

Pre-submission Draft Local Plan (Regulation 19)

Chapter 1 – District-wide Strategy



Foreword by Cllr Kevin Guy

One of the most important tasks for a council is to ensure that there's a vision for how the authority develops. That it facilitates homes, that it enables jobs, that it links these along with leisure, education, social and health facilities via planned transport and other infrastructure.

This document is the result of many hours of work from council officers, and has been drafted based on input from our communities. This is what we are looking to submit to the planning inspector as our Draft Local Plan, subject to the input we will receive from you, in the final Reg 19 consultation.

So why do we need a Local Plan?

We believe that there's a need for more homes, more truly affordable housing, and homes optimised for future climate change and demographic needs. And from what we've heard in talking with our communities, you believe that too.

All our residents want to feel that they are part of a community. That includes residents moving into new areas of housing. They need healthcare, social interaction, transport links to jobs and educational facilities.

The Government has done two things; it has imposed on us a target of 27,324 homes over an 18 year period and it has weakened the constraints to building. We had no choice in either of these. In setting these numbers, the uniqueness of our authority, in terms of World Heritage Listings and amount of current Green Belt, has not been taken into account in the way we would have hoped for.

Because of these actions by Government, a huge number of homes will likely be built in our area, that much is clear. Our only choice is to plan for it, or be at the mercy of developers; developers for whom building on our green fields is cheaper, creating cookie cutter homes is more profitable, and without a plan, will not have to contribute to the large infrastructure needs that all this new housing will create.

That's the answer to why we need a Local Plan.

With a Local Plan, we can have some influence into types of homes built and where they are built. We can ensure the cumulative impact of different developers' applications is taken into account and infrastructure funded. Given our unique circumstances, we have drafted a plan which could stretch to 80% of the Government's imposed numbers.

I thank all who have worked so hard on this draft, and who took the time to respond to previous consultations. Please do comment with your views on the soundness of this plan before it goes forward to the Inspector for examination later this year.



Councillor Kevin Guy

Leader of Bath and North East Somerset Council

Chapter 1 District-wide Strategy

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Chapter 1 – District-wide Strategy

Introduction

Purpose of the Local Plan

- 1.1 The Local Plan sets out the spatial strategy and planning policies that will guide the development of Bath and North East Somerset (B&NES) for the period **2025–2043**. It identifies the scale and distribution of new homes, employment space and supporting infrastructure required to meet the needs of communities, allocates development sites to meet these requirements, while protecting the District's distinctive environmental, landscape and heritage assets.
- 1.2 The Local Plan forms part of the statutory Development Plan for B&NES and will be used in the determination of planning applications. It provides a key framework to ensure that growth and development is planned in a sustainable manner, is of high quality and supported by the co-ordinated provision of necessary infrastructure, achieves the Council's corporate priorities, and responds to the key challenges and opportunities facing the area.

Preparing the Local Plan

- 1.3 The Local Plan has been prepared under the government's transitional arrangements related to the plan-making system established under the Planning and Compulsory Purchase Act 2004 and the December 2024 version of the National Planning Policy Framework (NPPF). All references to the NPPF in this Local Plan therefore, relate to that version except where specified.
- 1.4 Preparation of the Local Plan has been informed by a comprehensive and continually updated evidence base, including assessments of housing and economic needs, transport and movement, infrastructure capacity, environmental constraints, viability and sustainability appraisal. Engagement with communities, stakeholders and statutory bodies has shaped the development of the Plan.

- 1.5 In 2024 an Options consultation was undertaken under Regulation (Reg) 18 of the government's legislative plan-making regulations. It explored alternative approaches to meeting development needs, as well District-wide Development Management policy approaches. Views were sought on the spatial strategy options, development locations and policy approaches. Following revisions to national policy and a revised figure of housing need published by the government in late 2024 preparation of the Local Plan was reset to enable consideration of the implications. A further Local Plan Options consultation took place in autumn 2025 outlining and seeking views on further site options to address a substantially greater level of growth. The feedback received to both consultations, alongside updated evidence, has informed the preparation of this Draft Plan.

Regulation 19 Consultation and Next Steps

- 1.6 The Draft Local Plan will be subject to formal consultation under Reg 19 of the plan-making regulations and is therefore, sometimes referred to as the Reg 19 Draft Local Plan. This Draft Local Plan represents the Council's proposed strategy, site allocations and policies. It is being publicly consulted on for six weeks during September and October. At this stage, comments are invited on the soundness and legal compliance of the Plan, in accordance with national planning policy.
- 1.7 Following consultation, the Council will consider the comments received and submit the Local Plan, supporting evidence and the consultation comments to the Secretary of State for independent examination by Planning Inspectors. Subject to the Inspector's recommendations, the Council anticipates adopting the Local Plan in 2027 or early 2028.

Structure of the Local Plan

- 1.8 The Local Plan is structured as follows:
- District wide Strategy and Policies – setting out the overarching spatial strategy and approach to development.
 - Sub Area Strategies – providing place-based approaches and site allocations for:

- Bath
- Bristol to Bath Corridor
- Somer Valley
- Rural Areas
- Development Management Policies – setting out District-wide policies on a thematic basis to be used in determining planning applications.
- Appendices – including a monitoring framework – setting out how the implementation of the Plan will be monitored; additional detail on the implementation of some policies; and tables indicating which policies in the currently adopted Local Plan will be superseded or saved; and Policies Map changes.
- Policies Map – illustrating the spatial application of policies and site allocations.

1.9 The Local Plan comprises a suite of strategic and non-strategic policies.

The NPPF requires that the plan should make it explicit which policies are strategic policies i.e. policies that set out the overall strategy for the pattern, scale and design quality of places and make sufficient provision for:

- a) homes (including affordable housing), employment, retail, leisure and other
- b) commercial development;
- c) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- d) community facilities (such as health, education and cultural infrastructure); and
- e) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation

1.10 A schedule identifying which policies in this Local Plan are strategic and non-strategic is set out in Appendix 7.

District-wide Context

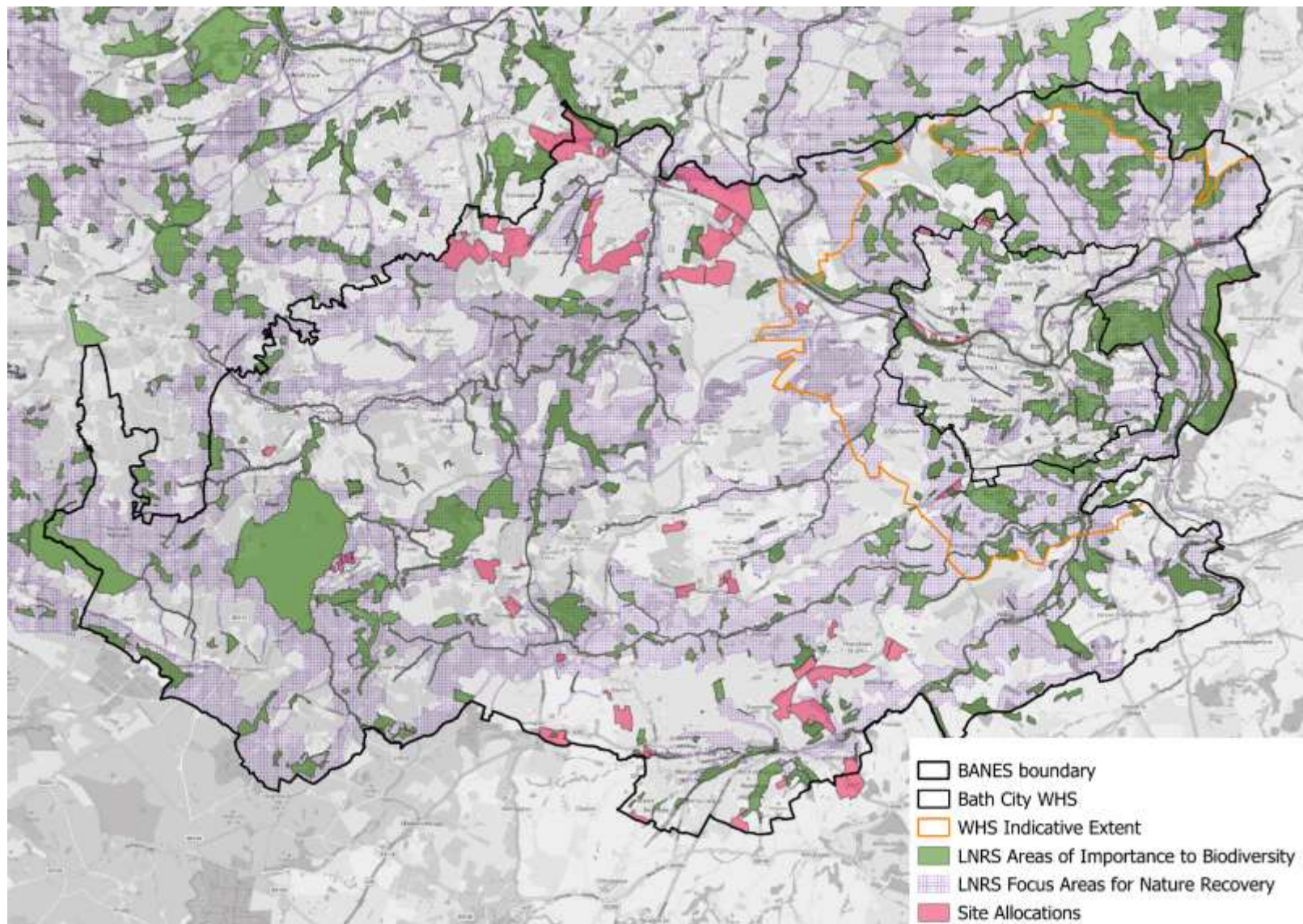
Key Issues and Challenges

- 1.11 B&NES is home to around 195,000 people and is an economically successful area with a beautiful and international and nationally renowned natural and built environment, hosting a double-inscribed World Heritage Site, parts of two National Landscapes and more than two-thirds currently being designated Green Belt. The District faces significant growth pressures which need to be accommodated whilst protecting what is special about it.
- 1.12 The attractiveness of B&NES means that there is substantial demand for housing and the associated high property prices result in significant housing affordability pressures across the District. The shortage of affordable homes for workers also impacts on the local economy. Whilst generally economically prosperous, the B&NES economy has over the last ten years performed poorly compared to the West of England and the UK and benefits of prosperity are not shared equally either spatially or across the population.
- 1.13 B&NES faces crucial challenges around mitigating the impact of climate change by reducing or minimising carbon emissions, as well as addressing concerns around the resilience of our places and communities to the effects of climate change. Sustainable transport connectivity across the District is variable and is limited in many parts of the District, especially the rural areas. This means there is a reliance on private car travel in these areas. Some of the key routes suffer from congestion, resulting in poor air quality, as well as increased carbon emissions.
- 1.14 B&NES also faces significant challenges associated with biodiversity loss and habitat fragmentation. In recognition of this, the Council declared an Ecological Emergency in 2020 and has identified nature recovery as a key corporate priority. The District contains areas of national and international importance for biodiversity, including the Bath and Bradford-on-Avon Bats SAC, the North Somerset and Mendip Bats SAC and the Chew Valley Lake SPA. Development therefore needs to be carefully planned and managed to avoid adverse effects on these protected sites and species and to support

wider ecological resilience. Bats SAC guidance has been prepared to inform Local Plan site allocations, masterplanning and development proposals to ensure that potential adverse effects are assessed and addressed in planning for and delivering development, thereby protecting functionally-linked habitats. Further detail is set out in chapter 6 (Development Management Policies) and the relevant sub-area chapter.

- 1.15 The West of England Local Nature Recovery Strategy (LNRS), published in 2024, provides a strategic framework for nature recovery across the sub-region. It identifies existing areas of importance for biodiversity together with Focus Areas for Nature Recovery (see figure 1.1 below) where habitat creation, restoration and enhancement can make the greatest contribution to recovering nature and strengthening ecological networks. The LNRS is an important evidence base for the Local Plan and helps to inform strategic planning for biodiversity, green infrastructure and nature recovery across the District.

Figure 1.1: Local Nature Recovery Strategy areas and proposed site allocations across Bath and North East Somerset



- 1.16 The availability and capacity of supporting infrastructure, including transport, community facilities and health services, vary across B&NES with concerns often raised by local communities. Bath and North East Somerset is generally a healthy and prosperous area, but significant inequalities persist, with people living in more deprived communities experiencing poorer health outcomes, shorter life expectancy and greater exposure to poor housing and other wider determinants that contribute to poor health and wellbeing. The Council's Health and Well-Being Strategy highlights the importance of planning in helping to shape places to facilitate healthier lifestyles.

Corporate Priorities and the Role of the Local Plan

- 1.17 The Local Plan is a key mechanism for delivering the Council's corporate priorities. The Council's primary purpose is to improve people's lives and this is supported by a series of principle and priorities which focus on:
- Tackling the climate and ecological emergencies
 - Delivering the right homes in the right places
 - Increasing travel choices and improved connectivity for all
 - Supporting a strong, diverse and fairer economy
 - Promoting healthy, inclusive and sustainable lives and places
- 1.18 The Local Plan aligns spatial planning with these priorities by directing growth to sustainable locations, supporting modal shift, enabling high quality and energy efficient development, and ensuring that infrastructure is planned and co-ordinated for delivery alongside new development.

District-wide Spatial Strategy

Spatial Priorities for the Local Plan

1.19 The spatial priorities for the Local Plan reflect the key issues and challenges facing B&NES, as well as the evidence base and the outcomes of the Options consultations. The spatial priorities are set out below:

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

The Plan will:

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

In doing so, our plans for development must:

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

1.20 The spatial priorities underpin and will be delivered by the spatial strategy, site allocations and policies of the Local Plan. Performance in delivering the spatial priorities, as articulated through the relevant key policies, will be monitored using the monitoring framework set out in Appendix 6.

Development Requirements

- 1.21 In identifying the development requirements for the period 2025-2043, the Local Plan reflects national policy, as well as local evidence relating to housing need, economic growth, environmental and other constraints and infrastructure capacity.
- 1.22 The Local Plan identifies and plans for the following housing and economic development requirements for the period **2025–2043**:
- **Housing:** around 22,000 homes
 - **Employment floorspace:**
 - Office: around 138,300 sqm
 - Industrial and warehouse/logistics: around 158,200 sqm

Housing Requirement and Justification

- 1.23 The NPPF makes it clear that in determining the Local Plan housing requirement the standard method figure of housing need should be the starting-point and in addition to meeting identified needs any unmet need arising in neighbouring authorities should also be taken into account. The Standard Method identifies a housing need of 1,518 homes per annum equating to 27,324 homes for B&NES over the plan period. The Local Plan sets a housing requirement of around 22,000 homes (just over 80% of the Standard Method figure). The Local Housing Needs Assessment identifies that around 40% of the overall requirement is for affordable housing.
- 1.24 Setting a Local Plan housing requirement equating to around 80% of the standard method housing need figure is justified in accordance with paragraph 11(b) of the NPPF, which allows local planning authorities to plan for a lower housing requirement where meeting the full need would result in significant adverse impacts that outweigh the benefits.
- 1.25 B&NES is a highly constrained District, containing:
- The double inscribed City of Bath World Heritage Site
 - Two National Landscapes (Cotswolds and Mendip Hills)
 - Extensive Green Belt
 - Areas of high landscape, ecological and heritage sensitivity
- 1.26 These are recognised as Footnote 7 constraints in the NPPF.

- 1.27 Planning for the full Standard Method figure would require development at a scale and in locations that would cause unacceptable harm to these nationally and internationally significant assets. The adverse impacts of meeting the full standard method figure of housing need in this Local Plan would demonstrably outweigh the benefits when assessed against both the national policies in the NPPF and the spatial priorities of the plan reflective of, and in accordance with, those national policies. The proposed housing requirement represents a justified and proportionate response to the District's constraints and opportunities for new development. Additionally, it is not realistic to deliver the standard method figure of 1,518 dwellings per annum over the entire plan period because the level of need has more than doubled between the currently adopted Local Plan and the emerging plan and the sites proposed to be allocated in the emerging Local Plan will take some time to start delivering housing.
- 1.28 Even at a level of around 80% of need, meeting the housing requirement will necessitate significant releases of land from the Green Belt, which are justified by exceptional circumstances set out in detail in supporting evidence, including:
- The need to meet housing and employment requirements
 - The lack of suitable non-Green Belt alternatives to deliver the required housing
 - The ability to deliver sustainable patterns of growth through infrastructure led development in strategic locations
 - The benefits of development at specific sites outweighing harm to the Green Belt
 - The cumulative impact of development ensuring that the fundamental purpose of the Green Belt is not undermined
- 1.29 The NPPF requires that in establishing the amount of housing to be planned for the Local Plan should take account of any needs that cannot be met within neighbouring areas. Through the preparation of the Bristol Local Plan, it has been established that Bristol City Council is unable fully to meet its objectively assessed need. The level of unmet need arising within Bristol is 13,860 dwellings over the period 2022 to 2040. A Local Plan housing requirement for B&NES is established of around 22,000 dwellings between 2025 and 2043, which is just over 80% of the B&NES standard method figure of housing need.

The Local Plan prioritises meeting B&NES housing need and as such is not identifying and allocating sites to contribute towards meeting the unmet need arising in Bristol.

- 1.30 Although there is no longer a strict “Duty to Co-operate”, the Local Authorities across the West of England area will continue to work together in identifying solutions to meeting Bristol’s unmet need. Similarly, an unmet need within B&NES, related to the standard method figure, of around 5,000 dwellings has been identified through this Local Plan and the Council will continue to engage with neighbouring authorities and work collaboratively with them, on this unmet need arising in B&NES. No unmet need is currently identified in the emerging Local Plans for either North Somerset or South Gloucestershire. Therefore, across the West of England sub-region a total unmet need of around 19,000 dwellings has been identified through these two plans.
- 1.31 The West of England Plan Combined Authority (WECA) have commenced work on the Spatial Development Strategy (SDS). The SDS will cover a thirty-year period, will establish the amount of growth to be planned for across the West of England, and will set out a spatial strategy and identify locations for accommodating it. In so doing, the SDS will establish a housing requirement for each West of England unitary authority. In preparing the SDS unmet housing need arising through this round of Local Plans will need to be taken into account. It is appropriate that the best solutions to addressing unmet need are considered strategically and sub-regionally through the SDS. Consultation on a vision for the SDS will take place in autumn this year, followed by consultation on a draft SDS in autumn 2027. It is anticipated the SDS will be adopted in 2029.
- 1.32 As required by the Levelling Up and Regeneration Act 2023 B&NES Council will prepare a new-style Local Plan that will need to be in general conformity with the SDS. This Local Plan 2025-2043 will therefore, be subject to an early review through the preparation of the new-style Local Plan which will plan for and allocate sites to meet longer term housing need identified through the SDS. In the sub-area chapters that follow, development locations that cannot be allocated in this Local Plan are also identified for exploration for longer term growth through the WECA SDS and the B&NES new-style Local Plan.

Employment Space Requirement

- 1.33 The requirement for employment floorspace is informed by local evidence and seeks to ensure that the space provided is sufficient to facilitate job growth that at least maintains the current balance between resident workers and jobs within Bath and North East Somerset. Planning for around 22,000 homes would require around 22,000 additional jobs to maintain this balance. This is important in seeking to reduce the need to travel and giving the opportunity to live and work locally.

Spatial Strategy Principles

- 1.34 In seeking to address the spatial priorities of the Local Plan identified above the spatial strategy and the allocation of sites for development, is based on ensuring development achieves key principles, including:
- Focusing growth in the most sustainable locations with the best connectivity to jobs, services and facilities via active travel and sustainable transport modes
 - Supporting the distinct roles and vitality of Bath, the Bristol–Bath corridor, the Somer Valley and rural communities
 - Delivering strategic development in locations well served by or capable of supporting new infrastructure
 - Minimising and managing flood risk both now and taking account of climate change
 - Protecting the District's heritage assets, landscape and environmental assets and facilitating nature recovery
 - Supporting inclusive economic growth and diversification
 - Maintaining local character and distinctiveness
 - Protecting and improving the health of existing and future residents
- 1.35 Sustainable transport connectivity is a fundamental principle underpinning the spatial strategy. The NPPF's vision-led approach has been applied, prioritising investment in active travel and public transport before considering highway mitigation. The focus is on creating well-connected places where the location of development and supporting transport measures enable people to access local services safely and conveniently, while providing attractive public transport connections to destinations further afield.

Sub-Areas and Their Role

1.36 The Local Plan adopts an approach based on sub-areas, reflecting the functional geography of the District and aligning with the WECA Growth Zones.

1.37 The sub-areas are:

- Bath: a regional economic centre and World Heritage Site
- Bristol to Bath Corridor: a key growth corridor with strong transport links
- Somer Valley: an important employment and service centre for the south of the District
- Rural Areas: diverse villages and countryside communities

1.38 This approach enables the formulation of place-specific strategic objectives for sustainable development, ensure that development responds to local opportunities and constraints and supports the co-ordinated and timely planning and delivery of necessary infrastructure.

1.39 Spatial Strategy Policy 1.1 sets out a broad, sub-area distribution of both housing and employment floorspace. The purpose of this distribution is to help guide development but it does not act as fixed requirement or a cap on development, nor should it be used for the purposes of calculating and assessing five-year housing land supply for the individual sub-areas and is not a cap on development.

Policy 1.1: Spatial Strategy

The Local Plan provides for sustainable, infrastructure led growth across Bath and North East Somerset during the period **2025–2043**.

As a priority, new residential and mixed-use development will be located in or close to urban areas, particularly focussed on previously developed sites, where there is an existing or proposed wide range of facilities, services and jobs, minimising the need to travel and providing opportunities to use public transport and active travel.

Employment opportunities will be encouraged at accessible locations well-related to the urban areas and where sustainable transport opportunities can be maximised.

Scale of Growth

The Local Plan housing and employment space requirements are:

- Around 22,000 homes

- Employment floorspace, comprising:
 - Around 138,300 sqm of office space
 - Around 158,200 sqm of industrial space and warehouse/logistics space

District-wide delivery arrangements for the required housing and employment space are set out in policies 2 and 3 respectively.

Site specific allocations to address the requirement for new homes, employment floorspace and supporting infrastructure are made in sub-area chapters (chapters 2 to 5).

Distribution of Housing

Housing development will be broadly distributed across the sub areas as follows:

- Bath – around 5,900 homes
- Bristol to Bath Corridor – around 8,900 homes
- Somer Valley – around 4,600 homes
- Rural Areas – around 2,600 homes

Distribution of Employment Floorspace

Employment floorspace will be delivered across the sub areas to support the economic roles of Bath, the Bristol–Bath corridor, the Somer Valley and rural employment locations. The employment space requirement will be distributed across the sub-areas broadly as follows:

Sub-Area	Office (sqm)	Industrial/Warehousing & Logistics (sqm)
Bath	80,000	30,900
Bristol to Bath Corridor	11,000	23,700
Somer Valley	43,900	99,700
Rural Areas	3,400	3,900
B&NES	138,300	158,200

Green Belt

The general extent of the Green Belt will be retained but to meet identified housing and employment needs, land will be removed from the Green Belt, justified by exceptional circumstances, to enable strategic and non-strategic

development at the locations indicated on the Key Diagram at the settlements listed below:

Strategic development:

- Keynsham
- Saltford
- Whitchurch
- Hicks Gate
- Peasedown St John

Non-strategic development:

- Bathford
- Chew Stoke
- Corston
- Farmborough

The revised detailed Green Belt boundaries will be defined as part of the site allocations in the sub-area chapters and shown on the Policies Map.

Spatial Strategy Principles

Development must:

- Support the delivery of the Movement Strategy for Bath, Creating Sustainable Communities in North East Somerset Strategies and the Active Travel Masterplan, including:
 - Reducing travel distances and car dependency
 - Improving sustainable transport connectivity, supporting modal shift and low carbon travel
 - Enhancing public transport
 - Delivering high quality walking and cycling networks
- Seek to minimise impacts on climate change and be designed to adapt and be resilient to the effects of climate change.
- Avoid areas of greatest flood risk now or in the future and demonstrate that it does not cause increased risk of flooding elsewhere.
- Be infrastructure-led and will be phased to align with the timely provision of all required supporting infrastructure, including transport (focussing on sustainable modes), education, health, utilities, digital connectivity, green and blue infrastructure and inclusive, multi-purpose community facilities. Proposals must demonstrate that necessary infrastructure can be funded and delivered.
- Promote healthy lifestyles, including through public spaces and local centres, retail and community facilities that promote health and well-being for people of all ages.

- Be of a high quality and inclusive design.
- Conserve and enhance the District's environmental and heritage assets, including the World Heritage Site, National Landscapes, biodiversity and landscape character.

Key Diagram

The spatial strategy is illustrated on the Key Diagram, which shows the distribution of growth, strategic development locations and key transport corridors.

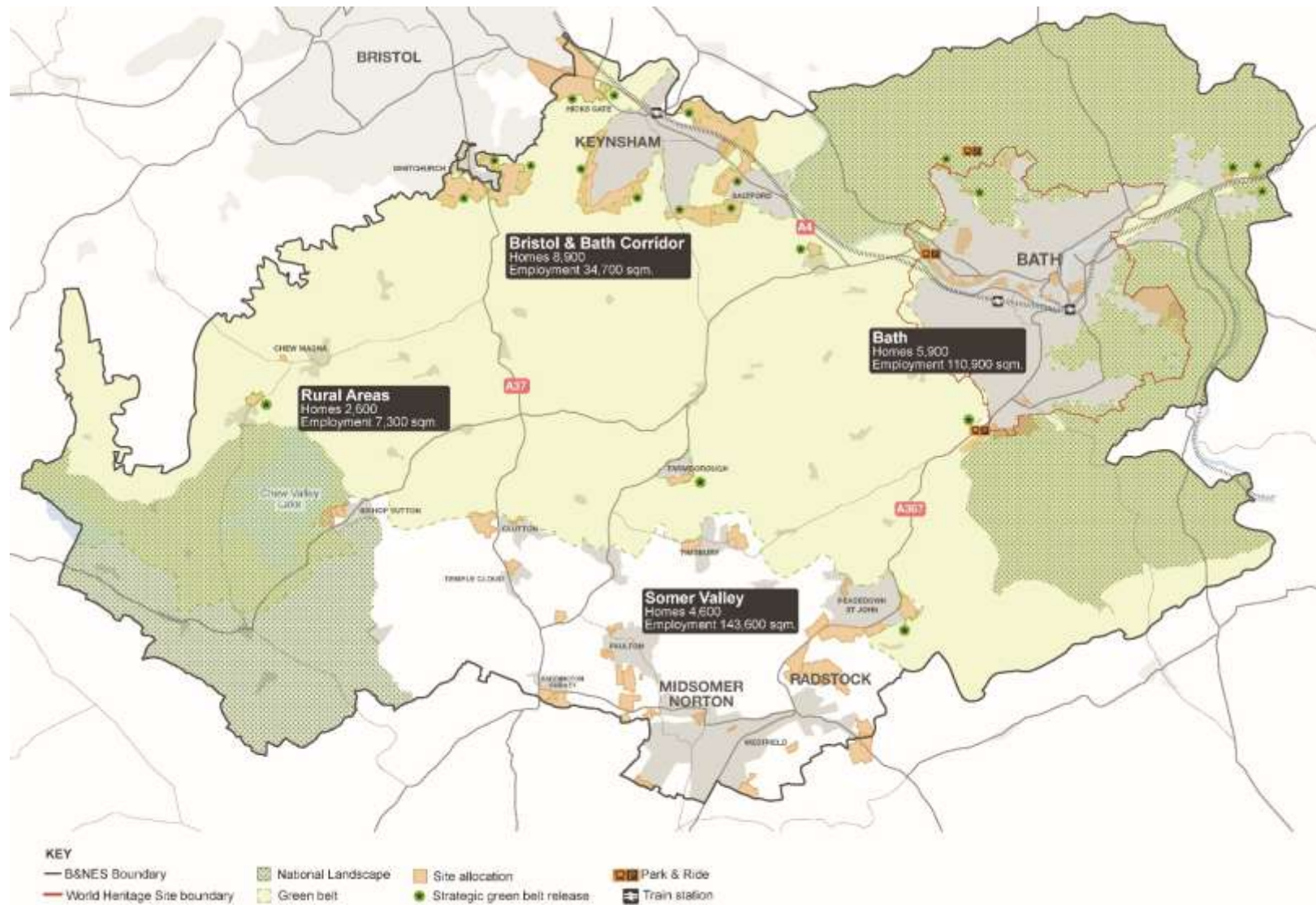


Figure 1.2: Key Diagram

Housing Requirement and Delivery

Introduction

- 1.40 The Local Plan identifies the minimum amount of housing required in Bath and North East Somerset over the plan period and against which delivery and the five year housing land supply will be assessed. The requirement is informed by national policy, the Standard Method, local evidence, and the significant environmental and policy constraints affecting the District. As set out above the Local Plan housing requirement is for around 22,000 dwellings to be delivered during the plan period. This represents a justified and proportionate response to the District's constraints and opportunities while ensuring that housing needs, including affordable housing needs, are met as far as is sustainably possible.
- 1.41 Meeting the requirement for around 22,000 dwellings necessitates release of Green Belt land justified by exceptional circumstances. The strategic scale releases are focussed on Keynsham, Saltford, Whitchurch, Hicks Gate (on the edge of Bristol) and Peasedown St John, with smaller non-strategic scale releases at Bathford, Chew Stoke, Corston and Farmborough.
- 1.42 Housing affordability is a key issue within B&NES. In planning for around 22,000 homes evidence shows that providing around 40% as affordable housing will enable a substantial element of need to be met, including both current need and projected need. Delivering this amount of affordable housing will also enable around half of potential households (i.e. people living in the local area as part of another household who want to live independently) to form a separate household and live in their own home. To meet those needs summarised above would require a higher proportion of affordable housing to be provided in Bath where need is greatest (around 61% of all new homes) and around 33% across North East Somerset. In terms of dwelling size mix, most of the need across the District (around 75%) is for smaller (one, two and three bed) affordable homes. Affordable housing is delivered through a number of mechanisms, including Planning Obligations which secure a proportion of housing delivered on qualifying sites as affordable housing. The

proportion of affordable housing sought is shaped not just by evidenced need but also by the viability of development. This is dealt with through Policy 6.14.

How the Requirement Will Be Delivered

Components of Supply

1.43 The 22,000 dwelling requirement will be met through:

- Existing commitments: sites with planning permission or allocated in the adopted Local Plan
- New strategic and non-strategic allocations in this Local Plan
- Small windfall sites development, which has historically been a reliable and consistent source of supply in B&NES

1.44 The Local Plan identifies sufficient deliverable and developable sites to meet the requirement with a degree of flexibility to allow for identified sites not coming forward as anticipated. A balanced mix of strategic and smaller sites are allocated to support delivery of housing throughout the plan period. Primarily through small windfall sites it is anticipated that, as required by the NPPF, at least 10% of the overall requirement will be delivered on sites no larger than 1ha over the plan period. The policy framework in the Local Plan supports appropriate incremental change on small sites within existing settlements. This helps to ensure efficient use of land, particularly previously developed sites, and also diversifies housing supply.

Delivery Trajectory and Capacity

1.45 A housing delivery trajectory has been prepared which has been informed by engagement with site promoters, developers and infrastructure providers. The trajectory takes account of:

- Lead in times for different types of development sites
- Infrastructure requirements
- Market absorption rates
- Phasing of strategic sites

1.46 The evidence underpinning the trajectory shows that it is not feasible to increase delivery immediately from the current Local Plan requirement of around 720 dwellings per annum to the significantly higher equivalent average annual rate of around 1,220 dwellings required to deliver the overall requirement. Strategic sites require time to secure planning permission,

deliver enabling infrastructure and reach full build out rates. Therefore, a stepped housing requirement is proposed.

Justification for a Stepped Housing Requirement

Rationale for Stepping

1.47 A stepped requirement is therefore necessary to ensure that the Local Plan is deliverable, sound, and aligned with the realistic delivery trajectory. A stepped approach:

- Reflects the realistic time needed for large scale or strategic sites to come forward and reach full build-out rates
- Avoids setting an unrealistic and undeliverable early plan requirement
- Ensures that the five-year housing land supply position is assessed against a deliverable target throughout the plan period
- Supports a plan led approach to growth and infrastructure delivery
- Does not seek to unnecessarily delay meeting housing needs over the plan period

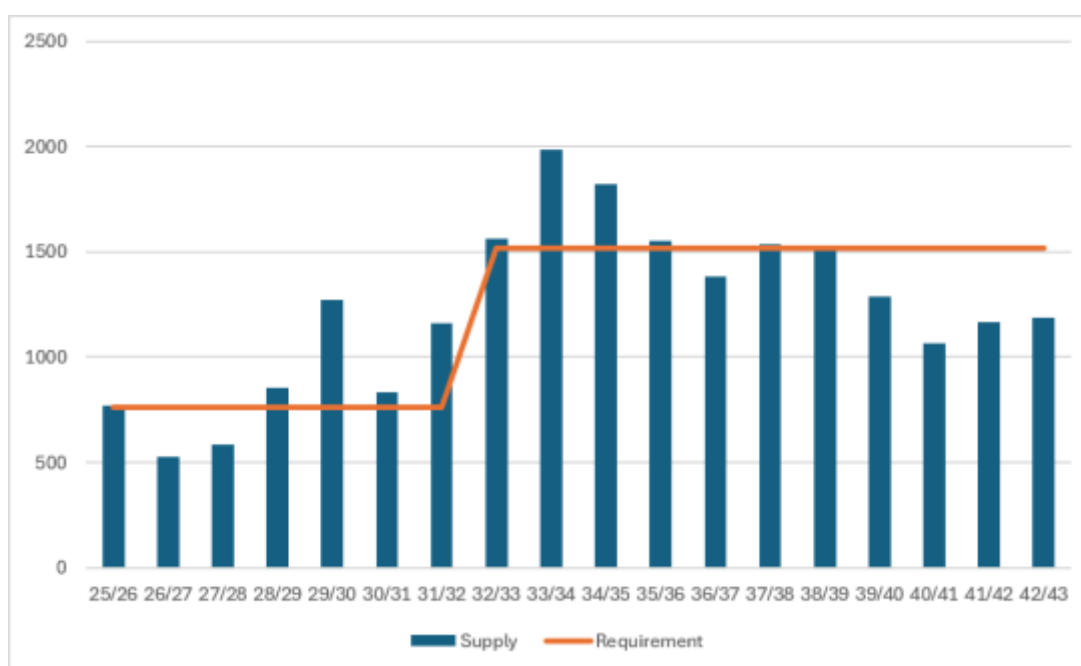
Structure of the Stepped Requirement

1.48 Based on the trajectory (see graph below) the stepped requirement is set out against the delivery phases or periods outlined below:

- 2025–2032
- 2032-2043

1.49 The stepped requirement figures are set out in Policy 1.2 and are based on the housing delivery trajectory. The significant increase in the annualised requirement figure in the second phase reflects many of the strategic sites starting to deliver at full build-out rates. The five-year housing land supply and Housing Delivery Test will be assessed against the stepped requirement, not the plan period average.

Figure 1.3: Housing Trajectory Graph



Stepped Requirement and Five-Year Land Supply

- 1.50 National policy requires that upon adoption of the Local Plan and during the remainder of the plan period a five-year housing land supply is demonstrated. Based on the latest Housing Delivery Test results and the recently published Housing Delivery Test rulebook a 5% buffer is applied to the five-year housing land supply. The stepped requirement proposed in Policy 1.2 below which is based on the realistic delivery of housing on sites, including those allocated in this Local Plan, secures a demonstrable five-year housing land supply from adoption and on a rolling basis for at least five years. At 2028/2029, the anticipated year of adoption, the five-year housing land supply with a 5% buffer and addressing unmet need arising from the start of the plan-period is around 5.4 years.

Neighbourhood Plan Housing Requirements

- 1.51 As required by the NPPF, para 69T the Local Plan sets housing requirements for designated Neighbourhood Plan areas. These requirements should not be regarded as a cap and provide a clear starting-point for Neighbourhood Plan groups to ensure that local housing needs are met in a plan led manner. Neighbourhood Plans must plan positively to meet these requirements.

Policy 1.2: Housing Requirement and Delivery

1. The Local Plan makes provision for around 22,000 dwellings to be delivered in Bath and North East Somerset during the period 2025–2043. This will include delivery of a significant amount of affordable housing, as well as housing to meet specific needs. The spatial distribution of housing is set out in Policy 1.
2. Stepped Housing Requirement: to reflect the realistic delivery trajectory of sites and the timing of infrastructure provision, the following stepped housing requirement will apply:
 - 2025–2031/32 Total: 5,320 dwellings Annual requirement: c. 760 dwellings
 - 2032/33 –2042/43 Total: 16,698 dwellings Annual requirement: c. 1,518 dwellings

The Council will assess five year housing land supply and Housing Delivery Test against the stepped requirement.

The annualised and total requirement in each step or phase will not be a cap on development during that period.

The annualised delivery trajectory of development sites is illustrated by the graph in paragraph 1.47.

3. Components of Housing Supply: The requirement will be met through:
 - Completions 2025-2026: 772 dwellings
 - Existing commitments: 5,042 dwellings
 - New strategic and non-strategic site allocations: 14,323 dwellings
 - Small windfall development: 1,944 dwellings
4. Neighbourhood Plan Housing Requirements: the Local Plan establishes a housing requirement for designated Neighbourhood Plan areas as set out in the table below. The figures below are not a 'cap' on development and additional housing may come forward in designated neighbourhood areas, including through site allocations in Neighbourhood Plan.

Housing requirement for designated Neighbourhood Plan areas

Designated Neighbourhood Area	Allocations in adopted Local Plan (remaining)	Proposed Local Plan 2025-2043 allocations	Housing requirement
Bathampton	0	0	0
Batheaston	0	0	0
Bathford	0	30	30
Chew Valley	0	120	120

Claverton	0	0	0
Clutton	0	330	330
Englishcombe	0	0	0
Farrington Gurney	0	500	500
Freshford and Limpley Stoke	0	0	0
High Littleton and Hallatrow	0	45	45
Keynsham	359	5,385	5,744
Midsomer Norton	145	292	437
Paulton	80	392	472
Publow and Pensford	0	0	0
Radstock	69	1,318	1,387
Stanton Drew	0	0	0
Stowey Sutton	0	280	280
Timsbury	4	410	414
Westfield	0	0	0
Whitchurch Village	0	1,612	1,612

Employment space requirement

Economic Context and Evidence Base

- 1.52 A strong, diverse, inclusive and resilient economy is essential to the long-term wellbeing of communities in Bath and North East Somerset (B&NES). The Local Plan plays a key role in supporting economic prosperity by ensuring that sufficient employment space is protected and delivered in sustainable locations across the District.
- 1.53 The B&NES Economic Strategy (2024-2034) sets out a vision for a fair, green and resilient economy. Key objectives are:
- Delivering a net zero and nature positive economy
 - Supporting residents to access and thrive in good work
 - Building a diverse, creative and sustainable business base
 - Establishing B&NES as a centre for scientific and health academic excellence, inclusive innovation and creativity
 - Ensuring residents have access to affordable and high-quality housing
 - Enabling all people and places to share in prosperity
- 1.54 Evidence shows that whilst the B&NES economy is generally prosperous economic productivity and performance (GVA) is lower than the UK and West of England average. Also, the benefits of prosperity are also not shared equally across the District. The reasons for poor economic performance are numerous, but particularly relevant to the Local Plan are the lack of housing that is sufficiently affordable for workers and the shortage of suitable space for business are key.
- 1.55 B&NES is also part of the wider West of England sub-region. The WECA has prepared a Local Growth Plan which outlines ambitions and actions to foster a sustainable and productive sub-regional economy based on continued innovation and creativity. In seeking to deliver a highly productive economy the Growth Plan identifies key growth zones within the West of England to act as the focus for economic investment. Two of these lie partly or wholly within B&NES - the central Bristol and Bath Growth Zone (including the corridor between) and the Somer Valley Growth Zone.
- 1.56 The Local Plan seeks to help address the issues and achieve the objectives outlined in the Council's Economic Strategy and align with the objectives of

the WECA Local Growth Plan. It will do this through planning for a significant uplift in housing delivery and by:

- Protecting existing employment sites and encouraging appropriate intensification of employment space
- Allocating land for new employment space in sustainable locations
- Enabling mixed use strategic development that integrates homes, jobs and infrastructure
- Supporting rural enterprise and small-scale employment opportunities

Economic Development Needs Assessment

1.57 The Economic Development Needs Assessment identifies B&NES as having a strong and diverse economy, characterised by:

- A significant concentration of knowledge-based sectors, including digital, creative, professional and scientific services
- A strong visitor economy, centred on Bath
- Established industrial and manufacturing activity in the Somer Valley
- Strategic employment opportunities in the Bristol to Bath corridor

1.58 The assessment confirms the importance of protecting existing employment sites and informs the allocation of sites to provide new employment space in sustainable locations, suitable for businesses in key sectors in the B&NES economy. Based on forecast economic growth and aligning job growth to likely population growth resulting from the Local Plan housing requirement the assessment outlines the estimated quantum of employment floorspace needed to meet generated demand across the District and the sub-areas – see figure 1.4 below. The spatial distribution across the different sub-areas is based on the current share of existing employment floorspace within each sub-area. Given uncertainties in economic forecasts and future changes in business operational requirements these figures are not an absolute requirement but instead are a starting point in planning for additional employment space provision. The employment floorspace in the table below are net additional figures and include additional floorspace required resulting from forecast economic growth, as well as replacement space needed to support operation of the existing economy.

Figure 1.4: Assessed employment space required aligned job growth to likely population growth at a District-wide level

Sub-Area	Office (sqm)	Industrial (sqm)	Warehouse / Logistics (sqm)	Total (sqm)
Bath	69,000 – 70,000	12,000 – 17,000	23,000 – 24,000	104,000 – 111,000
Bristol to Bath Corridor	11,000–12,000	7,000 – 8,000	16,000	34,000 –36,000
Somer Valley	6,000	11,000 – 15,000	15,000	32,000–36,000
Rural Areas	8,000 – 9,000	32,000 – 34,000	18,000 – 19,000	58,000 – 62,000
TOTAL	94,000–97,000	62,000–74,000	72,000–74,000	228,000 – 245,000

Employment Land Opportunities and Constraints

1.59 The estimated requirements identified above have informed the identification and allocation of sites for additional employment floorspace which provide around 296,000 sq. metres of space across the District. The allocations and resultant spatial distribution of employment space across the sub-areas (see Policy 1.1) have also been informed by the Local Plan spatial strategy, priorities identified in the B&NES Economic Strategy and the WECA Local Growth Plan and an assessment of the availability, suitability and deliverability of potential employment land across the District. Assessment of sites has considered factors including market attractiveness, access to labour and transport networks, environmental constraints, infrastructure requirements and viability.

1.60 The identification and allocation of land for new employment space has focused on potential opportunities to intensify existing employment land and premises within Bath and a series of strategic and smaller scale opportunities to provide additional employment space, including as part of mixed-use development, primarily in the Somer Valley and the Bristol to Bath corridor.

The spatial distribution of new employment floorspace across B&NES is set out in Policies 1.1 and 1.3.

- 1.61 New employment space will be primarily delivered through a mix of existing commitments and site allocations. The total estimated floorspace supply is greater than the requirement identified through the Economic Development Needs Assessment. This provides a degree of flexibility in meeting the currently assessed requirements of the economy. The spatial distribution proposed in the Local Plan focusses a greater proportion of additional employment floorspace than the current share of existing employment floorspace on the Somer Valley sub-area. This reflects its identification and role as one of the growth zones in the WECA Local Growth Plan and responds to relatively high levels of out-commuting from the area to work. In addition, the floorspace requirement set out in Policy 1.1 for the rural areas is less than that based on the existing share of employment floorspace. The floorspace requirements in Policy 1.1 are based on existing commitments and proposed site allocations in the Local Plan. Evidence supporting the Local Plan shows there is also potential to provide further employment floorspace through intensification and redevelopment of existing sites and premises not proposed to be allocated, especially in the rural areas.

Protection of Existing Employment Sites

- 1.62 Existing employment sites are vitally important to the B&NES economy. They support a wide range of businesses, provide local jobs, and contribute to economic resilience. Evidence shows strong demand for employment space and limited opportunities for new provision. The Local Plan therefore includes policies to robustly protect existing employment sites (see chapter 6).

Policy 1.3: Employment Space Requirement

1. Supporting a Prosperous and Sustainable Economy:

To maintain a resilient, diverse, sustainable and inclusive economy, the Local Plan will:

- protect existing employment sites and premises; and
- plan for and facilitate the delivery of additional employment space across Bath and North East Somerset.

2. Employment Space Requirement for B&NES:

The Local Plan makes provision for the following employment floorspace during the period 2025–2043:

- Around 138,300 sqm of office space
- Around 158,200 sqm of industrial space and warehouse/logistics space

3. Distribution of Employment Space:

Employment floorspace will be delivered across the sub areas as broadly set out in Policy 1.1 and reflecting their economic roles:

- Bath as a regional centre for office based and research and innovation employment
- Bristol to Bath Corridor as a strategic growth location
- Somer Valley as a key industrial and manufacturing area
- Rural Areas as locations for small scale and rural enterprise

4. Delivery of Employment Space:

The employment space requirement will be met through:

- existing commitments
- new employment site allocations
- employment floorspace delivered as part of mixed-use strategic development sites
- windfall employment development where appropriate

5. Protection of Existing Employment Sites:

Existing employment sites will be safeguarded for employment use as set out in Policies 6.24, 6.24 and 6.26.

Development within and outside settlements

Introduction

- 1.63 A central objective of the Local Plan is to direct development to the most sustainable locations, making best use of land within existing settlements, with good access to job opportunities, infrastructure, services and facilities.
- 1.64 Policy 1.4 sets out the overarching approach to development within and outside settlements. In December 2025 the government published a draft revised NPPF. The revised NPPF has still not been published in its final form by government but is anticipated imminently. The revised NPPF includes both plan-making policies and National Decision-Making Policies (NDMPs) proposed to be used in the determination of planning applications. Whilst the Draft NPPF 2025 does not form the framework for the preparation of this Local Plan, which is being prepared in accordance with the provisions of the December 2024 NPPF, the NDMPs proposed to come into force later this year and after this Pre-Submission Draft Local Plan has been published are relevant. Policy 1.4 below draws on the Draft NPPF 2025 (NDMPs S4 and S5), the B&NES Core Strategy, and the Placemaking Plan, and reflects the spatial strategy set out in Policy 1.1 above.
- 1.65 The approach seeks to ensure that development is primarily focused within settlements, especially on previously developed sites, and is appropriate to the scale and function of Bath city and the towns and villages across B&NES. Settlement boundaries are defined to facilitate this approach and will serve as the starting-point to identifying whether a development opportunity lies within or outside a settlement.

Focusing Development Within Settlements

- 1.66 Development will be focussed within settlements with defined settlement boundaries, where access to services, community facilities, active travel facilities, public transport and infrastructure is greatest. This approach:
- supports sustainable patterns of growth
 - reduces the need to travel by private car
 - makes efficient use of land

- strengthens the role and function of existing settlements
- protects the countryside and environmental assets

1.67 Development within settlement boundaries will generally be acceptable in principle, subject to:

- Compliance with other Local Plan policies
- The availability and capacity of existing or planned infrastructure
- The scale and type of development being appropriate to the settlement's role and function
- The benefits of development outweighing any harm

Development Outside Settlements

1.68 Land outside defined settlement boundaries is considered to be open countryside, where a more restrictive approach to development applies. This reflects the need to protect the character of the countryside, safeguard environmental assets, and promote sustainable patterns of development.

1.69 Development outside settlement boundaries will only be permitted where it meets specific criteria set out in Policy 1.4. The approach distinguishes between:

- Employment development, where a degree of flexibility is appropriate to support rural enterprise and economic diversification
- Housing development, where a more restrictive approach is required to ensure that growth is directed to sustainable locations

Employment Development Outside Settlements

1.70 The Local Plan recognises the importance of supporting a prosperous rural economy. In some cases, employment development may require a rural location—for example, where the business is land based; the nature of the operation requires a rural setting; and there are no suitable sites within settlements.

1.71 Policy 1.4 therefore allows for employment development outside settlement boundaries where it is demonstrated that:

- The location is necessary and is well-related to an existing settlement
- The scale and type of development is appropriate to the nearest settlement
- The proposal does not cause unacceptable harm to landscape character, biodiversity or heritage assets

- Safe and wherever possible sustainable transport access can be secured

Housing Development Outside Settlements

- 1.72 A more restrictive approach applies to housing development outside settlement boundaries. Such proposals will generally be refused, unless they meet an identified unmet need i.e. where the Council's monitoring shows that there is a lack of a five year housing land supply when judged against the stepped requirement set out in Policy 1.2 or delivery falls below 75% on the Housing Delivery Test.
- 1.73 Where unmet need exists, proposals outside settlement boundaries must:
- be well-related to an existing settlement
 - be of a scale that can be accommodated by existing and planned infrastructure
 - be appropriate to the scale, function and sustainability of the nearest settlement
 - avoid unacceptable harm to landscape, heritage, biodiversity or the character of the countryside
- 1.74 This ensures that any additional housing delivered in response to unmet need is directed to the most sustainable locations and does not undermine the spatial strategy. In focussing development at locations that are well related to existing settlements proposals on sites that lie within the Green Belt but meet the definition of 'grey belt' will not be considered to be 'inappropriate development' within the Green Belt where there is an unmet need as set out in para 6.10 above and applications meet the 'golden rules' outlined in the NPPF.

Settlement Assessment and Tiers

- 1.75 To guide the application of Policy 1.4, the Local Plan is underpinned by an assessment of settlements based on:
- services and facilities (e.g., schools, shops, health facilities)
 - sustainable connectivity (the ability to travel to different destinations, such as employment, healthcare, education, leisure, and shopping using various modes of transport, focussing on walking, cycling and public transport)
- 1.76 Rather than establishing a rigid settlement hierarchy fixed at a single point in time, the Local Plan adopts a flexible, evidence based approach. This

recognises that circumstances in individual settlements may change over time—for example, through new facilities, improved transport provision, or changes in population.

- 1.77 The assessment involved an audit of existing facilities and services within each settlement and an analysis of settlement connectivity using the Department for Transport (DfT) Connectivity Tool. The DfT Tool is a connectivity metric which applies a value to destinations based on the opportunity to reach employment, healthcare, other services and facilities., using various modes of transport, focussing on walking, cycling and public transport. The assessment implemented a weighted/rank-based scoring system, assigning each settlement a ranking from A (highest) to J (lowest) based on its facilities and services and connectivity metric.
- 1.78 The assessment groups settlements into tiers, which reflect their relative sustainability, role and function and capacity to accommodate development (see figure 1.5 below). These tiers guide the interpretation and implementation of Policy 1.4, particularly in relation to development outside settlement boundaries.

Figure 1.5: Current Settlement Tiers

Tier	Description	Typical characteristics	Settlements
Tier 1	Principal settlements	Excellent connectivity and a wide range of services/facilities	Bath, Midsomer Norton, Keynsham, Radstock
Tier 2	Highly sustainable settlements	Settlements with either good local service/facility provision and/or strong connectivity	Paulton, Peasedown St John, Saltford, Whitchurch, Batheaston. Bathampton, Chew Magna, Bathford, Timsbury
Tier 3	Moderately sustainable settlements	Settlements vary from broad to limited local service/facility provision and have good connectivity	Temple Cloud, Farrington Gurney, Pensford, Clandown, Haydon, Newton St Loe, South Stoke, Freshford, Corston, Farmborough, High Littleton, Clutton, Marksbury, Chew Stoke, Bishop Sutton, Kelston, Monkton Combe, Hinton Charterhouse

Tier 4	Less sustainable settlements	Settlements with basic to limited local services and/or weaker connectivity.	Stanton Prior, Englishcombe, Hallatrow, Queen Charlton, Upper Swainswick, Limpley Stoke, Sharpstone, East Harptree, West Harptree, Dunkerton, Shoscombe, Claverton, Woolley, Burnett, Camerton, Norton Malreward, Tunley, Stanton Drew, Wellow, Compton Martin, Combe Hay, Compton Dando, Ubley
Tier 5	Least Sustainable Settlements	Settlements with limited local services and poor connectivity.	Chelwood, North Stoke, Hinton Blewett, Priston

Policy 1.4: Development Within and Adjoining Settlements

1. Development within defined settlement boundaries will be acceptable in principle:
 - a. where it accords with the policies of the Local Plan;
 - b. where it is supported by existing or planned infrastructure;
 - c. where it is of a scale, type and form appropriate to the settlement's role and function; and
 - d. unless the benefits of doing so would be substantially outweighed by any adverse effects when assessed against policies in the Local Plan
2. Employment Development Outside Settlements: Employment development outside settlement boundaries will be permitted where:
 - a. a countryside location is demonstrated to be necessary;
 - b. the scale and type of development are appropriate to the nearest settlement;
 - c. there are no suitable sites within settlement boundaries; and
 - d. the proposal does not result in unacceptable harm to landscape character, biodiversity, heritage assets or the character of the countryside.
3. Housing Development Outside Settlements: Land outside settlement boundaries is considered open countryside. Planning applications for housing development outside settlement boundaries will be refused unless:
 - a. the Council cannot demonstrate a five-year housing land supply when judged against the stepped requirement set out in Policy 2 or delivery falls below 75% on the Housing Delivery Test, or it is a rural exception site to meet demonstrable local need for affordable housing to be determined against Policy RA4; and
 - b. the proposed development is physically well related to an existing settlement; and

- c. the proposal is of a scale that can be accommodated by existing and planned infrastructure; and
 - d. the development is appropriate to the scale, function and sustainability of the nearest settlement, having regard to the settlement assessment and tiers; and
 - e. the proposal does not result in unacceptable harm to landscape character, biodiversity, heritage assets or the character of the countryside.
- 4. Settlement Assessment: The Council will have regard to the settlement assessment and tiers when determining proposals outside settlement boundaries. The assessment will be updated periodically to reflect changes in services, facilities and transport provision.