

Bath and North East Somerset Council

Local Plan 2025 – 2043

Pre-Submission Draft Local Plan (Reg 19)

September 2026

Housing Supply Topic Paper

**Bath & North East
Somerset Council**

Improving People's Lives

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1. Introduction

1.1 The purpose of this Housing Topic Paper is to explain the:

- Local Plan housing requirement
- Approach to housing supply
- Approach to affordable housing

1.2 As such it is structured around these three elements and should be read in conjunction with the Draft Local Plan, in particular chapter 1 (District-wide strategy) and chapter 6 (Development Management policies).

2. Housing Requirement

2.1 2. The government's standard method figure of housing need is currently 1,518 per annum which equates to 27,324 homes over the Local Plan period of 2025-2043. This Local Plan is being prepared within the context of and against the provisions of the December 2024 NPPF (all references to the NPPF in this Topic Paper are to the December 2024 version). It requires that local plans should be positively prepared and at least meet objectively assessed needs. NPPF para 62 states that:

2.2 To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

2.3 A Local Housing Needs Assessment (LHNA) for Bath & North East Somerset (B&NES) was undertaken and published in September 2025 using the standard method housing need figure and in accordance with guidance set out in the NPPG. Based on the standard method figure the LHNA considers the implications for population and household projected growth, identifies the need

for affordable housing and establishes the mix of housing types and sizes required.

2.4 Further to the above the NPPF in para 11 sets out the presumption in favour of sustainable development. It states:

2.5 Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

2.6 As set out in chapter 1 of the Draft Local Plan the council has set a Local Plan housing requirement of around 22,000 homes, which is around 80% of the standard method need figure. This housing requirement is considered to be a proportionate response to the constraints and opportunities within B&NES and the application of the NPPF, specifically para 11b.

2.7 B&NES contains:

- The double inscribed City of Bath World Heritage Site
- Two National Landscapes (Cotswolds and Mendip Hills)

- Areas of high landscape, ecological and heritage sensitivity
- Extensive Green Belt covering almost 70% of the District
- These are recognised as Footnote 7 constraints in the NPPF.

2.8 Planning for the full Standard Method figure would require development at a scale and in locations that would cause unacceptable harm to nationally and internationally significant heritage and environmental assets. Specifically, opportunities for the growth of the city of Bath have been carefully considered and strategic growth of the city is not deliverable and/or will cause substantial harm to the Outstanding Universal Value of the World Heritage Site. In addition, opportunities for growth in other parts of the District e.g. the Bristol to Bath corridor are constrained or limited by the need to protect views from and the setting of the Cotswolds National Landscape.

2.9 All suitable, available and deliverable opportunities have been fully assessed in establishing the Local Plan housing requirement. The process of assessing and identifying sites for allocation in the Draft Local Plan, and the rejection of alternatives, is set out in the Sustainability Appraisal Report and the 'Identifying Sites for Allocation in the Draft Local Plan' Topic Paper. It should also be noted that appropriate opportunities to increase and optimise densities both within sites proposed to be allocated, as well as within existing urban areas, have been taken into account (see relevant parts of the Housing Supply section of this Topic Paper).

2.10 The Council has left 'no stone unturned' in its attempts to meet as much of the standard method local housing need as possible in a sustainable manner. Environmental and heritage constraints, as well as some locations/sites tested through the options (Reg 18) stages not being available for development, has fundamentally shaped the housing requirement proposed. It should be noted that as set out in chapter 1 of the Draft Local Plan meeting a Local Plan requirement of 22,000 homes and promoting sustainable patterns of development as required by the NPPF requires significant releases of land from the Green Belt. The

exceptional circumstances case to justify these releases is outlined in the Green Belt Exceptional Circumstances Topic Paper, supported by the Strategic and Stage 2 Green Belt Assessments.

- 2.11 In summary the application of policies in the NPPF protecting assets of particular value (and as defined in NPPF footnote 7) provide a strong reason for restricting the overall scale and distribution of housing and not meeting the full standard method figure of need.
- 2.12 The Council has focussed on considering suitable and available opportunities for development in relatively sustainable locations (as explained in both the SA Report and the 'Identifying Sites for Allocation in the Draft Local Plan' Topic Paper). It is considered that proposing sites in unsustainable locations would be contrary to national policy set out in the NPPF. As a result and because of the harm that would be caused to 'areas or assets of particular importance' the adverse impacts of meeting the full standard method figure of housing need in this Local Plan are considered to demonstrably outweigh the benefits when assessed against both the national policies in the NPPF as a whole and the spatial priorities of the plan.
- 2.13 The Local Plan housing requirement is also shaped by ensuring delivery rates from new allocations made through this plan are realistic. The existing adopted Local Plan has a requirement which equates to 722 dwellings per annum. The standard method housing figure more than doubles this to 1,518 per annum. This substantial uplift in delivery rates cannot realistically be achieved over the entire Local Plan period, primarily because it will take a few years for new plan-led strategic site allocations to reach full build out rates. Further detail is set out in the Housing Supply section and the associated delivery trajectory.
- 2.14 Over the longer-term and in the latter part of the plan period the delivery of sustainable housing growth within B&NES will need to be more appropriately considered and facilitated through the West of England Combined Authority (WECA) Spatial Development Strategy (SDS) and the associated new-style Local Plan for B&NES. In this regard two locations for potential longer-term

growth that are not deliverable at this point in time are identified for further exploration.

2.15 Related to this and as set out in chapter 1 of the Draft Local Plan it is acknowledged that this Local Plan has focussed on responding positively to the standard method figure of housing need in B&NES and that it has not been possible, through this Local Plan, to respond positively to unmet need arising in Bristol. Solutions to addressing this unmet need are more appropriately considered strategically and sub-regionally through the preparation of the SDS.

3. Housing Supply

Introduction

3.1 This section focusses on housing supply and delivery. It is structured as follows:

- Housing trajectory and delivery rates
- Stepped requirement and Five-Year Land Supply
- Sources of supply

Housing Trajectory

3.2 As explained in the Housing Requirement section above the Local Plan housing requirement is derived from assessment, identification and allocation of suitable, available and achievable sites for development. As such it is capacity-led. This section outlines the assessed sources of supply making up and enabling the housing requirement to be met.

3.3 Sites within the housing trajectory have been assessed against the guidance and proformas published in the NPPG. The data outlined in this topic paper and accompanying draft trajectory will be kept under review as the Local Plan progresses to submission and through examination.

3.4 Site deliveries shown in the housing trajectory have been discussed with site promoters to ascertain an estimate of when the sites will be delivered for housing. The delivery of strategic infrastructure that will impact the delivery of

site allocations, will be kept under review as the plan progresses and if necessary the trajectory will be amended prior to submission of the Local Plan for examination

3.5 Housing delivery monitoring is updated by the Council annually each March/April. This monitoring covers sites that are available for housing development through current planning permissions. Surveys are split into large sites (10+ dwellings) and small sites (1-9 dwellings). Every site and dwelling on those sites with an extant planning permission is visited and recorded as either not started, under construction or complete. Currently no small sites are allocated in the Council's adopted Development Plan and thus are all classed as windfalls. The Council reports the number of completed sites each year as part of its Authority's Monitoring Report.

3.6 Sites of 10 homes or more are named within the trajectory alongside a delivery estimate. Sites within the five year land supply are assessed against the definition of deliverable as laid out in the NPPF.

3.7 Sites of less than 10 homes are all classed as windfalls. Every year the windfall allowance is evaluated against past delivery and current planning permissions. Details of how windfall allowances are calculated is set out below.

3.8 Delivery estimates are based on information provided by developers and the latest iteration of the Lichfields paper entitled 'Start to Finish, How Quickly do Large-Scale Housing Sites Deliver?' The Lichfields figures are based on national averages which take into account lower value areas and areas where lower percentages of affordable housing delivery occurs.

Stepped Requirement

3.9 The Planning Practice Guidance states that "A stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan

period. Strategic policy-makers will need to identify the stepped requirement in strategic housing policy, and to set out evidence to support this approach, and not seek to unnecessarily delay meeting identified development needs. Stepped requirements will need to ensure that planned housing requirements are met fully within the plan period. In reviewing and revising policies, strategic policy-makers should ensure there is not continued delay in meeting identified development needs.”

3.10 The existing adopted Local Plan has a requirement which equates to 722 dwellings per annum. The standard method housing figure more than doubles this to 1,518 per annum. More than doubling housing delivery compared to both historic delivery rates in B&NES and the rate of development set out in the adopted B&NES Local Plan is considered by the Council to be a ‘significant change’ in delivery. As set out in the Housing Requirement discussion earlier in this Topic Paper, the Council has left ‘no stone unturned’ in attempting to meet the standard method local housing need and is not seeking to ‘unnecessarily delay meeting identified development needs’. This substantial uplift in delivery rates cannot realistically be achieved over the entire Local Plan period, primarily because it will take a few years for strategic site allocations to reach full build out rates. The number of site allocations on land which will need to be released from the green belt totals 41%, which requires local plan adoption to establish the principle of development and will extend the lead in time. Demonstrating a five year housing land supply at adoption is required by the NPPF and is a key part of the tests of soundness. Therefore it is proposed to use a stepped housing requirement and increase the annual requirement through the plan period in line with delivery rates forecast in the housing trajectory.

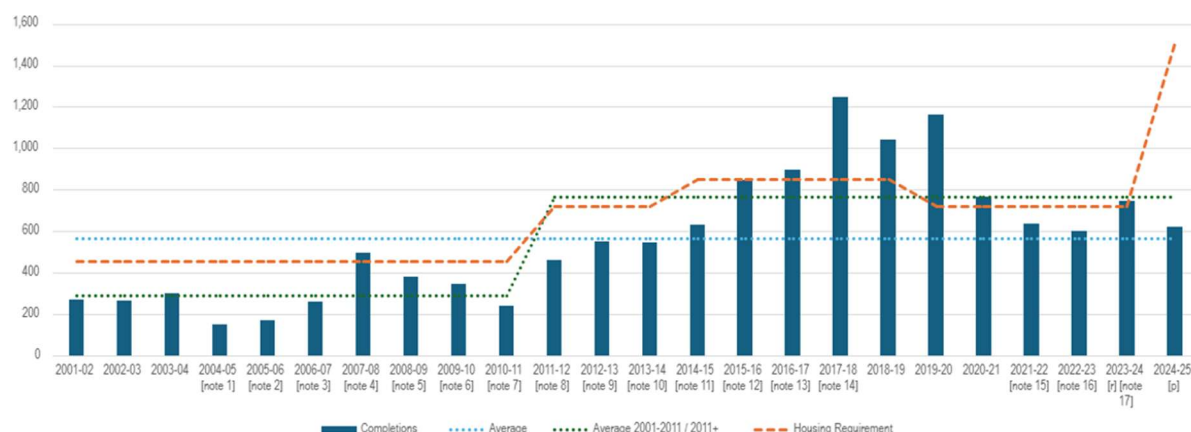


Figure 1 Historic Housing Delivery

3.11 Delivery in years 1-5 is primarily made up of smaller non-strategic sites which do not have major infrastructure requirements. Beyond the five year supply large scale strategic sites will begin to deliver.

3.12 It is estimated that the plan will be adopted in 2028. Therefore, the first full monitoring year post adoption will be 2028/29. Following adoption the annual requirement for the first four years is set at 760. This allows for new allocation applications to be submitted and for work to begin on site.

3.13 From years 2032/33 to 42/43 the annual requirement is set at 1,518, based on the assumption that the large site allocations will deliver at full build out rates as set out in the delivery trajectory. This annual requirement aligns with the standard method housing figure.

Five Year Housing Land Supply

3.14 Sites included within the five year supply have been assessed against the deliverability test. Sites within the five year supply either already have planning permission, are part of a live application or are being actively promoted for development.

3.15 The stepped housing trajectory sets the annual requirement at 760 at adoption. This is an increase compared to the existing Local Plan requirement of 722 dpa. Given in the early years of the plan period there may be under delivery.

The unmet need can be addressed in the first five years after plan adoption using the Sedgefield method in that the unmet need is considered within the five year supply. The recently published Housing Delivery Test 2025 measurement and the transitional arrangements set out in the 2026 Housing Delivery Test Rule Book enable the Council to predict that the Council will be required to add a 5% buffer at adoption.

- 3.16 The calculations show that a five year land supply can be demonstrated at plan adoption and in subsequent years, after which the SDS and associated local plan review will establish a new housing requirement for B&NES and allocate sites respectively.

Sites Beyond the Five Years

- 3.17 Any sites within the trajectory that are expected to deliver beyond the five year supply have been assessed against the definition of developable as set out in the NPPF.
- 3.18 Accordingly, through this process sites allocated in the draft plan are considered to be in suitable locations for housing development, with a reasonable prospect that they will be available and could be viably developed at the point envisaged. To assist this, as a starting point, the Council has used national averages set out in Lichfields' Start to Finish Paper for planning approvals for delivery periods and build out rates, adjusted as appropriate where delivery status of the site/evidence indicates sites will deliver sooner or later than Lichfields' averages suggest. In addition, promoters of the proposed site allocations were contacted and asked to provide information of when they expect to bring the site forward.

Sources of Supply

Allocated sites - site Capacity Estimates

3.19 For site allocations (both existing allocations in the adopted Local Plan and new allocations) densities on site have been optimised to increase the number of homes delivered and ensure land is being used efficiently.

3.20 In order to assess the capacities of new site allocations the developable area was calculated as follows;

- Assessment undertaken by landscape and ecology officers to identify what land would be required for landscape mitigation. This land is subtracted from the gross site area.
- Land take was then subtracted for required uses such as schools and local centres
- A 10% reduction was then applied to allow for infrastructure such as roads.
- A density multiplier was applied to the net developable area as set out in the table below

B&NES HELAA Location Definition	Lower Density Multiplier	Upper Density Multiplier
Bath Central Area	100	120
Town Centre, District Centre and Local Centres in Bath	70	85
Area outside the Town Centre but within 400m of Housing Development Boundaries	50	65
Area outside Town Centre but within 400m of adopted Housing Development Boundaries	40	50
Rural Areas	30	40
Hicks Gate	55	75

Table 1 density Multipliers

Student and Communal Accommodation

3.21 Given the large student population within Bath some of the housing requirement will be delivered through Purpose Built Student Accommodation (PBSA). In accordance with the Housing Delivery Test Rulebook the ratio of 2.4 beds to one home are applied to calculate the dwelling yield from PBSA.

3.22 The Council's approach to planning for student accommodation needs as part of the Local Plan is set out in the Student Accommodation Topic Paper.

3.23 Communal accommodation in the past has largely included care homes and the ratio of 1.9 is applied as outlined in the Housing Delivery Test Rulebook. However, B&NES is beginning to see applications submitted for co-living accommodation. In the case of co-living accommodation the ratio 1.9 bed spaces to one home is also used to calculate the dwelling yield.

Existing Commitments

3.24 Included in the housing trajectory are the existing commitments which are sites that are currently allocated or permitted and sit within the current housing trajectory. Through work on the local plan all existing commitments have been reviewed to check deliverability and this is reviewed on an annual basis. Each site has been assessed against the definition of deliverable and developable and allocated an appropriate delivery year in the trajectory. In general sites with planning permission are included in the five year supply, some have already begun to deliver. In accordance with the requirements of the NPPF evidence on sites with outline permission is sought to ascertain when delivery will commence.

3.25 Sites listed as 11+ years have either a major infrastructure requirement to allow them to come forward or proposals to develop the sites are not yet fully developed.

Windfalls

3.26 Windfall sites are classed as being sites of 9 homes or less not allocated within the Local Plan.

3.27 The council currently includes a windfall allowance within supply assumptions and reflected in the Housing Trajectory based on current planning permissions and past delivery

3.28 Paragraph 75 of the National Planning Policy Framework states;

Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.

3.29 In accordance with the NPPF, the method for determining a future anticipated windfall allowance will be based both on past trends and future projections, applying reasonable judgement to ensure that a justified and appropriate figure is reached which is supported by compelling evidence.

3.30 The windfall allowance within the five year land supply is assessed against planning permissions. All sites with planning permission are included in the five year supply and existing commitments. The total number of dwellings on small sites with planning permission is divided by five to provide an estimated annual allowance.

3.31 In previous trajectories, to calculate the windfall supply, the ten year average of previous delivery has been calculated to provide an annual allowance. However recent trends have shown a drop in windfall delivery and in order to take a cautious approach, the windfall allowance beyond the five year supply has been calculated using the mid point figure between the ten year average past delivery and the current annual permitted supply.

3.32 The diagram below shows the past trends in windfall delivery and future allowance. It is expected that the windfall delivery would likely be higher than predicted but given that fluctuation can occur a more cautious approach is proposed to be taken.

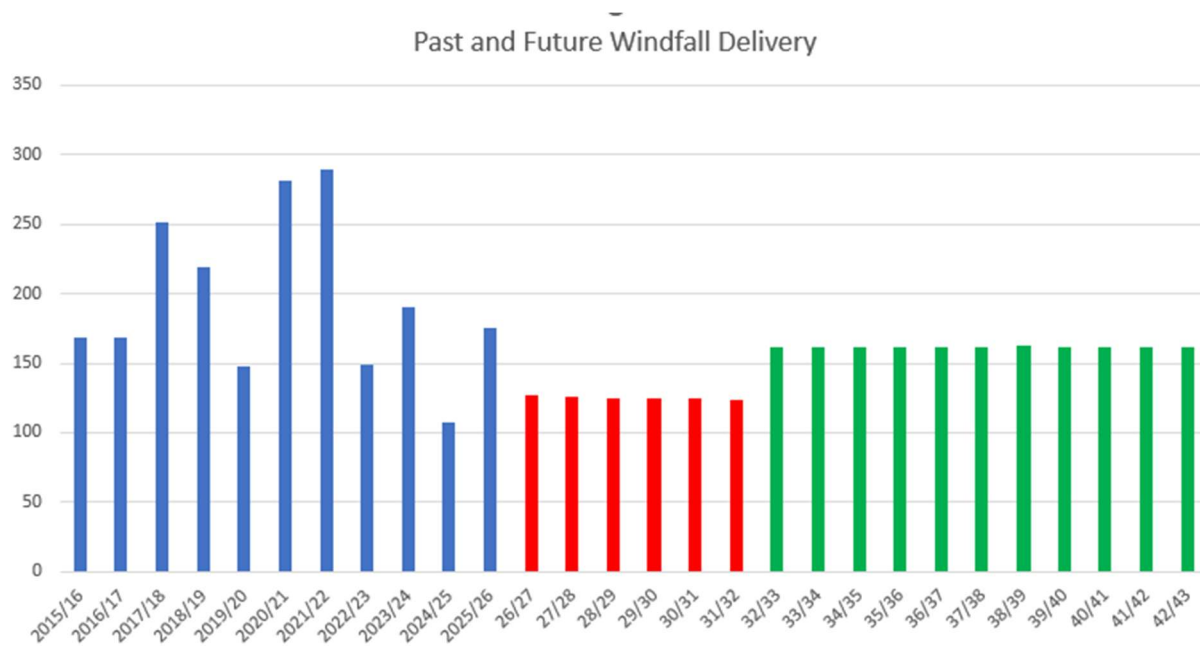


Figure 2 Past and Future Windfall Trends

3.33 Small site windfalls have historically made a consistent contribution to the overall housing delivery, and it is fair to assume they will continue to do so.

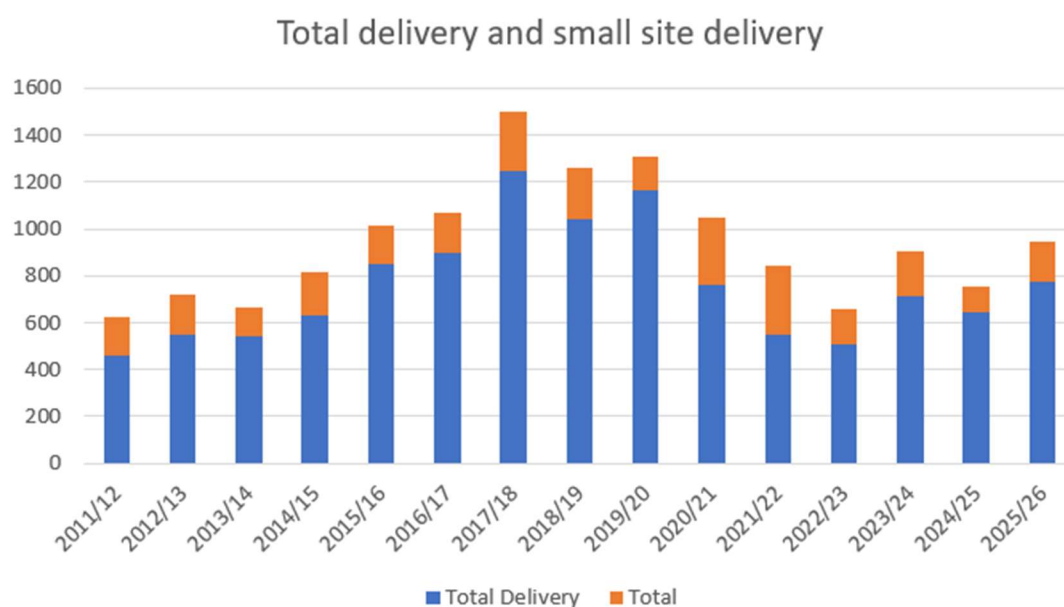


Figure 3 Total delivery and small site delivery

3.34 Past monitoring demonstrates that delivery on small sites exceeds the 10% of the housing requirement required in the NPPF, paragraph 73. It is likely that there will be sites of 10 homes or more which are below 1ha.

Milsom Street Flats Above Shops

3.35 Included in the housing trajectory is a separate allowance for 170 homes to be brought forward in part of Bath city centre known as the Milsom Quarter, as flats above shops. As part of the Milsom Quarter masterplan the council produced a study looking at reusing space above shops within the Milsom Quarter as residential. The study concluded that such work would unlock the provision of at least 170 homes. Given that the council is actively and specifically pursuing this project to unlock these sites and that such housing delivery is not typically part of small windfall supply, the dwellings are allowed for as a source of supply in addition to the windfall allowance within Bath.

Sites Being Considered for Planning Permission Not Currently Included in the Housing Trajectory

3.36 A number of sites have been submitted for planning permission which are not within the published trajectory and draft local plan. Should these sites progress through the planning process then this would result in additional homes providing greater flexibility in meeting the Local Plan housing requirement.

3.37 At the time of publication of the Draft Local Plan some applications are being considered by the council's planning committee who have resolved to grant permission subject to legal agreements. The sites below will be added to the housing trajectory (which is reviewed annually) once permission has been granted.

3.38 26/01208/OUT - Parcel 5325, Manor Road, Keynsham - Outline planning application for up to 105 homes (Use Class C3), new vehicular and pedestrian access onto Manor Road, public open space, tree planting and habitat creation, site drainage and associated infrastructure, with all matters reserved except for access.

3.39 Net gain of 105 homes.

3.40 25/03592/FUL – Former Bath Press Premises, Lower Bristol Road, Westmoreland, Bath - Residential-led redevelopment of the western end of the former Bath Press site to comprise new-build residential development (Use Class C3) and flexible commercial floor space (Use Class E) together with associated infrastructure, landscaping and car parking.

3.41 Planning application will increase the density of the development resulting in a net gain of 89 homes.

Summary of sites

Completions 2025-26	772
Existing Commitments	5,042
Large site allocations	14,456
Windfall allowance	1,944
Total	22,081
% of requirement	81%

Table 2 Summary of sites

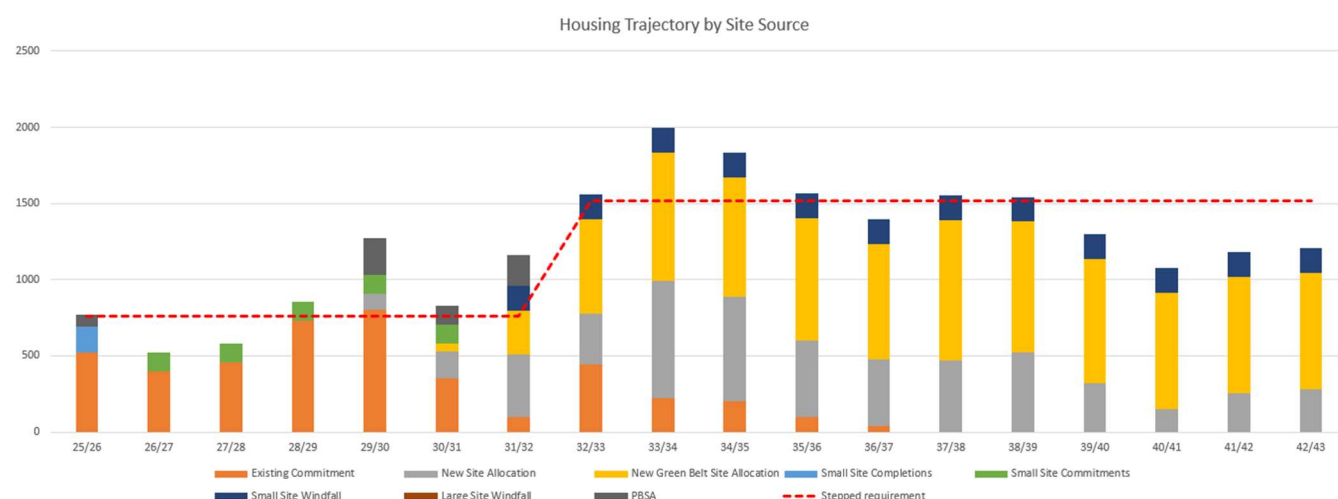


Figure 4 Housing trajectory by site source

4. Affordable Housing

Affordable housing need

4.1 The B&NES Local Housing Needs Assessment (LHNA) September 2025

provides the Council's assessment of housing need for the Local Plan period 2025–2043. It was prepared using the Government's standard method figure as its starting point and identified an overall need of approximately 27,000 homes, comprising approximately 14,400 market homes and 12,300 affordable homes. The affordable housing figure is an assessment of need unconstrained by land availability, development viability or the environmental and infrastructure constraints affecting the amount of development that can be accommodated within Bath and North East Somerset.

4.2 This separation between need and the amount planned for is important. National Planning Practice Guidance defines housing need as an unconstrained assessment and states that it should be undertaken separately from assessing land availability, establishing the housing requirement and preparing site-allocation policies. The standard method identifies minimum local housing need but does not itself produce the Local Plan housing requirement.

4.3 The LHNA identifies substantial affordability pressures and a need for a range of affordable housing sizes and tenures. It identifies households whose existing needs are not met, newly arising need associated with projected household and population change, and potential households whose formation has been suppressed because suitable housing is unavailable or unaffordable. National guidance similarly requires affordable housing assessments to take account of homelessness, temporary accommodation, overcrowding, concealed households, existing households in unsuitable accommodation, newly forming households and households unable to access market housing.

Relationship with the Local Plan housing requirement

4.4 As explained in the preceding Housing Requirement section, the Government's standard method figure is 1,518 dwellings per annum, equivalent to 27,324 dwellings over 2025–2043. The Local Plan housing requirement is around 22,000 dwellings. That requirement reflects the full assessment of suitable and

available development opportunities, the need to promote a sustainable pattern of development, realistic delivery rates, infrastructure requirements and the application of national policy to the internationally and nationally important environmental and heritage assets affecting the District.

4.5 The Local Plan does not provide for the full standard-method housing need and, consequently, cannot provide for the full objectively assessed affordable housing need of approximately 12,300 homes. This is not a redefinition or artificial reduction of need. It is the consequence of translating an unconstrained assessment of need into a deliverable housing requirement, having considered land availability, development constraints and the adverse impacts of alternative levels and distributions of growth.

4.6 As set out in the Housing Requirement section above paragraph 11(b) of the NPPF December 2024 allows strategic policies to provide for less than objectively assessed needs where policies protecting areas or assets of particular importance provide a strong reason for restricting the scale, type or distribution of development, or where the adverse impacts would significantly and demonstrably outweigh the benefits. B&NES includes the double-inscribed City of Bath World Heritage Site, two National Landscapes, extensive Green Belt and areas of high landscape, ecological and heritage sensitivity. The Housing Requirement section explains why accommodating the full standard-method figure would cause unacceptable harm and why the approximately 22,000-dwelling requirement represents the maximum justified, sustainable and deliverable provision through this Plan.

4.7 The housing requirement nevertheless represents a substantial increase in supply. The stepped requirement allows for 5,320 dwellings over 2025–2031/32, approximately 760 per annum, followed by 16,698 dwellings over 2032/33–2042/43, approximately 1,518 per annum. This reflects the time required for strategic allocations and supporting infrastructure to progress before sites reach fuller build-out rates, while maintaining a substantial programme of delivery across the Plan period.

LHNA Addendum July 2026

4.8 The 2026 LHNA Addendum does not replace the September 2025 LHNA or identify a lower affordable housing need. Its purpose is to consider the population, household and housing-mix implications of the Local Plan requirement and to identify an appropriate mix of market and affordable housing within that planned supply. On that basis, it identifies an affordable housing component of approximately 8,300 households, together with a tenure mix of 70% (rounded) social rent and 30% (rounded) affordable home ownership.

4.9 Actual delivery will arise through a combination of policy-compliant provision on market-led sites, affordable housing-led schemes, rural exception and community-led housing, public subsidy and investment, commuted sums, and additional affordable housing above the minimum policy requirement where funding and delivery circumstances permit.

Household formation scenarios

4.10 The Addendum tests alternative household-formation assumptions. Scenario A reflects projected household formation associated with the resident population and planned migration, whereas Scenario B additionally allows for the full potential formation of households whose formation is currently suppressed. The chosen approach lies broadly midway between those scenarios by allowing for approximately half of the additional potential households to form separately.

4.11 This midpoint is not used to measure or reduce affordable housing need. Need remains the unconstrained figure in the LHNA. Rather, it is used to describe a reasonable household and tenure mix for the amount of housing that the Plan can deliver. Maintaining that distinction responds directly to national guidance: assessment of need is the first stage; determining the housing requirement and the policies for delivering it is a separate stage informed by land, constraints, infrastructure and viability.

4.12 The approach supports the national objective of significantly boosting housing supply while remaining consistent with the Plan's evidence on constraints and

deliverability. It should not be understood as assuming that the remaining suppressed households have no need; their need remains recorded in the LHNA and should inform monitoring, Duty to Cooperate engagement, the West of England Spatial Development Strategy and the early preparation of the subsequent new-style Local Plan.

Affordable housing policy and tenure

- 4.13 Policy 6.14 seeks to maximise affordable housing delivery while setting requirements that can be supported by development viability. On large residential sites of 10 or more dwellings or 0.5 hectares and above, whichever threshold is reached first, affordable housing is normally required on site and without public subsidy. The Regulation 19 requirements are 40% across most of the District, 30% in the Somer Valley and 20% for flatted-only developments. Housing for older people and Build to Rent are subject to a 20% requirement, while Purpose Built Student Accommodation and co-living provide financial contributions under their respective policies.
- 4.14 In designated rural areas and the Cotswold and Mendip Hills National Landscapes, developments of two to nine dwellings are required to provide 20% affordable housing, normally on site unless an alternative is justified or preferred by the Council. Development within the Green Belt brought forward through a planning application is subject to a 50% requirement under the NPPF Golden Rules. Strategic sites released from the Green Belt through the Local Plan are generally subject to 40%, reflecting their substantial infrastructure requirements and the site-specific viability evidence.
- 4.15 The tenure requirement is 70% social rent and 30% affordable home ownership. Social rent is prioritised because it provides the most affordable rented tenure for households in greatest need. Shared ownership is the preferred affordable home-ownership product, with flexibility for an alternative tenure mix only where justified by up-to-date need, site characteristics and delivery evidence. This accords with NPPF paragraphs 63–64, which require policies to

specify affordable tenures, including a minimum proportion of Social Rent, and normally expect provision to be made on site.

- 4.16 Affordable housing developments must provide a suitable mix of dwelling sizes informed by the latest LHNA, the Homesearch register, rural housing-needs surveys and other approved evidence. Policy 6.14 aims for at least 60% of affordable dwellings to be family accommodation and includes provision for four- and five-bedroom homes. This responds to evidence of a significant shortage of larger affordable housing and very limited turnover of larger homes available to waiting-list households.

Viability and deliverability

- 4.17 The whole-plan viability evidence has considered affordable housing alongside CIL, Section 106 infrastructure, accessibility standards, NDSS, climate-change policies, biodiversity net gain and other development costs. It supports 40% affordable housing across most of the District, 30% in the lower-value Somer Valley and 20% for all-flatted schemes, where higher build and land costs create greater viability pressure.
- 4.18 Policy-compliant development is expected to be viable. A viability assessment at application stage is therefore confined to exceptional circumstances and must be robust, transparent and independently reviewed. Where full provision cannot be achieved, Policy 6.14 requires consideration of grant, tenure and dwelling mix, unforeseen abnormal costs and an early, mid- or late-stage review mechanism in the Section 106 agreement so that additional affordable housing can be secured if viability improves.
- 4.19 On-site provision remains the starting point because it best supports mixed and balanced communities. Commuted sums or off-site provision are accepted only where on-site provision is physically impracticable, independently demonstrated to be unviable, or where the Council considers that an alternative would secure a better affordable housing outcome. Contributions may support

additional affordable housing, larger family homes, older people's or supported housing and schemes that would not otherwise be deliverable.

Nationally Described Space Standards within Affordable Housing

4.20 All new-build affordable homes will be required to meet the Nationally Described Space Standard (NDSS). This formalises an established local approach: NDSS has been required for affordable housing through the Council's Planning Obligations SPD since 2018 and has routinely been secured through Section 106 agreements; Registered Providers generally expect planning-obligation affordable homes to comply with NDSS and non-compliant homes can be difficult to transfer to providers. Formal incorporation into policy provides consistency and certainty. Adequate internal space supports privacy, storage, home working, children's development, adaptability and independent living, while reducing the risk that high-density development results in cramped accommodation that adversely affects health and wellbeing. The requirement has been included within the Local Plan viability testing and is therefore considered proportionate and deliverable.

Accessibility standards within Affordable Housing

4.21 The Council already applies locally evidenced accessibility requirements through the Local Plan Partial Update, including M4(2) accessible and adaptable dwellings and M4(3) wheelchair-user housing, with differentiated requirements for affordable and market housing and flexibility where site conditions prevent step-free access. The September 2025 LHNA provides updated evidence supporting a minimum of 3% of homes to M4(3), with remaining dwellings meeting M4(2), subject to site-specific factors and viability. Regulation 19 Policy 6.19 therefore requires 3% of all dwellings to meet M4(3) and all remaining dwellings to meet M4(2), with a reduced requirement possible in exceptional circumstances including flood risk, topography or where lift access cannot practicably be achieved. This continues and updates an established local policy direction, increases the supply of homes capable of meeting changing needs over residents' lifetimes, supports independent living and responds to evidence concerning ageing, disability and health and social-care outcomes. Compliance

is implemented through the optional requirements in Part M of the Building Regulations.

[illegible]

5YHLS Calculation at 1st April 2028 (assumed earliest plan adoption)

Compon ent	Step	Calculation	Number
(a)	Requirement from start of plan period (1st April 2025 - 31st March 2028)	722×3	2166.0
(b)	Forecast completions from start of plan period (1st April 2025) to plan adoption (1st April 2028)		1881.0
(c)	Shortfall/Surplus*	$(a) - (b)$	285.0
(d)	5 year requirement + Shortfall/Surplus	$(722 \times 4 + 1518) + (c)$	4691.0
(e)	Add 5% buffer	$(d) \times 1.05$	4925.6
(f)	Annual target	$(e) / 5 \text{ years}$	985.1
(g)	Supply within first 5 years		5681.0
(h)	Land supply	$(g) / (f)$	5.77
(i)	Deficit / surplus	$(g) - (e)$	755

Barkley House PBSA	16
Minerva House PBSA	22
University of Bath PBSA	386
Cramer House PBSA	43
Total PBSA	649
Total Delivery	5948

				16													
				22													
				128	129	129											
						43											
77	0	0	0	240	129	203	0	0	0	0	0	0	0	0	0	0	0
632	336	367	626	843	402	363	565	303	238	158	98	87	218	207	112	164	229

Keynsham			25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41	41/42	42/43
			Years 1 to 5							Years 5 to 10					Post 10 years					
Site	Total																			
Somerdale phase 2	20		20																	
Keynsham Fire Station	20					20														
Keynsham Safeguarded Land	213			54	53	53	53													
Keynsham Safeguarded Land (Taylor Wimpey)	70				35	35														
Treetops (care)	36					36														
Land to the rear of Dane Court	10					10														
The Clockhouse	15		15																	
North Keynsham	1450										145	145	145	145	145	145	145	145	145	145
South East Keynsham	386							50	100	100	100	36								
South Saltford	330										48	47	47	47	47	47	47			
West Saltford	964									88	88	88	88	88	88	88	87	87	87	87
Avon Mill Lane	104																		54	50
Keynsham Car Parks	32										32									
South and West Keynsham (South)	952									87	87	87	87	87	87	87	86	86	86	86
West Keynsham (North)	477															80	80	80	79	79
Durley Farm	50																50			
Hicks Gate (B&NES) Option (NB different density)	1934									176	176	176	176	176	176	176	176	176	175	175
Small Sites	5		5																	
Committed Small Sites	37			8	8	7	7	7												
Small Sites (post 5YHLS)	168								14	14	14	14	14	14	14	14	14	14	14	14
Large Sites Windfall	0																			
Total	7273		40	62	96	105	116	57	114	465	690	593	557	557	637	686	635	587	640	636

Somer Valley		25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41	41/42	42/43
		Years 1 to 5					Years 5 to 10					Post 10 years							
Total																			
St Peters Factory	47	5	12	12	11	7					35								
Wheelers Road	35																		
Welton Bibby Baron	100							100											
Radstock Infants	15	15																	
Silver Street	45		23	22															
Radco	54				26	28													
Greenlands Road	51					26	25												
Remainder of Polestar land	80					40	40												
Hallatrow Road Care Home	42						42												
South Farrington Gurney	500									80	80	80	80	80	80	20			
Chilcompton Road, Midsomer Norton	162					54	54	54											
Thicket Mead, Midsomer Norton	130							43	43	44									
Farrington Road North, Paulton	27						27												
Farrington Road South, Paulton	45								45										
Paulton South	300									60	60	60	60	60					
Lower Peasedown	81									40	41								
Eckweek Lane, Peasedown	568									85	85	85	85	85	85	58			
Fosseway, Peasedown	349									70	70	70	70	69					
Writhlington	300									50	50	50	50	50	50				
North Radstock	951								34	96	95	95	95	95	95	95	95	95	61
Haydon	117					48	48	21											
Paulton Mendip Close	20							20											
Small Sites	13	13																	
Committed Small Sites	181		37	36	36	36	36												
Small Sites (post 5YHLS)	396							33	33	33	33	33	33	33	33	33	33	33	33
Large Sites Windfall	0																		
Total	4609	33	72	70	73	239	272	271	155	558	549	473	473	472	343	206	128	128	94

			25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41	41/42	42/43
Whitchurch																				
						Years 1 to 5					Years 5 to 10					Post 10 years				
Site	Total																			
East Whitchurch	952										96	96	95	95	95	95	95	95	95	95
Curo Site	90														45	45				
West Whitchurch	261														44	44	44	43	43	43
Taylor Wimpey Site	442												56	56	55	55	55	55	55	55
Total	1745		0	0	0	0	0	0	0	0	96	96	151	151	239	239	194	193	193	193

Rural		Total	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	38/39	39/40	40/41	41/42	42/43
			Years 1 to 5					Years 5 to 10					Post 10 years							
Freshford Mill	14		18	4			14													
The Wharf, Clutton	18																			
Whelers Yard, Timsbury	4																			
Poultry Houses High Littleton	10																			
Ashley Road	10								10	50										
Bathford Nurseries (South)	20																			
Old Tennis Court	20																			
Hedgehogs	100																			
West of Clutton	300																			
Timsbury Road (Phase 1)	100																			
Timsbury Road (Phase 2)	100																			
Bishop Sutton West 1	90																			
Bishop Sutton West 2	190																			
Temple Cloud Option 2	130																			
East of St Marys	55																			
West of Timsbury (Hayeswood Road)	170																			
East Timsbury	185																			
North of Fox Fields	45																			
Maypole, Clutton	30																			
Corston	60																			
Small Sites	49		49	51	51	51	51	51	57	57	57	57	57	57	57	57	57	57	57	57
Committed Small Sites	255																			
Small Sites (post 5YHLS)	684																			
Large Sites Windfall	0																			
Total			67	55	51	51	75	101	412	376	347	357	228	117	117	57	57	57	57	57