SSV4 allocates the former Welton manufacturing site in **Midsomer Norton** for mixed use development including a medium sized foodstore[11]. The policy indicates that the development of a foodstore on this site should provide linkages with the High Street and be sited on the southern section of the site. Within Radstock, the Charlton Timber Yard site is allocated under Policy SSV14 for mixed use development including active ground floor uses. Since the adoption of the plan, the site has been converted to provide a mixture of commercial uses (including retail, leisure and food/beverage uses).

[9] 7,000sq m net retail floorspace at Sydenham Park – smaller format space and not a continuation of the existing large format retail unit style of provision
[10] Small scale local needs retail
[11] A previous allocation of South Road car park for foodstore use was delete as part of preparing and adopting the Local Plan Partial Update in 2023 – with the delivery of a new foodstore transferred to the former Welton Manufacturing site.

3. Towards a Town Centres and Retail Strategy for Bath & North East Somerset

3.1 Following the review of baseline and evidence base information associated with existing defined 'town centres', recent changes in retail floorspace provision in the main settlements across B&NES, plus updated trends associated with retail expenditure and online shopping habits, it is possible to work towards an assessment of how the new B&NES Local Plan should plan for retail land use provision as part of its wider 'town centre's strategy. This looks back to the recommendations of the 2018 and 2021 retail studies and places them alongside the latest evidence base information and other material changes in circumstances in order to provide an assessment which is split into two parts:

a. A review of how the previous need assessment forecasts for Bath, Midsomer Norton, Keynsham and Radstock have been influenced by the content of the new evidence base information and material changes in circumstances.

b. Following on from the assessment of spatial retail needs associated with the various Local Plan options in our 2025 report, we provide an assessment of the likely retail and wider main town centre land use needs associated with the preferred spatial development strategy in the new Local Plan.

3.2 However, before we do so, we have re-visited a selection of the retail spending and online shopping market share forecasts contained within the 2025 study in light of the latest forecasts published by Experian in March 2026.

Retail Spending Forecasts.

3.3 Within Section 2 of the 2025 study, a comparison was undertaken between the retail spending forecasts adopted in the 2018 retail study and latest available forecasts as of September 2025[12]. In March 2026 Experian published its latest retail spending forecasts and therefore it is useful to provide updated information to inform the wider assessment of how B&NES will plan for retail floorspace provision in the new Local Plan.

3.4 Table 3.1 provides an update to the contents of Table 2.1 in the 2025 study and provide forecasts for retail sales growth, floorspace efficiency gains and resultant floorspace requirements. Whilst the forecasting period for the data is slightly different, the updated data in Table 3.1 provides a very similar picture in terms of retail sales growth both including and excluding online sales. There is a small difference in the expected gains in overall retail floorspace efficiency between 2025 and 2041 which leads to a consequential increase in floorspace required (after efficiency gains) of 7.8% over the period 2025-2041.

[12] Experian's Retail Planner Briefing Note 22 (March 2025)

Table 3.1: retail sales growth, efficiency gains and floorspace requirements

	% p.a. 2025 - 2032	Cumulative Growth, 2025-2032	% p.a. 2025-2041	Cumulative Growth, 2025-2041
Retail sales growth	1.5	12.5	1.7	32.4
Retail sales growth, less SFT adjusted for sales from stores	1.1	9.0	1.3	24.9
Efficiency gains	0.8	7.3	0.9	17.1
% increase in floorspace required after efficiency gains (sales growth less efficiency gains)	0.2	1.7	0.4	7.8

Source: Experian, March 2026

3.5 Table 3.2 provides the latest forecasts for changes in annual spending on comparison goods excluding the influence of online sales. These are placed alongside the contents of Table 2.2 from the 2025 study report and show a lower level of forecast growth up to 2036 (+7.8%) than previously forecast in 2025 (+12.8%). As previously noted, this is well below the forecast growth in spending comparison good at physical bricks and mortar floorspace at the time of the 2018 retail study (+52.4%).

Table 3.2: forecast year-on-year change in per capita comparison goods spending between 2018 and 2036 (excluding influence of online sales)

	2018 Retail Study (% change per annum)	Retail Planner 22 (2025) % Growth p.a.	Retail Planner 23 (2026) % Growth p.a.
2018	0.1	-0.8	-1.4
2019	1.5	1.8	2.0
2020	2.3	-19.5	-18.3
2021	2.7	7.7	9.2
2022	2.9	6.4	9.1
2023	3.2	-2.2	-11.1
2024	3.2	-1.7	-1.0
2025	3.1	-0.4	-1.1
2026	3.1	0.9	0.8
2027	3.1	1.3	1.2
2028	3.0	2.0	1.7
2029	3.1	2.2	2.0
2030	3.2	2.2	2.0
2031	3.4	2.2	2.2
2032	3.2	2.2	2.2
2033	3.3	2.2	2.1
2034	3.3	2.1	2.1
2035	3.3	2.1	2.1
2036	3.2	2.1	2.1
Change, 2018-2036	***+54.2%***	***+12.8%***	***+7.9%***

Source: Experian (2025 & 2026) and 2018 Retail Study

3.6 Table 3.3 performs the same exercise for convenience goods spending, incorporating the latest 2026 Experian spending forecasts. This shows a similar level of forecast reduction in spending in convenience goods over the period 2018-2036 as reported in the 2025 study, and which is a large reduction than adopted for the purposes of the need assessment in the 2018 study.

Table 3.3: forecast year-on-year change in per capita convenience goods spending between 2018 and 2036 (excluding influence of online sales)

	2018 Retail Study (% change per annum)	**Retail Planner 22 (2025) % Growth p.a.**	**Retail Planner 23 (2026) % Growth p.a.**
2018	-0.9	-0.3	1.3
2019	-0.4	-1.5	-1.7
2020	0.0	5.4	5.8
2021	0.0	-1.8	-1.9
2022	-0.1	-5.1	-1.9
2023	-0.3	-3.3	-5.2
2024	-0.1	-1.9	-3.0
2025	0.0	-0.9	-1.7
2026	-0.1	-0.7	-0.6
2027	0.0	-0.6	-0.7
2028	0.0	-0.4	-0.4
2029	-0.1	-0.4	-0.4
2030	-0.1	-0.4	-0.5
2031	0.1	-0.4	-0.3
2032	0.0	-0.3	-0.3
2033	0.1	-0.3	-0.3
2034	0.1	-0.3	-0.3
2035	0.2	-0.3	-0.3
2036	-0.1	-0.3	-0.3
Change, 2018-2036	***-1.7%***	***-13.8%***	***-12.7%***

Source: Experian (2025 & 2026) and 2018 Retail Study

3.7 In addition to the updates to convenience and comparison spending, Table 3.4 below provides a comparison between the online sales market share forecasts used within the 2018 study and the latest (2026) forecasts published by Experian. The forecasts used in the table below are online sales market shares adjusted for sales which are fulfilled via physical ‘bricks and mortar’ shops.

Table 3.4: online spending on convenience and comparison goods (adjusted to allow for online sales via stores) – comparison between 2018 retail study and latest 2026 Experian forecasts

	2018 Retail Study Convenience	2018 Retail Study Comparison	2026 Experian Forecasts Convenience	2026 Experian Forecasts Comparison
2018	3.4	15.4	-	-
2026	4.6	17.5	5.4	26.1
2036	5.3	18.0	6.8	29.7

Sources: Experian Retail Planner Briefing Note 15 (2017) and Experian Retail Planner Briefing Note 23 (2026)

3.8 A comparison between the two sets of data shows that whilst there is a relatively small increase in the market share of online sales in convenience goods shopping between 2018 and 2026, the increase for comparison goods has been significant. Within the 2018 study it was forecast that, by 2026, 17.5% of comparison goods spending would be associated with purely online sales. However, the latest forecasts indicate that the proportion of online sales will be 26.1%, an increase of around one half. This differential (between the previous and current forecasts) grows by 2036 with the latest forecasts indicating that almost 30% of all comparison goods spending will be purely online sales (compared with 18% at the time of the 2018 study).

3.9 The latest forecasts from Experian reinforce the contents of the 2025 study whereby the level of expenditure which is forecast to be available to physical retail floorspace has declined. This will have an effect on the level of retail floorspace which the main settlements (and their wider catchment) are able to support in the short, medium and longer term.

Planning for retail land uses

3.10 In order to help establish whether the new Local Plan should be planning for an expansion in the amount of retail floorspace in the main settlements, this sub-section examines extent of material changes in circumstances in each of the four main urban areas in B&NES. It takes into account the data in Section 2 of this report, along with other land use studies and initiatives over the past several years.

Bath

3.11 2018 study found a modest amount of quantitative capacity for convenience goods floorspace in Bath, starting at circa 1,700sq m (net) at 2018-2033, rising to 1,850sq m net in 2028, 2,100sq m by 2033 and 2,300sq m net by 2036. Since that time there have been limited changes in the amount of convenience goods floorspace provision, with the two notable changes being: (a) the redevelopment of part of the Co-op store (at the Scala site) in Moorland Road district centre (leading to the loss of circa 400-500sq m of retail space); and (b) the relocation of the Marks & Spencer store in the city centre, which includes a substantial improvement in the qualitative aspects of the M&S Foodhall. In addition, a small convenience store has been delivered as part of the redevelopment of the former MoD Endsleigh site.

3.12 The 2018 study did not recommend the need to allocate land to provide additional convenience floorspace and whilst there have not been any significant changes to provision (which would soak up identified capacity) the forecast reduction in expenditure growth would reinforce the previous (2018) conclusions and recommendations. The key aspects of convenience goods floorspace provision in Bath are:

a. Bath has a good range of grocery stores, including large Sainsburys (two stores), Morrisons, Lidl and Waitrose stores fulfilling both main and top-up food shopping requirements and located across the city.

b. The larger grocery stores are accompanied by a wide range of smaller stores which are generally located in defined local and district centres. These stores have a greater emphasis on top-up food shopping but provide a very important function for local communities across the city and are co-located with other retail, service, leisure and community land uses. Indeed, it is likely that many of these grocery stores pay an anchor role underpinning the health of local centres across the city.

c. The qualitative aspects of grocery retail provision in the city centre have recently been improved via the relocation of the M&S store from Stall Street to Southgate. Beyond that notable change, the amount of convenience goods floorspace in the city centre has remained relatively static between 2018 and 2026.

3.13 As a consequence, we do not consider that there have been any material changes in circumstance since the 2018 retail study to suggest that there is a need for the new Local Plan to include provision for a new medium to large sized foodstore within its spatial development strategy. Instead, the focus for Bath is likely to remain on smaller scale changes and improvement to provision. This is likely to be best achieved in relation to the delivery of appropriately sized provision as part of mixed use development opportunities through the city, along with on-going improvements to the city centre. Examples of this will be a continuation of policies such as those at Manvers Street, Bath Quays North, , Sydenham Park and Green Park Station. We also consider, in the next sub-section, whether there are any location-specific needs associated with planned new residential development areas to be included in the new Local Plan.

3.14 In line with previous retail and town centre studies, the 2018 study forecast a reasonably significant level of quantitative capacity for net additional comparison goods floorspace in Bath by 2036. This capacity was modest between 2018 and 2023 and grew to reasonably significant levels by 2028 and 2036. Like convenience goods floorspace provision, there have not been any notable or significant additions to the amount of comparison goods floorspace since the 2018 study.

3.15 The main influences over the approach to planning for comparison goods retail floorspace in Bath come in relation to the following areas:

a. Land use data in the previous chapter of this report indicates that there has been a material reduction in the amount of floorspace occupied by comparison goods retailers. The data shows that occupied space has fallen by circa 140,000sq ft, with the proportion of surveyed floorspace in comparison goods use falling from 38% in 2018 to 30% in the latest survey. There has been a similar reduction in the number / proportion of occupied units, from 342 to 280 units (which is equivalent to a fall from 38% to 32% of all surveyed units). It is to be noted that a large element of this change is due to the closure of the Jolly’s store on Milsom Street.

b. In addition to overall reduction in space occupied by comparison goods retailers, it is to be noted that there have been further closures and relocations which are relevant to the occupation of, and demand/need for, floorspace. These changes, since 2018, include the closure of the large Debenhams store in the Southgate development. The Debenhams store was one of the original anchor retailers of the Southgate development and, following a period of prolonged vacancy, the unit has now been re-occupied by a full-line Marks & Spencer store (selling both comparison and convenience goods). This relocation has, in turn, led to a large current vacancy on the corner of Stall Street and New Orchard Street.

c. The other large vacancy in the city centre is the former Jollys unit on Milsom Street. This unit will however soon be re-occupied by Morleys, which have acquired the unit and will re-open the unit under the Jollys fascia.

d. Outside of the town centre, the large Homebase store on Pines Way, on the western edge of the city centre closed in November 2018. The closure of this store followed several years of redevelopment proposals, with the latest proposal, approved in 2025, for a residential-led mixed use scheme.

e. An over-arching influence for the demand/need for comparison goods floorspace in Bath will be the changes in spending forecasts since the 2018 study. As noted earlier in this chapter, there has been a substantial reduction in the amount of forecast comparison goods spending growth over the medium to longer term. This reduction, which is linked to the continued rise in market share of online sales, will have a clear impact upon the amount of spending which will be available to support comparison goods floorspace.

3.16 As a consequence of the above evidence, we hold the view that there is no need to plan for net additional comparison goods floorspace in Bath within the new Local Plan. The available evidence suggests that there is now more limited growth in comparison goods retail expenditure over the medium to longer term which will be directed towards supporting existing retail floorspace, particularly given the need to ensure that the health of the city centre in Bath (along with the district and local centres) is maintained and enhanced over the new Local Plan period[13]. This approach is reinforced by the vacancies and changes in provision/occupation in existing retail space which have occurred in recant years.

Keynsham and Saltford

3.17 The 2018 retail study found that there was an over-supply of convenience goods floorspace in the Keynsham and Saltford area. This was based upon two particular factors: (a) the amount of in-centre and out-of-centre floorspace in this area; and (b) the falling market share of Keynsham and Saltford stores (based upon the results of a household survey undertaken in 2018). In relation to qualitative factors, the 2018 study highlighted that the fall in grocery shopping market share amongst Keynsham and Saltford (leading to a consequential increased outflow in forecast shopping trip leakage) could be a sign of qualitative need. However, due to the good qualitative nature of existing individual stores, the 2018 study recommended that there was no requirement to increase / change convenience goods floorspace provision.

3.18 Since the 2018 study, there has been little change in the amount of convenience goods floorspace provision in the Keynsham and Saltford area, whilst the previous sub-section of this report indicates that convenience goods spending levels (and future forecasts) per head will remain subdued.

3.19 The one change which has occurred is in relation to the availability of data on convenience goods shopping market shares. As part of the current planning application for a new ALDI store adjacent to the A4 Bath Road in Keynsham, a new survey of shopping patterns has been commissioned. Use of this new survey, which is based upon a finer grained analysis of local main and top-up food shopping patterns, forecasts an improved performance for most stores in Keynsham. A comparison between the forecast turnovers from the 2018 study and the information submitted with the current ALDI application is contained in Table 3.5 below.

[13] Via allowances for improved productivity and efficiency in existing floorspace. The available evidence and forecasts from Experian indicate that a large part of forecast comparison goods expenditure growth will be used to support efficiency and productivity in existing floorspace, rather to assigned to new floorspace

Table 3.5: comparison between trading performance forecasts for Keynsham grocery stores – 2018 Retail Study & current ALDI planning application

<table>
<tr><th></th><th>2018 Retail Study Forecast Turnover (£m)</th><th>2018 Retail Study Benchmark Turnover (£m)</th><th>2026 ALDI Planning Application Analysis Forecast Turnover (£m)</th><th>2026 ALDI Planning Application Analysis Benchmark Turnover (£m)</th></tr>
<tr><td>Tesco</td><td>10.0</td><td>19.5</td><td>38.2</td><td>21.7</td></tr>
<tr><td>Iceland</td><td>0.8</td><td>3.3</td><td>2.9</td><td>3.7</td></tr>
<tr><td>Sainsburys Local</td><td>0.7</td><td rowspan="2">2.1</td><td>3.3</td><td>3.1</td></tr>
<tr><td>Other town centre stores</td><td>0.9</td><td>0.5</td><td>0.5</td></tr>
<tr><td>Waitrose</td><td>13.4</td><td>26.3</td><td>18.4</td><td>24.6</td></tr>
</table>

Notes: forecast turnover levels are study area derived turnovers. All 2018 benchmark turnover levels taken from Table 8 of 2018 Retail Study. All 2026 benchmark turnover levels, apart from Waitrose, taken from Appendix I of Avison Young 'Response to Nexus Supplementary Retail Audit No.2' (February 2026). 2026 Waitrose benchmark turnover calculated using latest company average sales density and floorspace of 2,014sq m net.

3.20 Whilst, based upon the above snapshot data, there is now the potential for there to be a 'surplus' convenience goods expenditure in the Keynsham and Saltford area, the qualitative observations in the 2018 study (around the choice in existing facilities) remain valid in our opinion. This is also reinforced by the additional assessment work which has been undertaken as part of the current ALDI application which has confirmed the important positive contribution that the Tesco store makes towards the role and attractiveness of Keynsham town centre. In addition, it will also be noted that whilst the latest shopping patterns information forecasts an improved trading performance for most grocery stores in the Keynsham and Saltford area, many stores' performance remains below benchmark/average levels.

3.21 Therefore, for all of these reasons, we do not consider that there is a strong need case for the new Local Plan to identify land for a new medium to large stand-alone foodstore/supermarket in the Keynsham and Saltford. This is now further reinforced by the resolution of the Council to grant planning permission for the proposed new ALDI foodstore on Bath Road in Keynsham. This new store, once implemented, will soak up further convenience goods expenditure capacity and add to choice and competition. As a consequence, if new provision is to be provided via the new Local Plan strategy, it is likely to need to be associated with wider benefits and be integrated into the wider strategic land use strategy for the area. This is likely to focus upon new retail provision being closely associated with the large strategic development areas in the new Local Plan in the Keynsham and Saltford area and the next sub-section of this report covers this topic.

3.22 In relation to comparison goods floorspace, the 2018 retail study did not forecast a quantitative capacity for net additional floorspace in the Keynsham and Saltford area, whilst also highlighting, from a qualitative perspective, that the focus should on maintaining existing floorspace in the local area. Contributing to these recommendations were a falling market share for Keynsham for comparison goods shopping and the on-going (considerable) influence of Bath and Bristol.

3.23 It will be noted (from Section 2 of this report) that since the 2018 study the amount of floorspace in Keynsham occupied by comparison goods retailers has fallen by circa 11%, whilst the proportion of units and floorspace in the town centre occupied by comparison goods retailers has fell from one third to one quarter. When combined with the generally lower level of growth in comparison goods expenditure available to bricks and mortar floorspace, these factors point to a situation where there is no need to identify land specifically for new comparison goods floorspace. It is recommended that the focus remains on utilising existing 'town centre' floorspace for quantitative, qualitative and commercial needs associated with comparison goods retailing. There may also be opportunities for small scale comparison goods retail provision within any identified new local centres in the Keynsham and Saltford area, which are discussed in the next sub-section of this report.

Midsomer Norton & Radstock

3.24 In order to bring the assessment of need for retail floorspace across Midsomer Norton and Radstock up to date several factors need to be considered. As a starting point, the development plan allocates the former Welton Manufacturing site in Midsomer Norton for a new medium sized foodstore. This allocation was made following the removal of the foodstore allocation at South Road car park in the town centre and the identification, in the 2018 retail study, of a need for a new foodstore. Since the allocation of the Welton Manufacturing site in the Local Plan Partial Update, B&NES has prepared and approved a masterplan for Midsomer Norton town centre which highlights the potential for significant change in the north-eastern part of the town centre (across the Poundstretcher, Lidl and former Argos sites). The approved masterplan does not specifically promote the relocation of the Lidl foodstore away from the town centre, although this is the impression given by the land use strategy[14] for this area (which seeks to present future opportunities for this area *"including a combination of town centre homes and an improved high street frontage with active town centre uses"*)[15].

3.25 In addition, it is to be noted that since the completion of the 2021 retail study, which provided part of the evidence base for the relocation of the foodstore allocation from South Street to the Welton Manufacturing site, the Radco foodstore in Radstock town centre has closed (and been demolished) with a planning permission for redevelopment (including a smaller foodstore) awaiting implementation.

3.26 One conclusion to be drawn from the closure of the Radco store is that the loss of floorspace creates additional convenience goods quantitative capacity in the wider Radstock and Midsomer Norton area. However, in our opinion, the main implication of the closure is that there is a strong and focused need upon providing an improved amount and quality of floorspace within Radstock.

3.27 With regards to quantitative capacity indicators, more recent shopping patterns evidence has not become available since the 2018 retail study and therefore that most recent available information indicated: (a) good (and higher than average) trading performance levels for the Tesco and Lidl stores in Midsomer Norton; (b) below average trading conditions for the Sainsburys in Midsomer Norton town centre; and (a) a poor trading performance for the Radco store before its closure.

3.28 In order to reach a recommended strategy then it is also important to consider the future spatial development strategy for the Midsomer Norton and Radstock area. As will be set out in the next sub-section of this report, the main strategic residential allocations in the local area are on the eastern and northern edge of Radstock. These total circa 2,000 new homes. In addition, just under 1,000 new homes are planned for Peasedown St John. In contrast, a much lower amount of homes are proposed for Midsomer Norton. The proposed spatial strategy reinforces the importance of both quantitative and qualitative needs arising from the Radstock area (plus areas to the north-east) and not Midsomer Norton.

3.29 Against this backdrop, there is a current proposal by Lidl for a new store in Midsomer Norton to replace its existing town centre store; a store which sits in an area where the Council's masterplan suggests change in terms of large-format retail unit provision. In addition, a pre-application enquiry has recently been submitted to the Council in relation to the former Welton Manufacturing site on the northern edge of the town centre.

[14] As shown by the indicative urban design diagram on pages 120 and 123 of the document (along with associated text).
[15] For the avoidance of doubt, we also understand that an impact assessment associated with the potential loss of retail floorspace from this area of the town centre has not been carried out.

3.30 Therefore, based upon the above factors, we would recommend that the Council gives active consideration to the following outline strategy for convenience goods retail floorspace provision in the Radstock, Midsomer Norton and Peasedown St John area:

a. Based upon recent changes in provision, the overall balance of provision between Midsomer Norton and Radstock, plus planned residential development, a key priority for the retail strategy is Radstock. If implemented, the mixed use development on the former Radco site, including a smaller foodstore, would provide a much needed quantitative and qualitative improvement for the local area. However, the balance of provision between Midsomer Norton Radstock plus the scale of planned new residential development in Radstock suggests that further grocery provision beyond this permission can and should be supported.

b. The new Local Plan cannot influence the ability to progress the current permission on the Radco site, but nevertheless will need to be responsive to its progress/implementation. We would recommend that:

   1. If the current Radco site permission is progressed to implementation then the Radstock and Peasedown St John allocations are considered for local facilities (see next sub-section) plus the potential for a medium sized foodstore.
   2. If the current Radco permission does not progress, explore the opportunities for a larger foodstore in this town centre location. If that is deemed unsuitable then consider larger scale provision in a suitable location in one of the Radstock / Peasedown St John strategic allocations.
   3. Provision of additional grocery provision in Radstock and Peasedown St John should be co-ordinated by the new Local Plan and should be given, at the very least, equal priority to changing foodstore provision in Midsomer Norton.

c. Whilst the available evidence suggests that a need exists for improved provision in Midsomer Norton, the changing situation in the wider area means that if the Welton Manufacturing site continues to be identified for a foodstore development then this should be closely coordinated with any proposed loss of the Lidl store from the town centre. At the present time, there is a current undetermined planning application for a new Lidl store outside of the town centre which, if approved, would lead to the closure of the town centre Lidl store. Whilst the Council's masterplan does not activity propose the loss / re-location of the town centre Lidl store, its content provide a potential redevelopment scenario for the Lidl store should it become vacant. , This scenario, i.e. the Welton site being the first choice alternative location for a relocated Lidl store, is likely to provide the best fit with the wider grocery retail strategy for Midsomer Norton, Radstock and Peasedown St John.

3.31 With regards to comparison goods retail provision, the current development plan does not make any allowance for any specific net additional provision, whilst the 2018 and 2021 retail studies did not identified any specific quantitative and/or qualitative needs. Based upon the role and function of the Midsomer Norton and Radstock area, along with the reduced forecast growth in expenditure available to physical retail stores, we recommend that there continues to be no specific need for net additional comparison goods floorspace in this area.

Spatial assessment & strategic development areas

3.32 Looking beyond the town-wide issues discussed in the previous sub-section, it is also important for the assessment of need to consider more localised spatial issues. These are primarily associated with the proposed strategic residential-led allocations in the new Local Plan and our assessment has focused upon whether the needs of residents within these new and growing communities give rise to the need to plan for new retail floorspace in the local area (either on its own or as part of a planned new local centre).

3.33 For the avoidance of doubt, the locations which have been considered as part of our analysis are those locations which, we understand, are to be included in the forthcoming consultation for the new Local Plan.

Keynsham & Saltford

3.34 The 2025 study indicated that the preferred strategy for retail / main town centre land use provision in Keynsham and Saltford would be very dependent upon the scale and location of residential development sites / areas in and around these urban areas. The three key influencing factors were: (a) the preferred location and scale of residential uses amongst the various options; (b) the outcome of the current planning application for a new ALDI foodstore adjacent to the A4; and (c) the weight which should be given to the need to protect and enhance existing defined 'town centres' in the local area.

3.35 The relevance of each of these factors has not changed to any material extent since the 2025 study, although it is important to note that the Council has now resolved to grant planning permission for the proposed new ALDI store. The ALDI proposal should now be taken into account as a commitment for the purposes of our analysis and is likely to have a significant influence on the assessment of the need to provide new local retail, service and other main town centre uses in the Keynsham and Saltford areas.

3.36 Furthermore, Lidl has recently applied for planning permission for a new foodstore on the Jewson site on the corner of Ashmead Road and Broadmead Lane. Whilst the Lidl proposal cannot be given any weight in the overall assessment process it should be kept under review as that store would have cumulative effects on top of the ALDI commitment. The main reasons for doing so are that: (a) both proposals are located close to the areas of proposed residential land use growth; and (b) they will be providing retail floorspace which is an integral part of any planned new local centres for Keynsham and Saltford and, as a consequence, will soak up retail expenditure capacity generated by residents of the new strategic development areas (alongside having a material influence on the shopping patterns of existing residents).

3.37 Of the locations previously assessed, all but one remain within the proposed allocations [16]. The updated assessment of these locations, in terms of their respective site capacities and suitability, places the proposed number of residential units for most of these locations lies at the lower end of the potential capacity levels previously assessed[17], apart from North Keynsham which attracts a reduced capacity of circa 1,400 residential units.

[16] The area removed from consideration is South Saltford.
[17] See site capacity ranges in the Keynsham & Saltford section of Appendix A of our 2025 report.

Table 3.6: draft residential allocations in Keynsham and Saltford

Site	Indicative Residential Unit Capacity for Draft Allocation
Main Sites	
North Keynsham	1,434
West & North West Saltford	964
South West Keynsham	952
Other Sites	
South-east Keynsham	386
West Keynsham	477
South Saltford	300
Other sites (Avon Mill Lane and town centre car parks)	136

3.38 Based upon the updated assessment of site capacity for residential development, and also taking into account existing commitments, potential windfalls and smaller sites in the Keynsham/Saltford area, the total new residential unit capacity for the whole of this area is circa 5,400 units[18]. That is similar to the lower capacity scenario in the 2025 study and offers, on a combined basis, the opportunity to support circa 2,200sq m of net sales convenience goods floorspace. This figure is based upon a ring-fenced capacity and, as noted at paragraph 3.19 of our 2025 report, may not be fully available to support new floorspace in the local area. Nevertheless, on a combined basis, the scale of potential capacity is significant and leads to the conclusion that the level of planned residential growth in the Keynsham and Saltford area should be actively considering the provision of new convenience goods floorspace. This floorspace will now be provided by the recently approved ALDI foodstore on Bath Road which is neither within the planned areas of residential growth or to be provided as part of a wider local centre. It will soak up much of the additional (convenience goods) spending capacity generated by residents of the planned new strategic areas and will potentially constrain the amount of convenience goods floorspace which is capacity of being provided in the proposed allocations.

3.39 Looking beyond the overall potential capacity associated with the proposed residential land use allocations, the next stage is to examine the specific areas of growth. Based upon the proposed draft allocations, the three main areas are:

a. North Keynsham – circa 1,400 units.

b. South West Keynsham – circa 950 units.

c. West Saltford – circa 960 units.

3.40 The characteristics of each area, drawings upon the findings of the 2025 study, are outlined in Table 3.7 below.

[18] Total comprises sites in Table 3.6 plus commitments of 426 units and windfalls of 168 units

Table 3.7: assessment of main strategic residential development areas in Keynsham and Saltford

Area	Assessment
North Keynsham	The residential element of this proposed allocation extends to circa 1,400 units and is proposed to be accompanied by office/light industrial employment uses, education and other social infrastructure uses. The majority of the proposed allocation lies on land to the north of the main Bristol to Bath railway line, plus a smaller area of land to the south (which is already allocated for employment land uses in the current B&NES Local Plan). The proposed allocation lies a reasonably significant distance from Keynsham town centre and the existing local centre in Saltford, with the A4 providing a further barrier to movement. The nearest grocery store is the Waitrose on Broadmead Lane, which is able to offer residents of the new North Keynsham community a main and top-up food shopping destination. This is likely to be joined in the near future by a new ALDI store on Bath Road, which will lie to the south of the main proposed allocation area. Despite their reasonable proximity, the Waitrose and ALDI stores are stand-alone and therefore there remains a requirement for a range of easily accessible shops, services and other community functions. As a consequence, we consider that there is a good case for the provision of a planned new local centre to be provided at an appropriate stage of the phasing of the North Keynsham community. We recommend that, due to accessibility issues and the extent of the proposed allocation, that the new centre is placed to the north of the railway line (as placement to the south of the railway will not achieve the same level of benefits). Such a new centre would be anchored by an appropriately sized foodstore. The scale of store in this location is now likely to be significantly constrained by the influence of the (recently approved) ALDI store to the south of the main allocation area. Whilst the location of the new ALDI store this is not the preferred location for retail uses within the allocation, the scale and location of the remainder of the proposed allocation is such that a new local centre should still be planned for, albeit the scale and phased delivery of the new local centre at North Keynsham may now be smaller and more longer-term in nature.
South West Keynsham	This proposed allocation is intended to wrap around the southern and western edges of the Keynsham urban area and accommodation circa 950 new residential dwellings. The northern part of the proposed allocation lies in reasonably close proximity to Keynsham town centre whilst areas further to the south are closer to Queens Road local centre. As a consequence, the location of this existing provision reduces the need to provide a planned new local centre within this proposed allocation and, instead, we consider that the additional spending capacity generated by residents of this new community would be better utilised supporting these two existing centres. However, whilst a planned new centre is unlikely to be necessary in this location, we recommend that an allowance is made for a small convenience store within the allocation.
West Saltford	The West Saltford development areas would form a large western extension to the Saltford urban area on either side of the A4 and provide just under 1,000 new residential units. The closest existing defined centre to this area is the local centre at Saltford (adjacent to the A4), which contains a Tesco Express grocery store plus a range of food/beverage, pharmacy, health/beauty, post office and charity shop uses. This existing centre offers important facilities for residents of Saltford, but may not be ideally situated for residents of the proposed allocation areas. Therefore, there is a good case for a modest new local centre to be provided within the planned development area. The new centre should provide a small convenience store along with a range of other small-scale retail, service and social infrastructure uses (with the latter influenced by the needs of residents of the new development and the surrounding area). Given the decision of the Council to support the ALDI foodstore proposal on Bath Road, we recommend that only a small convenience style grocery store is required for the new local centre (wherever its location).

	We consider that there are opportunities to provide the new local centre in either the northern or southern parts of the proposed allocation. The Council considered its provision in the northern element, to the north of Bath Road and adjacent to a planned new primary school. There are a number of benefits in placing the centre in this location, including co-location with the school (in order to make the centre more attractive), proximity to the planned improvements to the public transport route, along with the ability to combine the new centre with the existing farm shop as an anchor (in order to provide a co-ordinated approach to retail and Class E land use provision) and the potential to make efficient use of land through sharing a proportion of car parking. However, provision of the centre to the north of Bath Road is less than ideal in relation to the spatial distribution of retail uses, given the ALDI store approval and the recommendation to provide a new centre at North Keynsham. In addition, the southern element of the proposed allocation is the larger of the two elements and this would, as a consequence, be left with no easily accessible day-to-day provision.

3.41 As a consequence of the above analysis, we recommend that the retail / main town centre land use content of each of the three main development areas in Keynsham and Saltford is as follows:

a. South West Keynsham. Given the existence of Queens Road local centre and the distance/accessibility characteristics to Keynsham town centre, the South West Keynsham area has the lowest need for a new local centre to serve the residents of this strategic development area. However, it would be appropriate for this area to include provision for one new convenience store, which should be modest in scale so as to not affect the role and function of Queen Road local centre.

b. West Saltford. We recommend that there is an opportunity to provide a modest-sized local centre within the West Saltford element of this development area. The content of the new centre should be carefully coordinated in order that it complements the existing centre in Saltford and, ideally, offers a different 'proposition' whereby the centre is placed in the heart of either the northern or southern elements of the proposed allocation. The decision by the Council to grant planning permission for a new ALDI foodstore will have an influence on the scale of grocery floorspace which can be provided as part of the centre. A number of inter-related (and potentially competing) factors will guide the Council's ultimate decision on where to place the new local centre and our analysis has set out those factors which are relevant to the spatial provision of retail and main town centre uses and also the opportunity to co-ordinate new provision with the existing farm shop site on Bath Road.

c. North Keynsham. The size, location and accessibility characteristics of the North Keynsham development area suggest that a planned new local centre should be part of the land use mix within this proposed allocation. Of the three main development areas, North Keynsham has the best case for new grocery retail provision and a new local centre. It is recommended that the new centre is placed in the main part of the proposed allocation to the north of the railway line and, in light of the Council's decision to support the ALDI proposal on Bath Road, the scale of grocery store will be limited to a convenience style top up food shop, to be provided as part of a mixed use local centre (contained small Class E and sui generis food/beverage uses). Given the decision of the Council to support the ALDI store proposal, and its likely effect on the retail content of the main proposed strategic allocations, the Council should be mindful of the effects of permitting more retail floorspace in the Keynsham/Saltford area outside of the proposed allocations.

Somer Valley

3.42 For the purposes of this assessment, the Somer Valley area covers Midsomer Norton and Radstock, Peasedown St John, Paulton and Farrington Gurney. Within the 2025 study, the range of potential residential unit development options comprised 5,350 to 6,400 units, although the list of proposed residential site allocations for the draft Local Plan has been refined to the following:

Table 3.8: draft residential allocations for the Somer Valley

Site	Indicative Residential Unit Capacity for Draft Allocation
Radstock & Midsomer Norton	
Haydon	143
Thicket Mead	130
Chilcompton Road	162
North Radstock	951
East Radstock	1,028
Farrington Gurney	
South of Farrington Gurney	504
Paulton	
Farrington Road North & South	94
Paulton South	300
Peasedown St John	
South of A367	510
Fosseway	349
Lower Peasedown	81

3.43 The refined list, which now excludes the Midsomer Norton North area, provides an indicative capacity of circa 4,700 new residential units. Like the 2025 study, it remains appropriate to split the wider Somer Valley area into its four main constituent parts and we outline our assessment for each area in turn below.

3.44 In relation to **Farrington Gurney** the single main residential allocation remains the land to the south of the village, which can accommodate circa 500 new units. As a consequence, our previous analysis, contained in paragraph 3.47 and 3.48 of the 2025 study continues to apply, namely that there is unlikely to be a significant requirement to expand convenience goods and wider retail/main town centre land use provision in the village. In particular, the existing Co-op store on Bristol Road along with the collection of uses on Main Street (in the eastern part of the village) will be able to continue to serve the needs of local residents (albeit the uses at Main Street have a more specialised function). As a consequence, we consider that the additional spending capacity associated with circa 500 new homes to the south of the village should be used to support existing facilities, with no requirement for the 'South of Farrington Gurney' allocation to include any provision for net additional retail or main town centre uses[19].

[19] As noted in the 2025 study, the only requirement for the 'land south of Farrington Gurney' area to accommodate retail / main town centre uses would be where there are planned and co-ordinated relocations of existing facilities from elsewhere in the village.

3.45 Given their close proximity, along with the characteristics of existing provision, the current development plan strategy and the closure of the Radco store, we consider it appropriate to consider the **Midsomer Norton, Radstock and Peasedown St John** areas together. The key characteristics of retail provision and the Council's land use strategy in the area are as follows:

a. The closure of the Radco foodstore in Radstock town centre has left a quantitative and qualitative gap in provision for the residents of Radstock.

b. The current draft strategy for new residential land use allocations has a particular focus upon Radstock, with the potential for circa 2,000 new units. A much lower level of planned new residential development is being assigned to Midsomer Norton.

c. In addition to the circa 2,000 new homes planned for Radstock, a further 900 new homes are planned for Peasedown St John (which currently possesses limited retail and main town centre land use provision).

d. There is an existing development plan allocation for the provision of a new foodstore on the former Welton Bibby site on the northern edge of Midsomer Norton town centre.

e. The Council has prepared a Town Centre Masterplan for Midsomer Norton, which identifies the potential for change in a number of different areas of the town centre.

3.46 As noted in the previous sub-section of this report, the Council will need to reconcile how it takes forward the relationship of the Midsomer Norton Town Centre Masterplan and the current Welton Bibby foodstore allocation. Based upon the content of the current development plan, a new additional foodstore can potentially be provided (in addition to existing provision) although the combined consequences of the current Lidl planning application and the Masterplan may mean that existing provision is re-organised rather than provision of a new store.

3.47 This situation is likely to remain unresolved in the short term and, therefore, the new Local Plan's spatial strategy for retail provision should focus upon provision in and around Radstock and its relationship with Peasedown St John. In our opinion, there are three important issues to address: the future mix of land uses in Radstock town centre; the need to provide land uses to meet the day-to-day needs of residents in the two large strategic residential development areas in Radstock; and, the relationship of new retail provision between Radstock and Peasedown St John.

3.48 In our view, the loss of the Radco foodstore has led to a diminution in the qualitative offer in Radstock town centre and has left Radstock without a large foodstore. We are of the view that the new Local Plan should seek to rectify this situation via a strategy which plans to replace the lost floorspace and, in any event, provide for an improved quantitative and qualitative level of provision for the benefit of existing Radstock residents and those of the two large strategic development areas.

3.49 In line with the main thrust of the sequential approach to site selection, the most obvious choice will be for the former Radco foodstore site to be used to provide a new large foodstore as part of a mixed use development proposal. The approved proposal includes a foodstore, which extends to circa 1,100sq m gross and circa 750sq m net sales. This foodstore will be placed alongside other commercial units and as part of a wider redevelopment including residential units. Should this commitment proceed to implementation, then it is likely to benefit the town centre in a number of ways, through re-introducing a grocery retail function, along with a wider mix of land uses which will attract further commercial occupiers and new residents, adding to town centre vitality. At 750sq m net sales, the new foodstore has the potential to attract a range of food shopping trips albeit the size of store is more orientated towards top-up and smaller scale main food shopping trips.

3.50 Implementation of the approved scheme may well mean that there are consequential further grocery store opportunities across the wider area. This will include both of the proposed large strategic development areas in Radstock and the large, proposed allocations on the south-western side of Peasedown St John. In all circumstances, a key priority will be to ensure that new retail provision in these areas does not adverse effect the continued implementation of the redevelopment of the former Radco site.

3.51 In light of the current policies and allocations associated with Midsomer Norton and the commitment in Radstock town centre, we do not consider there is a clear need or opportunity to plan for a larger foodstore in the Radstock / Peasedown St John area. Based upon current circumstances, we recommend that the new Local Plan makes an allowance for small scale grocery retail provision in each of these three areas, with a specific limit/control on the scale and role of new provision (i.e. day to day top-up grocery shopping provision). We do not consider that there is a requirement for any of these locations to provide a new local centre on the basis that: (a) residents of the new communities in east and north Radstock should continue to look towards Radstock town centre for their wider retail, service and community needs; and (b) the existing local centre at Peasedown St John remains the most appropriate location to serve the day-to-day needs of residents of the new communities at the south-west edge of the village.

3.52 Should proposals for larger scale grocery retail provision in the Radstock and Peasedown St John areas come forward in the future, an assessment of these proposals will need to take into account the progress which has been made with the current planning permission and planning strategy initiatives in Radstock and Midsomer Norton town centres[20].

Whitchurch

3.53 At the time of the 2025 study, the residential development options for Whitchurch extended to between 4,000 to 5,000 new dwellings on each of the four sides of the village. That scale of potential development led the study to conclude that: (a) the 'ring fenced' convenience goods spending capacity generated by residents of this scale of new homes was equivalent to a medium sized foodstore; (b) retail and main town centre land use provision in Whitchurch is likely to be heavily influenced by inflows and outflows of trips/expenditure associated with south-east Bristol[21]; and (c) there was a good case for the provision of a planned new local centre for Whitchurch (subject to the scale and location of planned new residential development).

3.54 Further work undertaken by B&NES has arrived at a preferred strategy which see land allocated on the western and eastern sides of the village for circa 1,700 new homes. This is summarised in Table 3.9 below.

Table 3.9: draft residential allocations for Whitchurch

Site	Indicative Residential Unit Capacity for Draft Allocation
South West Whitchurch	700
Land to the east of Whitchurch	1000

3.55 The scale of residential development within the preferred strategy generates a materially smaller level of expenditure potential than the full suite of options previously appraised. As a consequence, a lower level of convenience goods floorspace could be supported by this scale of development although the inflow/outflow shopping/expenditure

[20] Plus the outcome of the current Lidl application in Midsomer Norton.
[21] Including the large Tesco Extra (Brislington) and ASDA (Whitchurch) supermarkets.

characteristics previously described remain relevant. In addition, the location of the proposed residential land allocations also prompt consideration of how this will influence the provision of new retail and main town centre uses.

3.56 The starting point for our assessment of retail and main town centre land use provision is whether the preferred strategy for residential development should include the provision of a new local centre or a smaller scale convenience store provision. The analysis of the baseline position in the 2025 study remains relevant, with the key characteristics of the local area being an existing centre at Whitchurch Village (B&NES), a local centre to the north at Gilda Parade (Bristol City Council) and two large supermarkets (ASDA and Tesco Extra) further afield. There is also a local centre to the north-east, at Stockwood (Bristol City Council).

3.57 The limited scale of provision within Whitchurch Village at the present time suggests that there is the clear potential for new day-to-day retail and service uses for the local community, given that existing centres in the Bristol City Council administrative area (Gilda Parade and Stockwood) are available but are not particularly accessible. Based upon the scale of proposed residential development, along with the lack of existing facilities, we consider that there is an opportunity for a planned new local centre. The largest element of the proposed residential allocations lies to the east of Whitchurch village and, as a consequence, this would be an obvious candidate for the new centre. Access to the A37 towards the southern end of this allocation would also be a beneficial characteristic for a new centre, as would a proposal for a new secondary school within this area.

3.58 The smaller and fragmented nature of the proposed allocations to the west of the A37 and Whitchurch Village suggest that this area does not have the same attributes. However, the lack of a defined local centre in the south-east part of Whitchurch in the Bristol City Council administrative area does offer support for the provision of some facilities in the 'South West Whitchurch' allocation area. This may be in the form of a small convenience goods or small neighbourhood parade of shops and services. Should this element be pursued, liaison with Bristol City Council is recommended regarding the principle of this provision and the scale/type of facilities to be provided.

Hicks Gate

3.59 The Hicks Gate area contains potential development locations in both the B&NES and BCC administrative areas. Within the BCC area there is an undetermined planning application for residential-led mixed use development (including a new local centre) whilst the preferred development strategy for the land within the B&NES administrative area is as follows:

Table 3.10: draft residential allocations for Hicks Gate

Site	Indicative Residential Unit Capacity for Draft Allocation
Hicks Gate (B&NES administrative area)	1,934
Devonport House and Durley Farm	249

3.60 The site/area referred to as 'Hicks Gate' in Table 3.10 lies adjacent to the eastern edge of the BCC development area and lies on both side of the A4 Bath Road up to the roundabout with the Bristol ring road. The Devonport House / Durley Farm land is separate, lying to the east of the Hicks Gate roundabout and between the A4 and Durley Hill.

3.61 The 2025 study indicated a clear cross-boundary need for a planned new centre in the Hicks Gate area and, based upon a potential residential unit development capacity of 1,200-1,550 units, indicated that the need for a planned new local centre in the B&NES Local Plan area would be diminished by an approval for a local centre within the current BCC application. However, the significant increase in the preferred residential unit capacity within the B&NES element of this wider area reduces the level of caution regarding the need / ability for a second new local centre to be provided. In addition, the case for a new local centre within the B&NES Local Plan allocation for this area is also reinforced by the proposed inclusion of a transport interchange facility into the Hicks Gate allocation. Provision of an appropriately sized local centre containing retail, service, food/beverage and other community functions will, in our view, make a positive contribution to the attractiveness of the interchange due the co-location of these uses.

3.62 The masterplanning of the wider proposed allocation will determine the most appropriate location for the new local centre, although we recommend that the centre is planned to include a small convenience store, along with small-scale main town centre land uses designed to serve the day to day needs of residents of this new community along with uses which aide the attractiveness of the transport interchange.

3.63 We are also mindful of the Hicks Gate development area close to both the Bristol ring road and also a primary route into and out of Bristol. As a consequence, it is likely that this area will be very attractive for certain types of retail and other main town centre land use. Therefore, given that the primary purpose of new main town centre land uses in this areas is to serve the local community and not a wider catchment, we would recommend that the scale and type of retail / main town centre uses are tightly controlled and that they are placed away from main road frontages within this development area.

Bath

3.64 Within the 2025 study, a focus for the assessment of spatial options was a large area of land on the western edge of Bath. Following further assessment, an allocation for this area has not been taken forward for consultation in the next stage of the draft Local Plan. As a consequence, the remaining proposed site allocations for residential development in the city are much smaller scale and range, in capacity terms, between 10 and 90 units. The three largest proposed residential allocations lie in the north-western part of the city at: Bath Equestrian Centre[22], land north of Napier Road (Weston)[23], and Kingswood School playing fields[24]. None of these sites individually or collectively are large enough to support/require a new local centre and, instead, we have given consideration to whether they lie within an area of existing deficiency in north-west Bath which will be reinforced by the provision of these circa 210 new residential units.

3.65 The Kingswood School playing fields site is separated from the other two proposed allocations and lies adjacent to the recently developed former MoD Ensleigh site. This area is separated from the main urban area of Bath and, therefore, new retail/main town centre land use provision would only be easily accessible to residents of the proposed allocation and the MoD Ensleigh site. In addition, there is already a small Spar convenience store within the adjacent development. As a consequence, we do not consider that the proposed allocation raises any issues associated with the need for additional retail/main town centre land use provision in this part of north-west Bath.

3.66 A similar conclusion can also be reached in relation to the additional residential development proposed for the Napier Road and equestrian centre sites. These sites are a relatively short distance from Weston local centre which contains a reasonably wide range of retail, service and food/beverage uses, including two convenience stores[25]. As a consequence, there is no requirement to plan for modified or expanded local centre provision around the Weston area of Bath to respond to the proposed residential development allocations.

[22] 36 units
[23] 87 units
[24] 90 units
[25] Plus other specialist grocery retail provision.

Rural Areas

3.67 Looking beyond the main urban areas in the District, it is understood that the draft Local Plan proposes a series of small residential development allocations across the rural areas. For the most part, the scale and location of these proposed allocations do not prompt consideration of associated main town centre land use needs. However, in line with the 2025 study the three settlements which should be considered are: Timsbury, Temple Cloud and Clutton.

3.68 Given their close relationship, **Clutton and Temple Cloud** were considered together in the 2025 study. The study found that there was a case for the provision of a modest amount of retail floorspace in these areas where a sizable residential allocation was included in the new Local Plan. At the time of the 2025 study, the full extent of potential residential development options were between 300-400 unit in Clutton and between 300-700 units in Temple Cloud. It is understood that the draft Local Plan intends to allocate land for 460 new residential units in the Clutton / Temple Cloud area (300 units at west of Clutton; 30 units at Maypole, Clutton; and, 130 units on the northern edge of Temple Cloud.

3.69 Whilst the 2025 study contemplated a modest amount of new retail floorspace across both Clutton and Temple Cloud (in a co-ordinated approach), the smaller scale of proposed residential development will reduce the case for such a land use strategy. The total spending power associated with the full extent of the proposed residential unit allocation is equivalent to the turnover of one new modest-sized convenience store. Given that such a store, along with existing provision in Temple Cloud will not retain all locally-generated convenience goods expenditure, it is likely that the case for providing a new convenience store in this area will also need to rely on qualitative factors. In relation to the location of any new store, we would recommend that the focus is on Clutton given that: (a) Clutton does not currently posses a convenience store; (b) it is the large settlement; and (c) Clutton is proposed to accommodate two-thirds of the planned new residential development. As a consequence, the 'West of Clutton' allocation is considered to be the prime candidate for the provision of a new convenience store. However, the requirement for the allocation to provide the store is likely to be dependent on the outcome of a current planning application (reference: 26/00127/FUL) on an adjacent site which has the potential to meet this need (through new Class E units)

Strategic & development management planning policies

3.70 At the present time, the 'town centres and retailing' section of the current development plan contains five separate policies:

a. Policy CP12 provides the strategic policy for 'town centres', including definition of the town centre hierarchy in the District and general approach to land uses in defined centres.

b. Policies CR1 and CR2 provide development management framework relating to the sequential and impact policy tests.

c. Policy CR3 provides development management policy for proposals lying within the defined primary shopping areas and primary shopping frontages.

d. Policy CR4 provides the main development management policy for small scale shops, comprising two elements: (a) proposals for new small-scale local shops; and (b) proposals involving the loss of existing small-scale shops.

3.71 B&NES are proposing to retain policies CR1 and CR2 unaltered and, therefore, the focus for our analysis has been on the need to update and adapt CP12 and CR3[decided to save CR4]. When making recommendations for the policies to succeed CP12 and CR3 we have had regard to the contents of the Council's 'Local Plan 2022-2042 Options Document' which formed the basis for an earlier consultation between February and April 2024.

CP12

3.72 Policy CP12 outlines a four-tier hierarchy for the District, comprising Bath city centre, the three other town centres (Keynsham, Radstock and Midsomer Norton), one district centre in Bath (Moorland Road) and 33 local centres (including 22 in Bath). CP12 also outlines the suite of land uses which should, as a first preference, be located in these defined centres along with the main characteristics that these uses should possess in relation to their location in defined centres.

3.73 The 2024 Options Document outlines the following refinements and retained elements to CP12:

a. Retention of the existing hierarchy

b. Confirmation of which uses are considered appropriate (in principle) within the defined town centres

c. Retention and minor amendments to the Primary Shopping Area in Bath city centre

d. Amendments to some of the defined local centre boundaries

3.74 We agree that the existing four-tier hierarchy remains fit for purpose and no changes to the number of tiers and the centres contained in each tier are required (save for the Council's decision to remove Lansdown Road from the hierarchy, due to absence of retail uses. In particular:

a. Bath city centre, due to its size, role and land use diversity performs a materially different function than the main centre in the other three settlement. As a consequence, the hierarchy should recognise this characteristic.

b. Midsomer Norton, Radstock and Keynsham town centre all perform a materially similar role for their local communities and accommodate retail, service, leisure and other community uses which have a settlement-wide function.

c. Whilst there is a mix of urban and rural centres currently listed in CP12, their main functions are essentially the same: to provide for the day-to-day retail, service and social infrastructure needs of the local population/communities that they sit within.

3.75 The use of the four different tiers in the 'town centre' hierarchy should also be accompanied by the continuation of that part of CP12 which seeks to ensure that the scale and type of proposals are consistent with the role and function of that centre in the hierarchy. This principle should be maintained in either the successor policy to either CP12 or CR3, although reference to retail in the current (CP12) policy should be dropped in favour of all main town centre land uses.

3.76 It will also be important that the new Local Plan continues to provide a strategy and vision for each of the four main town centres in the District[26]. This approach is already provided in the current development plan and we recommend that each individual strategy and vision is updated to reflect the current role and function of each centre (including the uses which are important to its health) and the key aspects of the development strategy (and planned changes) for the centre.

3.77 The 2024 Options Document also outlines the need for Policy CP12 to adapt in order to make clear which uses will be permitted in 'town centre' locations. At the present time, CP12 sets the scene for the sequential test by indicating where the suite of 'main town centre uses' (as defined by national policy) should be located, although CP12 (or CR3) does not outline a framework for assessing proposals for these uses in defined centres. As a consequence, this should be addressed in the successor policies to CP12 and CR3, with our preference being for the latter. [Agree CP12 is the strategic policy and CR3 replacement is the development management policy so should include appropriate scale etc]

3.78 In addition to the hierarchy of existing centres, we have recommended that new local centres are provided as part of some of the larger strategic residential development allocations. These are:

a. North Keynsham

b. West Saltford

c. East Whitchurch

d. Hicks Gate

3.79 As a consequence of the need for these new centres, we recommend that the successor policy to CP12 also includes these centres as part of the formal hierarchy. These should be clearly identified as a separate category in the formal hierarchy, in order that they may be included (where appropriate) as a material consideration within the application of the sequential and impact assessments for other main town centre land use proposals. This is to ensure that:

a. Proposals for new main town centre land uses are directed to both existing centres and also to planned new centres, in order to ensure the co-location of uses in accessible locations.

b. Ensure that the delivery of planned new centres is not harmed by retail and leisure proposals located on sites outside of the 'town centre' network which are not allocated for the proposed use.

3.80 In addition to the inclusion of each of the planned new local centres in the formal centre hierarchy, each of the strategic development area allocations in the new Local Plan should provide a clear guide as to the expected role, function and scale of each new centre (including the mix of acceptable land uses). The same policies should also outline the range of information and supporting material which is expected in order to justify the scale and content of each proposed centre.

3.81 Each of the existing centres in the 'town centre' hierarchy will have a boundary shown on the Policies Map. For the larger centres there will be a defined city/town centre boundary and a separate primary shopping area boundary. The ability to define two separate boundaries is acknowledged by the current version of the NPPF. For the smaller centres, there will be one defined centre boundary. This is because the modest scale of lower tier centres in the hierarchy does not warrant separate town centre and primary shopping area boundaries. In order to avoid any confusion we would

[26] Which may be contained in either the supporting text to the 'town centre' hierarchy policy or within individual area-focuses sections of the new Local Plan.

recommend that for those centres that have just one boundary that the policies map and/or the supporting text in the Local Plan makes it clear that primary shopping area boundary is the same as the town centre boundary.

CR3 – primary shopping areas and primary shopping frontages

3.82 At the present time, Policy CR3 provides development management policy for proposals within either the primary shopping frontages or the primary shopping areas, as defined on the current policies map. Given the content of the current (2024) version of the NPPF, the 2024 Options Document is correct to highlight the removal of these frontages from the four main centres for the purposes of the new Local Plan. Based upon current national policy, the two defined areas which are required for 'town centres' in the formal centre hierarchy as town centre and primary shopping area boundaries.

3.83 With regards to the successor policy to CR3, we recommend that it is split into two main parts: (i) management of proposals within the defined primary shopping areas; and (ii) management of proposals within town centre boundaries (including the areas outside of primary shopping areas, but within the town centre boundaries, in the four main centres).

3.84 Before we outline the recommended policy approach for each element of the new policy, it is important to provide clarity over the basis for defining town centre and primary shopping area boundaries for all centres in the former B&NES town centre hierarchy. The current approach in the adopted development plan is to defined separate town centre and primary shopping area boundaries for Bath, Keynsham, Midsomer Norton and Radstock. This approach has been taken given the size of the centres and their individual characteristics. There are no separate primary shopping area boundaries for the local and district centres, which is also a reflection of their size and individual characteristics. We recommend that the same approach continues for the new Local Plan and, in order to avoid any confusion, the Plan should make it clear that there is a primary shopping area for the district and local centres and it is the same as the defined town centre boundary.

3.85 It is recommended that the following aspects should be included in the primary shopping area element of the town centres management policy:

a. They should indicate that proposals falling into Use Class E will be supported within the defined primary shopping areas.

b. Proposals should retain and enhance active frontages within primary shopping areas to support the wider attractiveness of the town centre. Specifically, proposals for physical development works, where the change of use doesn't require planning permission, should maintain and enhance the vitality and viability of the town centre, avoiding harm to the attractiveness of the primary shopping areas through the loss of an active frontage.

c. Proposals for change of use of retail and other Class E uses (in the primary shopping areas) to another non-Class E use will not be permitted (subject to permitted development rights) unless the proposed use would:

1. Make a positive contribution to the vitality, viability and diversity of the centre; and
2. Not fragment any part of the primary shopping area by creating a significant break in the Class E land use frontage; and
3. Not result in a loss of retail or Class E floorspace of a scale harmful to the shopping function of the centre; and
4. Be compatible with the primary shopping area in that it includes a shopfront with a display function and would be immediately accessible to the public from the street.

3.86 For the town centre boundary areas, it is recommended that the policy indicates that proposals for uses falling into Use Class E or the definition of Main Town Centre Uses[27] will be supported, where they:

a. maintain and enhance the vitality and viability of the centre.

b. Should be a use which attracts pedestrian footfall to the centre.

c. Are of a scale and type consistent with the existing retail function and character of the centre.

d. Well integrated into the existing pattern of the centre.

3.87 In line with the contents of paragraph 569 of the current Local Plan, it is recommended that the supporting text to the successor policy to CR3 provides guidance to applicants and the decision making around how the various criteria in both elements of the new policy should be addressed. The current content of paragraph 569 provides a very useful starting point for these criteria, although updates are required in order to reflect the change in emphasis of the policy away from primary frontages and towards Use Class E.

3.88 At the present time, residential land use issues do not feature as part of the current suite of town centre policies in the adopted development plan. In light of a national push towards increased house-building and also the contribution that residential uses may towards the health of 'town centres, it is recommended that the town centres chapter in the new Local Plan provides a framework for assessing proposals involving residential land use and how these uses will interact with main town centre uses.

3.89 In particular, the Council should consider whether to provide in-principle support for the change of use of existing upper floors to residential, except in circumstances where their use would be detrimental to the amenity of neighbouring activities, or would have a negative impact upon the successful running of the ground floor commercial unit, or the living conditions of future users and occupiers.

3.90 Given the focus on main town centre land uses within the defined 'town centre' boundary areas, it is likely that redevelopment or change of use proposals which seek to introduce residential uses at ground floor will not be the first choice scenario. As a consequence, the inclusion of a residential land use policy into the town centres chapter will need to provide a series of assessment criteria for ground floor residential. There are opportunities for this element of policy to also address proposals for non-Class E / non-Main Town Centre Uses with the following themes of assessment criteria:

a. Following effective marketing that there is no realistic prospect of securing the continued existing use of the unit, nor any alternative main town centre use with an active frontage;

b. Grants, loans and other funding sources to secure the continued existing use, or an alternative main town centre use, have been fully explored;

c. The proposal would not, individually or cumulatively, have a detrimental impact upon adjoining main town centre uses nor the vitality and viability of the centre.

3.91 CR4The final policy in the town centre chapter in the adopted Local Plan is focused upon small scale local shops in Bath or other settlements with a defined housing development boundary. The policy indicates that, in these locations, proposals for new shops less than 280sq m gross be supported. Proposals above 280sq m gross will, at the present time, be subject to the standard development management policies dealing with the sequential and impact tests (CR1

[27] To be clearly defined in either the supporting text to the policy or in the glossary to the new Local Plan.

and CR2) which are proposed to retain unchanged. In addition, Policy CR4 requires proposals involving the loss of an existing small scale local shop must be supported by a viability assessment to demonstrate that the unit is not capable of continuing in retail use.

3.92 In light of the advent of Use Class E, along with the content / structure of other policies in the town centres chapter and the 2024 Options Document, we set out below the following observations and recommendations for the successor policy to CR4.

3.93 The most straightforward update to CR4 would be to focus upon Use Class F2(a) which relates local community shops under 280sq m gross. However, the opportunity for this use class to provide a local shop will only be an available where a sub-280sq m gross retail store proposal does not lie within 1km of another Class E(a) or F2(a) retail store. If there is such a facility within 1km, then the proposed retail store will need to fall within Class E.

3.94 As a consequence, the update to Policy CR4 should allow for alternative eventualities for proposals for small scale local shops of up to 280sq m gross:

a. Support for local small shop proposals selling predominately convenience goods in areas where they lie beyond 1km from other existing Class E retail shops (i.e. Class F2(a));

b. Where there are existing Class E retail shops within 1km, support will be given to Class E local small shop proposals so long as they are: (a) restricted to Class E(a); (b) controlled to the sale of primarily convenience goods; and (c) do not affect the vitality and viability of nearby defined centres.

c. In all other circumstances, small shop proposals not restricted to Class E(a) and the sale of convenience goods will be assessed under policies CR1 & CR2.

4. Summary and Recommendations

4.1 This report has been prepared by Nexus Planning for Bath & North East Somerset Council to provide further information, analysis and advice on retail and town centre land use issues associated with the preparation of the new Local Plan for Bath & North East Somerset. It follows a Retail & Town Centres Briefing Note prepared by Nexus for B&NES in September 2025 which covered issues such as retail and town centre trends along with the main retail and town centre land use implications of the various potential options for residential development allocations in the new Local Plan.

4.2 As the preparation of the new Local Plan progresses to the next stage of consultation on a draft Local Plan document, the main focus of this report has been to examine whether there is a need for the new plan to alter existing development plan policy towards retail and town centre issues in light of any material change in circumstances. As a consequence, this current report is split into the following three topic areas:

a. The provision and analysis of additional evidence base data on retail and town centre land use issues including changes in the land use profile of centres in the development plan 'town centre' hierarchy; the progress which has been made towards implementing strategies and allocations in the current development plan; plus recent planning permissions associated with changes in retail and Class E floorspace.

b. Taking into account the contents of part (a) above, along with further updates to retail expenditure forecasts, we have assessed how retail land use needs can be met within the new Local Plan via: existing floorspace in the defined 'town centre' hierarchy; the ability for existing development plan allocations and commitments to accommodate identified needs; along with the potential need to identify new centres and main town centre land use provision in the new Local Plan' strategic allocations.

c. Provision of advice on retail and town centre planning policies in the new Local Plan, including: which existing strategic and development management policies should remain unaltered in the new Local Plan; which existing policies may require requirement; along with the need for new policies to address the content and recommendations of this report.

4.3 Our recommendations regarding part (b) above are contained in Table 4.1 below.

Table 4.1: recommended retail land use strategy for the main strategic development areas in the Bath & North East Somerset Local Plan

Location	**Recommendations**
Bath	No requirement to identify sites for specific convenience and / or comparison goods retail floorspace provision. Due to on-going changes in the city centre, there is potential for future demand to be met by the use of existing vacant and under-used space prior to the need to plan for net additional floorspace provision. Smaller scale retail needs will continue to be met via Class E floorspace to be provided as part of mixed use development schemes in the city centre and across the city centre.
Whitchurch	Based upon the likely scale and location of proposed strategic residential development allocations, it is recommended that a planned new local centre is placed within the eastern strategic allocation, along with the potential for a small convenience store to be included within the western part of the proposed allocations to the west of Whitchurch village and to the south of the Whitchurch area of Bristol).

Hicks Gate	Provision to be made for a new local centre within the strategic allocation at Hicks Gate. New centre should be provided in conjunction with planned new transport interchange and should also be based on the following principles: (a) given the likely provision of a further new local centre within the Bristol City Council element of the Hicks Gate strategic development area, new B&NES local centre should be complementary in scale and location; and (b) new centre should be located away from A4 / ring road frontage of site to ensure that it serves the day to day needs of the new local community and does not become a significant roadside facility, drawing from a wider catchment.
Keynsham & Saltford	South West Keynsham. Given the existence of Queens Road local centre and the distance/accessibility characteristics to Keynsham town centre, the South West Keynsham area has the lowest need for a new local centre to serve the residents of this strategic development area. However, it would be appropriate for this area to include provision for one new convenience store, which should be modest in scale so as to not affect the role and function of Queen Road local centre. West Saltford. Given the location of this development area and the specific characteristics of the existing local centre in Saltford, we recommend that there is an opportunity to provide a modest-sized local centre within the West Saltford element of this development area. In content of the new centre should be carefully coordinated in order that it complements the existing centre in Saltford and, ideally, offers a different 'proposition' whereby the centre is placed in the heart of the development area away from the A4 road frontage. This study has made a series of observations and recommendations regarding the spatial provision aspects of a new centre and how it will relate to the approved ALDI store on Bath Road and the recommended new local centre at North Keynsham. North Keynsham. The size, location and accessibility characteristics of the North Keynsham development area suggest that a planned new local centre should be part of the land use mix within this proposed allocation. Of the three main development areas, North Keynsham has the best case for new grocery retail provision and a new local centre. It is recommended that the new centre is placed in the main part of the proposed allocation to the north of the railway line and should accommodate a small grocery store (given the influence of the recently permitted ALDI store) as part of a mixed use local centre (contained small Class E and sui generis food/beverage uses).
Somer Valley	Recommended retail strategy for Midsomer Norton and Radstock should consider the inter-relationship of these two settlements, including the progress being made on the Radco site planning permission, the existing Welton Manufacturing site allocation and the Midsomer Norton town centre masterplan. Based upon recent changes in provision, the overall balance of provision between Midsomer Norton and Radstock, plus planned residential development, a key priority for the retail strategy is Radstock. If implemented, the mixed use development on the former Radco site, including a smaller foodstore, would provide a much needed quantitative and qualitative improvement for the local area. However, the balance of provision between Midsomer Norton Radstock plus the scale of planned new residential development in Radstock suggests that further grocery provision beyond this permission can and should be supported. a. The new Local Plan cannot influence the ability to progress the current permission on the Radco site, but nevertheless will need to be responsive to its progress/implementation. We would recommend that: 1. If the current Radco site permission is progressed to implementation, then the Radstock and Peasedown St John allocations are consider for local facilities plus the potential for a medium sized foodstore. 2. If the current Radco permission does not progress, explore the opportunities for a larger foodstore in this town centre location. If that is deemed unsuitable then consider larger scale provision in a suitable location in one of the Radstock / Peasedown St John strategic allocations.

	3. Provision of additional grocery provision in Radstock and Peasedown St John should be co-ordinated by the new Local Plan and should be given, at the very least, equal priority to changing foodstore provision in Midsomer Norton. b. Whilst the available evidence suggests that a need exists for improved provision in Midsomer Norton, the changing situation in the wider area means that if the Welton Manufacturing site continues to be identified for a foodstore development then this should be closely coordinated with Lidl's current proposal to relocate from the town centre. This scenario is likely to provide the best fit with the wider grocery retail strategy for Midsomer Norton, Radstock and Peasedown St John.
Rural areas	No requirement for new retail land use provision within Farrington Gurney strategic allocation. Large residential site allocation to the west of Clutton to be prioritised for new appropriately-sized convenience store, in order to serve the day to day needs of the wider village.

4.4 Our policy recommendations for the retail and town centre elements of the new Local Plan are as follows:

a. Retention of the existing 'town centre' hierarchy and include the planned new local centres in this hierarchy.

b. Refinements to the existing policy which deals with proposals within the defined primary shopping area and town centre boundaries.

c. A refinement to the existing development plan policy dealing with proposals for small-scale shops.

Appendix A: summary of Bath district and local centre land use data (2019, 2024 & 2025)

Nexus Planning
Suite B
Beacon Tower
Colston Street
Bristol
BS1 4XE

nexusplanning.co.uk