Regulation 18 Consultation Statement

This statement summarises the representations received during the two Regulation 18 consultations undertaken in 2024 and 2025. It also sets out the Council's responses to the key issues raised through those consultations.

2024 Consultation

Bath & North East Somerset Council

Improving People's Lives

Representation Summary Report

Local Plan Options 2024



Bath & North East Somerset Council

Improving People's Lives

Planning for the future of **the place where you live**

PREPARING FOR THE FUTURE

Introduction

This report provides an overview of the representations received during the Local Plan Options - Regulation 18 consultation, which took place from 12th February to 8th April 2024, with an extension until 16th April 2024. The consultation aimed to gather public input on future development needs, including housing, jobs, and policies addressing climate and ecological emergencies.

We received over 7,000 representations, demonstrating significant public engagement. This feedback will be instrumental in shaping the Draft Local Plan, ensuring it aligns with the community's needs and aspirations.

This summary has been generated through artificial intelligence (AI) to help group and extract statistics. Officers have read each representation and have reviewed the AI-generated outputs in this report.

The summary of representations is organised according to the plan order, along with Council responses to the issues raised.

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Chapters 1 to 4

Spatial priorities for the Local Plan

Addressing Housing Needs and Affordability (48 respondents, 55%): clearly justified strategy for the distribution of both market and affordable homes is key to resolving the housing crisis and improving the district's economic stance without compromising sustainability or addressing specific demographic needs.

Transportation and Connectivity Enhancement (43 respondents, 49%): Development of a comprehensive transport strategy is crucial for improved connectivity and support of sustainable travel, and should align with housing developments for the creation of interconnected communities.

Climate Resilience and Environmental Protection (40 respondents, 46%): Emphasis on mitigating climate change through sustainable infrastructure is essential, as is the support for local food growing strategies and regenerative farming for biodiversity and carbon footprint reduction while protecting valued landscapes and green spaces.

Economic Development and Employment Opportunities (37 respondents, 43%): Local plans should encourage economic growth by providing local jobs/employment space and supporting businesses, particularly in STEM fields and rural economies, alongside housing developments.

Biodiversity and Natural Asset Protection (27 respondents, 31%): support for the enhancement of biodiversity through ecological networks and conservation policies, encouraging development in urban areas to preserve natural spaces, supported by regular nature wealth assessments.

Accessibility and Social Inclusion (20 respondents, 23%): Plans should consider social contexts to ensure developments are inclusive and provide affordable access to healthy local foods, fostering socially sustainable communities.

Heritage and Cultural Conservation vs Development (13 respondents, 15%): There is a need for a balanced approach that respects heritage and green spaces preservation whilst accommodating development needs for infrastructure and housing.

Social Infrastructure and Community Services (9 respondents, 10%): The provision of social infrastructure, such as healthcare and education, should be integrated with new housing developments to improve health and well-being.

Council Response

The priorities that are referenced in comments received in response to the Options consultation align closely with the spatial priorities outlined in the Options document. The spatial priorities also align with and help to ensure the Council's primary purpose of improving people's lives and the corporate priorities are delivered.

The spatial priorities will help to ensure the Local Plan is able to influence and shape future development, ensuring it is of higher quality, that much needed affordable housing is provided, it adapts to and resilient to the impacts of climate change, nature recovery is prioritised and that the delivery of housing is supported by the co-ordinated provision of the necessary supporting infrastructure in a timely manner. As such the Local Plan (spatial priorities, strategy, site allocations and policies) will support better outcomes for communities through higher quality, more sustainable places.

The spatial priorities set out in the Options document will remain largely unchanged in the Draft Local Plan.

It is also noted that the Environment Agency emphasised the need to ensure consideration of current and future flood risk is adequately reflected in the spatial priorities and spatial strategy. Through the spatial priorities, strategy principles and spatial strategy the Draft Local Plan will ensure that flood risk is properly considered, as well as the timely provision of drainage/flood related infrastructure,

Needs that our Local Plan must address

Housing affordability and supply (34 respondents, 58%): Increase overall housing supply focusing on affordability; a variety of housing types needed for diverse demographics and economics. Some criticism of the plan's provisions and methodology for calculating needs; affordability should also considered in terms of running costs and accessibility.

Transportation and connectivity (27 respondents, 46%): Enhance public transport, park and ride facilities, and non-vehicle mobility to support developments and reduce congestion. Concerns about sufficiency of current and planned transport infrastructure.

Infrastructure and public services (25 respondents, 42%): Improve adequacy of existing infrastructure, including healthcare, schools, and utilities, to support developments. Improve public transport options and ensure infrastructure sufficiency in new housing areas.

Regional collaboration and strategic planning (24 respondents, 41%): Improved cooperation between neighbouring authorities needed for addressing shared housing needs and strategic goals. Accommodate housing demands from surrounding areas in support of regional development.

Climate change and environmental sustainability (22 respondents, 37%): Integrate climate resilience and sustainability into planning. Prioritise green spaces, sustainable transport, and brownfield sites use; address potential climate change impacts on housing.

Economic development and employment (17 respondents, 29%): Connect housing development with economic growth and employment opportunities. Focus on area regeneration, support local businesses, and strategic development location for job market access.

Heritage, culture, and community well-being (11 respondents, 19%): Balance development with the protection of heritage and culture; promote community health and well-being, as well as amenities for active lifestyles.

Demographic trends and housing diversification (8 respondents, 14%): Anticipate and respond to changing demographic patterns. Develop adaptable housing for an ageing population and diverse housing preferences.

Social infrastructure and services (7 respondents, 12%): Ensure new developments have adequate social infrastructure; address overcrowding and strain on services, including schools and healthcare facilities, to match population growth.

Collaboration and community engagement (1 respondent, 2%): Engage community in planning to ensure developments meet local needs; calls for more inclusive consultation processes and evidence-based planning decisions.

Council Response

The Government's standard method (target) identifies a local housing need for B&NES of 1,518 dwellings per annum, equating to 27,324 homes over the 2025–2043 plan period. Government expects local authorities through their Local Plan to plan for housing to meet the full need established through the standard method i.e. 27,324. However, national policy set out in the December 2024 NPPF allows Local Plan strategic policies to plan for a lower requirement where national policies that protect areas or assets of particular importance provide a strong reason for restricting the overall scale, type or distribution of development, or where adverse impacts would significantly and demonstrably outweigh the benefits.

B&NES is highly constrained, including the City of Bath being a double inscribed World Heritage Site, the presence of two National Landscapes, extensive Green Belt and areas of high landscape, ecological and heritage sensitivity. In light of these constraints and important protected assets the Local Plan will be unable to plan for housing to meet the full standard method figure of housing need. Having assessed suitable, available and developable opportunities the council considers that a housing requirement of around 22,000 homes in the Draft Local Plan represents a justified and proportionate response to housing need. As a result, the Draft Local Plan sets a housing requirement equating to around 80% of the stand method housing need figure.

The Council's approach is to plan for the delivery of housing to respond to B&NES needs. The West of England Combined Authority (WECA) has commenced preparation of a Spatial Development Strategy (SDS). The SDS is a thirty-year plan covering the sub-region. It is appropriate that solutions to unmet need arising from authorities across the West of England are considered strategically and sub-regionally through the SDS.

The Local Housing Needs Assessment (2026 Addendum) identifies that around 40% of the overall 22,00 housing requirement is for affordable homes. Provision of more affordable housing, also informed by the Local Plan viability assessment, is a key priority of the Draft Local Plan.

In addition to planning for significant housing in response to local needs the Council is also seeking to identify and allocate sites for additional employment space to help maintain economic prosperity. The requirement for employment floorspace is informed by evidence and seeks to ensure that the space provided is sufficient to help maintain a prosperous local economy and 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.

Employment floorspace will be delivered across the sub-areas to support the roles of Bath as a regional economic centre, the Bath to Bristol Corridor as a strategic growth location, the Somer Valley as a key industrial and service centre and rural areas as locations for appropriate small-scale and rural enterprise. A greater proportion of net additional employment floorspace than the current share of existing employment floorspace is focussed on the Somer Valley. This reflects its identification 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. Suitable sites for employment development are proposed to be allocated in the areas outlined above in order to support continuing local economic prosperity.

A clear vision-led approach to transport infrastructure and mitigations is being taken, prioritising sustainable modes of travel i.e. public transport, cycling, walking and wheeling. The Draft Local Plan and associated Transport Topic Paper will set out the proposed transport mitigations at both a District-wide and sub-area level. Site allocation policies will outline the transport mitigation measures required to enable development to be delivered.

Informed by evidence and assessment the Draft Local Plan will also be prioritising measures to facilitate nature recovery (e.g. through the provision of significant Green Infrastructure associated with strategic development sites), as well as including a range of policies that seek to ensure development minimizes impact on climate change and adapts to and is resilient to such impacts.

Supported by an Infrastructure Delivery Plan the need for infrastructure, including social infrastructure, to support and enable additional homes to be delivered has been identified. It is an important principle in the Draft Local Plan that housing development must be supported by the timely provision of necessary infrastructure.

Significant stakeholder engagement (including with communities) has taken place in preparing the Local Plan. The Council agrees that involving local communities in planning for new development and growth of the places in which they live is important and will be looking at the most appropriate mechanisms for achieving this.

Land availability and HELAA

Green Belt Management and Strategic Land Release (41 respondents, 47%): Some support for releasing green belt land to meet housing needs, while others worry about losing green spaces and environmental impacts. Agreement exists on the necessity for justification and careful consideration in green belt development, aiming for growth that preserves the natural landscape.

Focus on Brownfield Sites (40 respondents, 45%): Strong support to prioritise brownfield sites for development, balancing environmental concerns. Issues raised about the availability and suitability of such sites, pointing to a need for thorough assessment and innovation to maximise their use for housing and commercial purposes.

Affordable Housing Crisis (30 respondents, 34%): An acute shortage of affordable housing is identified, with a call for the local plan to allocate sites for homes at diverse price points, highlighting the needs of lower and middle-income families, as well as providing options for first-time buyers and someone downsizing.

Preservation vs Development Trade-offs (30 respondents, 34%): Interest shown in balancing the preservation of historical, cultural, and environmental assets with the need for development. Suggestions made for development that respects the district's heritage and enhances its character.

Sustainable Development and Infrastructure (24 respondents, 27%): Emphasis on sustainable development near existing settlements and transport links to minimise car use/environmental footprint. Additional investment in public transport and active travel infrastructure is advocated to support new developments and improve accessibility.

Addressing Climate Change and Environmental Concerns (14 respondents, 16%): Awareness for including climate resilience and environmental sustainability in planning, with calls for green infrastructure, sustainable drainage systems, and biodiversity considerations that reduce carbon emissions.

Economic Development and Employment Opportunities (10 respondents, 11%): Emphasis on housing growth aligning with job creation, suggesting that strategic site selection should foster economic development and provide local employment opportunities, proposing employment hubs and commercial development.

Consultation and Community Engagement (3 respondents, 3%): Dissatisfaction with the consultation process indicated, noting the need for more meaningful engagement with communities to ensure development meets local needs and respects resident opinions and preferences.

Housing Diversity and Demographic Needs (1 respondent, 1%): Necessity for a housing stock that caters for various demographic needs, including specialist housing for older people, family homes, and student accommodation.

Flood Risk Management and Environmental Protection (1 respondent, 1%): Concerns mentioned about development in flood-prone areas, stressing the importance of robust environmental assessments and planning to manage flood risks and prevent environmental degradation.

Council Response

In response to national policy and the constraints and opportunities within B&NES the Draft Local Plan is proposing a housing requirement of around 22,000 homes. This represents around 80% of the standard method figure of housing need identified by the government.

Nearly 70% of B&NES is currently covered by Green Belt. 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 a Topic Paper. This includes considering and demonstrating that the housing requirement cannot be met through alternative non-Green Belt solutions, including previously developed sites.

The Council is prioritising the development of previously-developed sites in seeking to meet the housing requirement. Significant previously-developed opportunities, particularly within Bath, are committed through the currently adopted Local Plan and planning permissions, and additional opportunities have been identified. This is not just for providing new homes but also redevelopment and intensification for additional employment space needed to support the economy.

Facilitating a diverse supply of housing of different types/sizes in response to demographic needs is an important objective of the Local Plan. This has been informed by the Local Housing Needs Assessment (September 2025 Draft and 2026 Addendum) and is achieved through site allocations and a supportive Development Management policy framework.

The response to the other issues raised in comments within this section is st out on pages 11 and 12 above.

Infrastructure provision, challenges and opportunities

Infrastructure Adequacy and Enhancement (49 respondents, 69%): Observations on utilities' deficiencies and the need for infrastructure upgrades to support growth.

Transport and Connectivity (35 respondents, 49%): Importance of sustainable transport to reduce car dependence and connect new developments to transport corridors.

Green Belt and Environmental Conservation (28 respondents, 39%): Discussion on the balance between green belt conservation and the need for strategic housing development.

Green Infrastructure and Biodiversity (18 respondents, 25%): Recognition of the need for urban green spaces, sustainable drainage, and preserving biodiversity.

Balancing Development and Agricultural Preservation (14 respondents, 20%): Support for protecting prime agricultural land alongside development, adhering to national guidelines.

Climate Change and Sustainable Development (13 respondents, 18%): Calls for incorporating climate mitigation into development plans, aiming towards net zero carbon goals.

Affordable Housing and Spatial Equity (13 respondents, 18%): The need for strategic planning for affordable housing distribution to meet social and economic needs.

Collaborative Planning and Community Engagement (8 respondents, 11%): Desire for transparent planning processes that include public consultation and regional collaboration.

Healthcare and Community Infrastructure (7 respondents, 10%): Calls for integrating healthcare facilities in new developments to cope with growing populations.

Heritage and Cultural Preservation (1 respondent, 1%): Concern over the impact of development on cultural heritage and the need for its protection.

Council Response

The Council is seeking to achieve the timely and co-ordinated provision of necessary infrastructure to support and facilitate the delivery of growth including new homes. Working with infrastructure and service provides the Infrastructure Delivery Plan identifies the required infrastructure, its funding and delivery timescales associated with the development trajectory. The Local Plan policy framework, including site allocations, will prioritise and facilitate delivery. Further information is set out in supporting evidence, including the Infrastructure Topic Paper. The LocalPlan is also supported by a Viability Assessment which examines the level of developer funding available to viably contribute towards infrastructure provision.

Specifically, with regard to healthcare infrastructure the Council is working closely with the Bath Swindon Wiltshire Integrated Care Board in identifying and planning for the most appropriate solutions for meeting the need for additional or improved health care facilities, including the role of developer contributions.

In allocating sites for development the Council has sought to avoid using the best and most versatile agricultural land. Local food production is also encouraged through the Local Plan policy framework.

See response to other issues raised in the response sections above.

Chapter 5: Bath and it's Environs

Bath overview

Transport and Connectivity Improvements (37 respondents, 39%): Critique of current public transport with suggestions for better cycling infrastructure, pedestrianisation, and improved connections to reduce car reliance.

Brownfield vs Green Belt Development (34 respondents, 36%): Focus on brownfield site development while considering the potential release of green belt land, highlighting growth and conservation/World Heritage Site (WHS) concerns.

Housing Affordability and Diversity (32 respondents, 34%): Call for more affordable housing and various solutions amidst issues of resident displacement due to investment properties.

Support for Local Amenities and Infrastructure (32 respondents, 34%): Suggestions for ensuring new developments include necessary infrastructure like healthcare, schools, and community amenities.

Sustainable and Green Development (24 respondents, 26%): Emphasis on eco-friendly housing solutions, green space protection and development plans that incorporate climate resilience.

Historic Preservation vs Development Needs (21 respondents, 22%): Discussion about balancing the preservation of Bath's heritage with the modern development demands.

Community Engagement and Social Equity (15 respondents, 16%): Desire for increased community involvement in planning and policies addressing social disparities, such as differential council tax.

Tourism Management and Economic Diversification (8 respondents, 9%): Recognition of tourism's impact with suggestions for better management and the need to broaden Bath's economic base beyond tourism and education.

Council Response

The consultation responses demonstrated broad recognition of the need for Bath to accommodate additional housing, employment and infrastructure growth, whilst highlighting the city's exceptional heritage, landscape, Green Belt and ecological constraints. Respondents consistently emphasised the importance of protecting Bath's World Heritage Site status, historic environment, landscape setting, biodiversity assets and quality of life, whilst also addressing housing affordability, supporting economic growth and improving transport infrastructure. In response, the Regulation 19 Local Plan has refined the Bath spatial strategy and site allocations through additional heritage, landscape, ecological, transport and infrastructure assessment. The Plan adopts a brownfield-first approach,

prioritising general and affordable housing, employment growth and regeneration within the existing urban area, while strengthening requirements for heritage protection, design quality, nature recovery, green infrastructure and sustainable transport.

Bath: Site options overview

Environmental Conservation vs. Development Needs (39 respondents, 71%): Respondents express a need to balance housing development with conservation of Bath's natural and historical environment, prioritising brownfield over greenfield locations to secure local biodiversity and heritage.

Sustainable Urban Planning & Transport Solutions (31 respondents, 56%): Discussions centre on the importance of site selection near to the city to reduce car reliance, integrating sustainable transport, managing congestion, and considering park and ride facilities to mitigate traffic impacts.

Heritage, Culture, and Community Well-being (24 respondents, 44%): There's a noted tension between growth and preservation of Bath's heritage, proposing developments respect cultural values and repurpose spaces within these constraints without compromising the city's historic character.

Housing Crisis and Affordable Accommodation (22 respondents, 40%): The acute need for housing, particularly affordable and student accommodation, is highlighted. Calls for higher density redevelopment of under-used sites and adherence to affordable housing provisions are mentioned.

Community Engagement and Policy Revision (18 respondents, 33%): Respondents encourage more community involvement in planning, revising existing site allocations to reflect updated priorities like climate adaptation and ecological preservation.

Infrastructure and Public Services Impact (12 respondents, 22%): Concerns focus on the potential strain of new developments on existing infrastructure and public services, advocating for corresponding infrastructural enhancements.

Climate Change and Ecological Response (4 respondents, 7%): Some emphasis on aligning housing developments with climate and ecological emergencies, focusing on energy-efficiency, green infrastructure, and sustainable water management practices.

Council Response

The Council has carefully considered the consultation responses on Bath's site options. The Regulation 19 approach prioritises previously developed and underused land, while recognising that every option must be assessed against housing and employment needs, deliverability, infrastructure capacity, heritage, landscape, ecology, flood risk and transport impacts. Consultation feedback and further technical evidence have informed the refinement of site boundaries and development requirements, and whether individual options should be progressed. Site policies include requirements for affordable housing where applicable, infrastructure provision, high-quality design, heritage protection, biodiversity net gain, green infrastructure and sustainable travel.

Site option: Milsom Quarter

Utilisation of Underused Spaces (8 respondents, 57%): Respondents mentioned the transformative potential of underused spaces, advocating for the conversion of car parks and the other under used spaces into vibrant urban areas.

Housing and Economic Development (6 respondents, 43%): Support was shown for affordable housing and local business stimulation, with a focus on creating pedestrian zones. Concerns about the types of development, such as hotel construction, were also mentioned.

Architectural Innovation and Public Spaces (4 respondents, 29%): There's an interest in contemporary architecture and the provision of public spaces, with considerations around the loss of community assets such as the Cattlemarket site.

Public Engagement and Planning Policies (4 respondents, 29%): Calls for greater public participation in the development process and a need for updated planning policies to meet current expectations were raised.

Biodiversity, Green Spaces, and Environmental Considerations (4 respondents, 29%): An emphasis was placed on enhancing biodiversity and sustainability within the development, reflecting a desire to improve urban living quality.

Heritage, Archaeology, and World Heritage Site Consideration (3 respondents, 21%): Protection of Bath's historical and cultural heritage, including its World Heritage Site status, was a concern among some participants.

Sustainable Transportation and Accessibility (3 respondents, 21%): The need for improved cycling infrastructure and pedestrian spaces was highlighted, along with concerns regarding vehicular access and the impact on traffic.

Council Response

The representations broadly supported the regeneration objectives of the Milsom Quarter and highlighted the importance of protecting Bath's historic character whilst bringing vacant and underused buildings back into productive use. Respondents were supportive of cultural investment, enhanced retail and leisure provision, reuse of upper floors and opportunities for city centre living. In response, the Regulation 19 Draft Local Plan continues to support the Milsom Quarter Masterplan, including delivery of the Fashion Museum, creative and cultural uses, the regeneration of Broad Street Yard, and additional housing opportunities through redevelopment and reuse of existing buildings. The policy framework ensures that development contributes positively to the World Heritage Site, Conservation Area and wider regeneration objectives for the city centre.

Site option: Bath Central Riverside

Preservation vs Development Impact (60 respondents, 65%): Balancing heritage preservation with development needs; concerns over negative impacts on World Heritage status and green spaces contrasted with potential economic benefits.

Traffic and Urban Congestion (40 respondents, 43%): Concerns about increased traffic and parking problems due to development; suggestions for improving public transport and active travel to align with clean air objectives and maintain livability.

Alternative Development Strategies (35 respondents, 38%): Suggestions for less contentious solutions include alternative locations and transport options like river taxis and park-and-rides to avoid adding to city centre congestion and preserve riverside areas.

Support for Sports and Community Activities (33 respondents, 35%): Support for enhancing Bath's sporting culture through new facilities, with emphasis on inclusive access to various sports and community uses, not just elite or commercial interests.

Economic Impact and Local Benefits (27 respondents, 29%): Expected benefits of developments include job creation and visitor attraction, yet there's scepticism about the scale of benefits and concern over potential adverse impacts on local businesses and congestion.

Architectural and Design Sensitivity (14 respondents, 15%): Calls for development that respects Bath's historical and architectural character; ensuring new structures complement rather than detract from the existing cityscape.

Environmental and Flood Risk Concerns (13 respondents, 14%): Anxiety over environmental impacts, including flood risks and pollution; suggestions for incorporating sustainable practices and mitigation measures in development plans.

Access and Use of Public Spaces (10 respondents, 11%): Desire to maintain public access to riverside areas; suggest community ownership and diverse use, with worries that development could limit access or favour particular groups.

Legal and Policy Considerations (3 respondents, 3%): Discussions on the appropriateness and potential need for amendments in policies to reflect contemporary challenges and align with sustainable and environmental objectives.

Engagement and Consultation Process (3 respondents, 3%): Calls for improved engagement with residents and stakeholders, including clearer information, more inclusive consultation, and genuine consideration of local needs in decision-making.

Council Response

Consultation responses generally highlighted the importance of preserving the role of the Recreation Ground and wider riverside area as a major leisure, recreation and cultural destination whilst protecting heritage assets, significant views and the River Avon corridor. In response, the Regulation 19 Plan saves the existing policy which retains support for leisure, recreational and cultural investment, and the requirements relating to biodiversity, flood risk management, improvements to public access and the protection of the World Heritage Site and its setting. The policy support improvements to riverside connectivity and public realm whilst ensuring that future development responds appropriately to this highly sensitive location.

Site options: Manvers Street

Economic Strategy Alignment and Flexibility of Use (6 respondents, 67%): Development at Manvers Street should align with the broader economic strategy, integrating flexible property uses such as hybrid spaces catering to evolving post-COVID needs, with calls for detailed, robust planning.

Vacancy and Regeneration Needs (2 respondents, 22%): Highlighting the number of vacant shops as a regeneration challenge and opportunity, there's a need for a comprehensive policy to revitalise Manvers Street and concerns about the effectiveness of current approach.

Strategic Planning Approach (2 respondents, 22%): Participants suggest a supplementary planning document or new comprehensive policy to guide development, ensuring coordination with economic, cultural, and environmental goals.

Inclusion and Housing Options (1 respondent, 11%): There's interest in including diverse mix of housing in the development, such as accommodation for non-first year and postgraduate students, representing a call for inclusive urban development.

Heritage and Urban Development Considerations (1 respondent, 11%): Proposed developments must consider the area's World Heritage Site status, needing a balance between heritage value protection and modern development, with design codes and building parameters.

Council Response

Representations were generally supportive of the redevelopment of Manvers Street as an important gateway into Bath and recognised the opportunity to provide employment, housing and improved public spaces. Respondents emphasised the need for high-quality design, protection of key views and enhancement of the public realm. The Regulation 19 Plan responds by saving the existing policy which retains Manvers Street as a mixed-use regeneration site with a strong employment focus, with refined design requirements that safeguard the setting of South Parade, St John's Church and important views towards the surrounding landscape.

Site options: Bath Quays North

Flexibility for Future Needs (14 respondents, 93%): Versatile space use at Bath Quays North is crucial, considering changing work patterns and economic adaptability; suitable for mixed-use, startups, R&D, and hybrid models.

Land Use and Development Strategy (9 respondents, 60%): Respondents call for a comprehensive land use strategy that is adaptable for modern needs; suggestions include a new policy framework, potentially via an SPD.

Housing vs Office Space Balance (8 respondents, 53%): Varied opinions on residential versus office space ratio; some favour increased housing due to reduced office demand, while others advocate mixed use for economic vitality.

Student Accommodation Debate (4 respondents, 27%): Mixed views on Purpose-Built Student Accommodation (PBSA) at Bath Quays North; some against over-concentration, others see the need for a balanced residential mix.

R&D and Economic Growth (4 respondents, 27%): Emphasis on leveraging university presence for R&D and innovation; ideas include spaces for business incubation and enterprise support, contributing to local economic development.

Sustainable and Active Transport Integration (2 respondents, 13%): Consensus on enhancing Bath Quays North with accessible transport including walking, cycling, and bus facilities; minimal car parking to reduce congestion.

Respecting Cultural and Historical Context (1 respondent, 7%): Importance placed on development that aligns with Bath's WHS status and its heritage; calls for planning that respects the city's unique characteristics.

Environmental Protection and World Heritage Site Compatibility (1 respondent, 7%): Development should be delivered with environmental conservation in mind and be compatible with the WHS; enhancement of Bath's historic and environmental heritage is key.

Council Response

Consultation responses strongly supported continued economic regeneration within this area and recognised its strategic importance for Bath's future economy. Concerns focused on design quality, transport infrastructure, flood resilience and ensuring development contributes positively to the city centre. The Regulation 19 Plan continues to support Bath Quays North as a flagship employment and innovation location, providing office, research and development floorspace, improved city centre connections and identifying further opportunities for new housing and employment space, whilst maintaining support for Bath College as an important educational institution.

Bath Quays South and Riverside Court

Policy and planning approach revisions (3 respondents, 50%): Clearer policies and refined development requirements needed for flexibility, while keeping Bath's heritage intact.

Balancing residential and commercial needs (3 respondents, 50%): Residential spaces for young professionals sought, with concerns over business displacement and local economic impacts, advocating a balanced development approach.

Development flexibility and context sensitivity (3 respondents, 50%): Flexibility in policy and design urged to respect Bath's historical significance and accommodate mixed-use demands.

Transport accessibility and economic impact (2 respondents, 33%): Advantage of Riverside Court's location near transport hubs is recognized, but the shift from commercial to residential use could hinder startup support and economic diversity.

Strategic use of brownfield sites (1 respondent, 17%): Brownfield sites should be used for residential development, reflecting sustainable urban practices and environmental conservation.

Protecting and enhancing cultural heritage (1 respondent, 17%): A masterplan is needed to align development with preservation of Bath's World Heritage status, suggesting tailored planning documents for historical integrity.

Council Response

Representations broadly supported ongoing investment along the river corridor and recognised the contribution that Bath Quays South has already made towards economic growth. Respondents highlighted the importance of active travel, biodiversity enhancement and improved public access to the river. The Regulation 19 Plan saves the existing policy, retaining the allocation and the requirements relating to riverside access, biodiversity enhancement, flood mitigation, active travel and the delivery of employment-led mixed-use development.

Site option: South Bank

Integrated design and planning strategy (6 respondents, 75%): A coherent development respecting the South Bank's attributes through comprehensive strategies including supplementary planning documents, masterplans, design codes and building height parameters is supported.

Sustainable and ecological development (3 respondents, 38%): Integration of green infrastructure and sustainable transport is emphasized to enhance green spaces and movement, with the need for clear policy and spatial understanding to support the site's ecology and social fabric.

Economic viability and housing affordability (2 respondents, 25%): Redevelopment of brownfield sites for housing should address shortages and include affordable options, using river frontage benficially, with policies to ensure location benefits contribute to housing accessibility.

Infrastructure and accessibility (2 respondents, 25%): Maintaining essential services and outlets locally is vital to avoid increasing car usage, with a mixed-use approach recommended for preserving amenities and advancing sustainable urban living and transport modes.

Cultural and historical preservation (1 respondent, 12%): Heritage-led development should avoid harming world heritage sites, with a requirement for development that respects and enhances the site, incorporating growth and preservation.

Council Response

Consultation responses recognised the potential of this area to contribute towards Bath's housing and employment needs whilst highlighting the importance of maintaining connectivity, environmental quality and access to the river. The Regulation 19 Plan saves the existing policy which supports mixed-use redevelopment subject to the retention of employment opportunities, delivery of strategic active travel routes, enhancement of the riverside environment and comprehensive flood risk and biodiversity mitigation measures.

Site option: Green Park Station West and Sydenham Park

Affordable Housing and Social Infrastructure (6 respondents, 43%): Respondents suggest prioritising affordable housing in developments at Green Park Station West and Sydenham Park, ensuring compatibility with Bath's World Heritage status without compromising the city's historical character.

Coordination between Development and Heritage Preservation (6 respondents, 43%): Discussions emphasise the need for a balance between new developments and preserving Bath's historical and environmental setting, requiring collaboration among stakeholders.

Heritage and Environment Preservation (6 respondents, 43%): Respondents place importance on preserving Bath's World Heritage site and its architectural aesthetics, highlighting the integration of new developments with the city's heritage values.

Strategic Planning and Policy Enforcement (5 respondents, 36%): Users call for strategic site-wide guidance and enforceable policies, such as building height restrictions, balancing policy framework with efficient planning processes.

Economic Viability and Diverse Needs (4 respondents, 29%): Development should be financially viable, catering to diverse housing needs beyond retirement homes, thus acknowledging the need for housing suitable for younger demographics.

Community Engagement and Local Economy Enhancement (3 respondents, 21%): Suggestions to integrate local businesses and artists within new developments, with a focus on ensuring a portion of profits benefits community initiatives, while maintaining heritage aesthetics.

Innovative Utilisation of Space (2 respondents, 14%): Ideas include repurposing Green Park Station as a local market and entertainment venue, and creatively using under utilised spaces to support local businesses and artists, enhancing the city's heritage and beauty.

Council Response

Respondents supported the principle of regeneration in this area whilst emphasising the importance of respecting the special character of Green Park Station, creating a distinctive place, delivering housing and employment and improving movement through the area. The Regulation 19 Plan continues to support a comprehensive mixed-use redevelopment framework and identifies new opportunities for additional housing and employment development, together with improvements to public realm, biodiversity, active travel connectivity and the setting of Green Park Station.

Site option: Bath Riverside

Planning and Policy Considerations (6 respondents, 67%): Emphasis on comprehensive planning, including strategies and codes to respect Bath's heritage while addressing building height and visual impact in line with the World Heritage status.

Heritage Preservation vs. Modern Development (2 respondents, 22%): Discussion around balancing preservation of Bath's architectural integrity and World Heritage attributes against the needs for modernisation.

Sports and Recreation Facility Development (2 respondents, 22%): Mixed opinions on providing sports facilities at the central riverside and recreation ground, contrasting support for diverse sports with opposition to a stadium due to heritage concerns and other impacts.

Affordable and Social Housing Initiatives (2 respondents, 22%): Calls for affordable and social housing to aid local workers and community needs, contrasting with criticisms of student housing and upscale residential units.

Sustainable and Recreational Space Management (2 respondents, 22%): Focus on maintaining spaces for sport and recreation, urban greening, and wildlife, balanced against overdevelopment concerns, such as parking in low emission zones.

Incorporation of Cultural and Green Spaces (1 respondent, 11%): Interest in integrating cultural hubs with historical significance and creating wildlife-friendly green areas as part of urban greening initiatives.

Council Response

Consultation responses recognised the significant progress already made in delivering the Bath Riverside regeneration programme and generally supported the continued implementation of the existing policy framework. Respondents highlighted the importance of ensuring that remaining phases contribute positively towards housing delivery, placemaking and the wider regeneration objectives established for the Western Riverside area. The Regulation 19 Plan saves the existing policy which supports the comprehensive redevelopment of Bath Riverside whilst recognising the substantial level of development already completed or committed. The policy framework continues to promote high-quality design, sustainable transport, active travel connectivity, biodiversity enhancement and attractive public realm.

Site option: Bath Press

Sustainable and Affordable Housing (5 respondents, 33%): Emphasised the need for housing that is both affordable and meets local community needs, discouraging luxury flats for non-residents.

Public Perception and Urban Aesthetics (5 respondents, 33%): Raised concerns about the visual impact of the area and the potential of the development to enhance the city's aesthetic while respecting heritage values.

Regulatory Framework and Implementation (4 respondents, 27%): Called for clear planning strategies and mechanisms to ensure on-schedule development and context-sensitive urban growth.

Green Infrastructure and Environmental Considerations (3 respondents, 20%): Acknowledged the importance of including green spaces and infrastructure, and suggested a focus on brownfield sites to preserve the natural environment.

Design Guidelines and Heritage Preservation (3 respondents, 20%): Stressed the need for strict guidelines and height restrictions to maintain the integrity of Bath's historic character and World Heritage status.

Infrastructure and Local Services Support (2 respondents, 13%): Expressed concerns over adequate infrastructure and local services to accommodate the growth from new developments.

Council Response

Consultation responses generally recognised that redevelopment of the Bath Press site is now well advanced and focused primarily on ensuring that the completed development provides lasting benefits for local communities. Respondents highlighted the importance of affordable housing delivery, biodiversity enhancement and the creation of a high-quality residential environment. The Regulation 19 Plan deletes the existing policy as the site is under development.

Site option: Roseberry Place

Policy Flexibility and Site-Specific Parameters (5 respondents, 71%): Existing policies for Roseberry Place are considered too rigid; adjustments to individual parameters to better respond to site-specific demands are advocated along with allowing broader mixed-use developments in accordance with NPPF guidelines due to decreased traditional office space demand.

Residential Development and Housing Needs (4 respondents, 57%): There's a call for a shift towards residential-led development at Roseberry Place, to help meet the city's housing requirements. Suggestions include incorporating affordable and 'build to rent' housing options within a mixed-use development framework.

Economic and Employment Opportunities (3 respondents, 43%): Opinions are divided concerning Roseberry Place's role in economic and employment growth. While some foresee benefits to the city's economic health through the provision of quality living spaces for employees and support of educational sectors, others doubt the viability of non-central office spaces due to historically low demand.

Changing Work Practices and Flexible Workspace Needs (2 respondents, 29%): The effect of the COVID-19 pandemic on work practices suggests a potential for Roseberry Place to offer flexible workspaces. This caters to the trend towards remote and hybrid working arrangements, though there's scepticism about the pre-let market for new office buildings.

Urban Design and Heritage Conservation (1 respondent, 14%): Emphasis is placed on the imperative of any development at Roseberry Place being sensitive to the historic environment of Bath, implying that any growth and modernisation should maintain a balance with heritage conservation per WHS and OUV guidelines.

Education, Student Accommodation, and Mixed-Use Development (1 respondent, 14%): The suitability of Roseberry Place for educational purposes is noted, with suggestions that development should encompass student housing and mixed-use areas geared towards educational and creative uses to match the needs of nearby campuses.

Council Response

Consultation responses highlighted the importance of ensuring that Roseberry Place remains capable of delivering both housing and employment benefits whilst responding to changing market conditions and patterns of business demand. Respondents supported a degree of flexibility regarding the mix of employment uses and highlighted opportunities for research and development, innovation and start-up businesses. The Regulation 19 Plan continues to support a mixed-use approach that provides housing and employment opportunities whilst allowing an appropriate degree of flexibility to respond to evolving economic circumstances. Development proposals will be expected to deliver high-quality design.

Site option: Westmark Site, Windsor Bridge Road

Population Density and Local Community Impact (4 respondents, 50%): Respondents raised concerns about potential overcrowding due to high population density, stressing the need for sufficient parking. Benefits such as urban revitalisation and the introduction of non-student housing were also mentioned, indicating a chance for community enrichment.

Building Height and Aesthetics (3 respondents, 38%): The discussion centred on adhering to council policies to limit building heights at the Westmark Site, balancing the area's existing character with the need for residential development.

Protection of World Heritage Site (WHS) Values (2 respondents, 25%): Emphasis was placed on safeguarding the WHS, suggesting that developments should respect the site's heritage by adhering to specific site parameters and planning documents.

Sustainable and Context-Sensitive Planning (2 respondents, 25%): Calls for a masterplan indicated a preference for development that is congruent with the local context and sustainable, mindful of the impact on views and careful resource management.

Local Amenity Support and Accessibility (1 respondent, 12%): Suggestions were made to improve accessibility and support for local amenities, reflecting the desire for developments to contribute positively to community life and well-being.

Traffic and Infrastructure Impact (1 respondent, 12%): Concerns were voiced about the potential increase in traffic and its speed, with remedies such as low traffic neighbourhoods and parking permits being proposed. There was also an acknowledgment that such development could lead to improvements in local infrastructure and amenities.

Council Response

Consultation responses demonstrated broad support for the redevelopment potential of the Westmark site whilst emphasising the importance of protecting existing employment opportunities, delivering affordable housing and maintaining strong connections with surrounding communities. Respondents also highlighted public access to the River Avon, high-quality design and appropriate building heights. The Regulation 19 Plan supports comprehensive mixed-use redevelopment, recognising the site's potential to contribute towards housing delivery whilst continuing to provide employment opportunities and wider community benefits. The policy framework requires high-quality public realm, active travel connections, biodiversity enhancement and improved access to the river corridor.

Site option: Stable Yard Industrial Estate

Protection and Utilisation of Employment Lands (2 respondents, 67%): Users want the site to maintain its industrial use, preserving jobs and allowing similar developments, with a focus on economic stability and job security.

Strategic Planning and Regulation (1 respondent, 33%): There's a call for detailed planning, such as a supplementary planning document, tailored to the site to balance local environmental needs and historic value.

Heritage Conservation vs Developmental Needs (1 respondent, 33%): Concerns were raised about reconciling development with conserving the World Heritage Site and its Outstanding Universal Value, suggesting a master plan with design codes and height restrictions.

Clarification and Transparency in Development Terms (1 respondent, 33%): Users request clear explanations of terms like "protected from development," seeking transparent communication on how changes will impact the community and heritage sites.

Council Response

Consultation responses generally supported the continued safeguarding of Stable Yard Industrial Estate for employment purposes and recognised the contribution that smaller industrial and business sites make towards Bath's economy. Respondents highlighted the importance of retaining employment land within the city. The Regulation 19 Plan therefore continues to protect the site for employment-generating uses and supports investment, refurbishment and modernisation that helps maintain its economic function, whilst enabling appropriate opportunities to use airspace above for other uses.

Site option: Newbridge Riverside

Economic development and innovation (6 respondents, 50%): Focus on creating a business-friendly environment in Newbridge Riverside that supports a range of industries, particularly focusing on innovation and research sectors such as life sciences, biosciences, and creative industries.

Integrated urban planning and management (6 respondents, 50%): Emphasis on comprehensive urban planning for Newbridge Riverside that blends new developments with the existing cityscape and balances residential, commercial, and industrial spaces through detailed planning and management.

Transportation and mobility (3 respondents, 25%): Concerns regarding traffic congestion and the need for a thorough traffic plan to improve parking, infrastructure maintenance, and general accessibility in Newbridge Riverside.

Community and recreation needs (3 respondents, 25%): Calls for development that addresses the lifestyle needs of the community, including innovative living spaces, recreation paths for pedestrians and cyclists, and hubs for leisure and environmental activities.

Infrastructure and environmental considerations (3 respondents, 25%): Importance of developing Newbridge Riverside's infrastructure with environmental conservation in mind, addressing issues like storm management and transportation, whilst protecting green spaces.

Cultural heritage and world heritage site (1 respondent, 8%): Highlighting the need to protect the historical and cultural heritage of Newbridge Riverside, especially in relation to the nearby world heritage site.

Stakeholder engagement and collaborative governance (1 respondent, 8%): The necessity for active engagement and collaborative governance involving various stakeholders such as the university, local businesses, residents, and the local council in Newbridge Riverside's development.

Council Response

The Council recognises the importance of Newbridge Riverside (renamed as The Production Quarter) as an established employment area and the consultation emphasis on retaining and supporting industrial, innovation and creative businesses. The Regulation 19 approach maintains the area's employment function while enabling appropriate modernisation and intensification, improved walking and cycling connections, environmental enhancement and better integration with the River Avon corridor.

Site option: Weston Island

Cultural and Arts Development (10 respondents, 67%): Focus on making Weston Island a vibrant cultural hub with art spaces, retail, and food outlets, leveraging local creative industries and Bath Spa University's proximity. Balance cultural innovation with heritage respect.

Regeneration and Community Benefit (10 respondents, 67%): Suggest mixed-use development to boost aesthetic, cultural, and economic aspects of Weston Island and Bath. Emphasise community inclusion and a diverse, vibrant spirit.

Economic and Educational Synergies (6 respondents, 40%): Point out the potential of merging creative industries with education institutions for economic development. Boost employment and foster interdisciplinary collaboration.

Inclusive Development Policies (4 respondents, 27%): Recommend developing flexible policies that support various activities and uses, adaptable to meet evolving needs with broad stakeholder benefits.

Connectivity and Access (1 respondent, 7%): Advocate for better transport connections, particularly for active travel modes, to maximise the area's potential as a cultural and leisure destination.

Council Response

Respondents highlighted the importance of biodiversity, improved sustainable travel connections and enhancement of the riverside environment. In response, the Regulation 19 Plan saves the existing policy which supports continued investment in active travel infrastructure and biodiversity enhancement measures whilst recognising the strategic transport and employment function of the site and opportunities for environmental improvements and appropriate supporting uses.

Site option: Twerton Park

Community and Football Club Welfare (5 respondents, 71%): Development should support the community and Bath City Football Club. The role of Twerton Park as a community asset is emphasised, with a focus on policy flexibility to enhance club sustainability and well-being.

Planning Flexibility and Local Uncertainty (4 respondents, 57%): Critique of current, restrictive planning policy at Twerton Park. A desire for adaptable strategies that account for local uncertainty and can ensure long-term interests.

Mixed-use Development and Viability (3 respondents, 43%): Mixed views on mixed-use development elements, such as student accommodation and NHS staff housing. Discussion on planning policies' compatibility with economic realities and the importance of a nuanced approach.

Protection of Heritage and Open Spaces (2 respondents, 29%): Preservation of playing fields and respect for World Heritage Site values is important. Development should be informed and balanced, safeguarding Twerton Park's historical relevance.

Strategic Planning and Development Approaches (2 respondents, 29%): Calls for comprehensive, strategic planning including a masterplan and design codes that respect Twerton Park's character and history, while addressing contemporary needs.

Regeneration and Local Investment (2 respondents, 29%): There's a call for regeneration and addressing the lack of investment in the area around Twerton Park. Development might catalyse wider socio-economic regeneration efforts.

Modernisation and Maintenance Costs (1 respondent, 14%): The need for modernisation of Twerton Park is acknowledged against the backdrop of high maintenance costs, highlighting the challenge of finding sustainable solutions.

Council Response

Consultation responses recognised the importance of Bath City Football Club as a community asset and generally supported proposals that would secure its long-term future. Respondents also highlighted the need to provide community benefits, improved facilities and high-quality development. The Regulation 19 Plan saves the existing policy which continues to support a mixed-use approach that secures the future of the football club whilst delivering housing, community facilities, public realm improvements and biodiversity enhancements.

Site option: RUH (Royal United Hospitals), Weston

Community and Staff Well-being (17 respondents, 65%): Emphasis on parking constraints and the search for affordable housing affecting both NHS staff and the local community. Proposals for better support for key workers suggest a need for a improved environment.

Balancing Housing Needs with Parking Provisions (13 respondents, 50%): Respondents provided varied perspectives on balancing the introduction of more housing with the necessity for adequate parking. Suggestions ranged from increasing parking facilities to innovative solutions like park and ride services.

Affordable Housing for NHS Workers (11 respondents, 42%): Emphasises the affordability of housing for NHS staff, noting the challenges posed by property prices, especially in Bath. Accessible accommodation is seen as crucial for staff retention and healthcare delivery.

Transport and Accessibility Solutions (10 respondents, 38%): There's an ask for improved transport options, such as park and ride or shuttle buses, tailored to reduce car use and address parking issues, aligning with the unique needs of the hospital staff, visitors, and residents.

Sustainable Development and Urban Planning (1 respondent, 4%): Calls for responsible development that considers the unique setting of RUH in Bath, proposing the creation of planning documents that recognise the importance of WHS attributes and community needs.

Impact on Local Infrastructure and Environment (1 respondent, 4%): Concerns about the effects of development on local infrastructure and the environment, proposing comprehensive planning to manage traffic, pollution, and maintain Bath's aesthetic integrity while protecting historical sites.

Council Response

Respondents strongly supported continued investment in healthcare infrastructure and recognised the importance of the Royal United Hospital as a strategic facility serving Bath and the wider sub-region. The Regulation 19 Plan saves the existing policy which continues to safeguard the site for healthcare uses, support estate renewal and service improvements, facilitate staff accommodation where appropriate and encourage sustainable travel and green infrastructure enhancements across the campus.

Site option: Hartwells Garage

Housing Needs and Student Accommodation (6 respondents, 67%): Division of opinion on whether to prioritise affordable housing for locals or student accommodation; concerns about over-saturation of student housing and calls for affordable non-student housing, particularly for key workers.

Strategic Development Approach (5 respondents, 56%): Demand for strategic, context-sensitive planning with a mix of affordable housing and considerations for WHS and OUV; suggestions for implementing an SPD and balancing developer-led planning with local needs assessments.

Traffic and Infrastructure Concerns (4 respondents, 44%): Concern over increased traffic and the adequacy of the current infrastructure; issues such as 'rat runs', parking problems, and calls for reevaluation of access routes and parking management.

Sustainability and Environmental Impact (4 respondents, 44%): Shared concern for the environmental impact with an emphasis on sustainable development; suggestions include enhancing green corridors for active travel and respecting WHS and OUV attributes.

Community and Quality of Life (4 respondents, 44%): Impact on community well-being key to discussions; focuses on affordable housing, local infrastructure improvements, and aligning development with Bath's heritage and sustainability goals.

Aesthetic and Scale Considerations (3 respondents, 33%): Some users find the proposed development aesthetically displeasing; calls for design considerations to respect local architecture and a masterplan to guide building heights and densities.

Council Response

Representations generally supported redevelopment of this previously developed site but highlighted concerns relating to design quality, impacts on neighbouring residents, ecology and transport. The Regulation 19 Plan retains the allocation and requirements relating to sustainable design, biodiversity enhancement, active travel connectivity and protection of ecological corridors.

Site option: Sion Hill

Traffic, Parking, and Public Transport Improvements (40 respondents, 91%): Respondents mentioned concerns about the increase in traffic and parking difficulties due to proposed road closures and narrow roads. Suggestions include revisions to traffic management plans, increased bus service frequency, and limits on the number of cars per household to alleviate congestion.

Housing Density and Development Scale (39 respondents, 89%): Some raised issues with the potential increase in residential units leading to overdevelopment, impacting local character and amenities. Lower-density developments that respect conservation guidelines and the area's character are favoured.

Infrastructure and Road Safety (22 respondents, 50%): Respondents discussed the need for adequate infrastructure to accommodate traffic from new developments. Recommended improvements include road widening, better pavements, and enhanced sightlines at junctions for pedestrian and cyclist safety.

Environmental Impact and Preservation of Green Spaces (19 respondents, 43%): There is significant focus on preserving existing green spaces and environmental quality in Sion Hill. Ideas include protecting mature trees and wildlife habitats, and maintaining the area's charm and UNESCO World Heritage status through careful development planning.

Development Design and Aesthetics (15 respondents, 34%): Respondents advocated for architectural designs that are sympathetic to the surrounding environment, suggesting restrictions on building heights and the adoption of styles like bay windows to keep with the area's aesthetic and UNESCO status.

Affordable Housing and Demographic Considerations (7 respondents, 16%): There is a concern over housing affordability and demographic suitability. The area might not cater well to young people or families due to the focus on apartment developments. Respondents suggest a mix of affordable housing to create a diverse community.

Community Amenities and Services (2 respondents, 5%): A few respondents highlighted the demand for community facilities within the Sion Hill development, such as shops, cafes, and play areas. The enhancement of pedestrian and cycling routes is also suggested to promote sustainable transport and provide spaces for all ages.

Council Response

Representations highlighted concerns relating to heritage impacts, landscape sensitivity and traffic generation. In response, the Regulation 19 Plan maintains a carefully controlled residential allocation focused on reuse of the existing developed footprint, whilst incorporating strong requirements relating to heritage protection, landscape enhancement, biodiversity net gain and sustainable transport improvements.

Site option: St Martins

Environmental and Heritage Protection vs. Development Needs (3 respondents, 50%): Discussions focus on the importance of balancing development with the protection of the World Heritage Site and its Outstanding Universal Value, suggesting development should consider the site's historical and ecological legacies.

Preservation of Green Spaces and Historical Attributes (2 respondents, 33%): Respondents highlight the need to conserve green spaces and historical landmarks like St Martins Chapel and Frome House, stressing their importance for community use and heritage continuity.

Housing and Community Space Utilisation (2 respondents, 33%): There is a conversation around St Martins as a location for sustainable housing, with suggestions pointing towards development that accounts for community needs and integrates green space.

Infrastructure and Utilities Concerns (1 respondent, 17%): Issues are raised regarding the suitability of current utilities and infrastructure for future development, with concerns about how increased traffic and parking could affect the community.

Planning and Development Approaches (1 respondent, 17%): The need for specialised planning approaches, like Supplementary Planning Documents, is mentioned, aiming at protecting the WHS's integrity while accommodating sustainable development fitting the site's unique context.

Community Engagement and Accessibility to Documentation (1 respondent, 17%): Challenges are noted in accessing and understanding planning documents, highlighting the importance of transparent communication and accessible information in the planning process.

Council Response

Consultation responses generally supported the principle of bringing surplus NHS land forward for housing whilst continuing to protect healthcare functions and heritage assets. The Regulation 19 Plan saves the existing policy which supports a mixed-use approach that allows residential redevelopment of surplus land whilst retaining operational healthcare uses, conserving heritage assets, enhancing biodiversity and improving walking and cycling connections.

Site option: Sulis Down (Land Adjoining Odd Down)

Environmental and Ecological Preservation (430 respondents, 86%): Respondents stress the importance of protecting Sulis Down's natural environment, citing its status as an AONB and habitat for endangered species. There is also recognition of development needs, with suggestions for a balanced approach that better utilises brownfield sites and conserves ecology.

Housing Development Strategy (332 respondents, 67%): Acknowledging the need for housing, participants advocate for development of brownfield sites over greenfield sites such as this. There is significant support for affordable, sustainable housing that addresses local needs while minimising environmental impact.

Traffic and Infrastructure Concerns (294 respondents, 59%): Many express concerns over increased traffic and the existing road network's capacity. Concern that development will worsen congestion and pollution. Alternatives proposed include better planning and infrastructure, such as public transport and non-motor traffic enhancements.

Community and Recreational Value (234 respondents, 47%): The communal value of Sulis Down, particularly recognised during the pandemic, is highlighted. Suggestions for retaining its recreational use involve improvements to walking paths and the introduction of community gardens.

Historical and Cultural Significance (78 respondents, 16%): Development at Sulis Down is a concern for its historical and cultural importance, particularly relating to Bath's World Heritage status. Protection is advised through legal safeguards and ensuring development is sympathetic to the landscape.

Local Amenities and Services (47 respondents, 9%): There is concern that current local amenities are insufficient for an increased population. Comprehensive planning is called for, ensuring that the provision of services such as schools and healthcare can meet the demands of growth.

Climate Change and Sustainability (16 respondents, 3%): Sustainability in development to combat climate change is a point of discussion, emphasizing the importance of sustainable building practices, renewable energy use, and maintaining green spaces.

Food Security and Sustainable Agriculture (8 respondents, 2%): Some suggest Sulis Down could support UK food security through sustainable agriculture, community allotments, or food growing projects, while preserving its open space.

Council Response

Consultation responses generally supported continued protection of the site's landscape, heritage and environmental qualities and recognised the importance of reflecting recent appeal decisions and evidence within the policy approach. Respondents emphasised the sensitivity of the location and the need to ensure that future proposals respect the surrounding landscape, heritage assets and ecological networks. The Regulation 19 Plan retains the existing allocation framework, highlighting landscape-led development, biodiversity enhancement, heritage protection and conservation of areas that contribute to Bath's distinctive setting.

Site option: Englishcombe Lane

Housing Needs and Development Opportunities (7 respondents, 64%): A significant portion of feedback indicates a demand for more housing, specifically affordable options for young people and families, with the site's proximity to Bath and transport links seen as advantageous. However, concerns range from topographical issues to potential ecological loss, with a call to prioritise brownfield site development.

Site-specific Challenges and Opportunities for Sustainable Development (6 respondents, 55%): Discusses technical and environmental challenges such as land stability, water management, and traffic. Respondents suggest strategic planning and adherence to environmental frameworks, focusing on sustainable and sensitive development integrating nature conservation.

Ecological Considerations and Wildlife Preservation (5 respondents, 45%): Highlights the divide between recognising the site's ecological significance, noting habitats for rare species and the need for green space preservation, and proponents of development who may rely on mitigation measures. The discussion centres on balancing development with conservation.

Historical and Policy Considerations (5 respondents, 45%): Focuses on the site's historical context of failed developments and complex policy landscape. Calls for policy revision in light of the site's ecological value are made and the preference for developing brownfield sites is reiterated.

Community and Social Impact (2 respondents, 18%): Feedback includes suggestions for development to address specific community needs and concerns about local infrastructure adequacy for new residents. The notion of a community-managed green space represents a desire for local control and involvement.

Council Response

The Council acknowledges the consultation concerns about land stability, drainage, traffic, ecology, landscape and the site's planning history, alongside comments supporting delivery of affordable and family housing. The Englishcombe Lane supported housing development has planning permission and has entered procurement and pre-construction stages. The policy is deleted.

Site option: Burlington Street

Heritage Protection and Development Impact (1 respondent, 50%): Emphasises the significance of heritage impact assessments to ensure development is balanced with heritage conservation. Advocates for clear plans that protect and enhance the heritage of the site, promoting development that is protective and contextually sensitive.

Planning and Approval Processes (1 respondent, 50%): Calls for meticulous, structured planning and approval processes with emphasis on a supplementary planning document (SPD). Highlights the necessity for development to adhere to regulatory and heritage guidelines, including UNESCO guidance for Heritage Impact Assessments (HIA) to protect World Heritage Sites (WHS) and their Outstanding Universal Value (OUV).

Council Response

Consultation responses did not identify significant concerns regarding the future of the Burlington Street allocation and generally indicated that the existing policy framework remains appropriate. The Regulation 19 Plan therefore retains the allocation and existing policy approach, whilst continuing to require high-quality design, sustainable development principles and appropriate consideration of the site's sensitive heritage context and relationship with surrounding listed buildings and streets.

Site option: University of Bath

Student Accommodation Expansion (15 respondents, 79%): Views on increasing on-campus student accommodation to address student numbers and local housing market pressures, with considerations of campus capacity, local population balance, and environmental impacts.

Community Impact and Local Infrastructure (10 respondents, 53%): Concerns over university expansion's effect on Bath's affordable housing and infrastructure, with on-campus housing seen as a way to mitigate these impacts.

Campus Masterplan and Development Strategy (9 respondents, 47%): The masterplan's role in balancing future academic space, accommodation, and facilities needs against growth accommodation and transport impact management.

Sustainable Transport and Parking Solutions (9 respondents, 47%): Trade-off between reducing campus car parking and the need for eco-friendly travel options like shuttle buses, e-bike rentals, and improved public transport.

Public and Active Transport Enhancement (5 respondents, 26%): Promotion of public transport and cycling through dedicated bike routes, subsidised transport for students and integrated transport systems.

Ecological and Heritage Considerations (4 respondents, 21%): Importance of ecological impacts, particularly on local wildlife and heritage landscape, suggesting development should be sensitive and adhere to nature protection laws.

Innovative Development Solutions (3 respondents, 16%): Creative approaches including multi-storey or underground parking with housing above, and environmentally respectful redevelopment, emphasizing conservation of green spaces.

Council Response

Representations recognised the University's significant contribution to the local economy and education sector whilst raising concerns regarding landscape impact, student growth, transport pressures and ecological effects. The Regulation 19 Plan saves the existing policy which continues to support sustainable growth of the Claverton Campus within an agreed development framework, requiring ecological mitigation, landscape enhancement, sustainable transport measures, protection of bat corridors and careful management of impacts on the World Heritage Site and surrounding landscape.

Site option: Sulis Club

Balancing Development and Environmental Protection (7 respondents, 50%): Respondents mentioned the importance of respecting the natural landscape while developing Sulis Club, including extra tree planting, controlling light pollution, and protecting local wildlife such as bats. The discussion shows the tension between progress and environmental protection.

Impact on Local Infrastructure and Quality of Life (6 respondents, 43%): Concerns were shared about how the development could affect local living conditions, with a focus on issues like light pollution from sports floodlights and the potential loss of community space. Suggestions include conducting health impact assessments to safeguard residents' quality of life.

Community Access and Sporting Value (5 respondents, 36%): Responses captured the importance of keeping or increasing public access to sports facilities. Respondents suggested maintaining the club's role in supporting community health and wellbeing, with potential expansions for broader utility.

Development Constraints and Opportunities (4 respondents, 29%): Discussions revolved around the constraints of development due to factors such as World Heritage Site status and building height regulations. Possibilities such as accommodating university car parking or new student accommodations while maintaining the area's green integrity were suggested.

Policy Compliance and Planning Considerations (4 respondents, 29%): Respondents discussed the need for development to comply with legal frameworks and policies like Sport England's Playing Fields Policy and the NPPF. Strategic planning documents that outline clear principles and preserve landscapes were advocated for.

Stakeholder Engagement and Flexibility in Use (4 respondents, 29%): There was an emphasis on engaging with various stakeholders to explore flexible uses for the site. Suggestions for making sports facilities more versatile were discussed, aiming for inclusive development strategies that accommodate diverse community needs.

Council Response

Representations raised significant concerns relating to Green Belt designation, impacts on the World Heritage Site, biodiversity, landscape character and the loss of recreational facilities. Following further technical assessment and review of consultation responses, the Regulation 19 Plan does not propose allocation of the Sulis Club for development and instead retains the existing policy position. Any future proposals would need to satisfy national Green Belt policy and demonstrate that impacts on heritage, landscape, ecology and recreation can be satisfactorily addressed.

Site option: Bath Spa University Newton Park Campus

Sustainability and Environmental Preservation (9 respondents, 69%): Emphasised importance of green spaces and ecological integrity, suggesting eco-friendly developments and care for natural and built environments.

Infrastructure and Facilities Development (7 respondents, 54%): Identified need for robust facilities, strategic delivery of spaces, and a masterplan respecting heritage and landscape.

Strategic Planning and Policy Alignment (7 respondents, 54%): Called for comprehensive planning documents and policies consistent with national standards and sensitive to site specifics.

Housing and Community Impact (6 respondents, 46%): Highlighted competition between student and local affordable housing, suggesting use of university land for student accommodation and community development.

Accessibility and Public Engagement (4 respondents, 31%): Proposed better public access and infrastructure, engaging community in policy discussions for inclusive decision-making.

Council Response

Consultation responses broadly supported the continued operation and evolution of the Newton Park campus whilst recognising the exceptional heritage, landscape and environmental sensitivity of the site. Respondents emphasised protection of the historic parkland setting, listed buildings, scheduled monuments and ecological assets. The Regulation 19 Plan saves the existing policy which continues to support the University's educational role whilst maintaining safeguards for heritage, landscape and biodiversity. Future proposals will be expected to respond positively to the historic character of the campus, protect its Green Belt setting and demonstrate that impacts have been appropriately assessed and mitigated.

Site: West of Bath (potential site)

Public Benefits versus Conservation (47 respondents, 63%): Some respondents highlighted development benefits, including housing and job opportunities, while others focused on the need for conservation of Bath's natural landscapes and heritage.

Heritage and Environmental Impact (46 respondents, 61%): Concerns were raised about potential damage to Bath's World Heritage status, with some suggesting that careful planning could enhance the city's historic environment.

Sustainable Development and Transport Links (44 respondents, 59%): Mixed opinions emerged about the sustainability of the site, with advantages noted for transport links potentially reducing carbon emissions, though some worried about increased traffic and urban sprawl.

Housing and Social Considerations (32 respondents, 43%): The need for affordable housing was weighed against potential loss of green spaces and impacts on local quality of life.

Community and Economic Perspectives (28 respondents, 37%): Economic benefits from development were discussed, against concerns for community cohesion and Bath's distinctive character.

Green Belt and Ecological Concerns (17 respondents, 23%): The importance of preserving green belt land for ecology was debated against the need for housing, with some considering development could be justified under exceptional circumstances.

Infrastructure and Services Enhancement (8 respondents, 11%): Some advocated improved infrastructure and services through development, while others worried about capacity and the need for investment in amenities.

Council Response

Consultation responses reflected a wide range of views regarding potential strategic growth west of Bath. While respondents acknowledged the site's potential contribution towards housing and employment needs, significant concerns were raised regarding impacts on the Green Belt, World Heritage Site and landscape. Subsequent heritage and landscape assessment concluded that development at the scale envisaged would be likely to result in substantial harm to the World Heritage Site and harm to the setting of the Cotswolds National Landscape. Consequently, the site has not been taken forward as a Regulation 19 allocation and will instead be considered through future strategic planning and the emerging Spatial Development Strategy.

Site: South of Burnett, next to A39 (potential site)

Agricultural and Environmental Concerns (329 respondents, 73%): Strong sentiment against using productive farmland for development, highlighting the ecological benefits, potential loss of biodiversity, and impacts on local and national food security. Emphasis on consistency with climate and ecological emergency declarations to preserve green belt lands.

Alternatives and Strategies for Housing Development (322 respondents, 71%): Support for a "brownfield-first" approach, utilising existing buildings and prioritising previously used sites. Calls for sustainable development strategies that include smaller scale infill, restoration, and conversion of non-residential spaces. Importance of enhancing public transport and infrastructure underscored.

Impact on Local Community and Heritage (306 respondents, 68%): Concern about the disruption to the area's rural character, its landscape, and proximity to historical sites. Concerns over eroding local village identity, traditions, and additional strain on local services, altering life quality for residents.

Infrastructure and Transport Challenges (294 respondents, 65%): Concerns about inadequate existing infrastructure, with specific mentions of roads, public transport, and utilities. Projections of worsened traffic congestion and pollution, with safety risks highlighted due to car-dependency and poor connectivity of the proposed site.

Planning and Policy Considerations (261 respondents, 58%): Emphasis on strict adherence to national green belt guidelines and transparent evaluation processes. Critique on potentially preemptive development decisions without adequate public consultation or consideration of cumulative effects on ecology, landscape, heritage, and community well-being. Calls for environmentally and socially sustainable development that aligns with local and regional strategies.

Council Response

The Council acknowledges the strong concerns about loss of productive agricultural land, biodiversity, landscape and rural character, heritage, infrastructure capacity, traffic and car dependency. This area has not been taken forward as a Regulation 19 allocation.

Chapter 6: Bath to Bristol corridor (Keynsham, Saltford, Hicks Gate and Whitchurch Village)

Keynsham and Saltford: Area overview

Preservation of green spaces (214 respondents, 82%): Respondents mentioned the importance of protecting the green belt, highlighting the value of open landscapes and the risks to wildlife, community spaces, and rural identity from development.

Housing and development strategy (189 respondents, 72%): Opinions are divided, with some advocating for new housing to meet local needs and others calling for strict development limits to prevent Keynsham and Saltford from becoming overcrowded and losing their character.

Environmental and health implications (140 respondents, 54%): Concerns were raised about the potential environmental damage from new developments, emphasising the importance of green spaces for public health and community resilience.

Traffic and transportation concerns (117 respondents, 45%): Respondents raised issues about increased traffic and congestion due to development, suggesting solutions such as new transport options and infrastructure improvements.

Public engagement and decision-making (62 respondents, 24%): There is a call for more effective community consultation on development plans and for decision-making that reflects local preferences and needs.

Alternative development solutions (46 respondents, 18%): Proposals included adopting different development approaches like garden cities, prioritizing brownfield redevelopment, and housing designs that use land more efficiently.

Infrastructure and services (36 respondents, 14%): The need for better infrastructure to support the population increase was noted, with calls for improvements to public transport, healthcare facilities, and other services.

Economic and social value of development (7 respondents, 3%): A few respondents discussed the economic advantages and social implications of development, weighing the potential benefits against the costs to local communities.

Council Response

The consultation responses demonstrated both recognition of the strategic role of Keynsham and Saltford within the Bath to Bristol Corridor and concern regarding the potential effects of growth on the character of the area. Respondents highlighted the importance of protecting Green Belt land, maintaining the separate identities of Keynsham and Saltford, supporting local services and facilities, and ensuring that development is accompanied by appropriate infrastructure. Concerns were also raised regarding traffic, environmental impacts and the cumulative effects of growth.

In response, the Regulation 19 Local Plan proposes a coordinated strategy for Keynsham and Saltford which seeks to balance the delivery of homes, employment opportunities and infrastructure with the protection of environmental assets and settlement identity. The strategy includes significant investment in transport infrastructure, education provision, healthcare facilities, green infrastructure and public open space, alongside measures to maintain separation between settlements, strengthen ecological networks and protect the setting of the Cotswolds National Landscape.

Keynsham and Saltford: Transport Opportunities

Public Transport Reliability and Accessibility (55 respondents, 72%): Emphasis on the need for more reliable and accessible public transport; services and schedules do not always cater to the diverse needs of users, including those with mobility issues or living far from stations.

Traffic Congestion and Environmental Impact (53 respondents, 70%): Concerns about traffic congestion potentially worsening with certain transport plans; strong desire for solutions to improve mobility while protecting air quality.

Infrastructure and Development Impacts (49 respondents, 64%): Tension between enhancing transport links and preserving green spaces; concerns over increased traffic and impact on the environment and local identities.

Active Travel and Green Initiatives (34 respondents, 45%): Mixed views on promoting cycling and walking; discussions on safety and suitability for all, including older individuals or those with disabilities.

Housing Development and Transport Capacity (33 respondents, 43%): Calls for transport plans to manage increased demands from housing developments without causing congestion and preserving community assets.

Financial and Planning Critiques (12 respondents, 16%): Skepticism over transport improvement funding and planning; calls for evidence-based, value-for-money propositions.

Equity and Inclusivity in Transport Planning (1 respondent, 1%): Need for considerate transport planning that is inclusive, avoiding exclusion or penalization of particular groups.

Council Response

Consultation responses highlighted the importance of delivering transport improvements alongside growth, with particular concerns regarding traffic congestion, the capacity of existing road networks, public transport reliability and the need to provide attractive alternatives to private car travel. Respondents also emphasised the importance of ensuring that transport investment supports existing communities as well as future development.

In response, the Regulation 19 Local Plan adopts a transport-led approach to growth across Keynsham and Saltford. The strategy includes significant investment in walking, cycling and wheeling infrastructure, improvements to public transport services, new travel hubs and strategic highway interventions, including delivery of the multi-modal North Keynsham Strategic Access Link Road. Together these measures are intended to improve connectivity, reduce reliance on private vehicles and support more sustainable patterns of movement across the corridor.

Keynsham and Saltford: Site options

Environmental and Green Belt Consideration (33 respondents, 72%): Mentioned concerns about building on green belt land, noting its importance for wildlife and public wellbeing. Some respondents are open to development if environmental considerations are met.

Infrastructure and Accessibility (32 respondents, 70%): Raised the need for sufficient infrastructure to support new housing, with a focus on traffic, medical facilities, schools, and sewage systems. Public transport improvements and development at sites with existing infrastructure were suggested.

Housing and Local Needs (25 respondents, 54%): Emphasised the need for housing that meets local requirements, such as smaller, affordable homes and social housing. Concerns included potential overpopulation and loss of green spaces.

Community Character and Wellbeing (24 respondents, 52%): Expressed apprehension about developments changing the character of local communities. Preserving open landscapes for mental health and maintaining quality of life in communities were underlined.

Utilisation of Brownfield Sites (12 respondents, 26%): Advocated for the redevelopment of brownfield sites as preferable to greenfield development, and criticised perceived local authority inaction regarding brownfield availability.

Sustainable Development and Transport Solutions (4 respondents, 9%): Discussed the importance of sustainable living and transport, including better public transport, cycling, and walking infrastructure, with attention to environmental impacts and accessibility.

Council Response

Consultation responses highlighted the importance of ensuring that site selection is supported by appropriate infrastructure, protects environmental assets and responds to local housing needs. Respondents raised concerns regarding Green Belt release, traffic impacts, landscape character, biodiversity, flood risk and infrastructure capacity, whilst also recognising the need to deliver additional homes, including affordable housing, in sustainable locations.

In response, the Regulation 19 Local Plan has refined the proposed development strategy through further technical assessment, infrastructure planning and consideration of consultation responses. Site capacities, boundaries and policy requirements have been reviewed and strengthened where appropriate. The proposed allocations are supported by requirements relating to affordable housing, education, healthcare, transport improvements, landscape mitigation, biodiversity enhancement, flood risk management and green infrastructure, with significant emphasis placed on maintaining settlement identity, supporting nature recovery and delivering coordinated infrastructure alongside growth.

Site: North Keynsham

Traffic and Transport Concerns (102 respondents, 66%): Respondents expressed concerns about increased traffic congestion and strain on Keynsham's infrastructure with the proposed development. Suggestions include improving roads, public transport, and walking/cycling infrastructure.

Green Belt and Open Space Conservation (70 respondents, 45%): Maintaining green belt land and open spaces is highlighted, reflecting worries about lost biodiversity and the blending of distinct local identities. Conversely, some respondents see an opportunity to build sustainable communities on low ecological value land.

Housing Demand and Type (61 respondents, 40%): There is a recognised need for a diverse mix of housing to address shortages and calls for careful planning to reduce the impact on green belts, with some advocating for using the site due to its proximity to transport links.

Flood Risk and Environmental Impact (53 respondents, 34%): Concerns are raised about the site’s floodplain status, historical flooding, and climate change. Suggestions encompass careful planning and alternatives less prone to flooding, along with potential for floodplain mitigation strategies.

Ecology and Biodiversity (41 respondents, 27%): The development's potential harm to local wildlife and ecosystems is noted. Respondents call for ecological surveys, enhanced green spaces, and incorporating nature conservation in development, alongside seeing an opportunity for nature recovery.

Alternatives and Strategic Planning (34 respondents, 22%): There is a push for alternative site consideration, such as brownfield land, and strategic land use planning that prioritises long-term environmental, social, and economic sustainability.

Community and Social Infrastructure (33 respondents, 21%): The need for community facilities like schools and healthcare centres alongside housing is emphasised. Concerns are voiced about the delivery of infrastructure commitments from developers.

Infrastructure and Service Pressure (8 respondents, 5%): Some respondents warn that existing infrastructure may not support the increased population. There is a call for improved connectivity, services, and utilities to accommodate growth without compromising the quality of life.

Council Response

Consultation responses recognised North Keynsham as one of the more sustainable locations for growth within the district, given its proximity to Keynsham railway station, the A4 corridor and existing employment areas. At the same time, significant concerns were raised regarding flood risk, transport impacts, pressure on local services and infrastructure, the release of Green Belt land, ecological impacts and the need to maintain separation between Keynsham and Saltford. Respondents also emphasised the importance of ensuring that any development is supported by schools, healthcare facilities, green infrastructure and sustainable transport improvements.

In response, the Regulation 19 Local Plan proposes a comprehensive mixed-use allocation at North Keynsham as part of a coordinated strategy for growth across Keynsham and Saltford. The allocation will provide new homes, employment land, a local centre, a primary school, green infrastructure and significant transport improvements, including the North Keynsham Strategic Access Link Road. The proposed allocation has been informed by further assessment of flood risk, wastewater infrastructure, landscape, heritage and ecological considerations and includes substantial areas of strategic green infrastructure and public open space associated with the River Avon corridor. The allocation also incorporates measures to support nature recovery, improve sustainable travel options and maintain the separate identity of Keynsham and Saltford.

Site: East of Avon Mill Lane

Residential development and community well-being (87 respondents, 66%): Contains views on redeveloping the site into housing; potential benefits include eradication of industrial nuisances and provision of affordable homes, while concerns include strain on local facilities, infrastructure challenges, and increase in noise pollution from the nearby railway.

Brownfield redevelopment and land use policy (48 respondents, 36%): Shows strong favour for developing brownfield sites; this site, due to its past industrial use, is seen as ideal and aligns with the preference to avoid using greenbelt areas, with a focus on densifying urban spaces rather than expanding.

Environmental and health concerns (47 respondents, 36%): Highlights opportunities to improve living conditions by reducing noise, pollution, and HGV traffic, though some are apprehensive about possible traffic increases leading to worse air quality; suggestions include integrating green spaces and sustainable practices in development plans.

Disruption and local infrastructure (42 respondents, 32%): Concerns over the disruption of relocating businesses and pressure on local infrastructure such as schools and healthcare services; but some see benefits in replacing an industrial area with a residential zone that could improve infrastructure if carefully designed.

Traffic and transport infrastructure (40 respondents, 30%): Worry over potential traffic congestion in an area already known for heavy traffic; while proximity to transport links is positive, fear of worsening air quality and noise pollution draws suggestions for traffic control measures and assessing the adequacy of current road access.

Access to amenities and sustainability (38 respondents, 29%): Agreement on the site's suitable central location near amenities conducive to sustainable, car-free living, alongside contrasting opinions on whether the current infrastructure can sustain more residents without significant development of public transport and local services.

Economic impact and employment (17 respondents, 13%): Some criticism for the potential loss of local employment due to business relocation; while a perceived opportunity exists to remove industrial nuisances, the importance of maintaining or enhancing job opportunities in the area leads to suggestions for mixed-use spaces to retain work within the town.

Council Response

Consultation responses recognised Land East of Avon Mill Lane as one of the more sustainable locations for growth within the district, given its proximity to Keynsham railway station, the A4 corridor and existing employment areas. The redevelopment of a brownfield site was also supported, although some concern was raised regarding the loss of employment. At the same time, significant concerns were raised regarding flood risk, transport impacts and pressure on local services and infrastructure. Respondents also emphasised the importance of ensuring that any development is supported by schools, healthcare facilities, green infrastructure and sustainable transport improvements.

The site has been allocated for residential development in the Regulation 19 Local Plan. The proposed allocation has been informed by further assessment of flood risk, wastewater infrastructure, landscape, heritage and ecological considerations and includes substantial areas of strategic green infrastructure and public open space associated with the River Avon corridor.

Site: Central Keynsham

Impact on Parking and Accessibility (236 respondents, 87%): Parking seen as essential for local businesses and community facilities like the scout HQ. Development reducing spaces could harm trade and convenience, with calls for maintaining or increasing facilities.

Impact on Local Economy and Community (153 respondents, 56%): Concerns that redevelopment could damage the town's character and economy, possibly leading to business departures. Acknowledgement that thoughtful redevelopment could revitalise Keynsham.

Alternative Development Suggestions (136 respondents, 50%): Proposals for using alternative sites to preserve parking and Keynsham's assets. Emphasis on a strategic, long-term approach that considers infrastructure and public transport improvements.

Safety and Accessibility for Youth and Community Groups (93 respondents, 34%): Importance of parking for groups like scouts highlighted, with calls to preserve facilities to maintain community life and support affordable activities.

Sustainable Transport and Environmental Concerns (59 respondents, 22%): Critique of expectations for a shift to sustainable transport without public transport improvements. Concerns about environmental impact of demolishing and new construction, and loss of green spaces.

Housing Affordability and Infrastructure (31 respondents, 11%): Concerns over the affordability of new housing and additional strain on infrastructure, with scepticism about sustainability of further development without corresponding improvements.

Engagement and Participation in Planning Process (24 respondents, 9%): Disappointment in the lack of consultation with local stakeholders, with a call for inclusive planning processes that incorporate residents' views and needs.

Council Response

Consultation responses recognised the opportunity to make more effective use of previously developed land within Keynsham Town Centre and acknowledged the potential benefits of bringing forward additional housing and mixed-use development in a highly accessible location. However, significant concerns were raised regarding the loss of town centre parking, the potential impact on local businesses, accessibility for shoppers and community groups, and the wider effect on the vitality and function of the town centre. Respondents also highlighted the importance of ensuring that any redevelopment forms part of a coordinated approach to town centre regeneration and sustainable transport improvements.

In response, the Regulation 19 Local Plan proposes a mixed-use redevelopment opportunity at Ashton Way and the Labbott Car Parks as part of a wider strategy for Keynsham Town Centre. The allocation seeks to support the vitality and viability of the town centre through the delivery of new homes and employment space in a highly sustainable location whilst recognising the need to carefully manage the future provision of town centre parking. The allocation has been informed by consultation responses and forms part of a broader programme of transport and public realm improvements linked to the Keynsham Town Centre Regeneration Action Plan, helping to support sustainable travel, improved connectivity and long-term investment in the town centre.

Site: West Keynsham

Infrastructure and Service Capacity (132 respondents, 68%): Concerns about the impact of new developments on Keynsham's existing infrastructure and services, such as roads, public transport, healthcare, and schools, with some seeing potential for improvements.

Green Belt Preservation vs. Development Needs (113 respondents, 59%): Tension between the need for new housing and protecting green belt land, recognising the demand for up to 200 dwellings versus the potential harm to rural character and wildlife habitats.

Traffic and Transport Solutions (70 respondents, 36%): Issues of existing and future traffic congestion, mainly on Charlton Road, and substandard public transport services, with suggestions to improve connectivity and sustainable travel options.

Landscape and Conservation Impact (70 respondents, 36%): Emphasis on safeguarding Keynsham's landscape setting, green spaces, and rural tranquility from development threats, with calls for careful planning to protect visual amenities.

Sustainable and Ecological Development (53 respondents, 27%): Calls for new housing to be sustainable and ecologically considerate, making use of brownfield sites, promoting biodiversity and carbon neutrality, and supporting active travel.

Community Integration and Accessibility (52 respondents, 27%): Criticism of potential housing developments being too isolated from Keynsham centre, stressing the need for accessibility to shops, services, and transport.

Economic and Employment Concerns (42 respondents, 22%): Concerns about the loss of local employment areas to developments and the importance of job opportunities to match housing growth, with suggestions to invest in existing business infrastructure.

Housing Strategy and Community Needs (27 respondents, 14%): Discussion of the need for a housing mix that addresses local demands, including affordable and social housing options, as well as housing that offers broader community benefits.

Public Participation and Policy Compliance (7 respondents, 4%): Desire for transparent decision-making processes respecting policies on green belt land, ensuring development aligns with community needs and environmental objectives.

Flooding and Environmental Risks (5 respondents, 3%): Worry about the potential exacerbation of flooding and water management issues, with a call for innovative planning to mitigate these risks.

Council Response

Consultation responses recognised the potential contribution that West Keynsham could make towards meeting housing needs, including affordable housing, in a location adjoining the existing settlement. However, significant concerns were raised regarding the release of Green Belt land, the impact of development on the landscape setting of Keynsham, traffic and congestion on Charlton Road, infrastructure capacity, biodiversity and the loss of existing employment land. Respondents also emphasised the importance of ensuring that any development is well connected to the town centre, services, public transport and local employment opportunities.

In response, the Regulation 19 Local Plan proposes a residential allocation at West Keynsham as part of a coordinated strategy for growth across Keynsham and Saltford. The allocation retains the existing employment function of Lays Farm Trading Estate whilst providing new homes, including affordable housing, alongside significant areas of green infrastructure, public open space and landscape mitigation. The proposed allocation has been informed by further assessment of Green Belt, landscape, transport, ecological and infrastructure considerations and includes measures to improve active travel connections, support sustainable transport, protect the landscape setting of Keynsham and establish a robust long-term Green Belt boundary. The allocation also forms part of a wider infrastructure-led approach to growth, linked to improvements in education provision, utilities, transport and green infrastructure across the town.

Site: South East Keynsham

Infrastructure and Accessibility (174 respondents, 82%): Concerns about inadequate transportation infrastructure, such as road congestion, safety of narrow lanes, and insufficient access routes for new developments; suggestions for using brownfield sites and improving sustainable transport.

Housing Demand and Location (167 respondents, 78%): Mixed opinions on the necessity and suitability of housing development in South East Keynsham due to remoteness and reliance on cars; suggestions include focusing on alternative sites with better infrastructure.

Green Belt and Urban Sprawl (141 respondents, 66%): Strong opposition to building on green belt land, with worries of countryside damage, loss of agricultural land, and towns merging; occasional support for ecologically sensitive development.

Environmental and Ecological Impact (113 respondents, 53%): Potential threats to wildlife, loss of green space, worsening pollution and flooding; some proposal for woodlands for flood mitigation, while others see an opportunity for development to integrate with ecosystems.

Community and Services (96 respondents, 45%): Emphasis on the need for housing to include local amenities and services like schools and GP surgeries; concerns about overburdening resources and eroding community cohesion against potential local growth and housing needs support.

Economic Implications (9 respondents, 4%): Viability of new businesses and impact on local property values discussed, with skepticism about attracting retailers and considerations on the economic landscape.

Transportation Solutions and Suggestions (4 respondents, 2%): Calls for traffic mitigation via new roads, improved public transport, and cycling or pedestrian paths as part of comprehensive transportation planning.

Council Response

Consultation responses reflected differing views regarding the suitability of South East Keynsham for development. While some respondents recognised its potential contribution towards housing delivery, including affordable housing, many raised concerns regarding Green Belt release, traffic generation, infrastructure capacity, landscape impacts, biodiversity, flood risk and the potential for development to increase the perception of coalescence between Keynsham and Saltford. Respondents also highlighted concerns regarding accessibility, reliance on private car travel and the ability of local schools, healthcare facilities and other services to accommodate additional growth.

In response, the Regulation 19 Local Plan proposes a revised allocation at South East Keynsham as part of a coordinated strategy for growth across Keynsham and Saltford. The allocation has been informed by further assessment of Green Belt, landscape, ecological, transport and infrastructure considerations and forms part of a wider approach that integrates development with strategic green infrastructure, public open space and nature recovery. The policy includes measures to strengthen walking, cycling and public transport connections, improve access to local services and support education and healthcare provision. Particular emphasis has been placed on maintaining separation between Keynsham and Saltford, protecting the setting of the Cotswolds National Landscape and delivering substantial landscape mitigation, biodiversity enhancement and accessible green infrastructure alongside new homes.

Site: West Saltford

Green Belt and Development Controversy (619 respondents, 89%): Division over preserving countryside against demands for housing; some advocate for green spaces reflecting worries about merging communities and loss of agricultural land, whilst others see development as necessary for housing needs.

Traffic and Infrastructure Challenges (561 respondents, 81%): Anxiety about increased traffic on the A4 due to new housing; criticisms of current road capacity and safety for non-motorized users, with suggestions for improved infrastructure and alternative transport solutions such as re-opening a railway station.

Housing Needs and Sustainability (475 respondents, 69%): Calls for more affordable and sustainable housing; concerns that development scale is unsuitable for rural village, with a preference for smaller, integrated approaches that respect the village identity and character.

Environmental and Ecological Concerns (456 respondents, 66%): Concern around habitat destruction and biodiversity loss; proposals for enhancing green belts and incorporating natural spaces in development to support ecosystems and resident wellbeing.

Cultural and Social Identity (369 respondents, 53%): Concerns that development may erode the rural and cultural identity of Saltford, transforming it into a suburban area; emphasis on maintaining individuality and the social fabric of the community.

Public Participation and Planning Policy (62 respondents, 9%): Dissatisfaction with the planning process; demands for genuine community engagement, adherence to green belt protections, and a planning policy that incorporates impact studies and public opinion.

Impact on Local Services and Community Wellbeing (39 respondents, 6%): Concern about the strain on local services like GP practices and schools; calls for planning that includes essential services and infrastructure to support community wellbeing.

Council Response

Consultation responses reflected a wide range of views regarding the role of West Saltford in accommodating future growth. While some respondents recognised the opportunity to deliver new homes, including affordable housing, in a location with good access to Bath, Bristol and the wider corridor, many raised concerns regarding Green Belt release, the potential reduction in separation between Saltford and Keynsham, traffic impacts on the A4 corridor, pressure on local services and infrastructure, and effects on landscape character and the setting of the Cotswolds National Landscape. Respondents also highlighted the importance of protecting biodiversity, maintaining the village's distinct identity and ensuring that development is accompanied by appropriate infrastructure and community facilities.

In response, the Regulation 19 Local Plan proposes a comprehensive allocation at West Saltford as part of a coordinated strategy for growth across Keynsham and Saltford. The allocation will deliver new homes, including affordable housing, alongside a local centre, primary school, healthcare provision, community facilities, strategic green infrastructure and improved public transport and active travel connections. The proposed allocation has been informed by further assessment of Green Belt, landscape, transport, ecological and infrastructure considerations. Particular emphasis has been placed on maintaining the separate identity of Saltford and Keynsham through substantial areas of publicly accessible green infrastructure and open space, strengthening ecological networks, and protecting the setting of the Cotswolds National Landscape through landscape-led design and mitigation measures.

Site: South Saltford

Housing Development and Urban Expansion (805 respondents, 83%): Concerns include loss of agricultural land, impacts on biodiversity and the rural character of South Saltford. Loss of recreational space and wildlife habitats is noted, alongside recognition of the need for more, including affordable, housing.

Traffic, Infrastructure, and Safety Concerns (734 respondents, 76%): Concern over increased traffic, impacts on local roads, and safety, with doubts about the adequacy of current infrastructure to support further development.

Environmental and Ecological Impact (587 respondents, 61%): Potential ecological damage from large-scale development is a concern, with suggestions to consider brownfield development and new green spaces.

Community and Recreational Losses (576 respondents, 59%): Strong opposition to loss of Saltford Golf Club facilities, with emphasis on their social and economic importance and potential job losses.

Alternative Suggestions and Planning Policies (460 respondents, 47%): Proposals of using brownfield sites and developing semi-urban areas, critiques of the plans' alignment with B&NES council policies, and calls for planning to avoid urban sprawl.

Loss of Agricultural Land and Food Security (80 respondents, 8%): Concerns over the loss of prime agricultural land affecting UK's food security and local food produce availability.

Council Response

Consultation responses raised significant concerns regarding the scale of development proposed in this location, including the loss of Green Belt land, impacts on landscape character, biodiversity, agricultural land, recreation facilities, traffic and infrastructure. Respondents also highlighted the importance of maintaining the distinct identity of Saltford and protecting valued open spaces and recreational opportunities. At the same time, some respondents recognised the need to provide additional housing, including affordable housing, in sustainable locations.

In response, the Regulation 19 Local Plan has refined the approach to development in this part of the corridor through a coordinated strategy across Saltford and Keynsham. The proposed allocation is supported by significant areas of strategic green infrastructure, publicly accessible open space and a new country park, helping to maintain settlement separation, support nature recovery and provide recreational opportunities. The allocation has been informed by further assessment of Green Belt, landscape, ecological, transport and infrastructure considerations and is supported by requirements relating to affordable housing, sustainable transport, education provision, healthcare contributions and biodiversity enhancement.

Site: Hicks Gate

Transport and Accessibility Considerations (79 respondents, 72%): Proximity to A4 and mass transit potential at Hicks Gate is valued; sustainable travel options like park and ride, cycling, and walking paths are advocated, while concerns over A4 congestion and traffic safety are noted.

Housing Needs and Development Preferences (68 respondents, 62%): The need for affordable housing at Hicks Gate is recognised; preferences are split between higher-density housing or mixed-use development and fears of urban sprawl, greenbelt encroachment, and under-utilisation of brownfield sites.

Socio-Economic Impacts and Community Infrastructure (40 respondents, 36%): Potential for local employment and enhanced community facilities at Hicks Gate is acknowledged; concerns about community character erosion, anti-social behaviour risk, and pressure on services are also raised.

Strategic Planning and Regulatory Compliance (33 respondents, 30%): Adherence to planning policy framework and alignment with local and regional frameworks at Hicks Gate are discussed, with calls for development priorities on brownfield sites and meeting conditions on sustainability and community benefit.

Environmental Sustainability and Green Infrastructure (27 respondents, 25%): Support for carbon-neutral development at Hicks Gate is shown, suggesting renewable energy integration and high building insulation standards; importance is placed on retaining and enhancing green spaces.

Flood Risk and Environmental Protection (20 respondents, 18%): Concerns about flooding risks in areas like Stockwood Lane at Hicks Gate are prominent; emphasis on comprehensive flood mitigation, greenbelt protection, and ecologically considerate development is evident.

Council Response

Responses recognised the site’s strategic location whilst raising concerns regarding transport impacts, Green Belt considerations, flood risk, environmental quality and community infrastructure.

The Council has carefully considered the consultation responses relating to Hicks Gate. Responses recognised the site's strategic location and accessibility within the Bath to Bristol Corridor whilst also raising concerns regarding transport impacts, Green Belt considerations, landscape character, environmental effects, infrastructure capacity and the relationship of development to surrounding communities.

Transport was the most frequently raised issue. The Council acknowledges concerns regarding congestion on the A4 corridor and the wider highway network, whilst recognising the opportunity to support a more sustainable pattern of growth through significant investment in public transport, active travel infrastructure, and wider strategic transport improvements. Any future development proposals will be required to demonstrate that transport impacts can be appropriately addressed and mitigated.

The Council also recognises comments regarding affordable housing, employment opportunities, community infrastructure and environmental protection. Hicks Gate has the potential to contribute towards identified housing and economic development needs whilst supporting the delivery of new community facilities, green infrastructure and biodiversity enhancements. However, any future allocation or development proposal would need to be supported by detailed technical evidence relating to transport, landscape, heritage, ecology, flood risk, Green Belt considerations and infrastructure delivery.

The emerging strategy for Hicks Gate is based on a comprehensive, transport-led and masterplan-led approach, working collaboratively with neighbouring authorities and stakeholders to ensure that development is integrated with supporting infrastructure and creates a sustainable, well-connected and high-quality new place.

Site: Whitchurch village: Area overview

Housing Development and Aesthetic Concerns (411 respondents, 98%): Discussions vary from addressing the housing shortage and the need for affordable options for young people, to concerns about development not matching the village's aesthetic, over-development, and changing the community's character. Preference for development on brownfield sites is noted to protect green spaces.

Green Belt Preservation vs Development Needs (408 respondents, 98%): Opinions are split between preserving the green belt for environmental and heritage reasons and the pressure for housing and economic growth. Some support limited green belt development in exceptional cases whereas others oppose any encroachment on green spaces, fearing urban sprawl and loss of village identity.

Infrastructure and Services Under Strain (407 respondents, 97%): There is concern that local infrastructure and services (GP and dental practices, schools, shops) are inadequate for current residents, exacerbated by poor public transport that disconnects the community. There's a call for improving infrastructure alongside or prior to housing expansion.

Sustainability and Environmental Concerns (17 respondents, 4%): The need for environmentally sustainable development is stressed, with support for repurposing underutilised spaces and maintaining green belts. Importance is placed on development patterns that protect biodiversity and enhance public green spaces for health benefits.

Community Consultation and Inclusion in Planning (12 respondents, 3%): Residents want more meaningful participation in planning, with a transparent process that incorporates community feedback and respects local views and needs.

Economic Impacts and Employment Opportunities (7 respondents, 2%): The conversion of commercial properties to residential use is critiqued for impacting local employment. It's suggested that developments should include mixed-use spaces for shopping, business hubs, and amenities to boost jobs and economic growth.

Transportation and Accessibility Challenges (4 respondents, 1%): Increased housing is seen to potentially strain transportation infrastructure. Criticisms focus on traffic congestion, pedestrian safety, and inadequate public transport, with calls for improvements in sustainable transport and better connectivity.

Council Response

Housing Development and Aesthetic Concerns

The Council recognises concerns regarding the scale and character of development, including the preference for brownfield land and the need to protect the village's identity. However, brownfield opportunities alone are insufficient to meet identified housing needs. Whitchurch Village has been identified as a sustainable location for growth, supported by the delivery of significant infrastructure, including schools, healthcare facilities, community facilities and transport improvements. Policy requirements ensure that development responds appropriately to the village's character, landscape setting and heritage assets through high-quality design, landscaping and green infrastructure.

Green Belt Preservation vs Development Needs

The Council acknowledges concerns regarding Green Belt release and the potential for coalescence with Bristol. Green Belt evidence has informed the proposed strategy and the Council considers that exceptional circumstances exist to justify the release of land in this location. The allocations have been designed to maintain separation between Whitchurch Village and Bristol, establish strong long-term Green Belt boundaries, and deliver extensive areas of accessible green infrastructure, open space and landscape mitigation.

Infrastructure and Services Under Strain

The Council agrees that infrastructure delivery must accompany growth. The proposed allocations include a new secondary school, a new primary school, healthcare provision, local centre facilities, community infrastructure and significant transport improvements. Development will be required to contribute towards the infrastructure necessary to support both existing and future residents.

Sustainability and Environmental Concerns

The Council supports environmentally sustainable development and has incorporated requirements for biodiversity net gain, habitat protection, sustainable drainage, strategic green infrastructure, woodland planting and nature recovery. The strategy also promotes walking, cycling and public transport improvements to support more sustainable patterns of travel and healthier communities.

Community Consultation and Inclusion in Planning

The Council welcomes the high level of community engagement and has carefully considered consultation responses in preparing the Local Plan. Community feedback has informed the development of the strategy, and further opportunities for public engagement will be available through future planning application processes.

Economic Impacts and Employment Opportunities

The Council recognises the importance of supporting local employment opportunities. The East Whitchurch allocation includes provision for small-scale employment floorspace within the Local Centre.

Transportation and Accessibility Challenges

The Council acknowledges concerns regarding traffic congestion, highway capacity and public transport provision. The Local Plan includes a comprehensive package of transport improvements, including new access roads, traffic management measures, active travel routes, public transport enhancements and travel hubs. These measures are intended to improve accessibility, support sustainable travel and mitigate the transport impacts of growth.

Site: Whitchurch village: Transport opportunities

Strategic Development and Transport Planning (401 respondents, 97%): Residents call for strategic planning linking transport infrastructure improvements with new developments, including innovative solutions like mobility hubs and park & ride facilities, yet express skepticism about plan execution and alignment with community needs.

Sustainable vs. Car-dependent Living (400 respondents, 96%): There is a push for a sustainable Whitchurch with reduced car dependency via better planning, despite the current reliance on cars due to inadequate public transport.

Traffic Congestion and Air Quality (394 respondents, 95%): Proposals to reduce traffic congestion and improve air quality include rerouting heavy goods vehicles and establishing traffic calming measures, amid concerns that new development could intensify these issues.

Green Belt Preservation vs. Development Needs (394 respondents, 95%): The need to protect the green belt is contrasted with the demand for housing and improved transport; some advocate for using alternative sites to prevent sprawl while others support expansion to enhance connectivity.

Active Travel Infrastructure (393 respondents, 95%): Residents suggest the necessity for safer, integrated pedestrian and cycling routes, also addressing the practicality and safety of these routes in rural settings.

Public Transport Reliability and Coverage (388 respondents, 93%): Calls for more reliable and comprehensive bus services are evident, highlighting a need for improved public transport to reduce reliance on personal vehicles.

Council Response

Strategic Development and Transport Planning

The Council agrees that transport infrastructure must be planned and delivered alongside new development. The Local Plan adopts an infrastructure-led approach, requiring new road connections, travel hubs, active travel improvements and public transport enhancements to support growth at Whitchurch Village. Development proposals will be expected to contribute to the delivery of both local and strategic transport infrastructure, helping to improve connectivity whilst reducing reliance on private car travel.

Sustainable vs Car-Dependent Living

The Council recognises that current travel patterns are heavily influenced by limited alternatives to the private car. The proposed strategy seeks to address this through investment in walking, cycling and public transport infrastructure, including enhanced connections to National Cycle Network Route 3, improved bus services, travel hubs and improved links between new development, the village centre and surrounding communities. These measures are intended to support a gradual shift towards more sustainable travel choices.

Traffic Congestion and Air Quality

The Council acknowledges concerns regarding traffic congestion and air quality. The Local Plan includes measures to manage traffic impacts arising from development, including new access roads, traffic management interventions, improvements to sustainable transport infrastructure and proposals to reduce through traffic within the village. Air quality assessments will be required as part of future development proposals to ensure impacts are appropriately mitigated.

Green Belt Preservation vs Development Needs

The Council recognises the importance of protecting the Green Belt whilst addressing housing and infrastructure needs. The proposed allocations have been informed by Green Belt evidence and seek to balance development requirements with the retention of meaningful gaps between settlements, the establishment of defensible Green Belt boundaries and the provision of significant green infrastructure and open space. Improved transport connectivity forms part of the wider public benefits associated with the proposed strategy.

Active Travel Infrastructure

The Council supports the provision of safe and attractive walking, wheeling and cycling routes. The Local Plan requires a comprehensive network of active travel

connections within and between sites, linking residents to schools, local facilities, public transport services and National Cycle Network Route 3. Improvements to public rights of way, crossings and village connections are intended to encourage greater uptake of active travel whilst improving safety and accessibility.

Public Transport Reliability and Coverage

The Council acknowledges concerns regarding the availability and reliability of public transport. The proposed strategy includes contributions towards enhanced bus services, travel hubs, improved bus stop infrastructure and better integration between public transport and active travel networks. Together, these measures are intended to improve accessibility, increase transport choice and reduce reliance on private vehicles over time.

Site: Whitchurch village, Option A: Land to the west and east of the A37

Preservation of Green Spaces (461 respondents, 93%): Strong opposition to development on preservation grounds, with the loss of recreational areas, wildlife habitats, and risk of urban sprawl seen as detrimental to community and environmental sustainability.

Alternative Development Solutions (443 respondents, 89%): Preference for housing development on brownfield sites and using existing infrastructure; stresses the need for sustainable planning for Whitchurch Village that considers innovative housing and infrastructure improvements.

Traffic and Transportation Challenges (433 respondents, 87%): Concern over potential traffic congestion increase, particularly on the A37, with suggestions including enhancing public transport, promoting sustainable travel, and upgrading road infrastructure.

Environmental Impact (428 respondents, 86%): Broader environmental implications of development raised, such as biodiversity loss and impact on climate efforts, with calls for prioritising brownfield sites and aligning strategies with environmental protection goals.

Infrastructure and Services Strain (424 respondents, 85%): Existing infrastructure perceived as inadequate for additional housing, with concerns about GP service capacity and schooling facilities' strain; discussions about the need for improved local services to support development.

Community and Heritage Preservation (411 respondents, 83%): Strong value on maintaining Whitchurch Village's identity and character, with development threatening local heritage assets and semi-rural appeal opposed; conservation of heritage-sensitive areas emphasised.

Housing Needs and Affordability (394 respondents, 79%): While recognising the demand for more and affordable housing, there is scepticism about meeting local needs and ensuring new homes' affordability without overwhelming public services.

Council Response

Preservation of Green Spaces

The Council acknowledges concerns regarding the loss of Green Belt land, open countryside and wildlife habitats. The proposed allocation includes significant areas of strategic green infrastructure, public open space, woodland planting and biodiversity enhancement, while maintaining separation between settlements and delivering long-term environmental benefits.

Alternative Development Solutions

The Council has sought to maximise brownfield development opportunities across the district. However, brownfield sites alone are insufficient to meet identified housing and infrastructure needs. Whitchurch Village has been identified as a sustainable location capable of supporting growth alongside new infrastructure, services and transport improvements.

Traffic and Transportation Challenges

The Council recognises concerns regarding congestion on the A37 and the wider transport network. The allocation includes a package of transport measures comprising a new access road, traffic management, active travel infrastructure, travel hubs and enhanced public transport provision to mitigate impacts and encourage more sustainable travel patterns.

Environmental Impact

The Council recognises concerns regarding biodiversity and climate impacts. The policy requires biodiversity net gain, habitat protection and enhancement, sustainable drainage systems, strategic landscaping and nature recovery measures to ensure environmental effects are appropriately mitigated.

Infrastructure and Services

The Council agrees that development must be supported by appropriate infrastructure. The allocation includes provision for a primary school, contributions towards a secondary school, healthcare facilities, community infrastructure and transport improvements to support both existing and future residents.

Community and Heritage

The Council recognises the importance of maintaining Whitchurch Village's distinct identity and protecting its heritage assets. The policy includes requirements to preserve separation from Bristol, protect the setting of heritage assets and deliver landscape mitigation informed by detailed heritage and landscape assessments.

Housing Need and Affordability

The Council acknowledges concerns regarding housing affordability and pressure on local services. The allocation will deliver both market and affordable housing as part of a comprehensive, infrastructure-led approach designed to meet identified housing needs while ensuring that growth is supported by appropriate facilities and services.

Site: Whitchurch village, Option B: Eastern extension of the village

Green Belt and Environmental Concerns (432 respondents, 95%): Strong opposition due to potential damage to green belt, loss of wildlife habitats, agricultural land, and impact on landscapes and conservation areas, with calls for sustainable development to avoid urban sprawl.

Housing and Development Needs Versus Preservation (424 respondents, 93%): While there's an understanding of housing needs, there's a preference for preserving green spaces and avoiding overdevelopment, with suggestions for smaller-scale developments or use of less sensitive areas.

Potential Alternatives and Solutions (416 respondents, 91%): Proposals include developing brownfield sites, considering other options beyond just Option B, and focusing on areas with minimal environmental impact, ensuring development aligns with village characteristics and green space preservation.

Infrastructure and Local Services Strain (406 respondents, 89%): Development is seen to strain already pressured infrastructure; improvements to roads, medical services, schools, and public transport are recommended before or alongside development.

Traffic and Transport Issues (403 respondents, 88%): Increased traffic, especially on the A37 and nearby roads, concerns many, highlighting safety issues, potential pollution, and the need for improved traffic management and public transport options.

Community Impact and Cohesion (402 respondents, 88%): There's a worry that Option B could change Whitchurch Village's character, impacting community cohesion; development should strive to maintain rural identity and strengthen the community fabric.

Health, Education, and Local Amenities (392 respondents, 86%): Concerns about the adequacy of health services and schools arise, with a call for improved existing amenities and the introduction of new services in line with population growth.

Landscape and Heritage Conservation (384 respondents, 84%): Emphasises the need to protect the character of the landscape and heritage assets from developmental impacts, with suggestions to maintain green buffers and sympathetic development.

Legal and Policy Compliance (383 respondents, 84%): Some point to contradictions with policies designed to protect the green belt, urging adherence to existing planning frameworks and justifications for any departures.

Community Sentiment and Participation (382 respondents, 84%): Call for more transparency and community consultation to ensure developments reflect local needs and preferences.

Council Response

The Council acknowledges the significant concerns raised regarding Green Belt release, environmental impacts and the potential effects of development on the character of Whitchurch Village. The proposed allocation seeks to balance identified housing and infrastructure needs with the protection of landscape, heritage and ecological assets through an infrastructure-led approach supported by extensive green infrastructure, landscape mitigation and community facilities.

Green Belt, Environment and Landscape

The Council recognises concerns regarding the loss of Green Belt land, impacts on biodiversity and effects on landscape character. The allocation has been informed by Green Belt, landscape and ecological evidence and includes substantial green infrastructure, habitat enhancement, biodiversity net gain and structural landscaping to mitigate impacts and maintain settlement separation.

Housing and Alternative Options

The Council has sought to maximise brownfield development opportunities; however, these are insufficient to meet identified housing needs. The site has been selected through the plan-making process as a sustainable location capable of accommodating growth alongside new infrastructure and services.

Infrastructure, Transport and Local Services

The Council agrees that infrastructure must accompany development. The allocation includes provision for a new primary school, healthcare facilities, a local centre, community facilities, transport improvements and contributions towards a new secondary school. A comprehensive package of transport measures is also proposed to address traffic impacts and promote sustainable travel.

Community Character and Heritage

The Council recognises the importance of maintaining Whitchurch Village's distinct identity and protecting heritage assets. The allocation includes requirements to conserve the setting of heritage assets, maintain separation from neighbouring settlements and deliver substantial landscape mitigation informed by detailed heritage and landscape assessments.

Community Engagement

The Council welcomes the extensive consultation responses received and has carefully considered them in developing the proposed strategy. Further

opportunities for community involvement will be provided through future masterplanning and planning application processes.

Site: Whitchurch village, Option C: Land to the west of the A37 (150 homes)

Environmental and Green Belt Impact (428 respondents, 95%): Respondents are strongly opposed due to potential negative effects on the green belt, local wildlife, and the overall environment. Concerns include habitat damage, pollution increase, and loss of green spaces affecting mental health and community well-being.

Alternative Development Suggestions (420 respondents, 93%): Suggestions are to explore brownfield sites, RAF Charmy Down, or other areas for development, emphasizing strategic, sustainable growth without compromising the environment or village life quality.

Traffic and Road Safety (412 respondents, 91%): The expected rise in traffic could worsen congestion and hazards, particularly on the A37, raising safety concerns for pedestrians and drivers, and potentially affecting the community's health and safety.

Infrastructure and Amenities (399 respondents, 88%): There's concern about the current infrastructure's capacity to handle new developments, with a call for improved transport, healthcare, education, and local services.

Heritage and Historic Land (394 respondents, 87%): Construction on or near heritage-sensitive land prompts protective stances against potential impact on important historical assets, with a desire to maintain the cultural integrity of Whitchurch Village.

Health and Well-being (391 respondents, 87%): Concerns involve the loss of open spaces, escalated pollution, and congestion from the development, stressing the need for more healthcare provision and recreational areas for local people's health.

Education and Schooling (389 respondents, 86%): The ability of local schools to support additional students from the new housing is questioned, calling for significant investment in educational infrastructure.

Community Cohesion and Identity (387 respondents, 86%): There's worry that the village's character may be lost, leading to urban sprawl and a diluted community identity, with insufficient facilities to maintain social cohesion.

Public Consultation and Planning Process (385 respondents, 85%): Calls for more transparency in the consultation process, community engagement, and consideration of residents' views.

Council Response

The Council acknowledges concerns regarding the potential impacts of development on the Green Belt, local infrastructure, traffic, heritage assets and the character of Whitchurch Village. The site has been assessed through the Local Plan process having regard to environmental, heritage, infrastructure and sustainability considerations.

Environment and Green Belt

The Council recognises concerns regarding Green Belt release, biodiversity and the loss of open space. Any development would be required to deliver appropriate green infrastructure, biodiversity enhancements and landscape mitigation to minimise impacts.

Alternative Development Options

The Council has considered a range of alternatives, including brownfield sites, as part of the site selection process. However, brownfield opportunities alone are insufficient to meet identified development needs.

Transport and Infrastructure

The Council acknowledges concerns regarding traffic, road safety and pressure on local services. Development would be required to contribute towards necessary transport, education, healthcare and community infrastructure improvements to support growth.

Heritage and Community Character

The Council recognises the importance of protecting heritage assets and maintaining the distinct identity of Whitchurch Village. Development proposals would be required to respond positively to the area's heritage, landscape and settlement character, supported by appropriate mitigation where necessary.

Consultation and Community Engagement

The Council welcomes the comments received and has carefully considered them in preparing the Local Plan. Further opportunities for public engagement will be provided through future planning application processes.

Site: Whitchurch village, Option D: Eastern extension of the village (150 homes)

Green Belt and Environmental Concerns (424 respondents, 94%): Impact on green belt central, with split views—some cite potential harm to rural areas and threats to wildlife, while others believe housing demand justifies development with environmental mitigations.

Alternative Development Sites and Options (419 respondents, 93%): Preference voiced for RAF Charmy Down and brownfield sites over green belt; more strategic, less contentious site selection desired.

Housing Needs and Character of Whitchurch Village (412 respondents, 91%): Balancing housing provision with maintaining village identity debated—some support new homes as a response to the housing crisis, others worry about urban sprawl effects.

Infrastructure and Service Capacity (410 respondents, 91%): Existing infrastructure deemed insufficient for additional homes; calls for investment in GP services, schools, and roads to manage increased demands.

Heritage and Landscape Impact (396 respondents, 88%): Concerns highlighted over potential conflicts with the character of the conservation area and landscape harm due to new development.

Safety, Traffic, and Pollution (390 respondents, 86%): Safety and pollution from additional traffic a worry; suggestions include better road infrastructure and promoting active travel.

Social Infrastructure and Community Services (382 respondents, 85%): Noted deficit in community services to support development; importance stressed on integrating necessary facilities for sustainable community growth.

Community Sentiment and Participation (381 respondent, 84%): Discrepancy observed between council proposals and community preferences; community engagement and transparent decision-making called for.

Council Response

The Council acknowledges concerns regarding Green Belt release, infrastructure capacity, traffic impacts and the potential effects of development on the character of Whitchurch Village. The site was assessed against environmental, infrastructure, heritage and sustainability considerations as part of the Local Plan process.

Green Belt and Environmental Impact

The Council recognises concerns regarding impacts on the Green Belt, biodiversity and landscape character. Development would be required to provide appropriate green infrastructure, biodiversity net gain and landscape mitigation.

Alternative Sites and Housing Need

A range of alternatives, including brownfield sites, were considered through the plan-making process. However, brownfield opportunities alone are insufficient to meet identified housing needs.

Infrastructure and Transport

The Council agrees that development must be supported by appropriate infrastructure. Contributions would be required towards education, healthcare, transport and community facilities, alongside measures to improve sustainable travel and mitigate traffic impacts.

Heritage, Landscape and Village Character

The Council recognises the importance of protecting heritage assets and maintaining the distinct identity of Whitchurch Village. Development proposals would be required to respond positively to the area's heritage, landscape and settlement character, supported by appropriate mitigation where necessary.

Community Engagement

The Council welcomes the comments received and has taken them into account in preparing the Local Plan. Further opportunities for public engagement will be available through future planning application processes.

Whitchurch village: Comparing Site Options

Housing need and development impacts (432 respondents, 94%): Concerns over balancing the demand for affordable housing against issues like pollution and service strain with suggestions for focused, sustainable growth.

Infrastructure and local services (422 respondents, 92%): Emphasised need for improvement in infrastructure like traffic, healthcare, and educational facilities to support the village's population.

Green belt and environmental conservation (418 respondents, 91%): Strong opposition to housing on green belt land due to risks of urban sprawl and biodiversity loss, with some advocating for strategic, nature-friendly planning.

Community and heritage preservation (416 respondents, 90%): Desire to preserve Whitchurch Village's distinct identity and character, avoiding merging with nearby areas and maintaining historical sites.

Public opinion and community engagement (410 respondents, 89%): Noted resistance to housing development, particularly on green belt land, and a call for genuinely considering community feedback in decisions.

Sustainability and transportation (392 respondents, 85%): Importance of eco-friendly development, public transport improvements, and promotion of active travel for healthier lifestyles.

Education and recreational facilities (384 respondents, 83%): Highlighted the shortfall in planning for educational and recreational facilities to meet the needs of an expanded population.

Council Response

Housing Need and Development Impacts

The Council recognises concerns regarding the balance between meeting housing needs and protecting the quality of life of existing residents. The Local Plan seeks to deliver new homes, including affordable housing, alongside the infrastructure, services and environmental mitigation necessary to support growth. Development at Whitchurch Village is planned as part of a comprehensive strategy which includes new schools, healthcare provision, transport improvements, community facilities and significant areas of green infrastructure.

Infrastructure and Local Services

The Council agrees that infrastructure must be delivered alongside development. The proposed allocations require provision of a new secondary school, a new primary school, healthcare facilities, community infrastructure, transport improvements and local services. Development will be expected to contribute towards the delivery of infrastructure necessary to support both existing and future communities.

Green Belt and Environmental Conservation

The Council acknowledges the strong concerns raised regarding development within the Green Belt. The proposed allocations have been informed by Green Belt evidence and are considered to be supported by exceptional circumstances. The strategy seeks to minimise harm through the retention of meaningful green gaps, the creation of robust Green Belt boundaries, and the delivery of extensive green infrastructure, biodiversity enhancements, nature recovery measures and publicly accessible open space.

Community and Heritage Preservation

The Council recognises the importance of maintaining Whitchurch Village's distinct identity and conserving its heritage assets. The Local Plan includes specific requirements to maintain separation from Bristol, protect important views, conserve the setting of designated heritage assets, and deliver landscape mitigation. Development proposals will be required to respond sensitively to the village's historic and landscape context through detailed heritage and landscape assessments.

Public Opinion and Community Engagement

The Council welcomes the significant level of public engagement throughout the plan-making process and has carefully considered consultation responses in preparing the Local Plan. Feedback from residents has informed the evolution of the strategy and policy requirements. There will also be further opportunities for community involvement through future planning application and masterplanning processes.

Sustainability and Transportation

The Council supports the delivery of sustainable development and recognises the importance of reducing reliance on private cars. The Local Plan includes significant investment in walking, cycling and public transport infrastructure, including improvements to National Cycle Network Route 3, travel hubs, enhanced bus services and new active travel connections throughout the village. These measures are intended to support healthier and more sustainable travel choices.

Education and Recreational Facilities

The Council acknowledges concerns regarding the provision of education and recreational facilities. The Local Plan addresses these requirements through the allocation of land for a new secondary school, a new primary school, early years provision, SEND facilities, sports pitches, community sports facilities, public open spaces and country parks. These facilities are intended to meet the needs arising from planned growth whilst also benefiting the existing community.

Chapter 7: Somer Valley: Vision, Strategy and Options

Somer Valley overview

Sustainable Transport and Infrastructure Challenges (36 respondents, 72%): High car dependency noted with suggestions for better public transport, cycle paths, and walking routes. Issues of congestion and inadequate bus services contrast with ideas for rail connectivity and eco-friendly options like electric buses.

Housing and Community Needs (32 respondents, 64%): Varied housing needs, especially for older populations, raised with emphasis on brownfield site development and affordable options. Concerns about housing mix and density possibly altering community character and putting a strain on infrastructure.

Environmental and Landscape Considerations (16 respondents, 32%): Impact on landscapes, biodiversity, and ecological networks from development discussed. Flood risks, air pollution, and climate change highlighted, alongside calls for green space protection and environmental agency involvement.

Access to Healthcare and Education (14 respondents, 28%): Insufficient healthcare facilities and challenges accessing secondary schools noted. The need for concurrent expansion of healthcare and educational infrastructure with housing development stressed.

Strategic Planning and Governance (11 respondents, 22%): Criticism of inadequate local resident consultation and transparency in planning processes.

Community Well-being and Social Cohesion (10 respondents, 20%): Worries about villages becoming dormitory towns and loss of social cohesion. Development plans encouraged to support community well-being, youth facilities, and initiatives for integrating new residents.

Local Economy and Employment Opportunities (9 respondents, 18%): Importance of local employment and business development in economic revitalisation identified. Comments on unsuccessful enterprise zones, with suggestions for supporting existing businesses and attracting new opportunities.

Somer Valley opportunities

Infrastructure and Services Capacity (25 respondents, 81%): Concerns about current infrastructure and services being insufficient for a growing population, potentially leading to congestion and overstretched schools and healthcare.

Economic Opportunities vs Community Well-being (19 respondents, 61%): Recognition of economic benefits from development, but with worries about the impact on traffic, pollution, community dynamics, and local services.

Housing Development and Location (18 respondents, 58%): Discussions on the need for new housing to be sustainable, appropriately located, and in harmony with local character and community needs.

Active Travel and Public Transport (12 respondents, 39%): Calls for improvements in active travel options and public transport to reduce congestion and promote a healthier lifestyle, despite challenges posed by the area's topography and existing infrastructure.

Environmental and Green Space Preservation (10 respondents, 32%): Strong sentiment towards protecting green spaces and wildlife, with a preference for redeveloping brownfield rather than greenfield sites and minimising flood risks.

Community Facilities and Recreation (6 respondents, 19%): Desire for new developments to include affordable and accessible recreational amenities to enhance community life.

Flood Risk and Environmental Sustainability (2 respondents, 6%): Specific concerns about building in flood-prone areas, exacerbating flooding, and the broader environmental impacts of development, stressing the importance of sustainable practices.

Sites overview: Somer Valley

Housing Development and Land Use (9 respondents, 90%): Discussions reflect diverse opinions on housing development, prioritising brownfield sites over agricultural land to preserve green spaces. Sustainability concerns are raised, particularly with the car dependency in Farrington Gurney, and tensions are noted between growth and preserving the environment.

Sustainable Development and Transport Infrastructure (7 respondents, 70%): Respondents highlight the lack of sustainable transport options and the high car dependency in Somer Valley. Calls for investment in improved connectivity and concerns about the adequacy of transport proposals to meet future needs and environmental impact.

Community Cohesion and Local Services (6 respondents, 60%): The impact of development on community cohesion and local services is noted, with the need for better infrastructure such as schools and healthcare. There are concerns about infrastructure keeping pace with housing development.

Planning Process and Community Engagement (5 respondents, 50%): There is a desire for a more inclusive planning process that reflects the unique characteristics of Somer Valley, with concerns over transparency and community involvement in decisions. Suggestions for a community-engaged approach to planning are common.

Environmental Sustainability and Agricultural Land (2 respondents, 20%): The use of agricultural land for development, especially in the Farrington Gurney area, raises issues about classification, sustainability, and car dependence. There is advocacy for prioritising brownfield sites for development to protect the environment and agricultural lands.

Economic Development and Employment Opportunities (2 respondents, 20%): There is a perceived need for more local employment opportunities to decrease commuting out of the valley. Critiques of the enterprise zone's narrow focus and calls for a broader economic development approach supporting diverse sectors and local business are present.

Council Response

Site allocations include specific provision for the expansion of education factitious and financial contributions to early years and SEND place. Healthcare facilities will be improved through the provision of financial contributions and wastewater provision will be managed by Wessex water.

Transport mitigation measures are proposed in the Somer Valley including improvements to public transport and access to active travel. This is intended to reduce the reliance on the private car. Alongside the A362, A367 and A37 a network of travel hubs will improve access to public transport and active travel. The frequency of public transport will increase.

The council acknowledges the importance of the surrounding landscape to the identity of the Somer Valley. All site allocation include landscape mitigation and green infrastructure requirements. In particular to screen development within hill tops. Wildlife buffers have been included within site allocations to protect existing wildlife sites such as SNCIs and SSSIs. Green infrastructure has been included within all site allocation to improve biodiversity and all site allocations are subject to biodiversity net gain.

All site allocation include landscape mitigation to existing heritage assets such as SAMs. Heritage assessments are required on site allocations close to heritage assets. Archaeological assessments are required in areas of potential archaeology.

Growth has been concentrated adjacent to settlements. Transport access will be improved to allow access to the local centres and improve the sustainability of the settlements.

All site allocations will require 30% affordable housing. Additional employment sites are proposed at Peasedown and Westfield.

Site: Peasedown

Infrastructure and Local Services Expansion (94 respondents, 82%): Adequacy of existing infrastructure to support housing developments questioned, with a call for improved local services and infrastructure expansions.

Housing Needs and Community Cohesion (72 respondents, 63%): Need for more affordable housing acknowledged, while maintaining community resources and village character is a concern.

Environmental and Biodiversity Considerations (65 respondents, 57%): Potential impact on local environment and biodiversity from developments worries residents; importance of preserving green spaces is highlighted.

Preservation of Rural Identity vs. Economic Growth (40 respondents, 35%): Balance sought between maintaining Peasedown's rural charm and seizing economic development opportunities.

Traffic and Transportation Safety (32 respondents, 28%): Expansion fears include worsening traffic congestion and road safety risks.

Access to Green Energy and Sustainable Development (10 respondents, 9%): Sustainable living practices and integration of green energy within scenic landscapes are discussed..

Archaeological and Cultural Heritage (4 respondents, 4%): Development's impact on the area's archaeological heritage is a point of concern; calls for preservation amidst growth.

Council Response

Transport mitigation including active travel and better access to public transport would mitigate against the impact of new homes. Financial contributions will be south to improve healthcare and education. All allocations include extensive landscape mitigation.

The transport modelling requires the provision of travel hubs with parking to improve access to public transport. The proposals also include upgrades to active travel including new footway crossings on the A367. The policy requirements for South Peasedown include extension planting and green infrastructure to protect the landscape and improve biodiversity. New landscape buffers are required along the ridge line. Landscape buffers will also protect existing habitats such as ancient woodland. Waste water infrastructure upgrades will be investigated by Wessex Water. Archaeology assessments will be required.

Proposals for renewable energy projects will not be taken forward due to the land not being available for such developments and the need for land for housing.

Site: North Radstock

Infrastructure and Traffic Management Challenges (55 respondents, 80%): Frustrations over existing road network issues, A367 congestion, inadequate public transport, and risks from additional vehicular access; some suggest mitigation strategies like traffic calming, new roundabouts, and enhanced public transport links.

Community Facilities and Local Amenities (33 respondents, 48%): Concerns about insufficiency of schools, GP services, and retail to support current and future populations; suggestions include enhancing local infrastructure to foster a self-sustaining community.

Environmental and Landscape Preservation (29 respondents, 42%): Strong opposition to loss of green spaces, potential harm to wildlife, increased air pollution, and drainage issues leading to flooding; opportunities for integrating green infrastructure highlighted.

Access to Green Spaces and Recreational Areas (20 respondents, 29%): Concern about loss of accessible green spaces and safe footpaths; potential for redevelopment to improve access to recreational areas through careful planning.

Housing Affordability and Diversity (12 respondents, 17%): Need for affordable housing options for young families and community living; suggestions for diversity including council housing, shared communal areas, and environmentally friendly housing designs.

Cultural and Historical Preservation (6 respondents, 9%): Impact on landscape character and archaeological sites concerns; development seen as a challenge to cultural assets with potential for sensitive incorporation of heritage preservation.

Sustainable Transport and Active Travel Initiatives (4 respondents, 6%): Lack of safe cycling and walking routes; calls for development promoting sustainable transport, with mixed opinions on the potential to reduce car dependency.

Public Consultation and Engagement (2 respondents, 3%): Frustration with the consultation process, feeling that community input is overlooked; room for improvement in engaging residents in planning and decision-making.

Council Response

The proposed allocation at North Radstock occupies an elevated position and therefore extension landscape planting is required to mitigate the impact on the ridgeline. Development will not occur within the heritage asset boundaries and planting will provide screening. A transport hub will improve access to public transport. The existing sports ground will be retained. Wastewater infrastructure will be managed by Wessex Water. Land will be safeguarded to allow for the expansion of the existing primary school. The site allocation will require the provision of 30% affordable housing.

Site: East Radstock

Transport and Connectivity (61 respondents, 80%): Concerns about development impact on local transport; calls for improvements in sustainable options and better connectivity amidst traffic congestion worries and the limited public transport available.

Infrastructure and Public Services (49 respondents, 64%): Anxiety over whether the current stretched services, including healthcare and education, could support population increase; points out the need for significant investment in infrastructure.

Housing and Community Impact (44 respondents, 58%): Opposition to large developments that may harm the local community fabric; emphasis on the need for thoughtful, integrated planning that maintains the community's social and economic landscape.

Alternatives and Strategic Planning (42 respondents, 55%): Suggestions for a broader strategic planning conversation that incorporates alternatives to greenfield development, considering brownfield sites or locations near employment hubs to mitigate ecological and infrastructure concerns.

Ecological and Agricultural Concerns (27 respondents, 36%): Highlighting the critical balance between agricultural productivity, ecological integrity, and development pressures; stressing the risks to farm land, habitats, and biodiversity, necessitating careful planning to mitigate environmental impacts.

Active and Sustainable Transport (13 respondents, 17%): Noting the lack of infrastructure for safe, sustainable transport modes; identifying challenges in promoting active travel due to steep topography and insufficient cycling lanes and pedestrian routes.

Social and Recreational Amenities (11 respondents, 14%): Concerns about the potential loss of community resources and recreational spaces due to development; underlining the importance of social infrastructure in new developments for residents' well-being and quality of life.

Economic and Employment Opportunities (1 respondent, 1%): Concern that development may not address insufficient local employment opportunities, potentially leading to increased out-commuting and social and economic disparities.

Flooding and Water Management (1 respondent, 1%): Points to flooding and effective water management issues intensified by development; stressing the need for robust drainage and water management strategies to protect human and natural environments.

Council Response

At Writhlington Active travel improvement and more frequent bus services will reduce the need to rely on a private car. Development will facilitate new road junctions and relieve pressure from the existing five way junction. The council will work with Somerset Council under the Duty to Cooperate. Financial contributions will be sought through planning applications to provide for healthcare improvements and the local centre improved. SUDS are required to prevent flooding and improve drainage. Landscape buffers will improve biodiversity and mitigate against impacts on the surrounding landscape.

The development is proposed to be located adjacent to schools and sports centre. The site allocation proposes improvements to the local centre.

West of the Somer Valley Enterprise Zone

Sustainable Energy Solutions and Location Concerns (8 respondents, 73%): Respondents suggest prioritising solar installations on commercial and industrial building rooftops, avoiding Grade 1 agricultural land to protect farming and food security.

Agricultural Land Use vs. Renewable Energy Priorities (7 respondents, 64%): Users stress the importance of preserving prime farmland, advocating for alternative energy project sites such as underutilised urban areas or brownfield sites.

Community Responses and Planning Process Critiques (5 respondents, 45%): Feedback includes demands for comprehensive environmental assessments, improved public consultation, and a transparent approach to evaluating development alternatives.

Renewable Energy Infrastructure Adaptation (3 respondents, 27%): Suggestions involve mandating rooftop solar for businesses in the enterprise zone and adopting successful models from other cities.

Transportation and Infrastructure Challenges (3 respondents, 27%): Concerns about potential traffic, inadequate sustainable transport options, and infrastructure planning are prominent, with calls for better connectivity and transit facilities.

Impact on Local Ecology and Landscape (1 respondent, 9%): The need for careful assessment of impacts on Mendip Hills, local wildlife, and landscape, alongside proposals for improving habitat connectivity and buffer zones.

Council Response

The site will not be taken forward as an allocation for renewable energy. Development Management polices allow for the provision of renewable energy and a site allocation is not required.

Site: Farrington Gurney

Rural Character and Community Cohesion (194 respondents, 77%): Development seen as potentially over-urbanising the village, risking rural character..

Planning and Policy Alignment (184 respondents, 73%): Perceived contradictions with development and planning policies designed to protect rural environments; calls for sustainable development aligning with existing infrastructure.

Transport and Traffic Implications (161 respondents, 64%): Concerns about increased traffic and declining air quality; while proposed solutions like traffic calming measures exist, doubts remain about car dependency reduction.

Access to Services and Facilities (119 respondents, 47%): Strain on healthcare and lack of amenities noted; evenly distributed development within the district as a whole and improved services are proposed as alleviating measures.

Impact on Local Amenities and Infrastructure (116 respondents, 46%): Worry over capacity of schools and healthcare to support more residents; incremental development and planned infrastructure upgrade suggested.

Agricultural Land and Biodiversity Loss (99 respondents, 39%): Opposition to building on grade 1 agricultural land citing irreversibility and food security; focus on brownfield sites or less valuable land proposed.

Environmental and Health Concerns (40 respondents, 16%): Increased pollution and green space loss are major worries; opportunities for protective measures and eco-friendly development practices discussed.

Heritage and Landscape Impact (18 respondents, 7%): Anxiety about effects on historical assets and countryside appearance; mitigation through considerate design and development scaling highlighted.

Economic and Employment Considerations (12 respondents, 5%): Potential harm to local businesses from agricultural land loss.

Council Response

The Council has carefully considered the consultation responses relating to Farrington Gurney. The issues raised have informed the refinement of the spatial strategy and site allocation policies for the area.

The proposed allocation in the south will more than double the size of the village. Transport mitigation including active travel and better access to public transport would mitigate against the impact of new homes. This will include the provision of a new travel hub. The quantum of development will require the provision of a new primary school. Financial contributions will be south to improve healthcare and education. The allocation will include extensive landscape mitigation. Landscape buffers will improve biodiversity and mitigate the impact of development within the countryside.

The proposed allocation within the north of the village will not be taken forward. The land is covered by Grade 1 farmland which is in active use. Development here would result in the loss of the most versatile agricultural land and harm the local farming business. The site is adjacent to the Grade II listed church and its isolated position is integral to its setting.

Somer Valley non-strategic sites

Housing Options and Types (12 respondents, 71%): Respondents discussed the need for diverse housing, including small and large site options, with a focus on delivering affordable and smaller houses suitable for rural communities.

Development Location and Land Use (12 respondents, 71%): Debate centred on prioritising brownfield and infill sites close to town centres to make use of existing infrastructure and reduce greenfield land use.

Community Needs and Integration (8 respondents, 47%): Concern for development to address local needs, including affordability, integration with current services, and maintaining the social fabric.

Strategic Planning and Assessment (8 respondents, 47%): Some exhibited mistrust in the strategic site appraisal process and called for detailed impact assessments.

Impact on Infrastructure and Services (4 respondents, 24%): Concerns were raised about the sufficiency of current infrastructure and the need for planning that accommodates development.

Sustainability and Environmental Concerns (3 respondents, 18%): Unease expressed about the environmental impact on air quality, traffic, and proximity to sensitive locations.

Economic Implications and Developer Contributions (3 respondents, 18%): Discussions included the economic risks of developments and the potential for infrastructure costs to limit affordable housing contributions.

Site: WF01

Accessibility and Site Location Concerns (2 respondents, 50%): Accessibility issues noted, with Site WF01's location separated from town by an industrial estate, leading to discussions on the importance of integrating new developments with existing urban infrastructure.

Planning and Developmental Constraints (2 respondents, 50%): Concerns regarding the opportunities of Site WF01's development are contingent on addressing flooding, accessibility, and integration with current urban areas, with planning as a potential solution.

Housing and Community Facilities (1 respondent, 25%): Acknowledgement of Site WF01's potential to meet housing needs and provide community facilities, emphasising thoughtful execution as key to community welfare enhancement.

Traffic Management and Air Quality (1 respondent, 25%): Concerns over potential traffic increase and air quality deterioration from Site WF01's development, highlighting the need for effective traffic management and environmental impact assessments.

Council Response

The Council has carefully considered the consultation responses relating to Westfield. The issues raised have informed the refinement of the spatial strategy and site allocation policies for the area.

The proposed development site at Westfield as been proposed to employment uses to meet the employment needs of the surrounding district. It sits adjacent to an existing industrial estate, therefore provides an opportunity to extend the exiting industrial estate. The proposal include landscape and wildlife buffers to protect the existing biodiversity. Development will not occur within the floodplain. Wastewater infrastructure will be managed by Wessex Water.

Site: MSN28a and b

Community and Social Wellbeing (4 respondents, 67%): Seen as a logical extension to Midsomer Norton's southwestern boundary, the development is anticipated to provide public open spaces for recreation and socialisation, along with improved local connections. However, the site's distance from key amenities led to concerns about community identity and accessibility.

Housing and Local Infrastructure (4 respondents, 67%): Addressing local housing shortages with affordable homes, the site's development is associated with expected infrastructure enhancements via s106 and CIL payments. However, concerns include potential traffic increase and overdevelopment due to its remote location from town centres.

Environmental Considerations and Green Space Provision (4 respondents, 67%): The development is noted for its likely positive environmental outcomes, including green infrastructure and over 10% net biodiversity gain. The integration of public open spaces is highlighted, along with concerns over air quality degradation and the necessity for accessible, eco-friendly transport options.

Planning and Development Strategy (3 respondents, 50%): The site's development is seen as a potential solution for housing needs in B&NES and the wider region. Calls for more transparent and participatory planning, with a strategic focus on leveraging economic, social, and environmental benefits without impacting the green belt, were also noted.

Economic and Employment Opportunities (1 respondent, 17%): Expected to stimulate the local economy through job creation, increased local business demand, and potentially higher council tax revenues, the project also raises concerns about balancing economic growth with environmental preservation and community wellbeing.

Council Response

The proposed allocation at Thicket Mead include landscape and ecological buffers to mitigate the impact of development to the surrounding landscape. Development will not be located close to Wellow Brook and has been kept away from the floodplain. The site will be connect to the active travel network. The site allocation will require 30% affordable housing.

Site: RAD 31c

Strategic planning and land use (4 respondents, 80%): Respondents support a strategic approach to land use at RAD 31c, advocating for housing expansion outside of the green belt through sensible infill without expanding village boundaries unnecessarily; early-phase development faces few constraints and aligns with strategic objectives.

Housing development support and viability (3 respondents, 60%): Stakeholders like Bromford Housing and the Silverwood Partnership express interest in residential development on RAD 31c, highlighting its potential for housing and emphasizing the site's availability, suitability, and deliverability.

Conservation balance (2 respondents, 40%): The balance between residential development and the site's geological conservation is essential to secure support for development projects, aiming for harmonious integration of development and conservation objectives.

Community and stakeholder engagement (2 respondents, 40%): Engagement with stakeholders, including local authorities and potential developers, is prioritized to ensure a collaborative and transparent planning process.

Environmental and heritage protection (1 respondent, 20%): Recognizing RAD 31c's geological rather than ecological significance, planning processes consider environmental and historic impacts, with no significant concerns from Natural England or the council's archaeologist.

Council Response

At Haydon landscape mitigation will be required to screen the development from the surrounding hillsides. Landscape mitigation will also provide an environmental buffer to the adjacent SSSI.

Site: MSN23 and PAU24a

Development approach and place-specific planning (5 respondents, 100%): Users discuss various approaches to development, advocating for cautious, gradual progress to integrate growth with existing infrastructure and services. Emphasis is placed on strategic planning unique to each site.

Economic vs environmental priorities (2 respondents, 40%): Balancing economic development with environmental conservation is a key concern among users. Discussions focus on non-green belt development while being mindful of traffic implications and sustainability.

Infrastructure and traffic impact (1 respondent, 20%): Concerns are centred around development strain on local infrastructure, with a focus on the potential for increased traffic and its impact on existing roads. Calls for traffic assessments and infrastructure planning are evident.

Sustainability and urban density (1 respondent, 20%): Infilling is suggested as a preferred sustainable development method, aimed at reducing urban sprawl and concentrating resources where most needed. This theme addresses the balance between densification and quality of living.

Land ownership and development strategy (1 respondent, 20%): Users express divergent views on development involving multiple landowners. Coordination and a unified approach are favoured by some, while others highlight the need for balanced decision-making to avoid bias.

Council Response

The proposed allocation at Thicket Mead include landscape and ecological buffers to mitigate the impact of development to the surrounding landscape. Development will not be located close to Wellow Brook and has been kept away from the floodplain. The site will be connect to the active travel network.

Site: PAU11 and 12

Housing and Population Growth Debate (7 respondents, 88%): Divided opinions on housing necessity and scale; some cite current growth as unsustainable, others propose small-scale or brownfield development; concerns about overpopulation and desires for community-beneficial growth reflected.

Infrastructure and Traffic Concerns (4 respondents, 50%): Adequacy of local infrastructure questioned, with focus on narrow and flood-prone Farrington Road; safety concerns due to visibility issues; some believe small developments manageable with infrastructure improvements.

Sustainable Development and Brownfield Focus (3 respondents, 38%): Preference for sustainable practices and brownfield site prioritization to preserve agricultural land and green spaces; recognition of the finite nature of local environments.

Community Integration and Development Strategy (3 respondents, 38%): Concerns about new developments lacking integration with village center; suggestions for holistic planning and development of new towns near transport links for sustainable growth.

Developer Contributions and Local Benefits (1 respondent, 12%): Dissatisfaction with perceived inadequate developer contributions to local enhancements; desire for developments with clear, direct, and immediate community benefits.

Environmental and Wildlife Considerations (1 respondent, 12%): Highlighting potential negative impacts of development on wildlife and landscape; loss of green fields and clean air of concern, underscoring sustainable planning needs.

Council Response

The proposed developments at Farrington Road require the provision of additional pedestrian access to the village centre, alongside financial contributions to sustainable transport measures. Both sites include landscape requirements which will mitigate the impact of the development on the surrounding landscape.

Chapter 8: Rural Areas: Vision, Strategy and Options

Rural areas overview

Land Use and Development Strategy (47 respondents, 82%): Strategic land use planning in rural areas should consider the unique needs, including brownfield sites use, green belt preservation, and avoiding disproportionate development, with sustainability and local character in mind.

Community-led Planning and Local Involvement (35 respondents, 61%): Emphasises the importance of community involvement in planning to ensure developments meet rural communities' specific needs and maintain their unique character.

Transportation and Public Services Capacity (27 respondents, 47%): Identifies the strain on transport and public services due to rural development, stressing the importance of enhancing capacity and accessibility to manage growth.

Housing Needs and Affordability (27 respondents, 47%): Highlights the need for affordable, accessible homes and diverse housing types in rural areas to serve different demographic groups and maintain local character.

Transport Infrastructure and Accessibility (19 respondents, 33%): Points to the need for improved transport infrastructure to support rural communities, reduce car dependency, and promote greener transport options like electric vehicles.

Sustainable Development and Environmental Protection (17 respondents, 30%): Advocates for environmentally sustainable development in rural areas that protects natural resources and promotes biodiversity alongside accommodating growth.

Economic and Social Sustainability (12 respondents, 21%): Addresses the need for development that not only provides housing but also supports local employment and social infrastructure for cohesive rural communities.

Infrastructure and Services Upgrading (6 respondents, 11%): Underlines the urgency to upgrade and expand essential services and infrastructure in rural areas, including healthcare, education, and utilities, to meet current needs and future growth.

Council Response

The consultation responses demonstrated broad support for meeting local housing needs in rural communities whilst protecting the distinctive character, landscape, biodiversity and heritage of the wider rural area. Respondents consistently emphasised the importance of proportionate growth, community involvement in planning decisions, affordable housing, improved infrastructure and access to local services. Concerns were also raised regarding traffic, public transport, environmental impacts and ensuring that development supports the long-term sustainability of rural communities.

In response, the Regulation 19 Local Plan introduces a Rural Place Strategy which seeks to balance the delivery of homes, including affordable housing, with the protection of environmental assets and village character. Growth has been focused on the most sustainable rural settlements, supported by site-specific infrastructure requirements, green infrastructure, biodiversity enhancements and sustainable transport measures. The strategy also continues to support neighbourhood planning, rural exception sites and other locally-led approaches to meeting local housing needs. This responds directly to the consultation emphasis on community involvement, sustainability and maintaining the distinct identity of rural settlements.

Rural areas: Village site options

Planning and Development Process (33 respondents, 66%): Criteria and processes for site selection are scrutinized, with calls for more comprehensive, evidence-based approaches that consider a broader scope of factors affecting sustainability and viability of village development.

Sustainability and Environmental Impact (31 respondents, 62%): Balance between development and environmental conservation is emphasised; discussions stress the importance of factoring in biodiversity, green spaces, and environmental risks—like flooding and air quality—into development plans.

Infrastructure and Amenities (28 respondents, 56%): Respondents underscore the need for developments to be paired with improved infrastructure, such as transportation, healthcare, and education, to avoid overburdening existing facilities and support community well-being.

Transport and Connectivity (25 respondents, 50%): Concerns focus on how new development will affect traffic and transportation infrastructure, with a strong call for enhanced public transport and sustainable travel options to meet local needs and reduce reliance on cars.

Housing Affordability and Diversity (18 respondents, 36%): There are significant discussions about the lack of affordable and diverse housing, spotlighting the needs for smaller homes and different tenures to cater to a spectrum of local residents, including the young and elderly.

Impact on Rural Character and Heritage (7 respondents, 14%): The effect of development on the distinctive character and historical heritage of rural villages is worrying some, who advocate for development that is mindful of village aesthetics and history.

Regional Growth Strategy Misalignment (5 respondents, 10%): The alignment between sustainable village development and regional growth strategies is questioned, indicating a call for planning decisions to be coherent with broader objectives and community sustainability.

Community-led vs Top-down Development (2 respondents, 4%): There is a preference for developments that are community-led and tailored to the unique needs and characteristics of villages, instead of generic, imposed strategies.

Council Response

Consultation responses highlighted the importance of ensuring that site selection is evidence-led, environmentally responsible and supported by appropriate infrastructure. Respondents raised concerns regarding transport, healthcare, education, landscape impacts, biodiversity, flooding and the effect of development on the character of rural villages. Many representations also

emphasised the need for affordable housing and a range of dwelling types capable of meeting local needs.

In response, the Regulation 19 Local Plan has refined the selection of village allocations through further technical assessment, infrastructure evidence and consideration of consultation responses. Site capacities, boundaries and policy requirements have been reviewed and, where appropriate, amended. The proposed allocations include requirements relating to affordable housing, infrastructure provision, landscape mitigation, biodiversity enhancement, green infrastructure and sustainable transport. Some options consulted upon have not been taken forward where further assessment identified significant constraints or more suitable alternatives. The resulting package of allocations seeks to support thriving rural communities whilst ensuring that development is sustainable and responsive to local circumstances.

Chapter 9: Development management policy options

Housing

Policy H/RES: Cross-subsidy between market and affordable housing

Clarity and Certainty in Policy (8 respondents, 80%): Respondents favour detailed policy guidance to ensure transparency in funding affordable units through market housing, which assists developers and advocates but caution against too prescriptive an approach, which can hinder flexibility, particularly for smaller rural sites.

Impact on Viability and Development Delivery (5 respondents, 50%): Some respondents are concerned that rigorous cross-subsidy requirements might jeopardise the feasibility of housing projects due to increased construction costs and demands for higher energy performance.

Setting Upper Limits for Market Housing (5 respondents, 50%): Discussions around the appropriate balance between funding for affordable housing through limits on market housing and maintaining project financial viability.

Rural Housing Needs and Site Specifics (3 respondents, 30%): Challenges of generating substantial cross-subsidy in rural areas are noted, with a call for policy adjustments that better address rural housing needs rather than sole reliance on exception sites.

Diverse Housing Stock and Community Reflection (1 respondent, 10%): A desire for housing to reflect community diversity and character through cross-subsidy policy, whilst managing the risk of developments not aligning with local needs or identities.

Sustainability vs. Affordability Trade-offs (1 respondent, 10%): The tension between achieving higher sustainability standards and the affordability of developments is highlighted, underlining the need for balance.

Council Response

Consultation comments are noted. Policy 6.14 provides a clear and flexible framework for affordable housing delivery, including affordable housing requirements, tenure mix, rural provision, viability assessment procedures and review mechanisms where exceptional circumstances are demonstrated. The policy seeks to maximise affordable housing delivery in response to identified needs whilst ensuring development remains deliverable. It also supports mixed and balanced communities through requirements relating to tenure, dwelling mix and integration of affordable housing within developments. Affordable housing delivery in rural areas is supported through both site-based requirements and Rural Exception Sites. Viability and the cumulative impact of policy requirements have been considered through the Local Plan evidence base, with flexibility available where justified through robust viability evidence.

Policy H/RES: First homes rural exception sites

Policy flexibility and constraints (5 respondents, 100%): Respondents mentioned concerns over the policy being too restrictive, potentially limiting rural affordable housing. A balance between national guidance and local criteria-based approaches was suggested for better adaptability.

Criteria-based approaches vs national guidance (4 respondents, 80%): Some raised the need for localised criteria specifically tailored to the unique needs of rural communities, as opposed to broad national policies.

Affordable housing adequacy (2 respondents, 40%): The conversation included opinions that national policies might consider the needs of first-time homeowners but called for a policy to ensure a diverse mix of house types in rural developments.

Geographical coverage and equity (1 respondent, 20%): There was a perception of unequal treatment across different rural areas, with a need for equitable policy application to encourage unbiased housing development.

Council Response

The comments are noted. The Local Plan supports First Homes exception sites where evidence of unmet local need has been demonstrated and the Council has agreed that the First Homes tenure is required in the locality. Policy 6.14 also provides flexibility for alternative tenure mixes where justified by local housing needs evidence and seeks to ensure that affordable housing delivery reflects local circumstances. The policy framework has been informed by the Local Housing Needs Assessment and supports the delivery of mixed and balanced communities, including in rural areas, through a range of affordable housing mechanisms rather than reliance on a single tenure or delivery route. Affordable housing requirements apply consistently across the District, whilst allowing local needs and site-specific circumstances to be taken into account where justified.

Policy CLH: Community-led housing for rural exception sites

Criteria-based policy approach (5 respondents, 56%): Divided opinions on whether a criteria-based approach to site selection offers clarity or if it stifles innovation and makes suitable site identification more difficult.

Policy effectiveness and value (4 respondents, 44%): Varying views on the current policy framework, ranging from redundant and valueless to fit for purpose without need for change.

Local autonomy vs national guidelines (4 respondents, 44%): Tension between the desire for more local decision-making in community-led housing and the necessity for national policy adherence, with a need to balance local flexibility and national consistency.

Housing diversity and accessibility (3 respondents, 33%): Calls for policies that promote diverse and accessible housing options to meet the broad needs of rural communities, including affordability.

Impact on sensitive landscapes (1 respondent, 11%): Acknowledgement of the complex issue of developing housing in sensitive areas, emphasising the balance between new housing needs and the preservation of natural and historic environments.

Community engagement and support (1 respondent, 11%): Preference for prioritising sites with proven community support, suggesting policies should foster significant community engagement from the start.

Council Response

The comments are noted. The Local Plan's criteria-based approach provides a consistent framework for assessing proposals whilst allowing consideration of site-specific circumstances. The Council considers this approach provides an appropriate balance between flexibility and certainty in decision-making, ensuring proposals are assessed against local evidence and planning objectives.

Policy H/EC: Affordable housing requirements within older person and specialist housing (including Extra Care)

Demand for age-specific facilities (5 respondents, 100%): Increasing need for housing tailored to older individuals, with an emphasis on adapting policies to incorporate diversified housing models that include care services, fostering environments that support aging in place.

Local community needs vs. development feasibility (4 respondents, 80%): Balance sought between meeting local community needs for affordable older person housing and the economic implications for developers.

Viability and operational challenges (3 respondents, 60%): Concerns raised about financial sustainability and operational practicality of mandatory affordable housing in specialist and older person's accommodations, alongside recognition of the broader demographic needs within aging communities.

Policy and regulatory framework (3 respondents, 60%): Calls for a nuanced policy approach, with an emphasis on viability assessments specific to older persons and specialist housing as per national policy guidelines, aiming for realistic policies that encourage development without undue burdens.

Community integration and downsizing (2 respondents, 40%): Support for policies that enable older individuals to remain integrated within their communities and promote downsizing to benefit the larger housing ecosystem, aiding in the release of larger family homes to the market.

Council Response

Consultation responses recognised the growing need for specialist and older persons' housing to support an ageing population, independent living and downsizing, whilst also raising concerns regarding viability and deliverability. In response, the Regulation 19 Local Plan takes forward an affordable housing requirement for eligible self-contained older persons' and specialist housing schemes through the Affordable Housing policy, requiring 20% affordable housing provision. This approach reflects the substantial identified need for both affordable housing and specialist accommodation, whilst being informed by the Council's viability evidence and the need to ensure that such developments remain deliverable. The policy therefore seeks to secure affordable housing within older persons' housing where appropriate, supporting mixed and inclusive communities and helping to meet the district's wider housing needs.

Policy H/SH: Design for specialist housing and homes for older people

Planning and policy considerations (6 respondents, 75%): Need for well-designed planning and policy to meet older people's housing needs, with concern that overly prescriptive regulations may deter developers or lead to outdated standards.

Accessibility and viability of specialist housing (5 respondents, 62%): Importance of physical and financial access to specialist housing for older adults, with a need for financial viability for developers and a demand for innovative housing models.

Integration and community cohesion (4 respondents, 50%): Emphasizes integrating specialist housing within communities to avoid isolation and maintain support networks, while acknowledging challenges in rural areas.

Health, well-being, and independence (3 respondents, 38%): Highlights how specialist housing can aid health, well-being, and promote independence, with consideration given to reducing strain on health and social services and the necessity of appropriate design and location.

Environmental impact and resource efficiency (1 respondent, 12%): Discusses potential of specialist housing to contribute to environmental sustainability through efficient use of land and resources, balanced with the need for flexibility to accommodate innovation.

Economic and community benefits (1 respondent, 12%): Notes potential economic benefits such as job creation, with positive impacts on the mental health of residents, balanced against the practical concerns of affordability and viability for providers.

Council Response –

The comments are noted. The Local Plan recognises the need to meet the housing needs of older people and specialist groups through a range of policy measures. Policy 6.14 requires 20% affordable housing provision on housing for older people and specialist housing schemes, while Policy 6.19 requires new residential development to deliver accessible and adaptable homes, including a proportion of wheelchair user dwellings, reflecting identified local needs. The policy framework supports the delivery of high-quality, accessible accommodation that promotes independence, health and wellbeing whilst remaining integrated within sustainable communities with access to services, facilities and public transport. The Council acknowledges the importance of viability and innovation, and the Local Plan has been informed by viability evidence, with flexibility available where exceptional circumstances can be robustly demonstrated. The wider sustainability, health and economic benefits of specialist housing are recognised and have informed the Council's approach.

Policy H/AS: Accessible homes and residential space standards

Viability and cost implications (9 respondents, 82%): Financial impacts of meeting M4(2) and M4(3) standards were a concern, with discussions on increased project costs and the necessity to include these in viability assessments.

Impact on accessible housing provision (9 respondents, 82%): Respondents considered trade-offs involving accessibility standards and housing provision. Issues included supporting the needs of elderly and disabled residents, differentiating accessible home types, and implications for community-centric housing delivery.

Local policy justification and evidence base (7 respondents, 64%): Emphasis was on the requirement for a solid local evidence base to justify the need for specific accessibility standards, demanding detailed analysis and clear linkage to local population needs.

Policy flexibility and local needs (7 respondents, 64%): Advocates for a policy that reflects local demographic and site-specific needs, utilising local housing market assessments to inform demand for accessible homes, and allowing variances under justified conditions.

Regulatory overlap and future proofing (7 respondents, 64%): Exploration of Policy H/AS's relationship with existing or upcoming building regulations, the need for policies to complement rather than duplicate regulations, and considerations for future changes in the regulatory landscape.

Council Response

Viability and cost implications

Concerns were raised about the impact of M4(2) and M4(3) requirements on development viability. However, the proposed accessibility standards have been subject to viability testing as part of the Local Plan evidence base, which confirms that the Regulation 19 policy requirements are capable of being delivered.

Impacts on accessible housing provision

The Local Plan proposes M4(2) Accessible and Adaptable Dwellings and M4(3) Wheelchair User Dwellings standards in accordance with identified local need and viability evidence. These requirements will help ensure that new homes are accessible to a wider range of residents, including older people, disabled people and those with changing mobility needs over their lifetime. The policy approach supports the delivery of inclusive and adaptable communities, responds to the needs of an ageing population, and increases the availability of housing that can accommodate a diverse range of household circumstances while maintaining overall housing delivery.

Local policy justification and evidence base

The policy is informed not only by the LHNA but also by the Council's wider evidence on health inequalities, independent living, inclusive communities and demographic change. Together, this evidence demonstrates a clear and increasing need for accessible and adaptable housing across Bath & North East Somerset and justifies the application of M4(2) and M4(3) standards within the Local Plan.

Policy flexibility and local needs The proposed policy provides an appropriate balance between responding to identified local needs and maintaining flexibility in delivery. The proposed accessibility standards are informed by a robust evidence base, including the Local Housing Needs Assessment (LHNA), which identifies the needs of older people, disabled people and households requiring accessible and adaptable housing, alongside wider Council evidence and strategic priorities relating to health, wellbeing, independent living and the creation of inclusive communities. Together, this evidence demonstrates a clear need for a greater supply of accessible homes to support residents at different stages of life and with a range of mobility and accessibility requirements. The proposed M4(2) Accessible and Adaptable Dwellings and M4(3) Wheelchair User Dwellings standards will help ensure that new homes can meet changing household needs over time, enabling people to live independently for longer and remain within their

communities as their circumstances change. The policy is also consistent with the Government's stated intention to take forward M4(2) as the future baseline standard through Building Regulations, reflecting the recognised need for homes that are accessible and adaptable throughout the life course. The Council therefore considers that the policy is justified by local evidence, aligned with emerging national direction, and will support the delivery of inclusive and resilient communities.

Regulatory overlap and future proofing

The Council acknowledges the importance of ensuring that Local Plan policies complement, rather than duplicate, Building Regulations. The proposed accessibility standards have been included because, whilst Government has indicated its intention to introduce M4(2) Accessible and Adaptable Dwellings as the future regulatory baseline, the necessary amendments to Building Regulations have not yet been implemented. In the absence of these changes, the Local Plan provides an important mechanism for securing the delivery of accessible and adaptable homes in response to identified local needs. The policy is supported by the Local Housing Needs Assessment (LHNA) and wider Council evidence relating to demographic change, health, wellbeing and independent living, which demonstrate a growing need for accessible housing across Bath and North East Somerset. The Council therefore considers that the policy is justified and necessary at this time, while also helping to future-proof the housing stock by ensuring that new homes can better accommodate the needs of an ageing population, disabled people and households whose needs change over time. Should national Building Regulations be updated during the plan period, the Council will have regard to the statutory framework in force at that time.

Policy H/AS: Residential space standards for accessible homes

Impact on Housing Affordability and Viability (4 respondents, 67%): Stakeholders are concerned that enforcing NDSS could potentially lead to fewer homes being built, specifically affordable ones, due to increased costs.

Need for Strategic Integration within Local Plans (4 respondents, 67%): Some stakeholders support the incorporation of NDSS within local plans, rather than applying them through SPDs.

Demand for Justification and Evidence (4 respondents, 67%): A call for council and policymakers to provide clear, evidence-based reasoning behind the adoption of NDSS for all residential developments.

Consideration of Design Flexibility and Alternatives (3 respondents, 50%): A viewpoint suggesting that smaller, yet well-designed homes could meet the objectives of quality living, advocating for a flexible application of NDSS.

Policy Formation Process (2 respondents, 33%): Concerns over the policy-making process, with demands for transparency, public consultation, and independent scrutiny, as opposed to directives issued through SPDs.

Council Response – Input

The comments are noted. The Draft Local Plan includes residential space and accessibility requirements within development plan policies rather than relying solely on supplementary guidance. Policy 6.19 requires new residential development to provide accessible and adaptable homes, reflecting evidence in the Local Housing Needs Assessment which identifies a need for M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings. The approach has been informed by the Council's evidence base and tested through the Local Plan viability assessment. The policy also provides flexibility in exceptional circumstances where site-specific constraints, such as topography, flood risk or other factors, affect deliverability. The Council considers that minimum space and accessibility standards are necessary to ensure new homes provide a suitable standard of accommodation and meet the needs of current and future residents, while allowing appropriate flexibility where justified.

Policy H/AS: Residential space standards in market housing

Balancing quality and flexibility in housing standards (6 respondents, 100%): Respondents mentioned the debate on maintaining high standards, such as the nationally described space standard (NDSS), to enhance living conditions while also acknowledging the need for flexibility allowing for well-designed homes that might not meet these standards but still offer acceptable living conditions.

Affordability, choice, and housing diversity (4 respondents, 67%): Some raised concerns that strict space standards could reduce housing affordability and limit buyer choice, suggesting that smaller, functional homes can play a vital role in the market for different budgets and lifestyles.

Impact of NDSS on housing viability and market response (4 respondents, 67%): Concerns were raised about the viability of new developments with the introduction of NDSS, with views expressed on the need for policies to be evidence-based and considerate of economic impacts, and allowing developers to adapt to market demands.

Evidence-based policy making and local authority role (3 respondents, 50%): There's a call for robust evidence to support the adoption of NDSS by local authorities, with policies to be justified, effective, and aligned with local conditions, including consideration of health, economic viability, and urban planning objectives.

Design versus size in housing standards (1 respondent, 17%): It was suggested that attention should shift from size to the quality of design and usability of living spaces, arguing that a well-designed smaller home could meet residents' needs better than a larger, poorly designed one.

Transitional measures and adaptation to new standards (1 respondent, 17%): The importance of a transitional period for developers to adjust to new standards like NDSS was mentioned, considering costs, planning processes, and the necessity for a gradual shift to ensure viability and benefits for all stakeholders.

Council Response

Comments are noted. Residential space standards in market homes have not been carried forward in the Draft Local Plan.

Policy H/HM: Housing mix

Site-specific flexibility and viability (13 respondents, 87%): Policies should allow for local market demands, site constraints, and economic conditions; inflexible policies risk economic viability and may reduce housing provision.

Diversity in housing types and affordability (13 respondents, 87%): Policies are needed to support diverse housing types and affordable options; overly prescriptive requirements might hinder developers' provision of affordable housing.

Policy clarity and implementation (10 respondents, 67%): Clear guidelines are valued, advocating for flexible compliance conducive to the site-specific context; unclear policies may stall housing delivery.

Evidence-based policymaking (10 respondents, 67%): Housing mix policies must be grounded in robust, local evidence; reliance on broad evidence might not address local demand nuances.

Adapting to market dynamics (9 respondents, 60%): Policies should adapt to market changes, especially in phased developments; concerns exist that too much flexibility may divert from strategic housing needs.

Council Response -

The comments are noted. The Local Plan supports the delivery of mixed, balanced and inclusive communities through its housing policies, whilst recognising that the appropriate housing mix will vary depending on local circumstances and identified needs. Policy 6.14 requires affordable housing schemes to provide a mix of affordable housing units informed by the latest Local Housing Needs Assessment, housing waiting list data, rural housing needs surveys and other relevant evidence, with the size and type of affordable homes agreed in consultation with the Council's Housing Enabling Team. The Council considers that the policy framework appropriately balances housing choice, affordability, viability and the need to meet identified housing requirements across the District.

Policy H/BtR: Build to rent developments

Market viability and local needs (3 respondents, 100%): Acknowledges the necessity for policy to recognise Build-to-Rent's (BtR) market viability, stressing that it must address economic feasibility and local housing requirements, and ensure BtR contributes effectively to housing supply tailored to community needs.

Policy and regulation impact (2 respondents, 67%): There is consensus on the need for pro-BtR policies, yet opinions vary on policy stringency; a balanced regulatory approach that encourages growth while complying with planning objectives is favoured.

Location and planning flexibility (1 respondent, 33%): Highlights divergent views on BtR development sites, debating the merits of urban versus rural settings; calls for policies to permit flexible growth across diverse locations without excessive constraints.

Diversity in housing supply (1 respondent, 33%): Emphasises the importance of including BtR in housing plans to diversify the market, arguing for policy integration of BtR without bias, catering to varied housing needs across societal segments.

Council Response

The comments are noted. Policy 6.15 supports the provision of Build to Rent (BtR) housing as a distinct form of housing delivery that can increase housing choice and contribute to housing supply in sustainable locations. The policy has been designed to balance support for the BtR sector with the need to ensure developments contribute towards meeting local affordable housing needs. It requires the provision of Affordable Private Rent homes whilst allowing viability considerations to be taken into account where applicants can robustly demonstrate that full policy compliance cannot be achieved. The Council considers that the policy provides an appropriate framework for supporting BtR delivery, promoting housing diversity and responding to local housing needs, while retaining sufficient flexibility to accommodate differing development circumstances.

Policy H/BtR: Location of Build-to-rent schemes

Sustainability and Local Needs (3 respondents, 100%): BtR developments should be integrated with sustainable practices and meet the needs of the local area. Policies must be informed by evidence and tailored to the infrastructure and demographic requirements of different communities.

Location Flexibility and Planning Policy (3 respondents, 100%): Respondents advocate for adaptable planning policies that are not too prescriptive, allowing BtR schemes to respond to market changes and sustainable development needs across a variety of settings, including town centres and suburban zones.

Regulatory Approach and Investment (2 respondents, 67%): Opinions diverge on regulatory approaches, with a leaning towards avoiding stringent regulations that may impede flexibility and innovation in BtR schemes. Policies should be conducive to investment and recognise varied BtR formats.

Housing Supply and Market Impact (2 respondents, 67%): BtR is seen as beneficial for housing supply, particularly in growing areas with housing needs. There are advantages in delivery speed and market absorption, but it's important that developments address real local needs rather than contribute to housing speculation.

Economic and Social Benefits (1 respondent, 33%): Single-ownership BtR developments can attract investment and facilitate placemaking. They also offer social benefits, such as improved housing options for certain demographics, notably the 20-44 age group in need of housing choices.

Council Response

The Council welcomes support for Build to Rent (BtR) as a means of increasing housing choice and supply. Policy 6.14 supports the delivery of professionally managed BtR development whilst ensuring it contributes towards local housing needs through the provision of Affordable Private Rent homes.

Viability and Housing Need

The policy adopts a viability-led approach, requiring a minimum of 20% Affordable Private Rent homes in accordance with national policy, whilst allowing flexibility where viability constraints are demonstrated. The Council will seek higher levels of affordability where viable.

Policy Approach

The Council considers the policy provides an appropriate balance between supporting BtR delivery and securing affordable housing outcomes consistent with national policy and local housing needs.

Location and Housing Choice

The policy supports BtR development in sustainable locations with good access to services, facilities and public transport. BtR forms an important part of the Council's strategy to diversify housing supply and meet a range of housing needs across the district.

Policy H/Btr: Affordable private rent discount in build-to-rent schemes

Economic viability of build-to-rent schemes (4 respondents, 80%): Focus on understanding build-to-rent economic models, aiming to balance affordable unit provision with financial project viability. Variable discounts and trade-offs highlighted for maintaining sustainability without compromising affordability.

Affordability and local market dynamics (4 respondents, 80%): Advocacy for rental prices to reflect local market conditions, suggesting rent should be pegged to a percentage of these rates. Emphasis on creating meaningful rent reductions for wider community accessibility.

Policy alignment and national standards (3 respondents, 60%): Consensus on the need for policy to adhere to national standards, particularly the National Planning Policy Framework, to ensure successful affordable housing delivery. Suggestions for policy adaptability to cater to varied site-specific viability.

Flexibility and context-sensitive implementation (2 respondents, 40%): Recognition that diverse site challenges mandate policy flexibility. Proposals for adaptive spatial zoning of affordable rental levels or concessions for complex sites, advocating pragmatic approaches towards land use and affordable housing inclusion.

Impact on local communities (1 respondent, 20%): Concerns about policy effects on community, relating to affordable and accessible housing developments. Discussions on ensuring policies promote community betterment through genuinely affordable housing in build-to-rent schemes.

Council Response

The Council supports Build to Rent (BtR) as a means of increasing housing choice and housing supply. Policy 6.14 seeks to balance scheme viability with the delivery of affordable housing by requiring a minimum of 20% Affordable Private Rent homes in accordance with national policy, whilst allowing flexibility where viability constraints are demonstrated. The policy also seeks greater affordability where viable to ensure BtR developments make a meaningful contribution to local housing needs.

Policy Flexibility

The Council considers the policy provides an appropriate and flexible framework that reflects national guidance, responds to local housing needs and supports the delivery of genuinely affordable rented homes within professionally managed BtR schemes.

Policy H/BtR: Affordable private rent homes required in each Build-to-rent development

Viability and affordability balance (5 respondents, 100%): Concerns exist that stringent requirements for affordable private rent homes might impact the viability of BtR projects. There is an acknowledgment of the need for affordable housing for the wider population.

Planning process and viability assessments (3 respondents, 60%): Complexities and potential delays during the planning stage due to viability assessments are a concern. Streamlined processes are needed to ensure efficient planning and safeguard the delivery of affordable units.

Economic distinctions of BtR developments (2 respondents, 40%): BtR's business model, based on long-term rental income, differs from immediate sales models, necessitating tailored planning policies that recognise these economic specifics to ensure project sustainability.

Policy flexibility and local housing needs (2 respondents, 40%): Debate centres on the need for policy flexibility, taking into consideration local housing needs and different housing types, suggesting custom solutions rather than a one-size-fits-all approach.

Localised affordable rent strategies (1 respondent, 20%): Proposals for varied affordable rent levels within BtR developments could meet diverse financial circumstances of residents, with some success examples highlighted.

Long-term vs short-term housing objectives (1 respondent, 20%): Policy adjustments may be needed to better align with the long-term rental income model of BtR, differentiating from the traditional short-term sales focus while addressing affordable housing needs.

Council Response

The Council recognises the need to balance affordable housing provision with the viability of Build to Rent (BtR) developments. Policy H/BtR reflects the distinct BtR delivery model by requiring a minimum of 20% Affordable Private Rent homes in accordance with national policy, whilst allowing flexibility where viability constraints are demonstrated.

The Council considers the policy provides an appropriate and proportionate approach, supporting the delivery of BtR schemes whilst ensuring they make a meaningful contribution to local housing needs through affordable rented housing. Higher levels of affordability will be sought where viable.

Policy H/CL: Location and provision of co-living schemes

Location Flexibility Versus Criteria-based Development (4 respondents, 80%): Policies should support co-living schemes beyond town centres via a criteria-based approach, emphasising accessibility and amenities to integrate into communities and meet sustainability goals.

Sustainability and Accessibility (3 respondents, 60%): Co-living schemes should be placed in areas that encourage sustainable living and provide strong non-car accessibility to bolster environmental benefits and urban integration.

Proximity to Employment and Services (2 respondents, 40%): The placement of co-living spaces near jobs, services, and community facilities is key to enhancing their liveability and supporting vibrant, accessible communities.

Demand and Supply Dynamics (1 respondent, 20%): Planning policies must offer flexibility to meet high rental demand with diverse housing, while avoiding negative impacts on local housing and infrastructure.

Evolving Policy Frameworks (1 respondent, 20%): Housing policies should be adaptable to the changing co-living model, encouraging innovation while ensuring co-living positively impacts housing markets and communities.

Co-living Density and Amenities (1 respondent, 20%): Co-living developments need to balance density with the provision of amenities and communal spaces, contributing positively to urban living without straining resources or local character.

Council Response

The Council supports co-living accommodation as part of a diverse housing offer and recognises its potential contribution to meeting the needs of single person households and other groups seeking flexible rental accommodation. Policy H/CL adopts a criteria-based approach, focusing on accessibility, living standards and management arrangements rather than restricting development to specific locations.

The policy requires co-living developments to be located where residents can easily access services, facilities and public transport by walking, wheeling and public transport, supporting sustainable travel patterns and reducing reliance on private vehicles.

The Council agrees that high-quality communal facilities and adequate living space are essential to the success of co-living developments. The policy therefore includes minimum space standards, requirements for communal amenity provision and a management plan to ensure schemes provide a high standard of accommodation and integrate successfully with their surroundings.

The Council considers that the policy provides sufficient flexibility to respond to evolving co-living models whilst ensuring developments contribute positively to housing choice, sustainable communities and local housing needs.

Policy H/CL: Affordable housing provision in co-living schemes

Affordability and Housing Needs (6 respondents, 86%): Respondents discussed how co-living contributes to affordable housing, prompting a re-evaluation of policy to reflect co-living's unique housing solutions.

Viability and Flexibility in Policy Implementation (4 respondents, 57%): Flexibility in policy for co-living schemes' affordable housing was flagged as crucial to balance economic feasibility with policy aims, with a suggestion for viability testing.

Community Impact and Social Housing (4 respondents, 57%): The impact on community welfare and the importance of inclusive policies that cater to diverse demographic needs within co-living schemes were highlighted.

Financial Contributions vs. On-Site Provision (3 respondents, 43%): There is division on whether on-site provision or financial contributions are more effective for fulfilling affordable housing obligations in co-living, with a call for clear calculation methodologies.

Legal and Regulatory Framework (2 respondents, 29%): Respondents mentioned the need for legal clarity and a robust framework that aligns co-living affordable housing policies with current legal practices, including aspects like the community infrastructure levy.

Council Response

The Council recognises the role of co-living in diversifying housing supply and meeting the needs of single-person households. Policy H/CL requires co-living developments to make a financial contribution towards conventional affordable housing, reflecting that co-living accommodation is not considered an appropriate form of affordable housing and that on-site provision is unlikely to be practical within a single managed scheme.

The Council considers that this approach provides an appropriate balance between supporting co-living development and securing affordable housing benefits, whilst ensuring contributions help meet identified local housing needs through the delivery of conventional affordable homes. The policy includes a clear methodology for calculating contributions and will be applied having regard to relevant viability considerations.

Policy H/CL: Amenity standards in co-living schemes

Amenity Standards Flexibility vs. Regulation (5 respondents, 100%): Stakeholders showcased varied opinions on whether co-living amenity standards should be strictly regulated or flexible to encourage innovation, with emphasis on resident expectations for quality and safety contrasted against a need to avoid stifling creativity.

Innovation vs. Standardisation in Co-Living Schemes (5 respondents, 100%): Respondents deliberated over the tension between fostering innovation and the need for clear guidelines in co-living schemes, balancing the need for adaptability and site-specific solutions against consistent quality and future housing standards.

Communal Spaces and Social Integration (3 respondents, 60%): There is a general consensus on the importance of well-proportioned communal spaces in co-living developments, highlighting their role in encouraging social interaction and fostering a sense of community among residents.

Economic and Market-Driven Approaches to Co-Living Development (3 respondents, 60%): Discussions centred on the extent to which the market should influence co-living scheme outcomes within policy parameters, with suggestions for occasional policy reviews to ensure they remain responsive to changing models and expectations.

Distinction in Housing Categories (1 respondent, 20%): A minority raised the debate on the distinction between conventional apartments and co-living schemes, arguing the necessity for clear differentiation for market clarity, but also acknowledging the potential benefits of flexibility in response to varied resident needs.

Council Response

The Council recognises the importance of maintaining high standards of accommodation whilst allowing flexibility for innovation in co-living developments. Policy H/CL adopts a criteria-based approach, requiring adequate private and communal amenity space, minimum space standards and appropriate management arrangements.

The Council considers this approach provides an appropriate balance between flexibility and consistency, ensuring high-quality living environments whilst allowing schemes to respond to changing delivery models and resident needs.

Policy H/PBSA: Provision and location of purpose built student accommodation

Housing Supply and Affordability (9 respondents, 90%): Respondents expressed concerns about student housing affecting local housing markets, potentially raising rents and limiting availability for non-students. Some noted that PBSA could ease demand on HMOs and aid overall housing provision if cleverly integrated, whilst others were concerned about a negative impact on efforts to secure affordable housing for all, indicating a need for policies that establish a balance between student and non-student housing.

University Responsibility and Policy Flexibility (8 respondents, 80%): Participants supported the idea that universities ought to take greater accountability for student accommodation, through on-site housing or stronger links with PBSA providers. Opinions indicated that policy flexibility should allow PBSA to develop beyond campus boundaries, fostering accommodation solutions attuned to student numbers and urban growth strategies.

Planning and Policy Review Needs (7 respondents, 70%): Users suggested current policies may be outdated in relation to student housing demands, alluding to the necessity for reviews considering the expansion aims of educational institutions, shifts in urban development, and the details of local housing markets. Respondents highlighted the significance of strategic planning at local and national tiers for harmonizing student accommodation with wider housing and urban planning.

Impact on Local Communities (6 respondents, 60%): A dialogue showcased the balance between accommodating students and protecting local community welfare, noting the transformation and service pressures in areas with high student influx. Yet, proper management of PBSA was also said to potentially rejuvenate spaces and benefit economies. The discourse supported policy formulation to avoid adverse effects such as loss of employment areas and community identity.

Sustainability and Location (3 respondents, 30%): Participants discussed sustainable development and strategic planning for PBSA, raising environmental concerns such as pollution and traffic. Conversely, the repurposing of brownfield sites was seen as favorable. There was support for a balanced approach that safeguards ecological integrity whilst providing sustainable, accessible student accommodation.

Economic and Social Contributions vs. Impacts (1 respondent, 10%): The respondent noted the pros and cons of student populations on local economies and communities. The discussion acknowledged students' financial and social inputs, weighed against the risks of community disruption and infrastructure pressure. A call was made for nuanced policy that equitably assimilates students into city life, contemplating both their impact and contributions.

Council Response

The strategy for provision of PBSA has been saved as per H2A.

Policy H/PBSA: Affordable housing or rent in purpose built student accommodation

Equity in Housing Contribution Requirements (7 respondents, 78%): Views differ on whether PBSA should contribute to affordable housing like other developments, with some seeing it necessary for equity, while others feel such contributions would be unjustified.

Affordability and Accessibility for Students (7 respondents, 78%): Stakeholders focus on the need for affordable PBSA to ensure higher education remains accessible to students from all financial backgrounds, recognising the financial burden unaffordable accommodation poses.

Policy Implementation and Viability (5 respondents, 56%): Concerns revolve around the practicality of implementing Policy H/PBSA, with some arguing strict requirements could impact the deliverability of new student accommodations, while others advocate for a balanced, case-by-case application.

Regulatory Framework and Policy Impact (4 respondents, 44%): Discussions highlight uncertainties in fitting policy aspirations within the existing regulatory framework, especially where it may conflict with national policies or maintenance loan limits, favouring implementable and balanced contributions.

Socio-economic Considerations (3 respondents, 33%): Emphasising that student housing should be a facilitator, not a barrier to education, hence some suggest exemptions or financial assistance for developments promoting affordability.

Long-term Local Resident Benefits vs. Transient Student Needs (2 respondents, 22%): Opinions are split between prioritising the immediate housing needs of students and the long-term benefits for permanent residents in the community.

Strategic Planning and Collaboration (1 respondent, 11%): Advocated for are robust strategic planning and collaboration between universities, councils, and developers, to ensure student accommodation policies align with both national housing strategies and local needs.

Supply and Demand Dynamics (1 respondent, 11%): Concerns include the potential impact of PBSA supply on local housing markets, with some concerned that an oversupply could detract from other housing needs and others hoping it might reduce rental costs.

Council Response

The Council recognises the differing views regarding affordable housing contributions from Purpose Built Student Accommodation (PBSA). Policy H/PBSA requires a financial contribution in lieu of on-site affordable housing, recognising that PBSA occupies land that could otherwise deliver conventional housing whilst acknowledging that on-site affordable housing provision is not feasible within PBSA schemes.

The Council considers this approach provides an appropriate balance between supporting the delivery of student accommodation and ensuring developments contribute to meeting wider affordable housing needs. The policy uses a clear and proportionate methodology to calculate contributions and reflects the Council's objective of supporting both student accommodation provision and the delivery of affordable homes for local communities.

Policy H/SBCHB: Self-build and custom housebuilding

Policy Flexibility and Development Responsiveness (9 respondents, 82%): Policies should be adaptable, avoiding over-prescriptive measures that fail to accommodate market and demand changes; concerns include potential negative outcomes of fixed self-build plot percentages and the suggestion to allow unsold plots to revert to developers after a given period.

Planning and Allocation Challenges (8 respondents, 73%): Efficient land allocation for self-build projects is critical, with views varying on mixed housing support and specific plot allocations; strategic planning is necessary to address potential delivery partner shortages and project scalability.

Developer Constraints and Opportunities for Custom and Self-Build Schemes (8 respondents, 73%): There is developer apprehension about mandated self-build plot inclusions affecting business models and plot suitability, though opportunities are recognised for the role of custom and self-build schemes in creating diverse communities.

Diversity and Community Needs versus Market Demands (4 respondents, 36%): While some advocate for policies under 'option a' to increase housing diversity, developers raise feasibility concerns regarding integrating self-build elements which could impact affordable housing provision and site complexities against market dynamics.

Economic Viability and Resources for Self-Builders (3 respondents, 27%): Highlighting economic barriers, a need is identified for policy support that makes self-build projects more financially accessible, attracting a wider range of self-build participants.

Impact on Rural Development and Flood Risk Management (1 respondent, 9%): Emphasis is placed on considering environmental sustainability within self-build policies, including careful site selection and adherence to flood risk management to ensure responsible rural development.

Council Response

The Council has carefully considered the consultation responses received in relation to self-build and custom housebuilding. Responses recognised the potential contribution that self-build and custom housebuilding can make towards housing diversity, choice and meeting a wider range of local housing needs. Comments also highlighted the importance of ensuring that any policy approach remains sufficiently flexible and does not create barriers to delivery.

In preparing the Draft Local Plan, the Council reviewed a range of approaches to supporting self-build and custom housebuilding, taking account of issues relating to demand, deliverability and policy flexibility. The Draft Local Plan continues to support self-build and custom housebuilding as part of a diverse housing market whilst seeking to ensure that policy requirements remain practical and deliverable.

Policy H/GT: Gypsies, travellers and travelling show people

Flood Risk Management and Site Allocation (1 respondent, 100%): Emphasises the need to select sites for gypsies, travellers, and travelling show people that are at reduced risk of flooding. Sequential testing must reflect NPPF guidelines to ensure suitability and address flood risks, balancing the safety of vulnerable communities with site availability challenges.

Sustainable Development Practices (1 respondent, 100%): Stresses planning for mitigations against climate change-induced flood risks for sites destined for gypsies, travellers, and travelling show people. Sustainable design, maintenance, and updating of flood defences are considered critical for community resilience amidst increasing climate threats.

Council Response –

The comments are noted. Policy 6.20 requires Gypsy, Traveller and Travelling Showpeople accommodation to avoid areas at high risk of flooding and demonstrate that sites can provide safe and suitable living conditions for occupiers. The supporting text recognises the need for sites to be appropriately located and confirms that proposals will be assessed against relevant environmental constraints, including flood risk. The wider Local Plan policy framework also requires development to address climate change adaptation and resilience, including flooding, intense rainfall and associated risks over the lifetime of development. The Council considers that the existing policy approach provides an appropriate framework for ensuring flood risk is taken into account whilst enabling identified accommodation needs to be considered through the criteria-based policy approach.

Policy H/M: Moorings

Policy clarity and regulation (3 respondents, 50%): Stresses the need for clearer definitions and regulations specific to different types of moorings.

Sustainability and accessibility of mooring sites (3 respondents, 50%): Addresses the importance of sustainable development and ensuring access to essential services at new mooring sites while considering environmental impacts.

Environmental and heritage conservation (2 respondents, 33%): Calls for protection measures of ecosystems and heritage sites against potential impacts from mooring developments.

Financial and resource considerations (2 respondents, 33%): Considers the financial and resource allocation required for development and maintenance of mooring sites, balancing costs with infrastructure needs.

Safety and flood risk management (2 respondents, 33%): Highlights the need for safety measures, emergency planning and flood risk assessments at mooring sites.

Education and community infrastructure (1 respondent, 17%): Discusses the need to consider the implications of residential moorings on local community infrastructure and services.

Council Response –

The comments are noted. Saved Policy H6 (Moorings) is retained within the Development Plan and continues to provide the policy framework for proposals relating to moorings.

Housing Policy H/AH: Affordable housing (large sites)

Policy implementation and delivery methods (29 respondents, 85%): Diverse opinions on delivering affordable housing; debate around on-site provision versus off-site contributions or council initiatives; calls for clear guidelines, including tenure splits, and ensuring policies secure long-term affordable housing.

Strategic planning and local needs (25 respondents, 74%): Emphasis on aligning policies with local needs and strategic planning; importance of using up-to-date local housing needs assessments; calls for policy clarity and provisions for specific groups such as NHS staff.

Viability and flexibility in affordable housing provision (20 respondents, 59%): Consensus on requiring adaptable policies responsive to the economic conditions of projects; suggestions for viability assessments to determine feasible levels of affordable housing while avoiding prohibitive policy rigidity.

Inclusive and diverse communities (13 respondents, 38%): Belief in the social value of affordable housing for achieving social cohesion and diversity; concerns about new developments affecting the character of villages; desire for policies that accommodate local demographic and economic conditions.

Challenges and costs to developers (7 respondents, 21%): Concerns over the financial burdens on developers imposed by regulations and standards, including exploration of a balanced approach between compliance and the viability of delivering affordable housing.

Access to affordable housing for key workers and vulnerable populations (4 respondents, 12%): Acknowledgment of the special need for affordable housing among key workers like NHS staff; urge for explicit policy design catering to these essential service providers and recognition of affordable housing as foundational for social stability.

Council Response

Consultation responses demonstrated strong support for maximising the delivery of affordable housing and ensuring that provision responds to identified local needs, whilst also highlighting concerns regarding viability, deliverability, tenure mix and the practical implementation of policy requirements. Respondents emphasised the importance of using up-to-date housing needs evidence, supporting inclusive communities and ensuring that affordable housing contributes to meeting the needs of a range of households, including key workers and lower-income residents. Concerns were also raised regarding development viability, the cumulative impact of policy requirements and the need for flexibility where justified by site-specific circumstances.

In response, the Regulation 19 Local Plan takes forward a comprehensive affordable housing policy informed by the latest Local Housing Needs Assessment and whole-plan viability evidence. The policy seeks to maximise affordable housing delivery across the district whilst ensuring that requirements remain deliverable and supported by viability testing. Reflecting both the identified housing need and national policy emphasis on genuinely affordable housing, the policy prioritises Social Rent, with 70% of affordable homes to be delivered as Social Rent and 30% as Low Cost Home Ownership products. The policy also provides clear requirements for affordable housing delivery, tenure and mix, whilst allowing viability considerations to be addressed in accordance with national policy where justified. Overall, the Regulation 19 approach seeks to balance the substantial need for affordable housing with development viability and deliverability considerations, supporting mixed, inclusive and sustainable communities across Bath and North East Somerset.

Policy H/AH: Affordable housing (first homes)

Policy clarity and government approaches (7 respondents, 54%): Calls for council to explain how first homes policies relate to affordable housing, aiming to align local strategies with national guidelines while addressing local affordability issues without complexity or overreliance on short-term funding.

Support for essential and local workers (6 respondents, 46%): Importance of supporting essential workers and local residents, with suggestions for housing protections based on residence or local commitments, including salary thresholds and extending key worker status to sectors like agriculture.

Affordability and accessibility (6 respondents, 46%): Concerns over the affordability of first homes, with suggestions for more accessible ownership models like shared ownership to help local families and essential workers afford homes against the backdrop of potentially inadequate policy.

Impact on traditional affordable housing delivery (6 respondents, 46%): Worries that the first homes initiative may adversely affect traditional affordable housing, questioning its relative effectiveness and reliance on uncertain short-term funding.

Policy implementation and viability (3 respondents, 23%): Calls for robust viability assessments from councils and considering higher minimum discounts for first homes, highlighting the risk of added policy complexity.

Rural worker housing needs and definitions (2 respondents, 15%): Focus on the unique housing requirements of rural workers, recommending the expansion of essential worker definitions to include those in rural economies, balancing their needs against the risk of displacing local families.

Council Response -

The comments are noted. Policy 6.14 supports the delivery of First Homes as part of affordable home ownership provision and requires any First Homes to be delivered at a minimum 30% discount to market value, with a maximum sale price of £250,000 or any updated national threshold. The policy also makes clear that shared ownership is the Council's preferred affordable home ownership tenure, reflecting evidence that it provides a more affordable route into home ownership for households unable to access the open market. The affordable housing policy has been informed by the Local Housing Needs Assessment, which identifies significant needs for both affordable rented and affordable home ownership products. The policy therefore prioritises a tenure mix of 70% social rent and 30% affordable home ownership to address identified local needs whilst remaining consistent with national policy. The Council recognises concerns regarding affordability, key workers and rural communities, however considers that the policy framework provides an appropriate balance between local housing needs, national policy requirements and affordable housing delivery. Viability considerations are addressed through the policy's established viability assessment process where exceptional circumstances can be demonstrated.

Policy H/AH: Affordable housing (small sites)

Viability and Affordability Challenges (12 respondents, 80%): Concerns highlighted about site viability and housing affordability, emphasising the need for affordable homes accessible to essential workers and addressing issues like overcrowding.

Flexibility and Site-Specific Adjustments (6 respondents, 40%): A call for policy flexibility accounting for unique challenges of small sites, ensuring both practical developments and community needs are met.

Social Housing and Rural Development (5 respondents, 33%): Advocacy for stronger approaches to rural social housing development, with suggested compulsory contributions from larger developments to local affordable housing.

Local Needs and Landscape Preservation (5 respondents, 33%): Importance placed on developments meeting local needs and preserving landscapes, balancing housing support for local economies with environmental care.

Off-site Contributions vs. On-site Developments (3 respondents, 20%): A split opinion on affordable housing delivery methods, weighing the integration benefits of on-site development against the broader potential of financial contributions.

Policy Clarity and Implementation Concerns (3 respondents, 20%): Requests for clearer policy articulation and implementation, highlighting concerns of potential loopholes for developers to provide affordable housing.

Financial Levies and Developer Contributions (2 respondents, 13%): Suggestions for imposing levies on high-value developments to finance affordable housing initiatives, leveraging private sector capabilities for social benefit.

Council Response

Consultation responses highlighted the importance of increasing affordable housing provision in rural areas and on smaller sites, whilst recognising the need to ensure that policy requirements remain viable and proportionate. Respondents emphasised the need for flexibility to respond to site-specific circumstances, support local housing needs, including the needs of essential workers and lower-income households, and provide clarity regarding delivery mechanisms. A number of representations also supported stronger affordable housing provision in rural communities where smaller schemes can make an important contribution to meeting identified local needs.

In response, the Regulation 19 Local Plan takes forward a requirement for 20% affordable housing on qualifying small sites, informed by the Local Housing Needs Assessment and supported by whole-plan viability testing. The policy seeks to secure additional affordable housing opportunities in rural and higher-value areas where smaller developments form a significant component of housing delivery, whilst ensuring that requirements remain deliverable. The approach balances the identified need for affordable housing with viability considerations and supports the creation of mixed, inclusive and sustainable communities across the district.

Policy H/AH: Affordable housing (viability)

Review Mechanisms and Viability Assessments (13 respondents, 93%): Viability review mechanisms within affordable housing policies are seen as essential, yet they raise concerns about project delays and increased demands on planning department resources.

Policy Flexibility and Site Specificity (7 respondents, 50%): Respondents called for policy flexibility to account for the unique challenges of individual sites, suggesting a one-size-fits-all approach may hinder affordable housing delivery.

Funding and Resource Allocation for Viability Reviews (5 respondents, 36%): There is a dialogue on how to resource and fund the necessary viability assessments while managing the strain on planning departments' budgets.

Impact on Rural Areas and Land Prices (3 respondents, 21%): The conversation includes the impact of affordable housing policy on rural land prices, with some advocating for policies to counteract inflated land price expectations.

Investment Safety and Market Attractiveness (2 respondents, 14%): Late-stage viability reviews are cited as detrimental to investor confidence and market attractiveness, with a suggestion for policy balance between affordable housing needs and investment stability.

Emerging Statutory Requirements and Strategic Planning (2 respondents, 14%): Concerns are raised about affordable housing policies keeping pace with new statutory requirements, stressing the importance of dynamic policies that align with strategic community objectives.

Council Response

Consultation responses highlighted the importance of maintaining a robust but flexible approach to viability, with respondents recognising the role of viability assessments and review mechanisms while raising concerns about complexity, delays, resource implications and impacts on development delivery. Comments also sought assurance that policies would respond appropriately to site-specific circumstances, changing market conditions and emerging statutory requirements, whilst avoiding unnecessary burdens on development and maintaining investor confidence. Concerns regarding rural land values and the cumulative impact of policy requirements on scheme viability were also raised.

In response, the Regulation 19 Local Plan takes forward an affordable housing viability policy aligned with national policy and Planning Practice Guidance. The policy is supported by whole-plan viability testing and proceeds on the basis that policy-compliant development should generally be viable, whilst providing a mechanism for applicants to demonstrate exceptional site-specific viability circumstances where justified. The policy also includes review mechanisms where appropriate to support policy compliance over the lifetime of longer-term developments and reflects national guidance on viability assessments and viability reviews. This approach seeks to maximise affordable housing delivery, including the proposed affordable housing requirements across the Plan, while ensuring that policies remain flexible, deliverable and responsive to changing circumstances.

Policy H/RS: Affordable housing regeneration schemes

Policy Flexibility vs. Developer Exploitation (6 respondents, 86%): Respondents focused on the need for a balance between policy flexibility to ensure viability of housing schemes, emphasising a scepticism towards vague language like 'viability concerns' that might be used to avoid obligations.

Uncertainty in Policy and its Effects on Regeneration Areas (4 respondents, 57%): Discussions stressed the need for clearer policy wording, pointing out that current ambiguities, especially concerning 'viability', deter investment and support for regeneration schemes.

Affordable Housing Supply and Tenure Diversity (3 respondents, 43%): Responses suggest the policy fails to address the shortage of affordable housing and does not reflect national framework requirements on housing diversity, advocating for specific housing types and greater density.

Regeneration Viability and Local Economy Impact (2 respondents, 29%): This theme explores the concerns about policy strictness potentially hindering financially feasible redevelopments, which are vital for local housing and infrastructure improvements.

Environmental and Community Upgrades (1 respondent, 14%): Recognising that regeneration should improve not just housing supply but also local infrastructure and environmental efficiency, with a call for upgrading existing housing stocks and communal spaces.

Strategic Policy Alignment and Housing Targets (1 respondent, 14%): Concerns are raised about the policy's consistency with broader strategic housing delivery goals and local housing needs, with suggestions to specify clear targets and increase housing numbers.

Stakeholder Engagement and Tenant Rights (1 respondent, 14%): The importance of resident participation in regeneration projects and the protection of tenant rights is highlighted, with an emphasis on policies that enforce comprehensive engagement strategies.

Council Response –

The comments are noted. Saved Policy H8 (Affordable Housing Regeneration Schemes) remains part of the Development Plan and is complemented by the Draft Local Plan's updated affordable housing framework.

Policy H/RES: Location of rural exception sites

Policy Alignment and Flexibility (8 respondents, 67%): Division in respondent opinions on whether Policy H/RES should strictly adhere to national policies or be revised for local specificity, with some valuing simplicity and others advocating for revisions to enhance clarity and effectiveness.

Affordable Housing and Local Needs (6 respondents, 50%): Respondents voice concerns about the council's understanding of local affordable housing needs and suggest a strategy not overly reliant on exception site housing, emphasising the need for more responsive measures.

Geographical Coverage and Settlement Size Considerations (4 respondents, 33%): Differing views on limiting rural exception sites to certain settlements, with some disagreements over national policy coherence and calls for village size proportionality in dwelling numbers.

Planning Certainty and Sustainable Development (2 respondents, 17%): Desire for more planning certainty and sustainable development with suggestions for early site allocation, balancing policy flexibility and appropriate rural development.

Market Housing Inclusion (1 respondent, 8%): Debate over market housing funding rural exception sites, with criticism that this undermines the developments' focus on affordable rural housing.

Council Response –

The comments are noted. The Local Plan supports the delivery of affordable housing in rural areas through a range of mechanisms, including Rural Exception Sites via saved Policy RA4 and affordable housing requirements on qualifying sites through Policy 6.14.

Policy H/RES: Scale of rural exception developments

Impact on local communities and character (7 respondents, 70%): Concerns about larger developments changing village character and impacting infrastructure.

Village size proportionality and housing density (7 respondents, 70%): Discussion on the suitability of a fixed maximum dwelling cap for all villages, potentially unsuitable for smaller communities.

Affordable housing delivery (7 respondents, 70%): Balancing the need for affordable housing with the preservation of the rural village integrity.

Policy requirements and flexibility (5 respondents, 50%): Critique of procedural requirements hindering swift affordable housing delivery and a call for adaptable policies.

National policy alignment and local decision making (2 respondents, 20%): Complexities in aligning local planning with broader national policies.

Research and evidence-based decision making (2 respondents, 20%): Advocacy for informed decisions supported by data to tailor policies to rural area characteristics.

Council Response –

The comments are noted. The Council recognises the importance of ensuring that Rural Exception Sites are proportionate to the scale and character of the settlement they serve and respond to locally identified housing needs. Policy RA4 has been saved.

Climate change

Policy C/RD: Sustainable construction for new residential development

Carbon Neutrality and Sustainable Construction Ambitions (37 respondents, 90%): Opinions vary on the council's aim for carbon neutrality and stricter sustainable construction standards. Praise for high sustainability ambitions coexist with concerns over practicality, enforceability, and potential impacts on housing affordability and supply.

Energy Efficiency Standards and Building Regulations (36 respondents, 88%): A significant dialogue involves the relationship between local energy efficiency policies and national building regulations. Debate exists between the merits of ambitious local standards and the complexities they introduce compared to a preference for national standardisation.

National vs. Local Standards Dilemma (30 respondents, 73%): Respondents discuss whether local authorities should set standards stricter than national benchmarks. Views differ on whether local standards should exceed national policies to serve public benefit and demonstrate climate change leadership.

Viability and Deliverability of New Developments (23 respondents, 56%): Concerns focus on balancing sustainability goals with the practicality and affordability of new residential developments. Suggestions include the need for a progressive policy application and flexibility to adapt to evolving standards.

Affordability and Social Equity in Sustainable Development (7 respondents, 17%): Discussions highlight potential issues of stringent sustainability mandates on housing affordability, emphasising the necessity to consider social and economic factors alongside environmental goals.

Renewable Energy Integration and Infrastructure Challenges (6 respondents, 15%): Support for renewable energy solutions is tempered by awareness of challenges such as conflicts with development objectives and limitations of the current energy grid.

Historic Preservation vs. Sustainability (1 respondent, 2%): Preservation of world heritage sites is noted as important while pursuing sustainable construction objectives, suggesting the need for policies that integrate sustainability with conservation efforts.

Council Response -
Policy SCR6 remains saved.

Policy C/NRB: Sustainable construction for non-residential buildings

Climate Change Mitigation and Construction Standards (8 respondents, 80%): Need for sustainable construction to address climate change recognised; policies need to balance ambition with the practicalities of diverse non-residential buildings.

Energy Efficiency and Metrics (6 respondents, 60%): Debate on specific metrics versus standard assumptions for energy efficiency; necessity for adaptable policies due to building use variability stressed.

Impact on Development Viability (3 respondents, 30%): Concerns about sustainable construction standards affecting new developments' feasibility; discussions reflect the tension between environmental goals and economic viability.

Financial Aspects and Policy Support Mechanisms (2 respondents, 20%): Carbon neutrality in construction could be aided by financial mechanisms like carbon offset funds; discussions on cost-bearing for compliance vary.

Future-Proofing and Evolution of Standards (2 respondents, 20%): Importance of developing policies that evolve with technological and methodological advances to sustain innovation and relevance.

Role of Lighting and External Factors (1 respondent, 10%): Minimising rural external lighting discussed in the broader context of energy use, ecological impacts, and diverse sustainability considerations.

Council Response

The Council welcomes the broad support for the principle of reducing operational carbon emissions from new non-residential development and recognises the importance of ensuring the policy requirements are both ambitious and deliverable across a wide range of building types.

In response to comments seeking greater flexibility for different forms of non-residential development, the policy has been revised to adopt a typology-based approach, setting targets specific to different building uses rather than applying a single standard across all development types. This recognizes the varying operational requirements of different sectors while maintaining a consistent framework for improving energy performance.

The policy continues to pursue high standards of energy efficiency through a fabric-first approach and a clear energy hierarchy but has been structured to provide flexibility in how outcomes are achieved. Recognising concerns regarding viability and technical constraints, the policy allows for circumstances where achieving an annual net zero energy balance through on-site renewable energy generation is not feasible. In such cases, a financial contribution to the Council's offset fund provides an alternative mechanism to address residual energy demand while continuing to support the district's carbon reduction objectives.

The Council acknowledges the importance of policy requirements remaining effective as technologies and assessment methodologies evolve. In response to the comments highlighting this, the policy adopts Energy Use Intensity targets as a key performance metric. By focusing on energy performance outcomes rather than prescribing specific technologies, the policy provides flexibility for developers to adopt individual design approaches, energy systems and emerging technologies over time. This performance-based metric helps futureproof the policy, ensuring it remains relevant throughout the Local Plan period while continuing to drive reductions in energy demand and carbon emissions.

Policy C/EC: Embodied carbon

Striking a balance between refurbishment and new builds (13 respondents, 57%): Respondents mentioned prioritising refurbishment of buildings over new constructions to reduce carbon output but also acknowledged that in some instances, new builds might be the more carbon-efficient choice.

Concerns over operational versus embodied carbon emissions (11 respondents, 48%): Discussions noted that focusing solely on operational efficiency can lead to the oversight of embodied carbon. Advocates for a policy that recognises the carbon cost of construction and operational emissions.

Demand for clear, accessible guidelines and targets (8 respondents, 35%): Clear and achievable embodied carbon targets are needed due to the lack of national policy and challenges using third-party data. Call for standardised national benchmarks.

Impact on housing delivery and viability (7 respondents, 30%): Concerns that strict embodied carbon regulations could harm the financial viability of housing projects, affecting affordability and development pace. Express the need for balance between carbon reduction and development.

Integration with broader environmental and social strategies (5 respondents, 22%): Suggestions for embodied carbon policies to be part of larger strategies addressing climate change and housing needs, promoting policies that support sustainability and socioeconomic benefits.

Necessity for collaboration and expertise (4 respondents, 17%): Collaboration with experts in sustainable development is essential for effective embodied carbon policy implementation, given the complexity of reducing embodied carbon.

Material availability and sustainable use concerns (3 respondents, 13%): Awareness of the environmental impact of material production underlines discussions about sustainable material use in construction, with an emphasis on innovative use and lifecycle assessment of materials.

Council Response

The Council welcomes the feedback received and recognises the importance of reducing embodied carbon while ensuring that development remains deliverable. Comments highlighting the need to balance refurbishment and redevelopment have informed the policy's emphasis on prioritising the renovation and retrofit of existing buildings wherever appropriate, whilst recognising that new development may in some circumstances provide the most sustainable long-term outcome. In response to the strong support expressed in comments received for prioritising retrofit and reuse, this aspect has been developed into a dedicated separate policy, providing a clearer framework and more detailed requirements to support the retention and retrofit of existing building stock.

In response to requests for greater clarity and consistency, the policy requires the use of nationally recognised embodied carbon assessment methodologies and establishes clear performance targets for both upfront and whole life-cycle embodied carbon emissions. The Council acknowledges concerns regarding viability and housing delivery and has therefore adopted differentiated targets for residential and non-residential development, with flexibility for applicants to demonstrate where compliance is not technically feasible. The introduction of a justification process and an offsetting mechanism for any residual upfront embodied carbon reflects consultation feedback seeking pragmatic approaches to achieving carbon reductions.

Comments regarding the need for embodied carbon policies to support wider sustainability objectives have influenced requirements relating to material efficiency, waste reduction, durability, reuse, adaptability and circular economy principles. The policy promotes high-quality materials with low embodied carbon, encourages the use of recycled and reusable materials, and seeks to ensure buildings remain adaptable to future needs, reducing the need for further redevelopment. The requirement for embodied carbon assessments, including refrigerant impacts, also reflects feedback highlighting the importance of considering the full environmental impact of construction

Policy C/RET: Renewable energy target

Target Setting and Adaptability (15 respondents, 88%): Users request precise, ambitious renewable energy targets, like a 300mw local plan capacity. They highlight the need for targets that adapt to new technologies and evidence, but caution against overly flexible goals that could obscure progress measurement.

Policy Coherence and Regulatory Framework (14 respondents, 82%): There's a call for aligning renewable energy targets with broader climate commitments and national frameworks. Concerns are raised about potential loopholes in too flexible targets that might hinder achieving carbon neutrality.

Monitoring, Evaluation, and Reporting (10 respondents, 59%): Clear, measurable renewable energy goals are deemed essential for effective monitoring and justification of renewable projects. Users suggest regular target reviews to remain aligned with current evidence, yet warn against excessive flexibility complicating progress assessment.

Local Implementation and Technological Considerations (5 respondents, 29%): Support is shown for maximising local deployment of renewable energy following national guidelines. Innovative suggestions include solar PV on commercial rooftops and equipping homes with solar panels, alongside rapid deployment of wind turbines and advancements in energy storage.

Council Response

The Council has carefully considered the consultation responses received in relation to renewable energy targets. Responses generally supported an ambitious and measurable approach, including support for the 300MW figure identified through the Council's earlier Climate Emergency evidence. Respondents also emphasised that the approach should remain responsive to changing technologies, energy demand and updated evidence, while retaining sufficient clarity to enable progress to be monitored.

The Regulation 19 Local Plan does not carry the 300MW figure forward as a fixed development management target. Instead, the Plan seeks to maximise renewable and low carbon energy generation, with the scale and mix of provision informed by the latest available renewable energy resource assessment and other relevant evidence. The 300MW figure provides a reference point for the Council's ambition and monitoring rather than a fixed threshold or ceiling for individual proposals. This enables the approach to respond to updated evidence, technological change and delivery outcomes over the Plan period.

Policy C/REA: Renewable energy approach

Strategic Planning and Local Development (17 respondents, 81%): Focus on integrating renewable energy into local development plans to quicken planning processes; some concerns over landscape impacts and area suitability.

Regulatory and Planning Frameworks (16 respondents, 76%): Importance of clear regulatory and planning environments to facilitate renewable energy adoption; issues raised about conflicts with national landscape protections.

Economic and Environmental Trade-offs (7 respondents, 33%): Debate over urgent climate action versus long-term sustainability, with worries about landscape, biodiversity, and food security from greenfield solar sites.

Policy Flexibility and Innovation (5 respondents, 24%): Need for policies that accommodate evolving technologies; while some favour wind energy, others advocate for a broader approach to include various renewable sources.

Environmental and Wildlife Conservation (4 respondents, 19%): Calls for renewable energy projects designed to support rather than harm biodiversity; the challenge is balancing infrastructure needs with conservation.

Grid Capacity and Energy Storage (1 respondent, 5%): Acknowledgement of the need to upgrade grid capacity and establish energy storage solutions, considering the investments required to update networks.

Community Involvement and Economic Benefits (1 respondent, 5%): Suggestions for greater community engagement and economic returns from renewable projects; some scepticism about the feasibility of community-led models.

Council Response

The Council has carefully considered the consultation responses received in relation to renewable energy development. Responses demonstrated broad support for renewable and low carbon energy generation whilst recognising the need to balance climate change objectives with landscape, biodiversity, heritage and other environmental considerations. Consultees also highlighted the importance of maintaining flexibility as technologies continue to evolve.

In preparing the Draft Local Plan, the Council reviewed the approach to renewable and low carbon energy development to provide greater clarity for applicants and decision makers. Consultation responses helped shape a revised policy framework that supports renewable energy generation whilst ensuring that environmental, landscape and infrastructure considerations are appropriately addressed.

Nature and ecosystem services

Policy N/SHS: Sites, habitats and species

Policy and planning for ecological improvement (13 respondents, 100%): Support for increased habitat connectivity and species diversity, with recommendations for clearer guidelines on habitat protection, biodiversity net gain, and the creation of green infrastructure.

Addressing development impacts on local biodiversity (10 respondents, 77%): Concerns over recent developments impacting green spaces and biodiversity, with calls for development projects to preserve wildlife spaces and enhance green infrastructure.

Urban greening and biodiversity enhancement (7 respondents, 54%): A desire for more ambitious green urban environments, including green roofs and connected habitats, to serve wildlife and city dwellers, ensuring ecological balance post-development.

Enhancement of rural and peripheral green spaces (6 respondents, 46%): Improved accessibility and management of countryside areas for public and wildlife benefits are highlighted, alongside potential biodiversity contributions through rewilding and habitat creation.

Challenges with biodiversity net gain (BNG) metric (4 respondents, 31%): Recognition of BNG benefits but concerns that the metric undervalues habitats with contextual biodiversity significance, suggesting policy amendments for urban environments and common habitats.

The importance of habitat connectivity and wildlife corridors (2 respondents, 15%): Emphasising the need for habitat connectivity and diverse ecosystems through policy and practical implementation, involving green corridors and valuing rural sites for their biodiversity contributions.

Comparative and inspirational models for habitat preservation (2 respondents, 15%): References to successful habitat preservation models from other cities and regions to inspire more effective conservation and urban greening strategies.

Balancing recreation and conservation (1 respondent, 8%): Concern about conflicts between recreational activities and conservation in sensitive areas, and the necessity of harmonious coexistence.

Council Response

The Council welcomes support for stronger biodiversity and nature recovery measures. The Local Plan includes policies on Biodiversity Net Gain, ecological networks, Green Infrastructure, trees and open space to ensure development protects and enhances biodiversity whilst contributing to wider nature recovery objectives.

The Council recognises concerns regarding the impacts of development on green spaces and wildlife. The Plan requires a minimum 10% Biodiversity Net Gain, protection and enhancement of habitats and ecological networks, and the delivery of multifunctional green infrastructure, including urban greening, habitat creation, tree planting and sustainable drainage features.

The Council also recognises the importance of habitat connectivity and wildlife corridors and seeks to strengthen ecological links across both urban and rural areas. Whilst the statutory Biodiversity Net Gain metric is nationally prescribed, the Plan's wider biodiversity and green infrastructure policies are intended to address broader ecological objectives.

The Council will continue to balance biodiversity enhancement, public access and recreation to ensure development delivers positive outcomes for both nature and communities.

Policy N/BNG: Biodiversity net gain

Biodiversity Net Gain (BNG) Ambition Levels (49 respondents, 88%): Opinions vary on BNG target ambition, with some advocating strict adherence to the statutory 10% and others recommending higher thresholds. Detractors warn of adverse impacts on development viability and housing affordability.

Policy Adaptation and Update Needs (29 respondents, 52%): Calls for policy evolution to align with modern guidelines and emerging local strategies are prominent, recognising the need for a dynamic regulatory framework while maintaining development viability.

Incorporation of Flexible and Holistic Approaches (27 respondents, 48%): Respondents support tailored BNG approaches that account for local conditions and ecological priorities, favouring qualitative assessments and integration with wider environmental strategies.

Impacts on Housing and Development Viability (23 respondents, 41%): Concerns relate to how stricter BNG requirements might limit affordable housing provision and impose burdens on small to medium-sized developers, highlighting the need to balance conservation efforts with housing and economic growth.

On-site vs. Off-site BNG Delivery and Management (20 respondents, 36%): There is a preference for on-site biodiversity enhancements and concerns over the management of off-site gains. Discussions include the challenges of on-site delivery and the need for clear, enforceable management guidelines.

Evidential Support and Viability Assessments (7 respondents, 12%): A pragmatic approach to policy-making is called for, with robust evidence and detailed assessments underpinning BNG policies, ensuring ambitious biodiversity targets do not hinder development goals.

Community and Stakeholder Engagement in BNG Planning (1 respondent, 2%): There is a demand for greater inclusion of communities and stakeholders in the development of BNG policies, with an emphasis on local nature recovery strategies and community benefits.

Council Response

The Council welcomes support for Biodiversity Net Gain and recognises its importance in delivering nature recovery. Policy 6.9 requires the statutory minimum 10% Biodiversity Net Gain in accordance with national legislation, whilst supporting higher gains where feasible.

The Council recognises concerns regarding viability and housing delivery. The policy reflects the nationally prescribed framework and is supported by wider policies relating to ecological networks, green infrastructure and nature recovery to ensure biodiversity enhancements are delivered alongside sustainable growth.

The policy prioritises on-site delivery wherever possible, with off-site provision required to support local nature recovery objectives through registered biodiversity gain sites. The Council considers this approach provides an appropriate balance between biodiversity enhancement, local priorities and development viability.

Policy N/GI: Green infrastructure

Bolstering Green Infrastructure (20 respondents, 74%): Strong support for the enhancement of green infrastructure, with diverse opinions on approaches, underscoring flexibility, evidence-based policymaking, and the balance between environmental goals and development practicality.

Policy Flexibility and Development Viability (15 respondents, 56%): Tension between the need for policy flexibility and maintaining the viability of new developments, with caution against too prescriptive or lenient policies.

Strategic GI Planning and Local Specificity (13 respondents, 48%): Advocacy for strategic GI planning that incorporates local characteristics and leverages local knowledge, ensuring fidelity to local green spaces and community attributes.

The Interface of GI Policies with Other Legislation (10 respondents, 37%): Emphasis on the alignment of GI policies with broader legislative frameworks, seeking a balance between statutory requirements and local aspirations.

Biodiversity Net Gain and Species-Specific Considerations (8 respondents, 30%): Strong advocacy for GI policies to support national biodiversity net gain objectives and to include strategies considering the impact on specific species.

Evidence-Based Policy Making and Implementation Challenges (7 respondents, 26%): Recurrent calls for GI policies to be underpinned by comprehensive evidence, viability assessments, and strategic environmental considerations.

Health, Wellbeing, and Environmental Benefits (5 respondents, 19%): Consensus on the positive impact of green infrastructure on health, well-being, and the environment, with recognition of potential design and implementation challenges.

Integration with Existing Urban and Rural Landscapes (5 respondents, 19%): Importance placed on integrating GI policies with urban and rural landscapes, ensuring advancements benefit both, and address connectivity issues in rural areas.

Council Response

The Council welcomes support for strengthening green infrastructure and recognises its role in supporting biodiversity, climate resilience, health and wellbeing. Policy 6.11 requires development to protect, enhance and connect green infrastructure networks and deliver multifunctional green infrastructure as part of sustainable placemaking.

The policy is informed by national policy and local evidence, including the Greener Places Plan and Local Nature Recovery Strategy, and seeks to balance environmental objectives with development viability through a proportionate and flexible approach.

The Council considers the policy will help strengthen ecological networks, support biodiversity net gain objectives and improve access to high-quality green spaces across the district.

Policy N/OS: Open spaces

Policy Clarity and Flexibility (10 respondents, 91%): Diverse views on policy flexibility; some favour adaptability to local needs while others seek clear standards for consistency and certainty for developers.

Development Viability and Standards (5 respondents, 45%): Concerns about balancing stringent open space standards with development viability, aiming for a compromise that supports growth without compromising space quality.

Sports and Recreation Provision (2 respondents, 18%): Stresses the inclusion of sports and recreation in policy considerations, with a focus on protecting facilities and informed by community needs.

Equity in Access to Open Spaces (1 respondent, 9%): Highlights the need for equitable access to open spaces across all community members, integrating social justice in urban planning.

Flood Risk Management (1 respondent, 9%): Recognises open spaces should also address environmental concerns, like flood risk management, calling for multifunctional space designs.

Historical and Recreational Value (1 respondent, 9%): Supports recognising local green spaces for their historical and recreational importance, and the value they add to communities.

Green Infrastructure and Open Space Distinction (1 respondent, 9%): Advocates for clear demarcation between open space and green infrastructure, requiring distinct policies for each.

Council Response

The Council welcomes support for the provision of high-quality open spaces. Policy 6.12 requires development to provide accessible and multifunctional open spaces that support recreation, health and wellbeing, biodiversity and climate resilience.

The policy is informed by the Open Space Assessment and adopts a proportionate approach that balances local provision standards with site-specific circumstances and development viability.

The Council considers the policy will help ensure development contributes positively to community needs whilst complementing the wider Green Infrastructure network.

Policy N/TWC: Trees and woodland conservation

Climate Change and Ecological Responses (13 respondents, 68%): Respondents advocated for tree and woodland conservation as means to tackle climate change, improve air quality, and promote biodiversity; they called for ambitious tree canopy targets and integration of trees as carbon sinks in developments.

Policy Clarity and Management (10 respondents, 53%): Contributors sought clearer guidelines to harmonize trees and woodland conservation with environmental and development policies, emphasizing the need for sustainable development and proper management of planted trees.

Policy Implementation Challenges (8 respondents, 42%): Frustrations were expressed about the current state of policy implementation, where developments sometimes neglect tree conservation; respondents suggested more rigorous conservation requirements in new developments.

Balancing Urban Development and Conservation (6 respondents, 32%): The need to adjust policies to achieve a balance between urban development and nature conservation was discussed, with suggestions for incorporating more greenery in cities and extending conservation to rural areas.

Health and Wellbeing Considerations (4 respondents, 21%): The health benefits of integrating trees and green spaces in urban and housing developments were highlighted, with a push for policies that promote residents' health and well-being through such green inclusions.

Council Response

The Council welcomes support for the role of trees and woodlands in addressing climate change, supporting biodiversity, improving air quality and promoting health and wellbeing. Policy 6.10 seeks to protect existing trees and woodlands, secure appropriate new tree planting and ensure trees form an integral part of sustainable development.

The Council recognises comments regarding policy clarity and implementation. The policy requires development to avoid adverse impacts on trees and woodlands wherever possible, secure compensatory planting where losses are unavoidable, and ensure both retained and newly planted trees have sufficient space to reach maturity.

The Council considers the policy provides an appropriate balance between development and environmental protection and will help strengthen the district's tree cover, green infrastructure network and resilience to climate change.

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

Information and guidance updating (1 respondent, 100%): Respondents express concerns about the outdated information affecting landscape policies. Emphasise the need for current data to better align with environmental challenges and regulation.

Policy scope and inclusivity (1 respondent, 100%): Push for broader policy coverage to protect and enhance non-designated landscapes as well, recognising their ecological and visual importance.

Regulatory enhancement for ecological recovery (1 respondent, 100%): Advocacy for adapting policies to improve ecological recovery schemes in non-designated landscapes, to offer targeted conservation support.

Council Response –

The comments are noted. The Local Plan already includes policies that protect and enhance both designated and non-designated landscapes. Saved Policy NE2A (Landscape Setting of Settlements) and Policy 6.11 (Green Infrastructure) provide a framework for conserving landscape character, enhancing ecological networks and supporting nature recovery across the district. Policy 6.11 also requires development to safeguard existing landscape features, habitats and natural features, strengthen green infrastructure networks, and integrate measures that support biodiversity, climate resilience and ecological recovery. The Council will continue to rely on the most up-to-date evidence base to inform decision making and monitor the effectiveness of landscape-related policies throughout the plan period. The Council considers that the existing policy framework already provides appropriate protection for landscape character and wider environmental enhancement, including within non-designated landscapes.

N/LCS: Landscape character and setting of settlements

Policy adequacy and updates (18 respondents, 90%): Debate over the effectiveness of current policies, with views split, where some respondents state these policies match national and local strategies, while others suggest they require updates, especially to tackle the ambiguity around non-designated landscapes and to prevent unwanted developments.

Specific area protections (11 respondents, 55%): Many respondents focus on the necessity of shielded spaces, particularly the A4 westbound into Bath and its surrounding green corridors, stressing their importance as entries to the city and warranting explicit policy protection to conserve locality and environmental quality.

Balance between development and preservation (11 respondents, 55%): Equally discussed, with opinions on how best to manage the dichotomy between required development for housing and employment and the conservation of green spots, skylines, and corridors, suggesting a reach for balanced policies that consider both progress and protection.

Community and heritage considerations (10 respondents, 50%): A sentiment emphasising the need to maintain local character and protect significant gateways, especially around world heritage sites, hinting at a preference for policies to put heritage and the unique identities of communities at the forefront of development plans.

Evidence-based and future-proof policies (5 respondents, 25%): Some respondents suggest policies should be grounded in substantial evidence and have the flexibility for future change, acknowledging the transformative nature of landscapes which may pivot due to land use amendments, greenbelt shifts, and evolving priorities.

Integration with wider environmental goals (4 respondents, 20%): Support for harmonising policies that govern landscapes with comprehensive environmental objectives appears in discussions, such as enhancing tree cover on roadsides and natural spaces, reflecting a view of landscape protection as part of a broader environmental strategy.

Objective and specific policy language (1 respondent, 5%): Critique around policy wording being too subjective is voiced by a few, with suggestions for more definitive, objective criteria to replace vague terms, aiming for increased clarity and less arbitrary interpretation in the application of policy.

Council Response –

The comments are noted. The Local Plan retains a robust framework for protecting landscape character and the setting of settlements through saved Policy NE2A and related Green Infrastructure, biodiversity, Green Belt and heritage policies. Policy 6.11 requires development to safeguard and enhance landscape features, ecological networks and local distinctiveness. The Council recognises the importance of gateway approaches, green corridors and valued landscapes, including the setting of Bath and its World Heritage Site. The policy framework is supported by an up-to-date evidence base and provides an appropriate balance between landscape protection and sustainable development.

Policy N/CELLC

Policy Integration with Environmental Legislation (1 respondent, 100%): Respondents mentioned the need for Policy N/CELLC to align with environmental conservation objectives as outlined in the Levelling Up and Regeneration Act 2023. The policy should not only be legally compliant but also proactive in protecting landscapes and enhancing natural heritage. This could lead to increased tourism and recreation but may impose constraints on development and necessitate a balance between conservation and socio-economic needs.

Council Response –

The comments are noted. The Council supports the objective of ensuring Local Plan policies align with relevant environmental legislation and wider environmental objectives. The existing policy framework, including Policies 6.11 (Green Infrastructure), 6.9 (Biodiversity Net Gain), 6.10 (Trees and Woodland Conservation), and relevant landscape and heritage policies, seeks to protect and enhance the natural environment, support nature recovery and conserve landscape character whilst balancing the need for sustainable development. The Council considers that the existing policies provide an appropriate framework for achieving these objectives.

Policy N/RFSD: Flood risk management and sustainable drainage

Sustainable Drainage Systems (SuDS) Implementation (28 respondents, 93%): Strong support indicated for incorporating SuDS in developments of all scales.

Climate Change Adaptation (14 respondents, 47%): Concerns discussed about flood risk models becoming outdated due to climate change enhancing flood frequency and severity.

Regulatory Framework and Compliance (12 respondents, 40%): Calls identified for updated regulations that account for modern challenges and include climate adaptation.

Infrastructure and Urban Development Pressures (9 respondents, 30%): Increased urbanisation and impermeable surfaces noted to intensify flood risks.

Policy and Planning Integration (7 respondents, 23%): A disconnect between existing flood risk management strategies and wider planning policies highlighted.

Public and Environmental Health (7 respondents, 23%): Flood risk management linked to wider public and environmental health concerns.

Council Response –

The comments are noted. The Council supports the use of Sustainable Drainage Systems (SuDS) as part of a wider approach to managing flood risk, improving water quality, enhancing biodiversity and supporting climate resilience. Policy 6.2 requires development to assess and address climate change risks, including flooding and intense rainfall, using the latest available climate projections and to incorporate appropriate mitigation measures from the outset of the design process. Policy 6.11 also supports the use of multifunctional green infrastructure, including SuDS, to provide flood risk mitigation and climate adaptation benefits. The Council considers that the Local Plan provides an integrated and forward-looking framework for flood risk management that responds to the challenges of climate change, development pressures and environmental protection.

Policy N/ES: Ecosystem services

Policy Effectiveness and Implementation (26 respondents, 90%): Feedback indicates a disparity between the policy's objectives and its actual enactment; criticisms point to ambiguity in policies and poor adherence by developers and local authorities. Stakeholders press for the policy to be made more explicit, stringent, and enforced to embed ecosystem services into development decisions. This highlights a tension between the need for precise policy and the practicalities of enforcement.

Wildlife Corridors and Urban Biodiversity (20 respondents, 69%): There is a robust endorsement for maintaining wildlife corridors, with a call for policies to be amended to protect these ecological networks from the impacts of development. Proposals like incorporating swift bricks in new buildings are suggested, yet there is concern over the efficacy of policy enforcement and its implications for biodiversity.

Stakeholder Involvement and Local Authority Action (8 respondents, 28%): Respondents argue for increased participation from local authorities in upholding ecosystem service policies, with some councils already taking proactive steps. There is an expectation for councils to reflect climate emergency commitments in their planning processes, balancing stakeholder aspirations with the complexity of policy and community expectations.

Nature-Based Solutions vs. Grey Infrastructure (7 respondents, 24%): A preference for nature-based solutions over traditional infrastructure is evident, with their benefits in multifunctionality, cost-effectiveness, and resilience against climate change being praised. Inclusion of such solutions in policy frameworks is suggested to optimise natural capital and ecosystem service delivery, juxtaposing the potential for sustainable development with existing policy integration challenges.

Engagement with Environmental Research and Best Practices (6 respondents, 21%): A call for policies informed by contemporary environmental research and best practices, following guidance from entities like Natural England and CIEEM, is voiced. Mandatory biodiversity features in development are debated, balancing policy-driven environmental progress against the hurdles in applying new ecological insights to development controls.

Council Response –

The comments are noted. Saved Policy NE4 (Ecosystem Services), together with Policies 6.9 (Biodiversity Net Gain), 6.10 (Trees and Woodland Conservation) and 6.11 (Green Infrastructure), provides a strong framework for protecting and enhancing ecological networks, biodiversity, green infrastructure and the wider benefits that ecosystem services provide. Policy 6.11 specifically requires development to safeguard and strengthen habitats, green infrastructure networks, climate resilience measures and nature recovery objectives, while Policy 6.9 requires measurable biodiversity gains. The Council supports the use of nature-based solutions and multifunctional green infrastructure to deliver environmental, climate adaptation and health benefits. The effectiveness of these policies will continue to be supported through development management decisions, guidance and monitoring.

Policy N/EN: Ecological networks and nature recovery - local nature recovery strategies

Strategic Implementation and Local Nature Recovery Strategies (LNRS) (12 respondents, 92%): Strong support for aligning local plans with LNRS to prioritize ecosystem services and nature recovery.

Policy and Planning Enhancements for Ecological Networks (6 respondents, 46%): Calls for nature recovery to be explicitly included in policies, with updates to Policy NE5 and changes to NE4 for better alignment with natural environment guidance.

Biodiversity Net Gain (BNG) and Metric Concerns (4 respondents, 31%): Debate over the statutory BNG metric's application and limitations, including whether it should include features like bird boxes.

Urban Wildlife and Architectural Biodiversity (3 respondents, 23%): Recognition of the built environment as important for urban wildlife, suggesting ecological integration into architectural design.

Integration of Biodiversity in Building Practices (3 respondents, 23%): Discussions on including wildlife-friendly features like swift bricks in buildings, emphasizing sustainability, aesthetics, and urban biodiversity at no extra cost.

Waterways and Landscape Conservation (2 respondents, 15%): Recommendations for extensive mapping of waterways and landscapes to identify nature recovery opportunities.

Public and Community Engagement in Nature Recovery (1 respondent, 8%): Highlighting the role of local community data collection in identifying development contributions to nature recovery networks.

Council Response

The Council welcomes support for strengthening nature recovery and ecological networks. The Local Plan supports delivery of the Local Nature Recovery Strategy through policies on Biodiversity Net Gain, Green Infrastructure and habitat connectivity.

The Plan promotes biodiversity enhancement, urban greening and wildlife-friendly design, whilst seeking to strengthen ecological networks across both urban and rural areas.

The Council acknowledges comments regarding the Biodiversity Net Gain metric. Whilst this is prescribed through national legislation, the wider policy framework seeks to secure nature recovery and biodiversity benefits beyond the statutory metric.

The Council considers that the Local Plan provides a comprehensive framework for supporting biodiversity, habitat connectivity and long-term ecological resilience.

Green Belt

Green Belt policy

Housing Needs vs. Green Belt Protection (26 respondents, 90%): Respondents discussed the conflict between the need for additional housing and the protection of green belt areas, advocating for flexible policies to balance environmental and community interests with development.

Development Strategy and Land Use (23 respondents, 79%): Strategies such as using brownfield sites and infill development were suggested to house people without compromising green belt goals, highlighting the need to avoid urban sprawl through strategic planning.

Comparison of Development Options (19 respondents, 66%): Specific solutions like 'option b' were debated with an aim to integrate housing needs while preserving village character and respecting green belt values.

Policy and Regulation Framework (9 respondents, 31%): The effectiveness of national and local policies, including the NPPF and EPPS, was questioned, with calls for updates to reflect modern perspectives on environmental protection and housing demand.

Local Community and Economy (9 respondents, 31%): Importance was placed on development that supports the local economy and community characteristics, with an emphasis on projects that align with local needs and preferences.

Environmental Concerns and Sustainability (8 respondents, 28%): Concerns were raised about the environmental impact of development, with suggestions for prioritising low-impact growth and enhancing green belt areas for biodiversity and ecological connections.

Public Participation and Trust (2 respondents, 7%): The need for local participation in planning and decision-making was stressed to build trust and ensure policies align with community values and needs.

Council Response –

The comments are noted. Policy 6.13 reflects national Green Belt policy and seeks to protect the openness of the Green Belt from inappropriate development. The Local Plan strategy has been informed by evidence demonstrating the exceptional circumstances required to justify Green Belt release to meet identified development needs. The Council has sought to direct development to the most sustainable locations, taking account of brownfield opportunities, settlement patterns, infrastructure provision and environmental constraints. The policy framework also requires development to support infrastructure provision, affordable housing and accessible green space, whilst protecting landscape character, biodiversity and community interests.

Jobs and economy

Policy J/O: Office Development and Change of Use

Trust and implementation in development processes (2 respondents, 67%): Concerns about the trustworthiness of developers and balancing strict approach with a need for flexibility in development policies are highlighted.

Flexibility and viability of conversion policies (2 respondents, 67%): Debates on the rigid nature of conversion policies, advocating for more adaptable approach versus the risk of losing valuable industrial spaces without economic justification.

Clarification and specification in policy language (1 respondent, 33%): Requests clearer policy language to avoid misinterpretation and ensure positive development outcomes.

Council Response

The Draft Local Plan evidence indicates that significant net additional office floorspace is required over the plan period within the District based on the proposed growth, and therefore the retention of existing floorspace is important to meet the Local Plan objectives. The draft Local Plan policy allows for the release of office premises where robust evidence shows that they are genuinely unsuitable for continued office use, there is no reasonable prospect of demand, and suitable alternative premises are available locally. This ensures that genuinely obsolete or unviable office stock can be managed flexibly, while safeguarding office floorspace that remains important to the local economy.

Policy J/I: Strategic industrial locations and locally significant industrial sites

Economic viability and potential for prosperity (3 respondents, 100%): Respondents raised issues about the current policy possibly not supporting long-term economic progress, arguing for a more inclusive approach that embraces a wider array of investments and job creation opportunities.

Deployment and utilisation of strategic sites (3 respondents, 100%): Some responses highlighted the need for policy flexibility in the use of strategic and brownfield sites, calling for an allowance of varied employment-generating uses. Noted some strategic sites may be better suited to mixed-use or alternative employment-generating development, rather than being limited to traditional industrial uses

Regional specific concerns and the need for localised approaches (2 respondents, 67%): Respondents signalled the importance of tailoring policy to regional characteristics and demands, suggesting a one-size-fits-all policy might not address each area's unique economic context.

Flexibility vs. rigidity in policy design (2 respondents, 67%): There's tension between the desire for a flexible policy that adjusts to market shifts and the current policy's perceived narrow focus, with a caveat that too much flexibility might detract from maintaining space for important sectors.

Policy clarity and implementation concerns (1 respondent, 33%): There were calls for clearer wording in the policy to avoid ambiguities and ensure that policy objectives are understandable and achievable, with a directive towards a broader spectrum of permissible uses. Identified that allocating land for industrial purposes does not, in itself, ensure that the land will be deliverable or retained in that use over the plan period. Market demand, viability and site attractiveness should be taken into account when deciding whether industrial land should continue to be protected. The policy is too narrowly focused on existing industrial or distribution floorspace, which may mean that undeveloped or underused land within industrial allocations is not able to come forward for viable development. Allowing small-scale or ancillary alternative uses within industrial allocations is not considered likely to undermine the overall supply of employment land, particularly where there is evidence of a sufficient long-term supply.

Council Response

Support noted.

Local Plan evidence identifies a continuing need for additional industrial and warehousing floorspace over the plan period. In this context, the retention of existing industrial land and premises is essential to supporting the Council's Economic Strategy, maintaining economic resilience and delivering the wider objectives of the Local Plan.

Strategic and Locally Significant Industrial Sites represent the District's most important concentrations of industrial and warehousing land. Given the identified need for additional employment floorspace, these sites should be safeguarded from alternative forms of development that would erode the supply of industrial land, fragment industrial areas, or constrain the operation, intensification and renewal of employment uses through conflicts relating to amenity, access or servicing requirements.

Policy J/UI: Undesignated industrial sites

Industrial space management and sustainability (4 respondents, 100%): Concerns over managing the shortage of industrial spaces while incorporating sustainable development, such as ecotourism, to balance economic growth with environmental preservation.

Flexibility and adaptability of policy (3 respondents, 75%): Suggestions for Policy J/UI to be more adaptable to diverse local needs, including repurposing old sites, while safeguarding industrial uses and allowing for sustainable development.

Policy implementation and effectiveness (3 respondents, 75%): Discussions on the need for more robust approach to Policy J/UI, preventing misuse by certain developments, coupled with calls for national policy revisions as concern raised the policy will regularly be circumvented by Class E use (which allows change of uses within the E use class without the need for planning permission).

Economic impact and growth considerations (2 respondents): Views vary between concerns over the impact of losing industrial space on economic growth and suggestions for policies to promote economic benefits, possibly through more liberal conversion approach.

Long-term use and sustainability of spaces (1 respondent): Awareness of industrial constructions' shorter lifespan vis-à-vis residential lifespan with a preference for developments with longer-term utility.

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Council Response

The Council recognises the need for some flexibility where existing industrial sites are no longer suitable, viable, or compatible with surrounding uses, particularly in residential areas.

However, evidence shows a continuing and increased need for industrial and warehousing floorspace, so retaining existing sites remains important. Undesignated industrial sites support local employment and smaller businesses, and their cumulative loss could reduce the availability, range and affordability of industrial premises.

The flexibility of Class E and national permitted development rights is noted, but these sit largely outside the Local Plan’s control.

Policy J/EM: Employment and skills

Local Workforce Empowerment and Skill Development (11 respondents, 100%): Advocacy for prioritising local labour and providing training in sustainable practices, with a view to address unemployment and contribute to climate change mitigation, albeit with concerns over potential neglect of sectors like heritage.

Sustainability and Climate Change Mitigation (8 respondents, 73%): Support for local workforce training in sustainable building practices to address climate change, acknowledging the need to balance this with other local economic interests.

Educational Overhaul and Community Support (2 respondents, 18%): Criticism of a skewed emphasis on academic education over practical skills, suggesting that reform should favour community-focused training that benefits local businesses.

Innovative Agricultural Practices (1 respondent, 9%): Endorsement of expanding local farming expertise in regenerative practices, signalling the employment-environment nexus within agriculture and the need for inclusive policy crafting.

Enhanced Local Services and Infrastructure Support (1 respondent, 9%): Recommendation for better training advisory services, indicating a gap in policy planning for skill development and training infrastructure support.

Economic Impact and Diversification (1 respondent, 9%): Acknowledgement of policy efforts in job creation yet highlighting a lack of focus on economic diversification, specifically the omission of the heritage economy, which calls for a balanced job market.

Council Response

Support noted. The Local Plan does not set policy on training and skills development – it relates to land use. The West of England Combined Authority and Council have published Employment and Skills Plans which include objectives and actions to support unemployed and inactive people into work and address employer needs and skills shortages.

Healthy, vibrant and inclusive communities

Policy HVC/TC: Town centre retail hierarchy and development

Economic Vitality and Retail Strategy (6 respondents, 100%): Emphasis on the need for vibrant and adaptable retail sectors in town centres, with a push for clarity and proactive management to balance economic growth and conservation of town centre character and accessibility.

Policy Integration and Specification (4 respondents, 67%): Policy on promotion of Town centres within the strategic sections is sought,. Respondents disappointed with lack of details and seek comprehensive policy frameworks and more explicit commitment to local centres protection citing Larkhall.

Urban Regeneration and Space Utilisation (3 respondents, 50%): Promotion of urban regeneration and mixed-use developments to boost employment and make better use of space, underpinned by centralised services and public transport. Calls for clearer planning on retail development allocations in local centres.

Transport and Accessibility Concerns (3 respondents, 50%): Support for improved transport infrastructure to meet net-zero emissions aims and 30-minute cycle ride accessibility. Respondents favour the '15-minute city' model for better town centre access while indicating a gap in current transport infrastructure and assessment efficacy.

Environmental and Sustainability Goals (1 respondent, 17%): Advocacy for alignment with broader environmental targets such as the net-zero transport plan, incorporating detailed impact assessments to aid sustainability in new developments. Acknowledgement of challenges in current strategies to meet environmental objectives.

Council Response

Support for the proposed approach is noted, including support for retaining existing local centre designations and for the Primary Shopping Areas.

The Council recognises the importance of town, district and local centres in supporting sustainable communities, local access to shops and services, economic vitality, health and wellbeing, and reduced reliance on car-based trips. The role of centres is therefore reflected through the retail hierarchy and associated development management policies, which seek to protect and enhance their function while allowing them to adapt to changing market conditions.

The reference to “main town centre uses” reflects the terminology used in the National Planning Policy Framework and includes uses such as retail, leisure, office, cultural and community uses that are typically located within centres. The policy is not intended to exclude niche or independent retailers, which make an important contribution to the character, diversity and vitality of local centres. The policy approach seeks to ensure that development is appropriate in function and scale to the role of the centre concerned.

Within centres, many commercial, business and service uses fall within Use Class E and can change without the need for planning permission. The Local Plan can therefore guide the overall role, scale and function of centres, but it cannot control every change between uses where national permitted development rights or use class flexibilities apply.

The Council agrees that centres need to remain flexible and responsive to changing shopping patterns, service needs and investment conditions.

The Council also notes the comments seeking a more proactive approach to centres. The policy requires that new development supports the vitality and viability of centres.

Policy HVC/TCD: Town, district and local centre development

Preservation of Retail Functions (2 respondents, 67%): Emphasises maintaining the retail identity of town and local centres, balancing traditional retail protection with adaptability to new retail behaviours.

Accessibility and Convenience (1 respondent, 33%): Highlights the need for local shopping districts to be readily accessible and support the community's lifestyle with services in close proximity.

Expansion and Inclusion in Local Centres (1 respondent, 33%): Discusses opinions on defining the geographical scope of local centres to ensure they include essential services and buildings while avoiding overexpansion.

Council Response

Support noted.

The comments regarding accessibility are noted. The wider Local Plan policy framework supports the principle that residents should be able to access day-to-day shops, services and facilities by walking, cycling and public transport where possible. Policy HVC/TCD should therefore be read alongside policies on the spatial strategy, sustainable transport, health and wellbeing, and placemaking.

The Council's ability to control the provision of shops and services within existing villages is limited, as many occupier decisions are commercial matters.

Policy HVC/LS: Dispersed local shops

Community building and local economy support (3 respondents, 100%): Distributed local shops are seen to strengthen community bonds and support the local economy by encouraging residents to shop locally.

Environmental considerations and travel reduction (2 respondents, 67%): The policy is recognised for its potential to lower carbon emissions by reducing the need for long-distance travel, especially in areas with limited public transport.

Improved accessibility and convenience (2 respondents, 67%): The dispersion of local shops is appreciated for its substantial reduction in travel times and added convenience, particularly for those far from urban centres or without efficient public transportation.

Focus on essential goods and services (1 respondent, 33%): There is a call for local shops to prioritise essential goods and services to ensure they meet the core needs of the community effectively.

Council Response

The Regulation 19 Local Plan has been prepared in the context of the introduction of National Development Management Policies (NDMPs) proposed via the 2026 NPPF. As a result, some policy approaches consulted upon at Regulation 18 have not been taken forward where they would duplicate or repeat national policy requirements. The Council has reviewed both proposed new policies and existing saved policies to ensure that the Local Plan focuses on locally specific matters and avoids unnecessary repetition of national policy. Whilst the practical implications of NDMPs continue to emerge through plan-making and decision-taking, relevant development management policies from the existing development plan have generally been retained at this stage to provide continuity and policy certainty, pending a fuller understanding of how the new national framework will operate in practice.

Policy HVC/H: Health and wellbeing

Promotion of Healthy Lifestyles via Infrastructure and Policy (5 respondents, 62%): Advocacy for policies promoting healthy lifestyles through improved public realm accessibility, active travel, and sustainable transport; requires collaboration among stakeholders.

Integration of Green Spaces and Active Travel (4 respondents, 50%): Need for high-quality green spaces and safe green corridors in urban planning to enhance physical and mental well-being, with inclusivity and safety as key considerations.

Health Impact Assessments (HIA) (4 respondents, 50%): Support for including HIA in planning to evaluate health outcomes from urban developments; simplifying policy framework is suggested for efficiency.

Engagement and Measurement in Health Policy Implementation (3 respondents, 38%): Calls for engaging healthcare professionals in HIA development and use of measurable metrics like WHOQOL for assessing quality of life improvements post-policy implementation.

Mental Well-being through Nature Connectedness (2 respondents, 25%): Creating tranquil areas and inclusive features in greenspaces to connect with nature and improve mental well-being, with planned accommodations for diverse needs.

Economic Perspectives on Health and Wellbeing (1 respondent, 12%): Investment in parks and green spaces justified by potential long-term savings in health and social care services, emphasizing the economic benefits of wellbeing policies.

Council Response –

The Regulation 19 Local Plan has been prepared in the context of the introduction of National Development Management Policies (NDMPs) proposed via the 2026 NPPF. As a result, some policy approaches consulted upon at Regulation 18 have not been taken forward where they would duplicate or repeat national policy requirements. The Council has reviewed both proposed new policies and existing saved policies to ensure that the Local Plan focuses on locally specific matters and avoids unnecessary repetition of national policy. Whilst the practical implications of NDMPs continue to emerge through plan-making and decision-taking, relevant development management policies from the existing development plan have generally been retained at this stage to provide continuity and policy certainty, pending a fuller understanding of how the new national framework will operate in practice.

Policy HVC/HIA: Health impact assessments

Health Impact Assessments (HIAs) in Development Projects (4 respondents, 80%): Strong support for systemic implementation of HIAs across major developments, with a balance sought between comprehensive health implications analysis and avoiding excessive burden on developers.

Policy Implementation Challenges and Solutions (3 respondents, 60%): Discussions highlighted the complexity of implementing HVC/HIA policy, emphasizing the need for clear guidance and simple procedures to increase compliance, involving NHS and establishing evidence-based thresholds.

Community and Stakeholder Engagement (2 respondents, 40%): Respondents indicated the importance of transparent policy-making, requiring evidence for HIA thresholds and advocating for increased commentary rights for stakeholders, including groups like the SMV.

Incorporation of Health Services in Planning (1 respondent, 20%): Recognition of the need to integrate healthcare facilities in new developments to meet the growing healthcare demands of larger populations, while considering resource allocation challenges.

Council Response –

The Local Plan supports the creation of healthy and sustainable communities through policies relating to green infrastructure, open space, active travel, climate resilience and infrastructure delivery. However a specific policy requirement for submission of Health Impact Assessment as not been included in the Draft Local Plan.

Policy HVC/CF: Community facilities

Support and Provision for Community Facilities (5 respondents, 71%): Respondents discuss the need for policies to support and enhance community facilities, particularly in accessible locations within small villages, including the integration of green infrastructure.

Open Space as a Community Asset (4 respondents, 57%): There is a call for recognising the value of open spaces, such as green spaces, within the community facilities framework, for the health and well-being benefits they provide.

Community Facilities Definition and Inclusion (4 respondents, 57%): Debates focus on what should be included under the community facilities definition, with some suggesting a broader scope that encompasses green spaces like community gardens.

Decision-making Criteria for Facility Retention or Repurposing (3 respondents, 43%): Discussions centre around the need for clear criteria in decision-making when determining the retention or repurposing of community facilities, taking into account the presence of community need and the viability of alternatives.

Balancing NHS Estate Flexibility with Community Needs (2 respondents, 29%): Points are raised about the tension between NHS estate flexibility for improved patient care, and the community's desire to retain such sites for community uses, acknowledging different impacts and exploring alternatives.

Alternative Uses and Community Innovation (1 respondent, 14%): There is mention of encouraging creative repurposing of sites deemed surplus for community benefit, contrasting with concerns about delays in healthcare improvements caused by such deliberations.

Council Response

This is covered by the National Decision Making Policies

Policy HVC/PS: Safeguarding land for primary school use

Community Support for Educational Infrastructure (2 respondents, 100%): Support for policies that reserve land for educational purposes, emphasising the importance of outdoor spaces for schools and the need for careful consideration of land use priorities.

Preservation of Educational Spaces (2 respondents, 100%): Strong consensus on the necessity of safeguarding land for primary school use, including protecting areas around schools like East Harptree Primary School, while acknowledging potential land allocation challenges.

Council Response

The policy will be retained to safeguard land for primary school use. Land will be safeguarded within proposed site allocations to allow for school expansions.

Policy HVC/PSC: Primary school capacity

Sustainable transport challenges and solutions (1 respondent, 100%): The policy on primary school capacity touches upon the need for adaptations in rural areas, particularly focusing on sustainable transport solutions that ensure equitable access to education, whilst acknowledging geographical and infrastructural constraints.

Council Response

Land will be safeguarded within proposed site allocations to allow for school expansions.

Policy HVC/C: Safeguarding land for cemeteries

Land Need and Utilisation for Cemetery Expansion (3 respondents, 100%): There is a noted requirement for more space for cemeteries, with a debate over suitable areas for expansion such as underused garages or green fields. Concerns centre on the environmental repercussions and finding community-beneficial uses for derelict spaces, as local cemeteries like St. Mary’s Church are nearing capacity.

Environmental Considerations in Cemetery Site Selection (1 respondent, 33%): Environmental impact assessments, particularly focusing on protected species such as bats in Special Areas of Conservation, are a critical part of selecting new cemetery sites. The discussion indicates a community's weight on balancing the necessity for more burial grounds with environmental conservation efforts.

Council Response

Land has been safeguarded at Haycombe cemetery to allow for expansion. A green infrastructure plan will be required to mitigate against the impact of development on the World Heritage Site.

Policy HVC/A: Protecting allotments

Policy strength and allotment protection (85 respondents, 79%): Policy LCR 8 deemed insufficient for safeguarding allotments, with call for stronger protections to prevent eviction of allotment holders, particularly in Combe Down area and loss of valued community spaces.

Allotment demand and supply challenges (80 respondents, 74%): Long waiting lists for allotments in Bath signify mismatch between demand and availability, highlighting difficulties in creating new sites and the pressure from new housing developments.

Developer contributions and replacement allotment sites (63 respondents, 58%): Developers expected to provide not just financial but physical replacement of allotments, with quality sites located appropriately to sustain community allotment needs.

Environmental and community impact (30 respondents, 28%): Allotments seen as environmentally beneficial for biodiversity and ecological balance, with some concerns about negative implications of expansion such as increased traffic and local wildlife disruption.

Access and safety concerns (25 respondents, 23%): Issues around vehicular access and parking following allotment expansion, notably at Combe Down, with fears over road infrastructure, traffic increases, and pedestrian safety.

Cultural and health value of allotments (19 respondents, 18%): Allotments valued for mental health, community bonding, educational benefits, and cultural significance; crucial to community identity and warranting integration in urban planning.

Communication and policy transparency (4 respondents, 4%): Dissatisfaction with clarity and inclusivity of consultation processes relating to allotment policies, highlighting a desire for more transparent communication and decision-making from the council.

Council Response

The current policy allows for strong protection against the loss of allotments and allotments are now protected by National Decision Making Polices. The proposals map has been revised to include new allotments at Fairfield Park. The expansion at Combe Down allotments is not included in the proposals map as this site is not operating as an allotment.

Policy HVC/B: Broadband connection at new residential properties

Regulatory Stability and Changes (2 respondents, 100%): Perspectives vary on how the policy fits with the existing regulatory framework. Some see the policy as a beneficial addition, promoting regulation stability. Meanwhile, concerns arise from a parish council suggesting the policy may be unnecessary due to evolving regulations.

Local Governance and Policy Reception (1 respondent, 50%): Acceptance levels of the policy vary among local governance, such as parish councils; alignment with local and national regulations is pivotal for effective policy implementation.

Council Response

This policy is covered by building regulations and is being deleted.

Policy HVC/LGS: Local green spaces

Community Engagement and Value (126 respondents, 90%): Combe Down allotments and other local green spaces seen as crucial community assets, demonstrated by petitions and proposals for community management; valued for recreational, aesthetic, historical significance; challenge in balancing development with community desires.

Environmental Conservation and Biodiversity (113 respondents, 81%): Strong desire to protect local green spaces for wildlife habitats, food security, and biodiversity; encouraging protective designations to balance ecological safeguarding with urban development; allotments valued for conserving underground minerals and supporting biodiversity.

Planning and Policy Challenges (102 respondents, 73%): Noted complexities in planning and policy frameworks protecting local green spaces; the procedural need for more in-depth examination and transparency; a call for stronger policies to protect valuable community assets like the Combe Down allotments against developmental pressures.

Potential for Future Development and Alternatives (68 respondents, 49%): Concerns expressed about new developments impacting green spaces; suggestions to use brownfield sites for development as an alternative to affecting green belts; necessitates rethinking urban development in light of climate change and biodiversity loss.

Resource Management and Sustainability (56 respondents, 40%): Emphasis on sustainable resource management, citing the allotments' role in preserving bath stone resources and contributing to ecosystem services; advocates for sustainable land use policies incorporating environmental stewardship with heritage conservation.

Health and Wellbeing Implications (27 respondents, 19%): Acknowledgement of the mental and physical health benefits provided by local green spaces; viewed as essential for community well-being, physical activity, and social inclusivity by offering natural settings for rest and community connection.

Council Response –

The comments are noted. Saved Policy LCR6A (Local Green Spaces), together with Policies 6.11 (Green Infrastructure) and 6.12 (Open Space), provides a strong framework for the protection and enhancement of local green spaces. The Council recognises the importance of these spaces for biodiversity, recreation, food growing, landscape character, heritage, climate resilience and community wellbeing. The Local Plan seeks to protect valued green spaces and ensure that development delivers high-quality green infrastructure and open space, while directing growth in accordance with the wider spatial strategy. The Council considers that the existing policy framework appropriately recognises the environmental, social and health benefits of local green spaces and provides suitable protection.

Heritage and design

Policy HD/EQ: Environmental quality

Policy clarity and guidance (2 respondents, 100%): Clear policy design expectations are vital, with a call for Policy HD/EQ to align with the National Design Guide and relevant NGI design guides for coherent and effective environmental quality standards.

Focus on sustainable and high-quality design (2 respondents, 100%): Strong support for creating sustainable, high-quality buildings and places, asserting that good design is key to sustainable development and that proper guidelines can help achieve environmental quality without major policy changes.

Stakeholder engagement in policy development (1 respondent, 50%): Emphasises the importance of collaboration among policymakers, designers, developers, and the community for the successful implementation of Policy HD/EQ to ensure high-quality, sustainable development.

Council Response -

Saved Policy CP6 (Environmental Quality), together with the wider design, climate change and green infrastructure policies within the Local Plan, provides a framework for securing high-quality, sustainable development.

Policy HD/WHSS: World heritage site and its setting

Development Guidance and Policy Enhancement (4 respondents, 100%): Opinions highlight the need for creating and updating policies and planning documents to guide development near WHS, aligning with preservation standards and enhancing the site.

Support for Policy Updates and Amendments (3 respondents, 75%): Stakeholders back revising policies like HD/WHSS to reflect modern conservation needs and development pressures.

Balancing Development with Heritage Conservation (2 respondents, 50%): General consensus on allowing developments that contribute to WHS character and appeal while stressing the need for controlled growth and regulations, particularly building heights, to maintain harmony with heritage.

Heritage Impact Assessments (HIA) Necessity (1 respondent, 25%): Strong agreement on the need for HIAs to safeguard WHS Outstanding Universal Value from developmental impact, promoting responsible development.

Site-specific Development Considerations (1 respondent, 25%): Opinions call for assessing development proposals based on their unique impact on WHS settings, advocating a tailored approach.

Comprehensive Monitoring to Prevent Cumulative Harm (1 respondent, 25%): Views emphasise systematic monitoring to prevent incremental deterioration of heritage values through ongoing oversight and assessment.

Council Response - Input

Policy HD/HE: Historic environment

Policy Framework and Strategic Guidance Integration (3 respondents, 50%): Highlights the need for better integration of historic environment policies with broader policy frameworks, including international, national, and local guidance, to ensure comprehensive policy coherence; acknowledges the potential increased complexity and compliance burden.

Impact Assessment and Management Planning (2 respondents, 33%): Suggests the necessity of updated and thorough impact assessments and management plans for Heritage Sites, calling for strategic planning in conservation; recognises the resource and expertise demands this may place on authorities.

Preservation vs. Modification Dilemmas (2 respondents, 33%): Discusses the challenge of balancing heritage asset preservation with contemporary needs like energy efficiency, noting the tension between existing regulations and the need for adaptability.

Heritage Assets as Catalysts for Public Benefit (1 respondent, 17%): Points to opportunities for policies to balance development impacts with potential public benefits, arguing for more support in policy for projects that enhance community gains while preserving heritage.

Bureaucratic and Cost Impediments (1 respondent, 17%): Comments on the bureaucracy and costs involved in altering heritage assets, such as the need for detailed plans and challenging local authority practices, which can discourage maintenance and improvements.

Urban Ecology and Character Preservation (1 respondent, 17%): Raises concerns about the loss of urban green spaces and character due to hard surfacing for parking, underlining their importance for biodiversity and historic area character; calls for policies accommodating both practical needs and conservation goals.

Council Response –

The historic environment is protected through Saved Policy HE1 and the wider Local Plan policy framework, including policies relating to design, climate change, green infrastructure and landscape. These policies are applied alongside national policy and statutory duties relating to heritage assets. The Council recognises the need to balance the conservation of heritage significance with appropriate adaptation, sustainability improvements and public benefits. Development proposals affecting heritage assets will continue to be assessed having regard to their significance, setting, potential impacts and opportunities for enhancement, whilst ensuring that wider environmental and place-making objectives are considered. The policy framework also supports the retention of local character, historic landscapes and green infrastructure which contribute to the significance and setting of heritage assets.

Policy HD/SCCW: Somersetshire Coal Canal and the Wansdyke

Policy HD/SCCW Revitalisation Support vs. Opposition (56 respondents, 95%): Divided opinions on policy amendments for canal restoration, with support for public benefit and opposition citing negative impacts on residential land and livelihood.

Potential for Canal as Community Asset vs. Risk to Personal Enjoyment and Property (46 respondents, 78%): Balance sought between the canal as a community asset for leisure and connectivity, and the protection of individuals' property rights.

Preservation of Heritage vs. Modern Development Concerns (32 respondents, 54%): Preservation of the canal's historical significance is valued, yet concerns exist over potential loss of land and negative impacts on local heritage from modern developments.

Economic and Community Benefits vs. Property and Environmental Concerns (32 respondents, 54%): Restoration seen as bringing economic and social benefits, with concerns about adverse environmental effects and property values.

Recreational Use and Access vs. Loss of Privacy and Tranquility (23 respondents, 39%): Advocacy for recreational paths contrasts with concerns over privacy and tranquillity for residents near the canal.

Nature Conservation and Biodiversity vs. Construction and Expansion Drawbacks (2 respondents, 3%): Project seen as an opportunity for wildlife and biodiversity, though there are reservations about the impacts of construction.

Public Engagement and Communication vs. Perceived Exclusivity (1 respondent, 2%): Need for inclusive decision-making emphasized, with concerns over lack of proper community consultation and notification of plans.

Council Response –

Saved Policy HE2 continues to provide protection for the Somersetshire Coal Canal and the Wansdyke as important historic assets.

Policy HD/GUDP: General urban design principles

Community Involvement in Urban Design Policy Making (1 respondent, 50%): Community input is seen as essential for developing urban design policies that reflect local desires and the specific character of an area.

Integration of Nature and Biodiversity in Urban Design (1 respondent, 50%): Critics suggest updating urban design principles to incorporate natural elements and biodiversity to align with the national design guide, enhancing ecosystems and resident well-being.

Council Response –

Saved Policy D1 (General Urban Design Principles), together with Policies 6.11 (Green Infrastructure), 6.12 (Open Space) and the wider design and climate change policies, supports the creation of high-quality places that respond to local character and context. The Council recognises the importance of community engagement in shaping development and the role of green infrastructure, biodiversity and nature recovery in delivering sustainable and attractive places. The policy framework (saved and draft policies) requires development to contribute positively to placemaking, local distinctiveness and environmental quality.

Policy HD/LCD: Local character and distinctiveness

Architectural Harmony and Landscape Integration (2 respondents, 67%): New developments should respect local architectural styles and landscapes, maintaining visual cohesiveness and the unique aesthetic of the area while also accommodating evolving demands.

Privacy and Residential Amenity Protection (1 respondent, 33%): Development policies need to consider the impact on residents' privacy, suggesting that thoughtful design can help balance development needs with the protection of residential amenity.

Policy Compatibility and Community Support (1 respondent, 33%): The success of the HD/LCD policy is tied to its resonance with local values, requiring it to reflect community aspirations to gain their support and effectiveness.

Ecological Consideration and Enhancement (1 respondent, 33%): Incorporating ecological networks and enhancing natural habitats should be part of the development process, promoting a balanced approach that can boost local biodiversity while meeting development goals.

Council Response –

Saved Policy D2 (Local Character and Distinctiveness), together with the wider design, landscape, biodiversity and green infrastructure policies, requires development to respond positively to local character, townscape and landscape setting. The Council supports development that respects the distinctive qualities of places whilst accommodating sustainable growth. Relevant policies also protect residential amenity, including privacy, and require consideration of ecological networks, biodiversity enhancement and green infrastructure. Community engagement has been undertaken, and played a very important part of the plan-making process, helping to ensure that development reflects local character and aspirations.

Policy HD/SS: Streets and spaces

Enhancement of urban greenery (2 respondents, 100%): Respondents mentioned significant support for more robust street tree policies, recognizing the essential role of trees in providing shade and enhancing urban spaces. Issues of maintenance and infrastructure compatibility were acknowledged in discussions on increasing urban greenery.

Council Response –

Saved Policy D4 (Streets and Spaces), together with Policies 6.10 (Trees and Woodland Conservation), 6.11 (Green Infrastructure) and 6.12 (Open Space), supports the integration of trees and green infrastructure within the public realm. Policy 6.10 specifically requires the retention and planting of trees.

Policy HD/BD: Building design

Environmental Integration in Building Design (2 respondents, 67%): Support expressed for incorporating habitat features in building designs to balance innovative architecture with conservation, notably including bird nesting sites and hedgehog-friendly measures.

Commitment to High Design Standards (1 respondent, 33%): Consensus on the need for high-quality, innovative design standards in building projects, emphasising improved urban aesthetics and living at the site off Claude Avenue.

Council Response –

Saved Policy D5 (Building Design), together with the Local Plan's biodiversity, green infrastructure and climate change policies, supports high-quality and sustainable building design.

Policy HD/A: Amenity

Protection of cultural venues under policy HD/A: Amenity (1 respondent, 50%): Respondents mentioned the policy's role in safeguarding small cultural venues, particularly from the challenges posed by new residential developments that might result in noise complaints and closures.

Enhancement of privacy regulations (1 respondent, 50%): Some raised the need for more robust privacy measures within the policy to prevent overlooking and protect residents' privacy from new developments, suggesting more specific planning guidelines.

Council Response –

Saved Policy D6 (Amenity) continues to provide protection for residential amenity and is supported by wider Local Plan policies relating to design, environmental quality and sustainable communities. The Council recognises the importance of protecting the operation of existing cultural and community venues and will continue to apply the agent of change principle where relevant. The policy framework also requires development to provide a high standard of amenity for existing and future occupiers, including consideration of privacy, overlooking and other impacts on residential living conditions.

Policy HD/IBD: Infill and backland development

Rural character preservation vs development needs (1 respondent, 50%): Development in rural areas should reflect existing housing densities to maintain green spaces and the local rural character, despite the challenge of balancing these values against housing needs, as seen in developments like Richmont Place, Silvertrees, and Water St Close in East Harptree.

Architectural integration and privacy (1 respondent, 50%): New developments should take into account ridge heights and the overall height relative to neighbouring properties to ensure architectural harmony and respect the landscape silhouette. Policy should protect against overlooking, maintaining privacy and residents' enjoyment of their property.

Council Response –

Saved Policy D7 (Infill and Backland Development) seeks to ensure that development respects the character, density and pattern of surrounding development.

Policy HD/L: Lighting

Community Engagement and Designation (8 respondents, 80%): Structured community involvement is favoured for decision-making on environmental zones and dark skies areas to customise local lighting solutions.

Cultural and Aesthetic Values (7 respondents, 70%): Preserving the night sky and historical vistas against light pollution is a priority, with a focus on balancing protection with lighting needs.

Wildlife Conservation and Biodiversity (6 respondents, 60%): The detrimental effects of artificial blue light on wildlife behaviour and ecosystems are highlighted, with calls for minimising light pollution while supporting human activities.

Innovative Solutions and Best Practices (3 respondents, 30%): Adoption of green infrastructure and flexible lighting solutions is encouraged, alongside learning from successful lighting management models.

Health and Well-being Impacts (3 respondents, 30%): Negative effects of blue and cool white light on sleep and well-being are noted, advocating for blue-light-free zones and specific colour temperature regulations.

Regulatory Compliance and Enforcement (3 respondents, 30%): A need for clearer lighting policy guidelines and stricter enforcement to bridge the gap between policy intentions and actual implementation is identified.

Council Response –

Policy 6.8 (Lighting) seeks to minimise the adverse impacts of artificial lighting on visual amenity, the historic environment, dark skies and local ecology, including protected species. The policy requires lighting proposals to minimise light spill, protect ecological corridors and avoid detrimental impacts on residential amenity and the wider environment. The Council recognises the importance of dark skies, biodiversity, heritage settings and public wellbeing, and supports the use of appropriate lighting design, technology and best practice guidance to achieve these objectives.

Policy HD/AOSF: Advertisements and outdoor street furniture

Impact on Urban Aesthetics (1 respondent, 100%): Respondents mentioned that the implementation of well-designed advertisements and outdoor street furniture is vital for enhancing urban aesthetics and maintaining high standards in public spaces. Conversely, neglect or poor execution could lead to a decline in the visual quality of urban environments, reflecting the "broken windows theory" where initial neglect can cause a cycle of degradation.

Council Response –

Saved Policy D9 (Advertisements and Outdoor Street Furniture) seeks to ensure that advertisements and street furniture are appropriately designed and located so that they do not detract from the character, appearance or visual quality of the public realm.

Policy HD/DC: Design codes

National vs. Local Design Codes (9 respondents, 82%): Local design codes should reflect local criteria, adapting national policies to the specifics of the community, thereby supporting grassroots planning approaches.

Avoidance of Generic Design (7 respondents, 64%): Concerns centre on preventing uninspired building designs, encouraging unique and characterful designs that contribute to the local area's distinctiveness.

Local Character and Architectural Heritage Preservation (6 respondents, 55%): There's a preference for design codes that ensure new developments harmonise with and enhance local character and architectural heritage, whilst also encouraging modern innovation.

Community Engagement and Master Planning (1 respondent, 9%): Design codes are viewed as a vehicle for improving master planning and community engagement in large developments, balancing local input with practical development needs.

Encouragement of Sustainability and Biodiversity (1 respondent, 9%): There is advocacy for design codes that mandate energy efficiency, reduced carbon emissions, and biodiversity protection, without hampering innovation.

Council Response –

The Council supports the preparation and use of design codes that respond to local character, distinctiveness and placemaking objectives. The Local Plan's design, green infrastructure, climate change and heritage policies already require development to reflect local context, contribute positively to local character and support high-quality design outcomes. Design codes can provide additional guidance to help ensure developments are well integrated with their surroundings whilst supporting innovation, sustainability, biodiversity enhancement and community involvement in the design process. The Council considers that the existing policy framework provides an appropriate basis for the preparation and application of locally responsive design codes.

Sustainable transport

Policy ST/HS: Promoting sustainable travel and healthy streets

Policy Precision and Clarity (19 respondents, 83%): Demand for clearer definitions within the policy, particularly around realistic travel options, the concept of short journeys, and sustainable transport modes.

Integration with Existing Transport Plans (14 respondents, 61%): Challenges in aligning new development plans with the current local transport plan, highlighting the need for integrated, coordinated planning.

Influence on Behavioural Change (13 respondents, 57%): The policy's role in encouraging a shift from cars to more sustainable modes, while considering the practicality and affordability of alternatives.

Equitable Access and Inclusivity (9 respondents, 39%): Equity and accessibility concerns in urban planning, suggesting the need for adaptable policies that cater to various community needs.

Infrastructure and Private Car Use (8 respondents, 35%): Acknowledgement of the ongoing role of private cars with a call for improved infrastructure that supports sustainability.

Environmental and Social Co-benefits (4 respondents, 17%): Advocacy for the policy to foster nature recovery, green infrastructure, and sociable spaces for a holistic urban environment.

Evidence Base and Monitoring (1 respondent, 4%): The necessity for a robust evidence base and uncertainty logging to underpin the policy and measure its success over time.

Council Response –

The Local Plan strongly supports sustainable travel, healthy streets and reduced reliance on private car use through Policies 6.30 (Active Travel Routes) and 6.31 (Transport Infrastructure), alongside saved transport policies. These policies are aligned with the Joint Local Transport Plan and promote walking, wheeling, cycling and public transport as the preferred travel choices. The policy framework also supports improved accessibility, inclusive design, green infrastructure and healthier places, whilst recognising the continued role of private vehicles in some circumstances. The Council considers that the existing transport policies provide an appropriate and evidence-based framework for supporting behavioural change, improving connectivity and delivering wider environmental and health benefits.

Policy ST/AT: Active travel routes

Strategic Planning and Policy Alignment (14 respondents, 78%): Calls for a holistic approach to integrate the active travel masterplan with other policies including local plans and transport strategies, ensuring alignment with sustainable development goals.

Integration with Other Transport Modes (12 respondents, 67%): Discusses the need for active travel routes to cohesively integrate with other transport forms, stressing on detailed evaluations for a sustainable, reduced-car-reliance transport system.

Protection and Enhancement of Active Travel Routes (11 respondents, 61%): Advocates for the protection of active travel routes against development pressures and enhancement by connecting key destinations, with necessary cost-benefit analyses.

Carbon Emission Reduction Prioritization (6 respondents, 33%): Places emphasis on prioritising transport modes that significantly cut down carbon emissions within the active travel strategy to support climate change mitigation efforts.

Public and Stakeholder Engagement (5 respondents, 28%): Highlights the importance of consulting the community and stakeholders to create an inclusive active travel masterplan that resonates with public and stakeholder expectations.

Challenges and Controversies (2 respondents, 11%): Addresses the diverse opinions on active travel, including concerns about impact on car users and behavior change towards walking or cycling, stressing the need for a balanced approach.

Accessibility and Inclusivity (1 respondent, 6%): Underlines the necessity for active travel routes to be universally accessible to all individuals, ensuring inclusivity across the demographic spectrum.

Council Response –

Policy 6.30 (Active Travel Routes) supports the protection and enhancement of active travel routes and requires development affecting public rights of way and other active travel corridors to maintain, improve and integrate these routes within development proposals. The policy supports strategic connections between settlements, services, public transport interchanges and the wider countryside, and aligns with the Council's wider transport strategy objectives of increasing walking, wheeling and cycling and reducing reliance on private car travel. The policy framework also promotes accessibility, inclusivity, climate change mitigation and integration with wider sustainable transport networks. Community and stakeholder engagement have informed the development of the Local Plan and associated transport strategies.

Policy ST/RMD: Transport requirements for managing development

Decide and Provide Approach (12 respondents, 75%): Respondents show support for the 'decide and provide' approach for its clear guidelines and potential to address actual transport needs alongside contributing to the climate emergency; however, concerns exist about the adequacy of evidence-based planning tools.

Policy Clarity and Consistency (9 respondents, 56%): Feedback indicates a need for clearer policy terminology and methodologies to avoid confusion and ensure a consistent approach across the 'decide and provide' model's implementation.

Sustainable Travel Integration (6 respondents, 38%): Support for the inclusion of sustainable travel options like public transport and cycling in early development stages is noted, with concerns about the challenges in rural areas and during winter conditions.

Proactive versus Promotive Approach to Sustainable Travel (5 respondents, 31%): A shift is suggested from merely promoting to enabling sustainable travel, proposing developments be designed to make sustainable options the most attractive choice.

Transport Planning and Development Impact (5 respondents, 31%): There's emphasis on integrating transport and land use planning, taking a proportionate approach to the scale of development, and improving the accuracy of traffic impact assessments.

Evidence-based Decision Making (1 respondent, 6%): The concern raised focuses on the need for developing or updating models like microsimulation traffic models to support informed planning and provide accurate, reliable data for policy decisions.

Council Response –

Policies 6.30 (Active Travel Routes) and 6.31 (Transport Infrastructure) prioritise walking, wheeling, cycling and public transport and require transport infrastructure to be planned using a vision-led approach and the sustainable transport hierarchy. The policy framework seeks to integrate transport and land use planning, reduce reliance on private car travel, support sustainable travel from the earliest stages of development and align with wider transport strategies. The Council recognises the importance of clear evidence, proportionate assessment and accessibility considerations, including in rural areas, and considers that the existing policy framework provides an appropriate basis for delivering sustainable and inclusive transport outcomes.

Pollution, contamination and safety

Policy PCS/NV: Noise and vibration

Residential amenity and mental wellbeing (4 respondents, 80%): Noise and vibration impacts are linked to reduced quality of life, with suggestions for robust policy measures to address mental wellbeing and sleep disruptions.

Balancing interests between new and existing developments (4 respondents, 80%): Tensions between the preservation of existing occupants' interests, including those in heritage properties and musical venues, and the facilitation of new developments necessitate policies for equitable coexistence.

Policy implementation and enforcement (2 respondents, 40%): Criticism of a shift towards self-regulation and the need for clearer enforcement principles to close the gap between policy intent and actual outcomes.

Support for cultural and creative activities (1 respondent, 20%): Advocacy for a regulatory framework that acknowledges the value of creative practices, arguing for noise regulation that allows cultural activities to thrive alongside residential tranquillity.

Heritage building protection versus development needs (1 respondent, 20%): The debate over stringent measures to protect heritage buildings' tranquillity versus the acceptance of necessary and harmoniously integrated development.

Council Response –

Saved Policy PCS2 (Noise and Vibration), together with Policy D6 (Amenity) and the wider development management framework, seeks to protect existing and future occupiers from unacceptable noise and vibration impacts.

Policy PCS/AQ: Air quality

Accessibility and clarity of policy information (1 respondent, 50%): Respondents mentioned difficulties in accessing and understanding 'Policy PCS/AQ: Air Quality' documents, suggesting a need for more transparent and user-friendly information to improve public engagement and compliance.

Impact of vehicle size on emissions and urban space (1 respondent, 50%): Some raised concerns over emissions from larger vehicles, including electric ones, in urban areas like Bath, indicating a need for a nuanced policy that encourages the use of smaller vehicles to benefit air quality and reduce congestion.

Council Response –

Saved Policy PCS3 (Air Quality), together with the Local Plan's sustainable transport policies, seeks to reduce air pollution and improve environmental quality.

Policy PCS/BHS: Bath hot springs

Environmental Impacts of PCS/BHS Policy (1 respondent, 100%): The policy for Bath Hot Springs is acknowledged for its potential to reduce environmental pollution, leading to cleaner air and water. Concerns are raised about possible ecological disturbances due to increased human activity and the need for infrastructure development. The balance of environmental pros against potential cons is noted as vital.

Council Response –

Saved Policy PCS8 (Bath Hot Springs) provides protection for the Bath Hot Springs system and ensures that development does not adversely affect this internationally significant environmental and heritage asset.

Minerals and waste

Policy MIN/M: Strategic approach to minerals

Policy Planning and Implementation (3 respondents, 75%): Criticisms highlight issues with the accuracy of maps delineating mineral safeguarding areas, emphasizing the need for precise and current mapping to prevent mismanagement of both mineral resources and green spaces.

Land Use and Resource Management (3 respondents, 75%): Respondents point out the conflict between designating land for mineral extraction and using it for housing or allotments, underscoring the challenge of balancing economic activities and community values.

Local Community and Green Spaces (2 respondents, 50%): Support is shown for protecting community resources like the allotments at Combe Down as local green spaces, emphasizing the value placed on maintaining these areas amidst mineral extraction interests.

Biodiversity and Habitat Connectivity (1 respondent, 25%): Interest is expressed in enhancing biodiversity and habitat connectivity through the strategic management of mineral extraction sites.

Environmental Enhancement and Restoration (1 respondent, 25%): Support is noted for initiatives aimed at mitigating the ecological impacts of mineral extraction and improving biodiversity and public access to nature through restoration efforts.

Council Response

The Regulation 19 Local Plan has been prepared in the context of the introduction of National Development Management Policies (NDMPs) proposed via the 2026 NPPF. As a result, some policy approaches consulted upon at Regulation 18 have not been taken forward where they would duplicate or repeat national policy requirements. The Council has reviewed both proposed new policies and existing saved policies to ensure that the Local Plan focuses on locally specific matters and avoids unnecessary repetition of national policy. Whilst the practical implications of NDMPs continue to emerge through plan-making and decision-taking, relevant development management policies from the existing development plan have generally been retained at this stage to provide continuity and policy certainty, pending a fuller understanding of how the new national framework will operate in practice.

Policy MIN/MSA: Mineral Safeguarding Areas

Proposed extension to Mineral Safeguarding Area at Stoke Hill Mine (1 respondent) Note that the principle of minerals extraction on these safeguarded sites has not been agreed, however the proposed safeguarded area at Stoke Hill Mine is in a location which may provide habitat which is functionally linked to the Bath and Bradford on Avon Bats SAC. Potential environmental impacts including impacts to functionally linked land through the working of this area will need to be considered.

Council Response

Noted. Mineral safeguarding does not establish the principle of mineral extraction or grant planning permission for working. Any future proposal for mineral extraction would need to be assessed through the planning application process and supported by appropriate environmental information. This would include consideration of potential effects on the Bath and Bradford on Avon Bats Special Area of Conservation, including any functionally linked habitat, and any necessary ecological surveys, assessment and mitigation in accordance with the Habitats Regulations and relevant Local Plan policies.

Notwithstanding this, the Regulation 19 Local Plan has been prepared in the context of the introduction of National Development Management Policies (NDMPs) proposed via the 2026 NPPF. As a result, some policy approaches consulted upon at Regulation 18 have not been taken forward where they would duplicate or repeat national policy requirements. The Council has reviewed both proposed new policies and existing saved policies to ensure that the Local Plan focuses on locally specific matters and avoids unnecessary repetition of national policy. Whilst the practical implications of NDMPs continue to emerge through plan-making and decision-taking, relevant development management policies from the existing development plan have generally been retained at this stage to provide continuity and policy certainty, pending a fuller understanding of how the new national framework will operate in practice.

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

Biodiversity vs. Recreational Use (1 respondent, 100%): The potential conflict between prioritising biodiversity net gain and the use of sites for recreation and leisure is examined, with an emphasis on finding a balance between conserving ecology and promoting public enjoyment.

Council Response

The Regulation 19 Local Plan has been prepared in the context of the introduction of National Development Management Policies (NDMPs) proposed via the 2026 NPPF. As a result, some policy approaches consulted upon at Regulation 18 have not been taken forward where they would duplicate or repeat national policy requirements. The Council has reviewed both proposed new policies and existing saved policies to ensure that the Local Plan focuses on locally specific matters and avoids unnecessary repetition of national policy. Whilst the practical implications of NDMPs continue to emerge through plan-making and decision-taking, relevant development management policies from the existing development plan have generally been retained at this stage to provide continuity and policy certainty, pending a fuller understanding of how the new national framework will operate in practice.

Policy MIN/HC: Conventional and unconventional hydrocarbons

Environmental Protection and Climate Action (4 respondents, 100%): Views emphasise preserving natural resources and aligning with climate emergency goals. Advocates favour sustainable energy over hydrocarbon extraction to protect biodiversity and landscapes.

Legislation and Local Authority Empowerment (2 respondents, 50%): Calls for stronger legislation and increased local authority powers, reflecting desire for more control over local environment and more effective means to combat climate change.

Council Response

The Regulation 19 Local Plan has been prepared in the context of the introduction of National Development Management Policies (NDMPs) proposed via the 2026 NPPF. As a result, some policy approaches consulted upon at Regulation 18 have not been taken forward where they would duplicate or repeat national policy requirements. The Council has reviewed both proposed new policies and existing saved policies to ensure that the Local Plan focuses on locally specific matters and avoids unnecessary repetition of national policy. Whilst the practical implications of NDMPs continue to emerge through plan-making and decision-taking, relevant development management policies from the existing development plan have generally been retained at this stage to provide continuity and policy certainty, pending a fuller understanding of how the new national framework will operate in practice.

Waste

Waste Policy

Collaboration and Efficiency in Waste Management (1 respondent, 100%): Notes collaboration is best for efficiency in waste management.

Council Response

Support noted. Bath and North East Somerset Council collaborate with West of England Unitary Authorities with regards to waste planning.

Infrastructure

Infrastructure Policy

Planning and Viability of Infrastructure Development (7 respondents, 100%): Respondents desire clear, strategic planning and express concerns over financial viability potentially affecting infrastructure provision and quality.

Funding and Resource Allocation for Infrastructure (4 respondents, 57%): Calls for sufficient funding for infrastructure. Highlights the challenge of matching resource allocation with infrastructure demands without compromising service levels.

Healthcare Infrastructure and Delivery (3 respondents, 43%): The need for planned, innovative healthcare infrastructure that is timely and integrated with overall development is emphasised.

Local Government Policy and Stakeholder Engagement (1 respondent, 14%): The alignment of local policies with national health policies and effective stakeholder engagement is encouraged.

Sustainability and Environmental Impact of Infrastructure (1 respondent, 14%): Sustainable development practices and the challenge of retrofitting buildings for environmental standards are important to respondents.

Energy Efficiency and Housing Policy (1 respondent, 14%): High sustainability standards for housing developments and refurbishments are called for, recognising financial and practical challenges.

Council Response

Support noted.

In relation to funding, the Council can only seek planning obligations or developer contributions where they meet the relevant legal tests, including being necessary to make development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind. Community Infrastructure Levy contributions will also apply where relevant.

The Council is working with the NHS to identify specific healthcare infrastructure requirements arising from planned growth. Local Plan allocations identify where healthcare contributions or on-site provision may be required, and the Infrastructure Delivery Plan will set out the relevant health facility requirements and the approach to securing appropriate contributions.

2025 Consultation

Introduction

Purpose of this report

1.1 This report summarises the issues raised in comments received during the Bath & North East Somerset Local Plan Options Consultation and explains the principal issues raised by respondents. It provides an overview of the key themes emerging from the consultation and summarises comments relating to strategic planning matters, places, site options and policy approaches. The report does not seek to reproduce individual comments or representations in full but identifies the main matters raised through the consultation process. Responses will be considered alongside the council's evidence base and ongoing technical work in preparing the Draft Local Plan.

About the Consultation

1.2 The Options Consultation sought views on a revised range of development and policy options following the Government's introduction of a significantly increased housing requirement for Bath & North East Somerset. The consultation considered strategic planning issues including housing, employment, transport, climate change, nature recovery, infrastructure and spatial strategy, alongside place-based and site-specific options across the district.

District-Wide Strategic Issues

Introduction

1.3 This section summarises comments received in relation to the strategic planning issues, challenges and opportunities presented in Chapters 1 to 4 of the Local Plan Options Consultation document. Comments were received from local residents, parish and town councils, statutory consultees, landowners, developers, infrastructure providers and other stakeholders. Comments focused on the overall direction of the emerging Local Plan, the level and distribution of growth required across the district, and the strategic principles that should guide future development. These included housing need, affordability, climate change,

nature recovery, Green Belt policy, infrastructure provision, transport, economic growth and the protection of the district's environmental and heritage assets.

1.4 The consultation generated a wide range of views reflecting the need to balance housing and employment growth with the protection of valued landscapes, heritage assets, community identity and environmental resources. While many respondents recognised the need to plan positively for future growth, views differed regarding the most appropriate strategy for delivering development and the extent to which environmental and infrastructure constraints should influence future site allocations. Comments also highlighted the importance of maintaining a robust evidence base and ensuring that future decisions are informed by both strategic and local considerations.

Housing Need and Affordability

Summary of Comments

1.5 Housing affordability emerged as one of the most frequently discussed strategic issues. Many respondents acknowledged the challenges associated with accessing housing across Bath and North East Somerset, particularly for younger households, families, key workers and those wishing to remain within their local communities. There was broad support for increasing the supply of affordable housing and delivering a wider range of housing types, sizes and tenures that better reflect local needs. Respondents frequently referred to the need for smaller homes, accommodation suitable for older people and housing that enables local people to remain within their communities.

1.6 A significant number of responses commented on the Government's housing requirement and the implications of the increased housing target for the district. Some respondents considered that the Local Plan should seek to meet identified housing needs in full, whilst others questioned whether growth on this scale could be delivered sustainably given infrastructure, environmental and land availability constraints. Comments also referred to the role of Purpose Built Student Accommodation, affordable housing delivery and the relationship between housing growth and wider economic objectives. Several respondents also commented on housing mix, student accommodation, affordable housing

delivery mechanisms and the extent to which future development should prioritise local housing needs.

Council Response

1.7 The consultation responses demonstrate broad recognition of the affordability challenges facing the district, whilst also highlighting differing views regarding the scale of growth required to address housing needs. Planning for and facilitating delivery of more housing and particularly affordable housing is a key priority for the Council. Therefore, the Draft Local Plan will establish a housing requirement that responds positively and appropriately to the government's standard method of housing need. The Draft Local Plan also establishes a spatial strategy and allocates sites to deliver a mix of housing types in various types of locations across the District. The need to plan for new homes and employment space in order to at least maintain the existing balance between resident workers and jobs has also underpinned the strategy.

1.8 Evidence from the Local Housing Needs Assessment (LHNA) and other supporting studies has been used to inform decisions regarding the scale, type and distribution of future housing development. Specifically, the policy approach to affordable housing has been informed by the level of need identified by the LHNA (and the 2026 Addendum) and also the overall plan viability assessment. The Draft Local Plan also contains policies that seek to manage and shape the provision of various different types of housing, including PBSA and HMOs.

Spatial Strategy and Distribution of Growth

Summary of Comments

1.9 Many respondents commented on how future development should be distributed across the district and the relative roles of Bath, Keynsham, the Somer Valley and rural settlements in accommodating growth. Respondents frequently referred to the relationship between housing delivery, infrastructure provision, transport accessibility and economic opportunity. Views differed regarding whether growth should be focused on a limited number of strategic locations or distributed more broadly across a greater number of settlements.

1.10 Comments also addressed the strategic principles used to assess locations for development, including sustainability, accessibility, environmental constraints, infrastructure provision and community impacts. Some respondents supported a strategy focused on the most sustainable and accessible locations, whilst others emphasised the importance of maintaining a balanced approach that reflects the differing roles and characteristics of individual settlements.

1.11 The Environment Agency emphasised the need to integrate consideration of current and future flood risk (including applying the sequential test) into the spatial strategy and site allocations.

Council Response

1.12 Consultation responses demonstrated differing views regarding the most appropriate distribution of growth across the district. These responses have been considered alongside evidence relating to transport, infrastructure, environmental constraints, sustainability and deliverability in identifying the preferred spatial strategy. It is worth noting that in relation to the amount of development the Local Plan needs to respond to is established by the government. The government's standard method figure of housing need has more than doubled for B&NES to over 1,500 per annum (equating to over 27,000 over the full Local Plan period 2025-2043). The overall housing and employment space requirements established in the Draft Local Plan that respond to the government's standard method figure of housing need also strongly influence the proposed strategy approach.

1.13 The Draft Local Plan sets out a spatial strategy and allocates sites for development that remain primarily focussed on the most sustainable settlements i.e. those that are better connected to job opportunities, services and facilities by sustainable modes of transport and/or where that connectivity can be improved. Whilst most of the proposed growth is directed towards strategic sites where infrastructure improvements can best be provided and co-ordinated a range of smaller, non-strategic sites are also allocated. It is important that a diverse supply of sites is allocated for housing in order to maintain housing delivery through the Local Plan period.

Green Belt and Grey Belt

Summary of Comments

1.14 Green Belt policy generated a significant level of interest throughout the consultation. Respondents commented on the implications of recent national policy changes, including the introduction of grey belt and the requirement to consider Green Belt review where development needs cannot be accommodated elsewhere. Views ranged from support for the release of lower-performing Green Belt land to strong opposition to any Green Belt release.

1.15 Comments frequently referred to openness, settlement separation, landscape character and the need to demonstrate exceptional circumstances. Respondents also discussed the Government's "golden rules" relating to affordable housing, infrastructure provision and accessible green space, with the Environment Agency and Natural England noting the importance of securing GI/environmental improvements that contribute to nature recovery if land is removed from the Green Belt. Environmental and landscape interests highlighted the importance of ensuring that any Green Belt review is supported by robust evidence and fully considers environmental constraints and the purposes of the Green Belt designation. Comments also differed regarding whether Green Belt review should be concentrated around the most sustainable settlements or avoided entirely where alternative growth options exist.

Council Response

1.16 The council has carefully considered the role and importance of the Green Belt and balanced it against the need to plan for and provide additional housing and ensuring such housing is planned for in sustainable locations. In order to meet the Local Plan housing requirement in a sustainable manner some release of land from the Green Belt and allocation for development will be required. The 'exceptional circumstances' required to justify removing land from the Green Belt relate to both the strategic need for development and the lack of sustainable alternatives to meet that need, as well as site specific circumstances related to the benefits of development at a specific location and the level of harm caused to the Green Belt. In justifying the removal of land from the Green Belt for

development it also needs to be demonstrated that cumulatively the land releases will not undermine the fundamental purposes of the Green Belt as a whole.

1.17 The Draft Local Plan is supported by a Green Belt Assessment (both a Strategic Green Belt Assessment and a more detailed Stage 2 Green Belt Assessment). The approach taken to this assessment accords with national policy outlined in the NPPF and associated PPG. The Green Belt Assessment has considered the implications of 'grey belt' policy and identifies whether the land proposed to be allocated for development meets the definition of 'grey belt'. The 'exceptional circumstances' justifying removal of land at specific sites is referenced in the Draft Local Plan and outlined in further detail in supporting evidence including a Topic Paper.

1.18 Applying all aspects of the 'golden rules' in releasing land from the Green Belt has been subject to and informed by the whole plan viability assessment. Relevant site allocations in the Draft Local Plan outline the required GI improvements/provision and delivery of more than 10% BNG (for most sites 20% BNG).

Climate Change, Biodiversity and Nature Recovery

Summary of Comments

1.19 Many respondents, including Natural England, strongly supported the Local Plan's emphasis on addressing the climate and ecological emergencies. Responses highlighted the importance of reducing carbon emissions, improving climate resilience, supporting renewable energy generation and ensuring that new development contributes positively to environmental objectives. There was widespread support for protecting biodiversity, expanding green infrastructure and delivering nature recovery alongside future growth.

1.20 Biodiversity Net Gain, ecological connectivity, habitat protection and the implementation of the Local Nature Recovery Strategy were frequently referenced. Respondents also highlighted the need to consider impacts on protected species, designated sites and wider ecological networks. Natural England and environmental consultees emphasised the importance of ensuring that development contributes positively to the natural environment and supports

long-term environmental resilience. The Environment Agency is supportive of the priority and approach towards nature recovery, green infrastructure and biodiversity, but seek clarity on integration with the LNRS and funding and delivery of GI.

Council Response

1.21 The council remains committed to addressing the climate and ecological emergencies through the Local Plan. Consultation comments and further assessment work has informed the proposed approach in the Draft Local Plan relating to climate mitigation, adaptation, biodiversity enhancement, nature recovery and green infrastructure. The Draft Local Plan is also supported by a Habitats Regulation Assessment to help ensure that development, shaped by the policy/site requirements set out in the Draft Local Plan, will not cause a significant adverse effect to protected habitats and species. The Draft Local Plan takes a robust approach to ensuring adverse effects are minimised and adequately mitigated. The Plan will also be supported by separate guidance relating to the Bats Special Areas of Conservation.

Heritage and Landscape

Summary of Responses

1.22 Comments frequently highlighted the importance of protecting the district's internationally, nationally and locally significant landscape and heritage assets. Many respondents referred to the contribution made by landscapes, historic settlements, conservation areas, listed buildings and the World Heritage Sites to local character and identity. Concerns were raised regarding the potential impact of future development on valued landscapes, views and settlement settings.

1.23 Historic England, Cotswolds National Landscape and Mendip Hills National Landscape highlighted the importance of understanding and protecting the significance of heritage assets (including the dual inscribed World Heritage Site of Bath) and their settings, protecting designated landscapes and ensuring that future growth responds appropriately to landscape character and environmental sensitivities. Particular attention was given to the role of the Cotswolds National

Landscape, Mendip Hills National Landscape and the wider setting of the World Heritage Sites.

Council Response

1.24 The protection and enhancement of landscape character (including the National Landscapes), heritage assets and their settings remain fundamental considerations within the Local Plan process. Consultation comments have been carefully considered alongside further landscape, heritage and environmental assessments. The Draft Local Plan site allocations and Development Management policies ensure that harm to landscape character/designated landscapes and heritage assets is minimised and appropriately mitigated. Minimising and mitigating such harm (alongside other factors including sustainable connectivity) has been an important factor shaping the spatial strategy and choice of sites to be allocated,

Transport and Connectivity

Summary of Comments

1.25 Transport and accessibility were recurring themes throughout the consultation. Respondents highlighted the importance of improving public transport, walking, wheeling and cycling infrastructure and reducing reliance on private car travel. Particular concerns were raised regarding the availability and reliability of public transport, especially within rural communities, and the need to improve connectivity between settlements and key employment, education and service centres.

1.26 Comments frequently referred to congestion, highway capacity and the ability of transport infrastructure to accommodate future growth. Many respondents supported a strategy that aligns development with investment in sustainable transport and active travel infrastructure.

Council Response

1.27 In preparing the Draft Local Plan the comments raised during the consultation have been carefully considered by the Council. The Draft Local Plan is also

underpinned by extensive transport evidence, including modelling the impact of development and various proposed transport mitigations or interventions. This evidence is set out in a Transport Topic paper published alongside the Draft Local Plan.

1.28 The approach of the Draft Local Plan is in line with the nationally required vision and validate approach. The Council's transport vision focusses on sustainable modes of transport. Providing the necessary improvements to facilitate sustainable travel (walking, cycling and wheeling and public transport) is central to the approach in seeking to both alter travel behaviours and also mitigate the impacts of further development. The Draft Local Plan sets out out not only proposed sites to be allocated to meet development needs, but also the required transport mitigations or infrastructure improvements. The Council continues to work with WECA to secure funding for transport improvements, as well as requiring a financial contribution from developers.

Employment and Economic Growth

Summary of Responses

1.29 Many respondents recognised the importance of supporting economic growth alongside housing delivery. Comments referred to the need for additional employment land, support for key growth sectors and the role of employment opportunities in creating sustainable communities and reducing out-commuting. Respondents also discussed the Bristol to Bath Growth Zone, Somer Valley Growth Zone and opportunities associated with strategic employment locations across the district.

1.30 Some respondents supported the allocation of additional employment land to address identified shortages and encourage economic investment. Others emphasised the need to balance economic growth with environmental protection and infrastructure capacity.

Council Response

1.31 The Council agrees there is a need to plan for additional employment space and supporting key growth sectors in the local economy. The provision of

additional employment land and support for intensification of some existing sites through the Local Plan is an important element of the wider Economic Strategy which seeks to ensure B&NES has a prosperous, fair and sustainable economy. The Draft Local Plan is underpinned by evidence assessing the forecast need for additional employment space across the District and a review of existing and proposed sites to provide additional employment space. Responding to this evidence the Draft Local Plan allocates sites to provide additional employment space. These allocations are in areas that are generally well related or well connected to housing and they also seek to align with the growth zones identified by WECA in the Local Growth Strategy.

Infrastructure Delivery

Summary of Comments

1.32 Respondents consistently highlighted the importance of ensuring that development is supported by appropriate infrastructure. Frequent references were made to healthcare provision, education capacity, transport infrastructure, drainage, wastewater treatment, utilities and green infrastructure. Many respondents expressed concern regarding the cumulative impact of development on existing services and facilities.

1.33 Infrastructure providers and technical consultees highlighted the importance of aligning development with infrastructure investment and ensuring that capacity constraints are identified and addressed at an early stage. A recurring theme was the need for growth to be accompanied by timely and coordinated infrastructure delivery. Statutory consultees, including the Environment Agency and National Highways, highlighted the importance of identifying, safeguarding and securing funding for the necessary relevant infrastructure improvements.

Council Response

1.34 The timely and co-ordinated provision of necessary infrastructure alongside proposed development is a key priority of the Draft Local Plan. Infrastructure planning is a key component of Local Plan preparation. Engagement has taken place and continues with infrastructure providers, service organisations and

partner agencies to inform the spatial strategy, site allocations and identification and delivery of required infrastructure. The funding of infrastructure, including through developer contributions, is informed by the plan-wide viability assessment and other ongoing work. Discussions continue with WECA and other agencies to help secure the necessary funding.

Community Identity and Local Decision-Making

Summary of Comments

1.35 Many respondents emphasised the importance of community identity, local distinctiveness and maintaining the individual character of towns and villages. Parish and town councils frequently highlighted the relevance of neighbourhood plans, village character assessments and locally developed visions in shaping future growth. There was broad support for ensuring that development responds positively to local context and reflects the unique characteristics of individual communities.

1.36 Comments also highlighted the value of local knowledge in informing site selection and planning decisions. Many respondents supported approaches that combine strategic planning objectives with meaningful local engagement and community involvement.

Council Response

1.37 The Local Plan seeks to balance strategic planning requirements with local priorities and community aspirations. Issues raised through consultation and ongoing engagement will continue to inform future place-shaping, site selection and policy development. The valuable role of Neighbourhood Plans in supporting appropriate development and addressing more localised issues that are a priority for communities is acknowledged. The Council will continue to support those communities wishing to progress Neighbourhood Plans.

Plan-Making Process and Evidence Base

Summary of Comments

1.38 A number of respondents commented on the Local Plan preparation process, consultation arrangements and supporting evidence base. Respondents referred to the importance of transparency, community engagement and the need for decisions to be supported by robust and up-to-date evidence. Comments also addressed the relationship between the Local Plan and wider strategic planning initiatives, as well as the need to ensure that the emerging plan remains consistent with national planning policy.

Council Response

1.39 Consultation and stakeholder engagement form important elements in the preparation of the Local Plan. Comments received on the Options documents have been carefully considered alongside the council's evidence base and national policy requirements. Stakeholder engagement has continued in preparing the Draft Local Plan, which will be subject to further public consultation.

Strategic Themes Summary

1.40 Comments received through the consultation demonstrated broad recognition of the challenges facing Bath and North East Somerset, including housing affordability, economic growth, climate change, biodiversity loss and infrastructure provision. Respondents generally supported the need for a plan-led approach to growth but expressed differing views regarding the scale, location and distribution of future development.

1.41 The most frequently recurring themes related to housing need and affordability, Green Belt policy, transport and connectivity, climate change, nature recovery and infrastructure delivery. Respondents consistently emphasised the importance of ensuring that future growth is supported by appropriate infrastructure and informed by robust evidence. Landscape character, heritage assets and community identity also featured prominently throughout consultation responses.

1.42 Many respondents highlighted the importance of balancing the delivery of housing and employment opportunities with the protection of environmental assets and the distinctive character of places across the district. Comments also demonstrated strong interest in how national planning policy changes, including those relating to housing requirements and Green Belt policy, should influence the emerging Local Plan.

Bath

Introduction

1.1 Responses relating to Bath reflected the city's unique role as the district's principal settlement, economic centre and international visitor destination. Many respondents recognised the important contribution that Bath will need to make towards meeting future housing, employment and infrastructure needs. However, responses consistently highlighted the challenges associated with accommodating growth in a city constrained by its double World Heritage Site designation, extensive conservation area, Green Belt, the Cotswolds National Landscape, ecological designations and the limited availability of development land.

1.2 Respondents generally acknowledged the affordability challenges facing the city and the need to provide additional housing, employment opportunities and supporting infrastructure. However, views differed regarding the most appropriate approach to accommodating growth, the balance between brownfield regeneration and Green Belt release, and the extent to which development should be accommodated within or on the edge of the city. Issues relating to heritage, landscape, student accommodation, transport and nature recovery featured prominently throughout consultation responses.

Key Themes

Housing Need, Affordability and Brownfield Capacity

1.3 Housing affordability was one of the most frequently raised issues. Respondents highlighted the difficulty of accessing housing within Bath, particularly for younger households, families, key workers and those wishing to remain within their local communities. There was broad recognition of the need to increase housing delivery, including affordable housing, although views varied regarding the scale and location of development required. Many respondents also highlighted the importance of housing mix, the provision of homes suitable for different stages of life and the need to ensure that future development contributes towards meeting local needs.

1.4 Comments frequently highlighted the limited availability of undeveloped land within the city and the importance of making efficient use of brownfield sites, vacant buildings and opportunities for urban regeneration. Some respondents argued that further opportunities should be explored within the existing urban area before considering development on greenfield or Green Belt land. Others considered that the scale of identified housing need would require a broader range of options to be considered.

Heritage, World Heritage Sites and Townscape

1.5 The protection of Bath's historic environment was one of the most significant themes arising through the consultation. Respondents frequently referred to Bath's status as a double World Heritage Site, its extensive conservation area, listed buildings, historic landscapes and distinctive townscape character. Many responses highlighted the need to ensure that future growth respects the city's heritage assets and safeguards the qualities that contribute to its Outstanding Universal Value.

1.6 Historic England and other heritage interests emphasised the importance of understanding impacts on the World Heritage Sites, their setting and the wider historic environment. Particular concerns were raised regarding development on the edge of the city and the potential effect on key views, landscape setting and the attributes that contribute to Bath's international significance. Responses consistently highlighted the need for decisions to be supported by robust evidence and informed by national heritage policy.

Green Belt, Landscape and Edge-of-City Growth

1.7 Responses demonstrated significant interest in the role of Green Belt land surrounding the city and whether development on the edge of Bath might be required to help meet future housing and employment needs. Many respondents supported prioritising brownfield opportunities before considering Green Belt release, whilst others considered that some Green Belt review may be necessary given the scale of growth required.

1.8 Landscape impacts and the relationship between development and Bath's setting were recurring themes throughout the consultation. Cotswolds National

Landscape, local organisations and residents highlighted the sensitivity of the city's landscape setting and the importance of protecting the character and appearance of the Cotswolds National Landscape, the World Heritage Sites and the Green Belt. Particular attention was given to development options at West of Bath, Sulis Club and Bath Equestrian Centre, with differing views regarding the extent to which future development could be accommodated without causing unacceptable harm.

Student Accommodation and University Growth

1.9 The role of the universities and the provision of student accommodation emerged as a major theme. Respondents recognised the important contribution made by the University of Bath and Bath Spa University to the city's economy, cultural offer and innovation ecosystem. At the same time, concerns were raised regarding the implications of continued student growth for the local housing market and the availability of housing suitable for permanent residents.

1.10 Many responses discussed the provision of additional Purpose Built Student Accommodation (PBSA), the potential impact on existing housing stock and the balance between accommodating student growth and meeting wider housing needs. Debate centred on the extent to which future student accommodation should be provided on existing university campuses, within the city, or at locations such as Sulis Club. Respondents expressed differing views regarding whether additional PBSA would help reduce pressure on the wider housing market or constrain opportunities to deliver housing for local residents.

Employment, Regeneration and Economic Growth

1.11 Many respondents supported the need to strengthen Bath's economy and improve opportunities for employment growth. Comments frequently referred to the city's role within the Bristol and Bath Growth Zone, the Bath Riverside Innovation Quarter and the need to deliver a broader range of employment opportunities across the city. There was support for additional office, research and development, industrial and creative workspace alongside housing growth.

1.12 Responses highlighted the importance of city-centre regeneration projects, including the Milsom Quarter, Bath Quays and other redevelopment

opportunities. There was broad support for improving the city's economic resilience, strengthening innovation sectors and supporting cultural and creative industries. Some respondents also highlighted the importance of ensuring that regeneration proposals remain flexible enough to respond to changing economic circumstances and emerging business needs.

Transport, Movement and Infrastructure

1.13 Transport and accessibility were recurring issues throughout consultation responses. Many respondents highlighted concerns regarding congestion, air quality and the capacity of existing transport infrastructure. Support was expressed for improvements to public transport, walking, wheeling and cycling infrastructure and for reducing dependence on private car travel. Responses frequently linked future development to the need for investment in sustainable transport infrastructure and improved connectivity.

1.14 Infrastructure providers and statutory consultees also highlighted the importance of ensuring that future growth is supported by suitable infrastructure and environmental mitigation. Environment Agency responses referred to flood risk, flood resilience, drainage, emergency access and environmental constraints affecting a number of city-centre and riverside regeneration sites. Respondents also highlighted healthcare, education, utilities and wastewater infrastructure as important considerations in accommodating future growth.

Nature Recovery, Climate Change and Green Infrastructure

1.15 Many responses supported the council's ambition to address the climate and ecological emergencies through the Local Plan. Respondents highlighted the importance of protecting biodiversity, strengthening ecological networks and delivering nature recovery alongside future development. Strategic initiatives such as Bath River Line and Bathscape were frequently identified as opportunities to improve environmental quality, climate resilience and public access to green and blue infrastructure.

1.16 Natural England, Cotswolds National Landscape and environmental organisations highlighted the importance of ecological connectivity, biodiversity enhancement and habitat protection. Particular attention was given to bat

populations associated with the Bath and Bradford-on-Avon Bats SAC, the potential effects of development-related lighting, and the need to ensure that future growth contributes positively towards biodiversity recovery. Responses also highlighted the importance of maintaining Bath's green setting, which contributes to both ecological value and the Outstanding Universal Value of the World Heritage Sites.

Council Response

1.17 The consultation responses demonstrated broad recognition of the need for Bath to accommodate additional housing, employment and infrastructure growth, whilst highlighting the city's exceptional heritage, landscape, Green Belt and ecological constraints. Respondents consistently emphasised the importance of protecting Bath's World Heritage Site status, historic environment, landscape setting, biodiversity assets and quality of life, whilst also addressing housing affordability, supporting economic growth and improving transport infrastructure.

1.18 In response, the Regulation 19 Local Plan has refined the Bath spatial strategy and site allocations through additional evidence gathering, including heritage, landscape, ecological, transport and infrastructure assessments. The Plan adopts a brownfield-first approach, prioritising the delivery of general housing, particularly affordable housing, alongside employment growth and regeneration opportunities within the existing urban area. Significant emphasis has been placed on protecting the Outstanding Universal Value of the World Heritage Site, strengthening design requirements, safeguarding important views, supporting nature recovery and biodiversity enhancement, and promoting sustainable transport solutions that reduce reliance on private vehicle use.

1.19 The consultation process has directly informed the refinement of individual site allocations and development requirements. The Plan now includes strengthened requirements relating to landscape mitigation, ecological enhancement, biodiversity net gain, heritage protection, travel by sustainable modes, green infrastructure and design quality. In addition, further assessment of strategic growth options has resulted in some proposals being amended or not progressed where evidence identified unacceptable impacts. Most notably, the proposed West of Bath growth option has not been taken forward as a

Regulation 19 allocation because subsequent assessment concluded that development would likely result in substantial harm to the World Heritage Site and harm to the setting of the Cotswold National Landscape. Similarly, the Plan has not allocated the Sulis Club for development and instead maintains the existing policy approach, recognising its Green Belt, landscape and environmental sensitivities.

1.20 Overall, the Regulation 19 Plan seeks to strike an appropriate balance between meeting Bath's identified housing, employment and infrastructure needs and safeguarding the environmental, landscape, heritage and ecological qualities that make Bath internationally significant. The consultation responses have therefore played an important role in shaping the final spatial strategy, site selection process and development requirements contained within the draft Local Plan.

Existing Site Allocations

Milsom Quarter

Summary of Responses

1.21 Responses generally supported the continued regeneration of the Milsom Quarter and recognised its role in contributing towards the vitality and economic prosperity of Bath city centre. Comments focused on the future of the Cattlemarket site, Broad Street Yard, vacant upper floors and opportunities to strengthen the area's cultural, commercial and residential functions. Many respondents welcomed wider placemaking initiatives and supported the ambition to enhance the city's cultural and creative offer.

1.22 A recurring theme was the importance of ensuring that redevelopment respects the distinctive historic character of the area. Respondents highlighted the townscape qualities of Milsom Street, the contribution of important views and the need for future development to respond positively to the sensitive historic environment. Comments also highlighted the importance of maintaining an appropriate scale of development and preserving the established character of surrounding streets.

1.23 Several respondents supported extending the existing policy approach to include Broad Street Yard and adjoining areas, arguing that a broader allocation would help deliver comprehensive regeneration and improve connectivity across the wider quarter. There was also support for enhanced pedestrian permeability and improved links between key destinations within the city centre.

1.24 The reuse of existing buildings and vacant upper floors was strongly supported. Respondents highlighted opportunities to bring vacant premises back into productive use and suggested that retrofit and reuse should be prioritised where possible before more substantial redevelopment is pursued. Comments also supported a flexible mix of residential, commercial and cultural uses capable of adapting to changing market conditions.

1.25 Specific technical matters included flood risk considerations associated with areas adjoining the River Avon, the presence of vaults and underground structures beneath parts of the site, and operational constraints associated with servicing and access arrangements. The Environment Agency highlighted the

need to consider flood risk at the edge of the allocation in future planning proposals.

Council Response

1.26 The representations broadly supported the regeneration objectives of the Milsom Quarter and highlighted the importance of protecting Bath's historic character whilst bringing vacant and underused buildings back into productive use. Respondents were supportive of cultural investment, enhanced retail and leisure provision, reuse of upper floors and opportunities for city centre living. In response, the Regulation 19 Draft Local Plan continues to support the Milsom Quarter Masterplan, including delivery of the Fashion Museum, creative and cultural uses, the regeneration of Broad Street Yard, and additional housing opportunities through redevelopment and reuse of existing buildings. The policy framework ensures that development contributes positively to the World Heritage Site, Conservation Area and wider regeneration objectives for the city centre.

Bath Central Riverside

Summary of Responses

1.27 Responses focused primarily on the future role of the existing allocation in the context of the Bath Rugby redevelopment proposals. Respondents generally supported retaining an appropriate policy framework for the site but raised differing views regarding the continued need for specific references to a stadium within the allocation. Comments also referred to development requirements, connectivity improvements, biodiversity net gain and the long-term management of sporting and leisure uses.

1.28 The Environment Agency suggested that the policy could be reviewed to provide greater clarity regarding development requirements and design principles. Some respondents also highlighted the importance of ensuring that future development respects the wider riverside setting and contributes positively to the public realm.

Council Response

1.29 Consultation responses generally highlighted the importance of preserving the role of the Recreation Ground and wider riverside area as a major leisure, recreation and cultural destination whilst protecting heritage assets, significant views and the River Avon corridor. In response, the Regulation 19 Plan retains support for leisure, recreational and cultural investment, and the requirements relating to biodiversity, flood risk management, improvements to public access and the protection of the World Heritage Site and its setting. The policy continues to support improvements to riverside connectivity and public realm whilst ensuring that future development responds appropriately to this highly sensitive location.

Manvers Street

Summary of Responses

1.30 Limited comments were received regarding Manvers Street. Responses generally supported continued regeneration of the area and the wider objectives of improving the city centre environment, economic vitality and connectivity. Some respondents supported greater flexibility within future commercial floorspace requirements to accommodate a broader range of business and innovation uses.

Council Response

1.31 Representations were generally supportive of the redevelopment of Manvers Street as an important gateway into Bath and recognised the opportunity to provide employment, housing and improved public spaces. Respondents emphasised the need for high-quality design, protection of key views and enhancement of the public realm. The Regulation 19 Plan responds by retaining Manvers Street as a mixed-use regeneration site with a strong employment focus, with slightly refined detailed design requirements that safeguard the setting of South Parade, St John's Church and important views towards the surrounding landscape.

Bath Quays North

Summary of Responses

1.32 Bath Quays North attracted considerable interest owing to its strategic role within the Bath Riverside Innovation Quarter and its importance in supporting the future economic growth of the city. Responses generally supported the continued regeneration of the area but expressed differing views regarding the appropriate balance between employment uses, housing and supporting facilities.

1.33 A key theme related to flexibility in the proposed land use mix. Respondents highlighted changing patterns of business demand and suggested that policy should accommodate a wider range of employment uses, including research and development, innovation, start-up space and hybrid business accommodation. Several responses noted that traditional office demand may have changed since the original allocation was prepared and argued that greater flexibility could improve deliverability and viability.

1.34 The future role of the University of Bath was also discussed. Respondents highlighted opportunities for the university to act as an anchor occupier and suggested the allocation should support education, research and innovation uses alongside commercial development. Comments argued that such uses could contribute towards regeneration objectives and strengthen Bath's role as a centre for innovation and knowledge-based industries.

1.35 Housing provision also featured in responses. Some respondents considered that greater flexibility should be provided for residential development, including affordable housing, whilst others emphasised the importance of maintaining the employment-led role of the allocation. Several comments suggested that any residential element should include policy-compliant affordable housing provision and contribute towards creating a mixed and sustainable community.

1.36 The Environment Agency highlighted flood-risk related issues, including concerns regarding access routes that may pass through flood zones and the need to ensure that future development appropriately addresses emergency access and evacuation considerations.

Council Response

1.37 Consultation responses strongly supported continued economic regeneration within this area and recognised its strategic importance for Bath's future economy. Concerns focused on design quality, transport infrastructure, flood resilience and ensuring development contributes positively to the city centre. The Regulation 19 Plan continues to support Bath Quays North as a flagship employment and innovation location, providing substantial office, research and development floorspace, improved city centre connections and new housing, whilst maintaining support for Bath College as an important educational institution.

South Quays and Riverside Court

Summary of Responses

1.38 Responses focused on the future balance between employment and residential development within the allocation and the role that South Quays and Riverside Court should play in supporting wider regeneration objectives within Bath Quays. Many comments acknowledged progress already made through the delivery of office and creative workspace and considered that the area remains an important component of Bath's future economic strategy.

1.39 A number of respondents highlighted the continuing importance of employment uses and commented on whether existing policies should place greater emphasis on protecting office floorspace or provide additional flexibility to respond to changing market conditions. Some respondents argued that additional flexibility for residential development at Riverside Court could improve deliverability, whilst others emphasised the need to retain employment uses in highly accessible city-centre locations.

1.40 Issues relating to the occupancy of Riverside Court were also raised, with comments pointing to long-term vacancy within parts of the office complex and questioning whether the current mix of uses remains appropriate. Suggestions were made that alternative approaches to land use may help support regeneration and improve activity within the area.

1.41 The Environment Agency highlighted flood risk considerations associated with the site's location within Flood Zone 3, including the need to consider flood

resilience, safe refuge and appropriate mitigation measures as future proposals come forward.

Council Response

1.42 Representations broadly supported ongoing investment along the river corridor and recognised the contribution that Bath Quays South has already made towards economic growth. Respondents highlighted the importance of active travel, biodiversity enhancement and improved public access to the river. The Regulation 19 Plan retains the allocation and the requirements relating to riverside access, biodiversity enhancement, flood mitigation, active travel and the delivery of employment-led mixed-use development.

South Bank

Summary of Responses

1.43 Responses focused on the future balance between employment and residential uses within the allocation. Some respondents considered that the current policy framework provides an appropriate degree of flexibility, whilst others suggested that greater emphasis should be placed either on employment space or housing delivery depending on future market conditions.

1.44 Comments also highlighted the strategic importance of this riverside location, the need to support regeneration objectives and the importance of ensuring that development contributes positively to the wider Bath Quays and city centre area.

Council Response

1.45 Consultation responses recognised the potential of this area to contribute towards Bath's housing and employment needs whilst highlighting the importance of maintaining connectivity, environmental quality and access to the river. The Regulation 19 Plan continues to support mixed-use redevelopment subject to the retention of employment opportunities, delivery of strategic active travel routes, enhancement of the riverside environment and comprehensive flood risk and biodiversity mitigation measures.

Green Park Station West & Sydenham Park

Summary of Responses

1.46 Responses highlighted the strategic importance of the Green Park Station West and Sydenham Park area and recognised the complexity of bringing forward development across multiple landholdings. Respondents generally supported regeneration of previously developed land but emphasised the importance of securing coordinated development that delivers wider benefits across the allocation rather than fragmented or piecemeal outcomes.

1.47 Housing, employment and affordable housing provision featured prominently within comments. Respondents placed particular emphasis on ensuring that future redevelopment contributes towards identified housing needs whilst protecting existing employment floorspace and supporting economic activity. There was support for reviewing existing land use requirements where necessary to ensure that future development better reflects current needs and priorities.

1.48 Comments also highlighted the significance of transport, connectivity and movement through the area. Respondents referred to opportunities to improve walking, cycling and public transport links and emphasised the need for future masterplanning to create strong connections between the city centre, Green Park, Bath Quays and surrounding neighbourhoods.

1.49 A number of respondents supported reviewing the existing allocation structure and suggested that separate allocations reflecting individual development parcels may provide a more practical framework for delivery. Others emphasised the importance of retaining a strategic framework to ensure that long-term regeneration objectives are successfully realised.

Council Response

1.50 Respondents supported the principle of regeneration in this area whilst emphasising the importance of respecting the special character of Green Park Station, creating a distinctive place, delivering housing and employment and improving movement through the area. The Regulation 19 Plan continues to support a comprehensive mixed-use redevelopment framework including new housing, employment, retail and leisure uses together with substantial

improvements to public realm, biodiversity, active travel connectivity and the setting of Green Park Station.

Bath Riverside

Summary of Responses

1.51 Relatively few comments were received regarding Bath Riverside. Respondents generally recognised that development across much of the allocation has either been completed, is under construction or has planning consent. Some respondents considered that the existing policy remains appropriate and does not require significant amendment.

1.52 Comments also referred to delivery progress, co-living proposals, wider Western Riverside regeneration and the importance of ensuring that development continues to contribute towards housing delivery and regeneration objectives.

Council Response

1.53 Consultation responses recognised the significant progress already made in delivering the Bath Riverside regeneration programme and generally supported the continued implementation of the existing policy framework. Respondents highlighted the importance of ensuring that remaining phases contribute positively towards housing delivery, place-making and the wider regeneration objectives established for the Western Riverside area. The Regulation 19 Plan therefore continues to support the comprehensive redevelopment of Bath Riverside whilst recognising the substantial level of development already completed or committed. The policy framework continues to promote high-quality design, sustainable transport, active travel connectivity, biodiversity enhancement and attractive public realm, ensuring that future proposals contribute to the successful completion of one of Bath's most important regeneration areas.

Bath Press

Summary of Responses

1.54 Responses focused largely on the status of the allocation given that development is now underway. The Environment Agency raised no objection to the future removal of the allocation following completion of the scheme and highlighted the need to continue to consider flood risk due to the site's relationship with Flood Zones 1, 2 and 3.

1.55 Additional comments referred to affordable housing provision, biodiversity net gain and the importance of ensuring that the completed development contributes positively to the surrounding area.

Council Response

1.56 Consultation responses generally recognised that redevelopment of the Bath Press site is now well advanced and focused primarily on ensuring that the completed development provides lasting benefits for local communities. Respondents highlighted the importance of affordable housing delivery, biodiversity enhancement and the creation of a high-quality residential environment. The Regulation 19 Plan acknowledges the site's progression through the development process and supports the completion of the approved scheme, whilst continuing to ensure that flood risk, environmental mitigation, landscape enhancement and active travel connections are appropriately addressed. The completed development is expected to make an important contribution towards housing delivery and urban regeneration within this part of the city.

Roseberry Place

Summary of Responses

1.57 Comments focused on the future mix of uses within the allocation and the challenges associated with delivering the office element of the approved development. Some respondents supported greater flexibility for research and development, start-up and hybrid employment uses, whilst others suggested that

consideration should be given to alternative forms of residential development that better meet local housing needs.

1.58 Overall, responses highlighted the importance of ensuring that the allocation continues to contribute towards both housing and employment objectives whilst responding to changing market conditions.

Council Response

1.59 Consultation responses highlighted the importance of ensuring that Roseberry Place remains capable of delivering both housing and employment benefits whilst responding to changing market conditions and patterns of business demand. Respondents supported a degree of flexibility regarding the mix of employment uses and highlighted opportunities for research and development, innovation and start-up businesses to complement existing commercial activity. The Regulation 19 Plan continues to support a mixed-use approach that provides housing and employment opportunities whilst allowing an appropriate degree of flexibility to respond to evolving economic circumstances. Development proposals will be expected to deliver high-quality design, contribute positively to the surrounding area and support the wider economic objectives of the Bath Riverside and Production Quarter areas.

Westmark Site, Windsor Bridge Road

Summary of Responses

1.60 Responses largely focused on the proposed creation of a separate allocation for the Westmark site and the future role of the site within Bath Riverside. Respondents highlighted the importance of protecting existing employment uses, particularly within Victoria Park Business Centre, whilst supporting the delivery of housing that helps meet identified local needs.

1.61 Comments also referred to public access to the river, affordable housing provision, community facilities, building heights and the importance of maintaining a positive relationship between the site and surrounding neighbourhoods. Some respondents disputed suggestions that little progress had been made towards bringing the site forward and highlighted ongoing design and development work.

Council Response

1.62 Consultation responses demonstrated broad support for the redevelopment potential of the Westmark site whilst emphasising the importance of protecting existing employment opportunities, delivering affordable housing and maintaining strong connections with surrounding communities. Respondents also highlighted the importance of public access to the River Avon, high-quality design and appropriate building heights that respond positively to the character of the wider Bath Riverside area. The Regulation 19 Plan supports comprehensive mixed-use redevelopment of the site, recognising its potential to contribute towards housing delivery whilst continuing to provide employment opportunities and wider community benefits. The policy framework requires development to secure high-quality public realm, active travel connections, biodiversity enhancement and improved access to the river corridor whilst respecting neighbouring communities and the character of the wider area.

Stable Yard Industrial Estate

Summary of Responses

1.63 Very limited comments were received regarding Stable Yard Industrial Estate. Responses generally supported the continued protection of the site for employment uses and recognised its contribution towards meeting identified industrial and business needs within the city.

1.64 No significant concerns were raised regarding the existing approach to safeguarding the site for employment purposes.

Council Response

1.65 Consultation responses generally supported the continued safeguarding of Stable Yard Industrial Estate for employment purposes and recognised the contribution that smaller industrial and business sites make towards Bath's economy. Respondents highlighted the importance of retaining employment land within the city, particularly where opportunities for industrial and business activity are increasingly constrained. The Regulation 19 Plan therefore continues to protect the site for employment-generating uses and supports investment,

refurbishment and modernisation that helps maintain its economic function. The policy approach seeks to ensure that the site continues to contribute towards local employment opportunities whilst enabling opportunities to utilise the airspace above for other uses such as residential.

The Production Quarter

Summary of Responses

1.66 Responses generally supported the continued protection and enhancement of the Production Quarter as Bath's principal industrial and employment location. Many respondents welcomed the Production Quarter Masterplan and recognised the area's importance in supporting advanced engineering, creative industries, industrial businesses, innovation and other employment-generating activities.

1.67 There was strong support for protecting existing employment land and ensuring that future redevelopment strengthens rather than weakens the area's economic role. Respondents recognised the importance of retaining industrial and business uses within Bath and supported efforts to intensify employment activity where appropriate. Several responses highlighted the importance of ensuring that future redevelopment remains flexible enough to accommodate a variety of business sectors and changing economic demands.

1.68 Many comments highlighted opportunities to improve environmental quality, public realm, sustainable transport connections and links to the River Avon. Respondents generally supported the principle of creating a more attractive and accessible employment area whilst maintaining its industrial function and supporting future economic growth.

1.69 Responses also identified the importance of balancing redevelopment opportunities with the operational requirements of existing businesses and ensuring that future plans remain deliverable and responsive to market conditions. There was broad support for the continued exclusion of uses that may undermine the area's primary employment role, particularly where this could reduce opportunities for business growth within the city.

Council Response

1.70 Respondents identified the importance of retaining and expanding employment opportunities within Bath and expressed support for protecting industrial land from competing uses. The Regulation 19 Plan responds by establishing the Production Quarter as Bath's principal industrial and advanced manufacturing location, safeguarding employment land, supporting intensification and modernisation of existing businesses and promoting opportunities for innovation, creative industries, research and development and advanced engineering sectors.

Weston Island

Summary of Responses

1.71 Responses relating to Weston Island focused primarily on its continuing employment function and the emerging proposals associated with the electrification of the First Bus depot. Many respondents acknowledged the importance of retaining employment uses on the site and recognised the contribution that investment in public transport infrastructure could make towards wider sustainability objectives.

1.72 Comments also highlighted opportunities associated with creative industries and cultural uses, including potential links with Bath Spa University and proposals promoted by Bath Art Depot. Whilst there was support for exploring such opportunities, respondents generally recognised the importance of maintaining employment-generating activity on the site and ensuring that future proposals contribute positively to the wider objectives of the Production Quarter.

1.73 The site's industrial role, flood risk constraints and relationship with the wider employment area featured prominently within responses. There was broad recognition that future uses should complement and support the economic function of the surrounding area rather than undermine it.

Council Response

1.74 Respondents highlighted the importance of biodiversity, improved sustainable travel connections and enhancing the riverside environment. In response, the

Regulation 19 Plan supports continued investment in active travel infrastructure and biodiversity enhancement measures whilst recognising the strategic transport function of the site and opportunities for environmental improvements and appropriate supporting uses.

Twerton Park

Summary of Responses

1.75 Very limited comments were received regarding Twerton Park. No significant new issues emerged through the consultation and respondents generally did not propose substantive changes to the existing allocation.

1.76 Comments that were received broadly recognised the site's established role and ongoing importance within the local community.

Council Response

1.77 Consultation responses recognised the importance of Bath City Football Club as a community asset and generally supported proposals that would secure its long-term future. Respondents also highlighted the need to provide community benefits, improved facilities and high-quality development. The Regulation 19 Plan continues to support a mixed-use approach that secures the future of the football club whilst delivering housing, community facilities, public realm improvements and biodiversity enhancements.

Royal United Hospital (RUH), Weston

Summary of Responses

1.78 Responses highlighted the important role of the Royal United Hospital and the need to ensure that future planning policy supports healthcare provision and the long-term operation of the site. Some comments referred to opportunities associated with staff accommodation and the role that affordable key worker housing could play in supporting recruitment and retention.

1.79 Respondents generally supported the principle of ensuring that future policy aligns with emerging estate planning and service delivery requirements.

Council Response

1.80 Respondents strongly supported continued investment in healthcare infrastructure and recognised the importance of the Royal United Hospital as a strategic facility serving Bath and the wider sub-region. The Regulation 19 Plan continues to safeguard the site for healthcare uses, support estate renewal and service improvements, facilitate staff accommodation where appropriate and encourage sustainable travel and green infrastructure enhancements across the campus.

Hartwells Garage

Summary of Responses

1.81 Limited comments were received regarding Hartwells Garage. Respondents generally acknowledged the site's existing planning permission and ongoing delivery process.

1.82 No significant issues were raised beyond comments relating to implementation and the continuing contribution the site is expected to make towards housing delivery.

Council Response

1.83 Representations generally supported redevelopment of this previously developed site but highlighted concerns relating to design quality, impacts on neighbouring residents, ecology and transport. The Regulation 19 Plan retains the allocation and requirements relating to sustainable design, biodiversity enhancement, active travel connectivity and protection of ecological corridors.

Sion Hill

Summary of Responses

1.84 Responses focused on the future residential redevelopment of the site and the need to ensure that development responds appropriately to its landscape and townscape context. Some respondents supported a landscape-led approach to redevelopment and highlighted the importance of protecting local character and managing impacts on traffic and parking.

1.85 A small number of responses questioned the proposed capacity of the allocation and suggested that a lower level of development may be more appropriate. Comments also referred to the relationship between redevelopment and Bath Spa University's wider estate strategy.

Council Response

1.86 Representations highlighted concerns relating to heritage impacts, landscape sensitivity and traffic generation. In response, the Regulation 19 Plan maintains a carefully controlled residential allocation focused on the reuse of the existing developed footprint, whilst incorporating strong requirements relating to heritage protection, landscape enhancement, biodiversity net gain and sustainable transport improvements.

St Martins

Summary of Responses

1.87 Very limited comments were received regarding St Martins. No significant issues emerged through the consultation and respondents generally did not identify any concerns regarding the recently adopted allocation.

1.88 Overall, responses suggested that the existing policy framework remains broadly appropriate.

Council Response

1.89 Consultation responses generally supported the principle of bringing surplus NHS land forward for housing whilst continuing to protect healthcare functions and heritage assets. The Regulation 19 Plan supports a mixed-use approach that allows residential redevelopment of surplus land whilst retaining operational healthcare uses, conserving heritage assets, enhancing biodiversity and improving walking and cycling connections.

Sulis Down

Summary of Responses

1.90 Comments relating to Sulis Down generally reflected the site's sensitivity in landscape, heritage and environmental terms. Respondents referred to the recent appeal decision and the importance of ensuring that future development respects the limitations identified through previous planning decisions and evidence.

1.91 Many responses supported retaining the existing allocation framework and continuing to protect areas of land that contribute towards landscape character, heritage significance and the setting of surrounding assets.

Council Response

1.92 Consultation responses generally supported the continued protection of the site's landscape, heritage and environmental qualities and recognised the importance of reflecting recent appeal decisions and evidence within the policy approach. Respondents emphasised the sensitivity of the location and the need to ensure that any future proposals respect the site's relationship with the surrounding landscape, heritage assets and ecological networks. In response, the Regulation 19 Plan retains the existing allocation framework which highlights the importance of landscape-led development, biodiversity enhancement, heritage protection and the conservation of areas that contribute to the distinctive setting of Bath.

Burlington Street

Summary of Responses

1.93 Very limited comments were received regarding Burlington Street. No significant issues were identified that would warrant changes to the existing allocation and respondents generally considered that the current policy approach remains appropriate.

1.94 The consultation did not identify any substantial concerns regarding the future of the allocation.

Council Response

1.95 Consultation responses did not identify any significant concerns regarding the future of the Burlington Street allocation and generally indicated that the existing policy framework remains appropriate.

University of Bath

Summary of Responses

1.96 Responses recognised the important contribution that the University of Bath makes to the economy, educational offer and innovation ecosystem of the city. Many respondents acknowledged the role of the university as a major employer and the wider benefits associated with research, teaching and knowledge-based activities. At the same time, comments reflected wider concerns regarding the relationship between university growth, student accommodation needs and pressures on the city's housing market.

1.97 A recurring theme was the provision of additional student accommodation and the extent to which future growth should be accommodated on campus. Some respondents considered that the university should continue to explore opportunities to provide further accommodation within existing campus areas before seeking additional off-campus locations. Others emphasised the importance of ensuring that university growth does not reduce opportunities to deliver housing and employment space required to meet wider city needs.

1.98 Comments also referred to existing policy restrictions on off-campus student accommodation and highlighted the need to maintain an appropriate balance between educational expansion, housing delivery and employment objectives. Respondents generally supported a strategic and evidence-led approach to managing future university growth and associated accommodation requirements.

Council Response

1.99 Representations recognised the University's significant contribution to the local economy and education sector whilst raising concerns regarding landscape impact, student growth, transport pressures and ecological effects. The

Regulation 19 Plan continues to support the sustainable growth of the Claverton Campus within an agreed development framework, requiring substantial ecological mitigation, landscape enhancement, sustainable transport measures, protection of bat corridors and careful management of impacts on the World Heritage Site and surrounding landscape.

Sulis Club

Summary of Responses

1.100 The Sulis Club proposal generated a substantial volume of responses and was one of the most debated site allocations within the Bath chapter. Consultation responses demonstrated strongly differing views regarding the future of the site and, in particular, the proposal to consider removing the site from the Green Belt to facilitate Purpose Built Student Accommodation and other university-related uses.

1.101 A significant number of respondents objected to any change in the site's Green Belt status, highlighting the importance of the site in maintaining the setting of Bath, the openness of the landscape and the relationship between the city and the surrounding countryside. Many comments referred to the role of the site within the setting of the World Heritage Sites and the Cotswolds National Landscape, emphasising its contribution to the green skyline that characterises Bath. Historic England, Cotswolds National Landscape and other respondents highlighted heritage and landscape sensitivities associated with the location.

1.102 Student accommodation and university growth featured prominently throughout responses. Supporters of the proposal argued that additional Purpose Built Student Accommodation could help accommodate future student growth and reduce pressure on existing housing stock. Others questioned whether sufficient evidence exists to justify additional off-campus provision and argued that opportunities should first be explored within existing university landholdings.

1.103 Ecological impacts formed a further key theme. Natural England and environmental organisations highlighted the importance of bat habitats associated with the Bath and Bradford-on-Avon Bats SAC and emphasised the need to carefully consider ecological connectivity, habitat protection and the

impacts of lighting. Biodiversity, dark skies and landscape mitigation were all identified as important considerations should further development be contemplated.

1.104 Sport and recreation issues were also raised. Sport England and other respondents highlighted the importance of protecting playing fields and ensuring that any future proposals adequately address the loss or replacement of sports facilities. Comments also referred to transport impacts, active travel connectivity and the potential effect of additional development on local infrastructure.

1.105 Overall, responses highlighted the challenge of balancing the need for student accommodation and university growth against the site's significant heritage, landscape, ecological and recreational sensitivities. Views remained strongly divided on whether development could be accommodated in a manner that preserves the qualities that many respondents considered fundamental to the character and setting of Bath.

Council Response

1.106 Representations raised significant concerns relating to Green Belt designation, impacts on the World Heritage Site, biodiversity, landscape character and the loss of recreational facilities. Following further technical assessment and review of consultation responses, the Regulation 19 Plan does not propose allocation of the Sulis Club for development and instead retains the existing policy position. Any future proposals would need to satisfy national Green Belt policy and demonstrate that impacts on heritage, landscape, ecology and recreation can be satisfactorily addressed.

Bath Spa University at Newton Park

Summary of Responses

1.107 Relatively few comments were received regarding Bath Spa University's Newton Park campus. Responses generally recognised the sensitive historic, landscape and ecological context of the site and the constraints arising from its Green Belt location and heritage significance.

1.108 The site's historic parkland setting, listed buildings, scheduled monuments and ecological value were frequently referenced. Respondents acknowledged

that these designations significantly influence the type and scale of development that could be accommodated at the campus. Comments generally supported the continued protection of these assets whilst allowing appropriate evolution of university facilities where compatible with the site's historic and environmental significance.

1.109 The Cotswolds National Landscape noted that existing campus buildings are already notable features within the landscape but did not identify significant additional visual impacts associated with the existing policy approach. Overall, responses did not identify a need for substantial changes to the allocation and generally supported the continued application of the existing policy framework.

Council Response

1.110 Consultation responses broadly supported the continued operation and evolution of the Newton Park campus whilst recognising the exceptional heritage, landscape and environmental sensitivity of the site. Respondents emphasised the importance of protecting the historic parkland setting, listed buildings, scheduled monuments and ecological assets that contribute to the significance of the campus and its wider setting. The Regulation 19 Plan continues to support the ongoing educational role of Bath Spa University whilst maintaining strong safeguards for heritage, landscape and biodiversity interests. Any future development proposals will be expected to respond positively to the historic character of the campus, protect its Green Belt setting and demonstrate that impacts on heritage assets, landscape character and ecological value have been appropriately assessed and mitigated.

New Site Options

Odd Down – Land South West of the Park & Ride

Summary of Responses

1.111 Responses to the Odd Down option reflected differing views regarding the principle of providing additional employment land on the edge of Bath. Supportive responses recognised the need for additional employment space to support economic growth, reduce pressure on existing employment locations and provide opportunities linked to wider economic strategies. Respondents noted the potential advantages of locating employment uses adjacent to existing transport infrastructure and recognised the role that the site could play in meeting identified business and industrial needs.

1.112 Many responses focused on the environmental sensitivity of the site and its location within the Green Belt. Concerns were raised regarding potential impacts on landscape character, ecological interests and the setting of Bath. Respondents highlighted the site's proximity to the Cotswolds National Landscape, its relationship with the World Heritage Sites and the presence of biodiversity interests, including habitats associated with protected bat species and other wildlife.

1.113 Transport and infrastructure considerations also featured prominently. Respondents highlighted the need to ensure that any future development would be supported by suitable transport improvements, sustainable travel options and appropriate environmental mitigation. Comments also referred to the relationship between this site and wider employment growth opportunities along the A367 corridor.

1.114 Several responses emphasised the importance of robust ecological, Green Belt and landscape assessment before any allocation is taken forward. While some respondents considered the site capable of accommodating carefully designed employment development, others questioned whether the benefits would outweigh the environmental constraints associated with the location.

Council Response

1.115 Representations emphasised the ecological sensitivity of the area, its role as a Site of Nature Conservation Importance and the need to support sustainable transport infrastructure. The Regulation 19 Plan responds by requiring comprehensive ecological assessment before development can be considered, safeguarding the existing waste facility and Park and Ride function, requiring substantial biodiversity enhancement and supporting only development that can demonstrate positive outcomes for nature recovery, transport infrastructure and employment growth.

West of Bath

Summary of Responses

1.116 The West of Bath options generated a significant level of interest and represented one of the most frequently discussed development proposals within the Bath chapter. Responses reflected the strategic nature of the proposal and the potential role that development west of the city could play in addressing housing, employment and infrastructure needs. Views were strongly divided between those who considered that Bath requires strategic growth opportunities to help meet housing and economic needs and those who considered that development in this location would result in unacceptable environmental and heritage impacts.

1.117 Housing provision and the ability of the city to meet identified development needs featured prominently within responses. Supporters of development highlighted the potential contribution that the site could make towards housing delivery, including affordable housing, the provision of new employment space and supporting infrastructure. Some respondents considered that Bath's constrained geography means that edge-of-city growth may need to form part of the overall strategy if identified needs are to be addressed. Others argued that development should remain focused on previously developed land and urban regeneration opportunities before Green Belt land is considered.

1.118 The most frequently raised concerns related to the impact of development on Bath's double World Heritage Site designation, the green setting of the city and the wider historic environment. Many respondents referred to the importance of

the city's landscape setting and its contribution to Outstanding Universal Value. Concerns were raised that development west of Bath could extend the urban footprint into areas that play an important role in defining the relationship between the city and its surrounding landscape. A number of responses questioned whether the identified heritage impacts could be adequately mitigated and highlighted the need for any decision to be supported by robust evidence and engagement with heritage bodies. Historic England highlighted the importance of the World Heritage Site setting, heritage impacts and the need to fully consider statutory heritage duties in plan-making.

1.119 Landscape impacts were also a recurring theme. Respondents frequently referred to the sensitivity of the surrounding countryside, the setting of the Cotswolds National Landscape, important views towards and from the city, and the role that this landscape plays in shaping Bath's distinctive character. Many responses considered that development could adversely affect landscape character, openness and the relationship between the city and surrounding settlements. The Cotswolds National Landscape highlighted the need to carefully consider impacts on landscape character, views and the setting of the National Landscape.

1.120 Green Belt considerations featured prominently throughout consultation responses. Respondents discussed whether exceptional circumstances could be demonstrated to justify Green Belt release and whether land in this location should be considered within the context of emerging Green Belt and grey belt assessments. Some respondents argued that the need to address housing and economic requirements supported consideration of Green Belt review, whilst others maintained that the Green Belt should continue to protect the setting of Bath and prevent outward expansion into the surrounding countryside.

1.121 Infrastructure and transport capacity were also widely discussed. Respondents raised questions regarding the ability of the local highway network, public transport services, schools, healthcare facilities and utilities infrastructure to accommodate development of the scale proposed. Comments highlighted the importance of ensuring that any future development is supported by appropriate transport improvements, active travel connections, community facilities and green infrastructure. Some respondents also noted that a larger scale development could support the delivery of additional infrastructure and services

that may benefit neighbouring communities. Particular reference was made to the relationship between the West of Bath proposals and the future role of Corston, with some respondents noting that strategic infrastructure associated with development could potentially influence future growth opportunities in the village.

1.122 Environmental organisations and technical consultees commented on ecological, hydrological and environmental considerations. Responses highlighted the importance of protecting habitats, ecological corridors, watercourses and biodiversity interests. Consideration was also given to the potential cumulative impacts of development in combination with other growth locations around the city. Respondents emphasised the importance of ensuring that any future proposals contribute positively towards nature recovery, climate resilience and environmental enhancement. The Environment Agency and other consultees highlighted the need to consider watercourses, flood risk and wider environmental implications associated with strategic growth in this location.

1.123 Overall, responses demonstrated the challenge of balancing the need for additional housing and employment opportunities against Bath's internationally important heritage, landscape and environmental assets. While some respondents considered West of Bath to be one of the few locations capable of delivering strategic-scale growth for the city, others regarded the identified environmental and heritage harm as unacceptable and considered that alternative approaches should be pursued. Consultation responses consistently highlighted the importance of a robust evidence base, careful assessment of alternatives and clear justification should the site continue to be considered through subsequent stages of plan preparation.

Council Response

1.124 Consultation responses reflected a wide range of views regarding the potential strategic growth opportunity west of Bath. While respondents acknowledged the site's potential contribution towards housing and employment needs, significant concerns were raised regarding impacts on the Green Belt, the World Heritage Site and landscape. Subsequent heritage and landscape assessment concluded that development at the scale envisaged would be likely

to result in substantial harm to the World Heritage Site and the setting of the Cotswold National Landscape. Consequently, the site has not been taken forward as a Regulation 19 allocation and will instead be considered through future strategic planning and the emerging Spatial Development Strategy.

Bath Equestrian Centre

Summary of Responses

1.125 The Bath Equestrian Centre generated a substantial number of responses, the majority of which focused on the environmental sensitivity of the site and the implications of development on the edge of the city. While a small number of respondents supported the principle of development in this location, most responses expressed concerns regarding landscape, heritage, ecological and transport impacts.

1.126 Landscape and visual impacts were among the most frequently raised issues. Respondents highlighted the site's location within the setting of the Cotswolds National Landscape, its contribution to the transition between the urban area and surrounding countryside, and the role it plays in views towards and from Bath. Concerns were raised that development could erode openness, affect the character of the landscape and alter the relationship between Weston and the surrounding rural area. The Cotswolds National Landscape highlighted the need for careful assessment of landscape and visual impacts and the importance of considering the site's sensitivity in relation to the wider landscape setting.

1.127 Ecological considerations also featured prominently. Respondents highlighted the importance of habitats associated with protected bat species and raised concerns regarding vegetation loss, lighting, habitat fragmentation and impacts on ecological connectivity. Natural England and other consultees emphasised the need for ecological assessment and mitigation and the importance of ensuring that development would not adversely affect biodiversity interests.

1.128 Transport and access issues were raised repeatedly. Respondents questioned whether existing local roads, including Weston Farm Lane and surrounding routes, are capable of accommodating additional traffic generated by residential development. Concerns were expressed regarding road widths, traffic congestion, safety and the impact of development on nearby communities.

Some respondents suggested that access constraints represented one of the principal challenges associated with the site.

1.129 Additional comments related to housing density, drainage, the future of the former equestrian use and the need for development to reflect local character and vernacular design. Several respondents considered that a lower level of development would be more appropriate if the site were to be taken forward, whilst others questioned whether development should occur at all given the acknowledged environmental constraints. Overall, responses highlighted the difficulty of balancing housing delivery objectives against the significant landscape, heritage and ecological sensitivities associated with the location.

Council Response

1.130 Consultation responses highlighted concerns regarding landscape impacts, ecological sensitivity, highway access constraints and effects on the setting of Bath. In response, the Regulation 19 Plan substantially strengthens the site requirements through extensive landscape mitigation, woodland planting, biodiversity net gain requirements, protection of bat corridors, detailed ecological assessment requirements and highway access testing. Development can only proceed where these matters are satisfactorily resolved and where impacts on heritage, landscape and ecological interests are appropriately mitigated.

Bath to Bristol Corridor

Introduction

1.1 The Bath to Bristol Corridor forms one of the most sustainable and strategically important parts of the district. It includes the settlements of Keynsham, Saltford Village, Hicks Gate and Whitchurch Village, all of which benefit to varying degrees from proximity to major employment centres, public transport corridors and strategic transport infrastructure linking Bath and Bristol. The corridor is identified as having a potentially important role in helping to accommodate future housing and employment needs whilst supporting wider objectives relating to sustainable transport, economic growth and climate resilience.

1.2 As part of the Options Reset Consultation, respondents were invited to comment on a range of places and site options within the corridor. Responses reflected differing views regarding the most appropriate locations for growth and generated extensive discussion regarding transport infrastructure, Green Belt release, landscape impacts, biodiversity, heritage assets and infrastructure capacity. Many respondents recognised the relative accessibility of locations along the corridor, whilst others highlighted environmental constraints and the importance of maintaining the distinct identities of existing settlements.

1.3 This chapter summarises the key consultation themes raised across the corridor before considering place-specific and site-specific responses.

1.4 A number of common themes emerged across responses to the Bristol to Bath Corridor place and site options. Whilst views varied regarding the suitability of individual sites and the distribution of growth between settlements, many respondents raised similar issues relating to infrastructure, transport, environmental protection and the character of existing communities. These themes were evident across comments submitted by local residents, community organisations, landowners, developers, statutory consultees and infrastructure providers.

Key Themes

Sustainable Locations for Growth

1.5 Many respondents recognised that settlements within the corridor are amongst the most accessible locations within Bath and North East Somerset, benefiting from proximity to Bristol and Bath, existing public transport services and employment opportunities. A number of respondents considered that future growth should be concentrated in areas with the greatest potential to support sustainable travel patterns and reduce reliance on private cars. North Keynsham, Hicks Gate and other locations along the A4 corridor were frequently highlighted as relatively sustainable locations.

1.6 Others questioned whether some site options would achieve genuinely sustainable patterns of development, particularly where access to services, schools, healthcare facilities or public transport was limited. Concerns regarding the relationship between strategic growth and travel demand were raised throughout the consultation.

Transport and Infrastructure

1.7 Transport impacts were among the most frequently raised issues across all settlements and site options. Respondents highlighted existing congestion on the A4 corridor, the A37, Wellsway, Charlton Road and other key routes. Concerns were raised regarding the cumulative impact of development on highway capacity, journey times, air quality and community severance. Many responses emphasised the need for substantial investment in public transport, active travel infrastructure and strategic transport improvements to support future growth.

1.8 Infrastructure capacity was another recurring theme. Respondents referred to healthcare provision, education, utilities, wastewater infrastructure and community facilities. Many representations emphasised that future growth should be accompanied by infrastructure investment and that cumulative impacts across the corridor should be fully understood before development decisions are made.

Infrastructure providers highlighted a number of technical matters requiring further assessment.

Green Belt and Settlement Identity

1.9 The release of Green Belt land generated significant discussion throughout the consultation. Respondents frequently referred to the role of the Green Belt in maintaining separation between Bath, Bristol, Keynsham, Saltford Village and Whitchurch Village. Concerns were raised regarding urban sprawl, coalescence and the potential erosion of settlement character. Many respondents emphasised that any release of Green Belt land should be supported by robust evidence and a clear demonstration of exceptional circumstances.

1.10 The importance of protecting the distinct identities of settlements emerged as a consistent theme across responses, particularly in relation to Saltford Village and Whitchurch Village where respondents frequently highlighted concerns regarding potential loss of separation from neighbouring settlements and urban areas.

Environment, Landscape and Heritage

1.11 Environmental considerations featured prominently throughout responses. Respondents referred to biodiversity, habitat networks, green infrastructure, woodland, rivers, agricultural land and opportunities for nature recovery. The importance of retaining and enhancing ecological networks and delivering biodiversity improvements alongside development was frequently emphasised.

1.12 Landscape and visual impacts were also raised across many site options. Particular attention was given to the relationship between growth and the setting of the Cotswolds National Landscape, the Avon Valley, local heritage assets and historic landscapes. Consultees highlighted the need for robust landscape, visual and heritage assessment work to inform future decisions regarding growth.

Deliverability and Infrastructure Planning

1.13 Statutory consultees and infrastructure providers commented on a range of matters relating to growth within the corridor, including wastewater infrastructure, flood risk, ecological networks, landscape and heritage considerations, recreational facilities and strategic transport infrastructure. Responses also highlighted the importance of coordinating future growth with the provision of supporting infrastructure and cross-boundary planning.

Council Response

1.14 The Council has carefully considered the consultation responses received in relation to the Bath to Bristol Corridor. The issues raised have informed the proposed spatial strategy, infrastructure requirements and site allocations. The Council considers the corridor to be one of the most sustainable locations within Bath and North East Somerset for accommodating growth due to its proximity to Bath and Bristol, existing public transport corridors, and employment opportunities.

1.15 Many respondents raised concerns regarding whether development would deliver genuinely sustainable patterns of growth. In response, the strategy focuses development in locations that can support enhanced public transport, active travel and local services. Major allocations are required to provide a range of supporting infrastructure including schools, healthcare facilities, local centres, employment opportunities and green infrastructure to reduce the need to travel and create sustainable communities.

1.16 Transport and infrastructure capacity were recurring concerns throughout consultation responses. The Council recognises existing pressures on the A4 corridor, A37 and local road networks. The Local Plan therefore includes a range of transport interventions, including improvements to walking, cycling and wheeling routes, enhanced bus services, transport hubs and strategic highway improvements. Development proposals will also be required to contribute towards education, healthcare, utilities, wastewater and community infrastructure necessary to support growth.

1.17 The release of Green Belt land and the protection of settlement identity was raised throughout many consultation responses. The Council recognises the importance of maintaining the distinct identities of Keynsham, Saltford Village and Whitchurch Village. Allocation policies therefore include strategic landscape buffers, green infrastructure corridors and areas of public open space designed to maintain separation between settlements and provide strong Green Belt boundaries. The strategy seeks to ensure that development delivers significant public benefits, including affordable housing, infrastructure and accessible green space.

1.18 Environmental, landscape and heritage considerations have also informed the strategy. Allocation policies include requirements for biodiversity enhancement, nature recovery, strategic green infrastructure, sustainable drainage and landscape mitigation. Development proposals will be required to protect and enhance ecological networks and demonstrate that impacts on heritage assets and sensitive landscapes have been appropriately assessed and mitigated. The strategy also supports delivery of the West of England Local Nature Recovery Strategy and Future Parklands Vision.

1.19 The Council agrees that successful delivery of growth must be coordinated with infrastructure provision. The proposed allocations have therefore been developed alongside infrastructure planning and include requirements for comprehensive masterplanning, transport mitigation and proportionate contributions towards strategic infrastructure. The Council will continue to work with infrastructure providers, neighbouring authorities and other stakeholders to ensure that development is delivered in a coordinated and sustainable manner.

Places and Site Options

1.20 This section summarises responses received in relation to the individual place and site options consulted upon across the Bath to Bristol Corridor. The summaries identify the principal issues raised by respondents and do not seek to reproduce every representation received.

Keynsham

Settlement Overview

1.21 Consultation responses relating to Keynsham reflected its role as one of the district's most sustainable and accessible locations for future growth. Many respondents recognised the town's strategic position between Bath and Bristol, its rail station, public transport connections and range of services and facilities. At the same time, concerns were frequently raised regarding the cumulative effects of development on highway capacity, public transport, healthcare provision, school places, utilities, wastewater infrastructure and environmental assets. A recurring theme throughout consultation responses was the need to ensure that growth is supported by appropriate infrastructure and delivered in a way that protects Keynsham's character, landscape setting and relationship with neighbouring settlements.

North Keynsham

1.22 Consultation responses relating to North Keynsham reflected a broad range of views regarding its role as a strategic location for future growth. Many respondents considered the site to be one of the most sustainable options within the district, highlighting its proximity to Keynsham railway station, the A4 corridor and the Bristol and Bath Railway Path together with the potential to deliver significant numbers of homes, employment opportunities, community facilities and supporting infrastructure. Several respondents referred to sustainability appraisal work which identified North Keynsham as one of the better performing options around Keynsham.

1.23 The most frequently raised concern related to flood risk. Respondents highlighted the site's relationship with the River Avon floodplain and raised concerns regarding climate change, existing flooding issues and the safety and accessibility of future development during flood events. Flooding, drainage and resilience during extreme weather events were repeatedly raised as key constraints that would need to be addressed through future planning and design work.

1.24 Transport and infrastructure issues also featured prominently throughout consultation responses. Respondents referred to traffic generation, capacity on local roads, pressure on schools, healthcare services and utilities infrastructure. A number of comments highlighted opportunities for sustainable transport and active travel, whilst others questioned whether public transport improvements could be guaranteed over the plan period. Concerns were also raised regarding access arrangements and the relationship between the site and existing communities.

1.25 Several respondents commented on employment land, noting existing employment uses within the area and questioning how these uses would be retained or replaced. Opportunities for mixed-use development, including community facilities, green infrastructure and affordable housing, were identified as potential benefits of a comprehensive masterplanned approach. Consultees also highlighted biodiversity, landscape and wastewater infrastructure considerations requiring further assessment.

1.26 Statutory consultees identified a range of technical issues requiring further assessment. The Environment Agency highlighted existing and future flood risk within the area, noting that flooding is expected to increase as a result of climate change and raising concerns regarding the potential resilience of site access during flood events. The consultee also referred to the relationship between development proposals and wider flood management initiatives within the Avon corridor. Wessex Water identified wastewater infrastructure considerations associated with future growth, whilst the Cotswolds National Landscape Board supported the inclusion of mitigation measures intended to address potential impacts on the National Landscape.

South Keynsham

1.27 Responses relating to South Keynsham focused on the site's accessibility, Green Belt location and the implications of development on transport networks and surrounding communities. Respondents expressed differing views regarding the suitability of the area for development, with some acknowledging potential

housing delivery opportunities and others questioning whether the location represented a sustainable option when compared to alternatives around Keynsham.

1.28 Transport concerns featured strongly throughout consultation responses. Respondents referred to the reliance on Charlton Road and Parkhouse Lane for access, existing congestion and the potential for increased traffic and rat-running through surrounding settlements. The relationship between the site and public transport services was also discussed, with concerns raised regarding the frequency, reliability and long-term funding of bus services. Some respondents considered the location likely to increase reliance on private car travel.

1.29 Green Belt release, landscape impacts and settlement separation were recurring themes. Many respondents emphasised the importance of maintaining openness and protecting the rural setting of Keynsham and neighbouring villages. Ecological considerations were also raised, including the site's relationship with habitat networks and opportunities to deliver green infrastructure and biodiversity enhancements.

1.30 Infrastructure capacity was another common issue, with respondents highlighting concerns regarding schools, healthcare provision, utilities and wastewater infrastructure. Representations frequently highlighted the need for significant infrastructure investment to accompany any future development in the area.

1.31 Statutory consultees primarily focused on ecological and infrastructure matters. Natural England highlighted the ecological value of land within and adjacent to the site and advised that areas of higher ecological interest should be retained as part of a wider green infrastructure framework. The consultee also identified opportunities to deliver multifunctional green infrastructure and habitat creation through any future masterplanning exercise. Wessex Water noted that the site lies on the edge of the Keynsham wastewater catchment and advised that additional wastewater network improvements may be required to accommodate future development.

East Keynsham

1.32 Consultation responses relating to East Keynsham reflected contrasting views regarding the site's suitability for development. Several respondents highlighted the potential for the site to contribute towards housing delivery and considered it a logical extension to the existing urban area, whilst others raised concerns regarding environmental impacts and accessibility.

1.33 Environmental considerations featured prominently throughout responses. The site's proximity to Manor Road Local Nature Reserve and surrounding woodland led many respondents to highlight ecological sensitivities and the potential impact of development on wildlife habitats and biodiversity. Concerns were also raised regarding cumulative impacts arising from other recent or proposed development in the surrounding area.

1.34 Concerns were also raised regarding highway access and local transport conditions. Respondents highlighted the limitations of Manor Road, existing access arrangements and the absence of direct public transport provision serving the site. Potential increases in traffic congestion and the need for infrastructure improvements were frequently referenced.

1.35 Green Belt considerations were raised by a number of respondents, together with questions regarding site capacity, design and deliverability. Some respondents supported the site's allocation on the basis that it could make an early contribution to housing supply, while others considered environmental constraints to outweigh the potential benefits of development.

1.36 Statutory consultees emphasised the ecological sensitivity of the site and its relationship with surrounding woodland habitats. Natural England highlighted concerns regarding recreational pressure on the nearby Manor Road Local Nature Reserve and advised that ecological buffers and habitat corridors should be incorporated into any future development proposals. The consultee also emphasised the importance of on-site green infrastructure to help reduce pressure on nearby natural spaces. Wessex Water highlighted constraints

associated with an existing sewer crossing the site and advised that limited capacity within the receiving network may influence the scale and layout of development.

West Keynsham

1.37 West Keynsham generated a significant number of responses and was one of the most debated site options within the corridor. While some respondents considered that the site could contribute towards meeting development needs in a sustainable location, many representations focused on Green Belt impacts, transport issues and infrastructure constraints.

1.38 The most common concern related to the release of Green Belt land and the potential impact on the western setting of Keynsham. Respondents frequently referred to the importance of maintaining separation between Keynsham, Queen Charlton and Stockwood and expressed concerns regarding urban sprawl, impacts on rural character and effects on the setting of nearby heritage assets.

1.39 Traffic congestion and highway capacity were also frequently cited. Charlton Road was identified by many respondents as already experiencing congestion and concerns were raised regarding the cumulative impacts of additional development on both local roads and the wider transport network. The potential for increased air pollution and rat-running through neighbouring villages was also highlighted.

1.40 Infrastructure and utilities featured prominently throughout consultation responses. Respondents referred to water supply, wastewater infrastructure and wider service provision, whilst some representations also highlighted the importance of retaining employment land and supporting local economic activity alongside any future housing development.

1.41 Statutory consultees identified infrastructure, flood risk and servicing considerations. Wessex Water advised that wastewater and utility network improvements may be required to support development and highlighted the need

to identify suitable connection points into the existing network. The Environment Agency raised concerns relating to reservoir failure flood risk associated with Chew Valley Lake and advised that potential mitigation requirements should be considered through future planning work. Consultees also highlighted wider infrastructure constraints which may influence the suitability and deliverability of development within this location.

South East Keynsham

1.42 Responses relating to South East Keynsham frequently focused on the balance between accommodating growth and protecting the landscape setting of the southern edge of Keynsham. Respondents expressed differing views regarding the site's role in meeting housing needs, with some identifying opportunities for strategic growth whilst others raised concerns regarding Green Belt release and environmental impacts.

1.43 Traffic and transport capacity featured prominently within responses. Many respondents referred to existing congestion on Wellsway and the wider road network and questioned whether local roads, schools and health services would be capable of accommodating substantial growth. Concerns regarding rat-running and additional pressure on surrounding villages were also raised.

1.44 Landscape character, heritage considerations and the contribution of the site to Green Belt purposes were recurring themes. Respondents highlighted the importance of retaining the rural approach to Keynsham and protecting views towards the Chew Valley. Some representations argued that parts of the site may make a limited contribution to Green Belt purposes, whilst others emphasised the need to retain openness and agricultural land.

1.45 Environmental and infrastructure considerations also featured prominently, including concerns relating to drainage, surface water flooding, biodiversity, agricultural land and the cumulative impacts of growth alongside other development proposals within the corridor.

1.46 Statutory consultees focused primarily on landscape and infrastructure issues. Wessex Water highlighted the relationship between the site and the Keynsham wastewater catchment, advising that future growth may require additional network improvements should cumulative development exceed existing capacity. The consultee also noted the need to consider the most appropriate point of connection into the existing infrastructure network. The Cotswolds National Landscape Board highlighted the importance of understanding potential impacts on landscape character and supported the inclusion of mitigation measures where development is considered further.

Central Keynsham

1.47 Consultation responses relating to Central Keynsham generally focused on the redevelopment of previously developed land within the existing urban area. Respondents frequently recognised the site's proximity to shops, services, employment opportunities and public transport and considered these to be positive attributes when compared with edge-of-settlement growth options.

1.48 The principal concerns raised related to the potential loss of town centre parking and the implications this may have for local businesses and the vitality of Keynsham town centre. Respondents highlighted the importance of maintaining accessibility for visitors, workers and shoppers and questioned whether reductions in parking provision could lead to increased congestion elsewhere within the town.

1.49 Many respondents nevertheless supported the principle of making more efficient use of brownfield land within the town and considered redevelopment opportunities in central locations to be preferable to development in the Green Belt where suitable opportunities exist. The site's accessibility to existing facilities and public transport connections was frequently highlighted as a key benefit.

Council Response

1.50 Consultation responses recognised Keynsham's role as one of the most sustainable and accessible locations in the district for accommodating future

growth, given its strategic location between Bath and Bristol, rail station, public transport connections and range of services and facilities. At the same time, respondents raised significant concerns regarding transport impacts, congestion, healthcare provision, school capacity, wastewater infrastructure, flood risk, Green Belt release, landscape impacts, biodiversity and the cumulative effects of development. A recurring theme was the need to ensure that growth is supported by appropriate infrastructure and delivered in a way that protects Keynsham's character, environmental assets and relationship with neighbouring settlements.

1.51 In response, the Regulation 19 Local Plan proposes a coordinated strategy for growth across Keynsham through a series of strategic and non-strategic allocations supported by comprehensive infrastructure planning. The strategy seeks to focus growth in sustainable locations whilst delivering new homes, employment opportunities, education provision, healthcare facilities, sustainable transport improvements, green infrastructure and public open space. Significant emphasis has been placed on improving walking, cycling and public transport connections, supported by delivery of the North Keynsham Strategic Access Link Road and wider corridor transport improvements. The allocation strategy has also been informed by further assessment of flood risk, wastewater infrastructure, landscape, biodiversity and heritage considerations, with strengthened requirements relating to environmental mitigation, nature recovery and the delivery of multifunctional green infrastructure.

1.52 The Draft Local Plan comprises the following site allocations at Keynsham:

- *North Keynsham – a housing-led mixed-use development incorporating employment land, a local centre, primary school and the Strategic Access Link Road*
- *East of Avon Mill Lane – a brownfield residential allocation near Keynsham town centre*
- *Central Keynsham (Ashton Way and the Labbott Car Parks) – a brownfield mixed-use office and residential allocation in Keynsham town centre*
- *West Keynsham – a residential allocation with strategic green infrastructure*
- *South West Keynsham – a residential-led allocation incorporating a local centre, primary school and supporting community infrastructure*

- *South East Keynsham – a residential-led allocation with a shop and strategic scale green infrastructure and connectivity to a new Country Park at South Saltford*

1.53 The following allocations consulted on at Regulation 18 have not been taken forward into the Draft Local Plan:

- *East Keynsham – Not taken forward due to concerns over the ecological impact on the adjacent Manor Road Community Woodland and the cumulative impact of development*

1.54 A recurring concern relates to the potential loss of separation between Keynsham and Saltford. The Council recognises the importance that respondents attach to maintaining the distinct identity of Keynsham and Saltford Village. The Local Plan's strategic objectives for the Bristol to Bath Corridor also specifically seek to maintain and reinforce separation between Keynsham and Saltford Village. The allocation strategy has therefore been designed to retain and reinforce strategic green infrastructure corridors and areas of open land between development, delivering strategic scale public open space, nature recovery and biodiversity net gain. Extensive green infrastructure, landscape buffers and areas of public open space intended to maintain a clear distinction between settlements and provide strong Green Belt boundaries beyond the Plan period. The largest development option consulted on at South East Whitchurch is not being progressed which maintains separation between South West Keynsham and Whitchurch Village.

1.55 Concerns were raised about the cumulative impact of development in the Keynsham and Saltford area on the setting of the Cotswolds National Landscape, including from statutory consultees. The allocations in the draft plan have been informed by a comprehensive Landscape Sensitivity Assessment which includes consideration of cumulative impacts through use of photomontages. This has led to landscape-led concept plans and policy wording which shows how mitigation measures can ensure that the impact of development is acceptable.

1.56 Transport concerns were among the most commonly raised issues. The Council acknowledges existing congestion on the A4 corridor and the importance of ensuring that growth is supported by sustainable transport infrastructure. The proposed allocations therefore form part of a wider corridor-based transport strategy including improvements to bus services, active travel routes, travel hubs and traffic management measures. All strategic site allocations will be required to contribute towards the delivery of the multi-modal North Keynsham Strategic Access Link Road which will mitigate the cumulative impact of development and deliver significant improvements to the highway network and public realm in Keynsham Town Centre. Development proposals will also be required to provide extensive walking, cycling and wheeling connections, improve access to National Cycle Network Route 4, support public transport improvements, contribute towards travel hubs and deliver measures to reduce reliance on private car travel. Concerns were also raised about the loss of parking in Keynsham Town Centre, however there is currently an under-utilisation of space and the strategy and mitigation measures set out in the Transport Topic Paper will increase accessibility for non-car modes.

1.57 Many respondents questioned whether infrastructure capacity is sufficient to support future growth. The Council agrees that development must be accompanied by appropriate infrastructure provision. For this reason, the Keynsham strategy includes the allocation of land for new primary schools at North Keynsham and South West Keynsham, a local centre at North Keynsham, healthcare provision identified through engagement with the Integrated Care Board, community facilities, sports provision and supporting utilities infrastructure. Allocation policies require development to contribute proportionately towards this infrastructure and include mechanisms to ensure that costs are shared fairly across development sites.

1.58 Environmental considerations were also a key issue raised through the consultation. The Council recognises the importance of biodiversity, ecological connectivity and landscape character within and around Keynsham. Allocation policies therefore require detailed ecological assessment, delivery of a minimum 20% biodiversity net gain, retention and enhancement of hedgerows and trees,

habitat buffers, dark corridors, strategic green infrastructure and nature recovery measures. Significant areas of multifunctional green infrastructure and publicly accessible open space are proposed alongside development to provide recreational opportunities, strengthen ecological networks and contribute towards wider nature recovery objectives.

1.59 The Council also notes concerns regarding Green Belt release and the need to demonstrate exceptional circumstances. The proposed strategy has been informed by the Council's evidence base, including Green Belt assessment work. The Council considers that the exceptional circumstances required by national policy are provided by the need to meet identified housing and infrastructure requirements, the relative sustainability of the location, and the ability of the allocations to deliver significant public benefits including affordable housing, education facilities, transport improvements, healthcare provision, community facilities and substantial green infrastructure. Development released from the Green Belt will be required to deliver public benefits consistent with national policy.

Saltford Village

Settlement Overview

1.60 Consultation responses relating to Saltford Village frequently referred to the village's strategic location between Bath and Bristol, its role within the wider Bath to Bristol Corridor and the implications of accommodating future growth within a largely Green Belt environment. Respondents recognised Saltford's accessibility to employment opportunities, public transport services and strategic transport routes whilst also highlighting concerns regarding infrastructure capacity, traffic congestion, environmental impacts and the need to maintain the village's distinct identity. A recurring theme was the need to balance housing delivery with protection of landscape character, community facilities and the Green Belt.

West Saltford

1.61 Consultation responses relating to West Saltford were predominantly focussed on the implications of development for the Green Belt, landscape

character and the relationship between Saltford Village and Keynsham. Many respondents considered the site to play an important role in maintaining separation between the two settlements and raised concerns that development could reduce the remaining gap and contribute towards a perception of coalescence along the A4 corridor.

1.62 Landscape impacts featured prominently in representations, particularly in relation to views from the Cotswolds National Landscape. Respondents referred to the sensitivity of the landscape and the potential for development to increase the prominence of built form within wider views across the Avon Valley. Concerns were also raised regarding impacts on local distinctiveness, rural character and recreational use of the surrounding countryside.

1.63 Transport and accessibility issues were also frequently raised. Concerns focused on existing congestion along the A4, the capacity of local roads and the potential for additional development to increase reliance on private vehicles. Some respondents questioned assumptions relating to a potential future railway station at Saltford and raised concerns regarding access arrangements and wider transport connectivity. Others highlighted opportunities to improve active travel connections between Saltford, Keynsham and Bath.

1.64 Environmental and infrastructure considerations also featured within responses. Respondents referred to biodiversity, heritage assets, recreational facilities and wastewater infrastructure. Concerns were raised regarding the loss of agricultural land and the impact of development on wildlife habitats and ecological networks.

1.65 Statutory consultees focused primarily on landscape, Green Belt separation and infrastructure matters. Cotswolds National Landscape highlighted the sensitivity of the landscape, the potential for development to reduce the perceived gap between Saltford Village and Keynsham, and the effect of additional built form in views from the CNL escarpment. Wessex Water highlighted the presence of strategic sewer infrastructure along the southern edge of the site and advised that required standoff distances for maintenance

and repair could constrain layout and reduce the number of dwellings deliverable.

South Saltford

1.66 Responses relating to South Saltford focused on the role of the area in maintaining the rural setting of Saltford Village and preserving the openness of the Green Belt. Many respondents expressed concerns regarding development within open countryside and emphasised the importance of retaining the distinct identity of Saltford between the urban areas of Bath and Bristol. Views frequently referred to the contribution made by the site towards landscape character, settlement separation and opportunities for recreation and access to green space.

1.67 Transport and infrastructure capacity were commonly raised concerns. Respondents referred to existing congestion on the A4 corridor and questioned whether local roads, schools, healthcare provision and utilities infrastructure would be capable of accommodating significant additional growth. Many representations stressed that infrastructure improvements should accompany any future development and that cumulative impacts across the wider corridor require consideration.

1.68 Landscape and environmental considerations featured strongly throughout responses. Many respondents highlighted the visual role of the open land south of the village and referred to its contribution to biodiversity, landscape character and the setting of the settlement. Concerns were also raised regarding the loss of agricultural land and the implications of development for wildlife and ecological networks. Respondents frequently emphasised the need to ensure that environmental considerations form a key part of future decision-making.

1.69 A number of representations also highlighted concerns regarding Green Belt release and the precedent that development in this location could establish for further growth around the village. Others questioned whether the site's

accessibility and infrastructure capacity would support the scale of development envisaged.

1.70 Statutory consultees raised matters relating to landscape, visual impact and recreational provision. Cotswolds National Landscape highlighted the potential for development to affect views from CNL escarpment viewpoints and noted wider concerns regarding South Saltford, West Saltford and related options when considered cumulatively with North Keynsham and South East Keynsham. Sport England also highlighted the safeguarding of Saltford Golf Course under policy LCR5 and noted that development resulting in the loss of existing sport and recreational facilities would conflict with adopted policy.

Council Response

1.71 Consultation responses highlighted Saltford Village's strategic location between Bath and Bristol and recognised its accessibility to employment opportunities, public transport services and the wider corridor. However, respondents frequently raised concerns regarding Green Belt release, the potential erosion of the gap between Saltford and Keynsham, landscape impacts, the setting of the Cotswolds National Landscape, traffic congestion on the A4 corridor, infrastructure capacity and the ability of development to respect the village's distinct identity and character. Representations also highlighted the importance of protecting environmental assets, maintaining recreational opportunities and ensuring growth is supported by appropriate community infrastructure.

1.72 In response, the Regulation 19 Local Plan proposes a planned approach to growth at West Saltford and South Saltford, supported by a package of transport, education, community and green infrastructure measures. The strategy has been designed to maintain and reinforce the separate identity of Saltford Village and Keynsham through the provision of substantial areas of publicly accessible green infrastructure, open space and landscape mitigation. The allocations provide opportunities to deliver new homes, including affordable housing, alongside a local centre, primary school, healthcare provision, improved active travel

connections and enhanced public transport accessibility. Particular emphasis has been placed on protecting the setting of the Cotswolds National Landscape, maintaining settlement separation and delivering strategic green infrastructure and nature recovery benefits across the corridor.

1.73 The Draft Local Plan comprises the following site allocations at Saltford Village:

- *West Saltford – a housing-led mixed-use development incorporating a local centre and primary school. This allocation combines the West Saltford and North West Saltford options consulted on in 2025 in order to provide comprehensively planned new infrastructure.*
- *South Saltford – a residential-led allocation with strategic scale green infrastructure including a new Country Park*

1.74 All site options consulted on at Saltford Village in 2025 have been taken forward into the Draft Local Plan.

1.75 A recurring concern relates to the potential loss of separation between Keynsham and Saltford Village. The Council recognises the importance that respondents attach to maintaining the distinct identity of Keynsham and Saltford Village. The Local Plan's strategic objectives for the Bristol to Bath Corridor also specifically seek to maintain and reinforce separation between Keynsham and Saltford Village. The allocation strategy has therefore been designed to retain and reinforce strategic green infrastructure corridors and areas of open land between development, delivering strategic scale public open space, nature recovery and biodiversity net gain. Extensive green infrastructure, landscape buffers and areas of public open space intended to maintain a clear distinction between settlements and provide strong Green Belt boundaries beyond the Plan period.

1.76 Concerns were raised about the cumulative impact of development in the Keynsham and Saltford area on the setting of the Cotswolds National Landscape, including from statutory consultees. The allocations in the draft plan have been informed by a comprehensive Landscape Sensitivity Assessment which includes consideration of cumulative impacts through use of

photomontages. This has led to landscape-led concept plans and policy wording which shows how mitigation measures can ensure that the impact of development is acceptable.

1.77 Transport concerns were among the most commonly raised issues. The Council acknowledges existing congestion on the A4 corridor and the importance of ensuring that growth is supported by sustainable transport infrastructure. The proposed allocations therefore form part of a wider corridor-based transport strategy including improvements to bus services, active travel routes, travel hubs and traffic management measures. All strategic site allocations in Keynsham and Saltford will be required to contribute towards the delivery of the multi-modal North Keynsham Strategic Access Link Road which will mitigate the cumulative impact of development and deliver significant improvements to the highway network and public realm in Keynsham Town Centre. Development proposals will also be required to provide extensive walking, cycling and wheeling connections, improve access to National Cycle Network Route 4, support public transport improvements, contribute towards travel hubs and deliver measures to reduce reliance on private car travel.

1.78 Many respondents questioned whether infrastructure capacity is sufficient to support future growth. The Council agrees that development must be accompanied by appropriate infrastructure provision. For this reason, the Saltford strategy includes the allocation of land for a new primary school and local centre at West Saltford, healthcare provision identified through engagement with the Integrated Care Board, community facilities, sports provision and supporting utilities infrastructure. Allocation policies require development to contribute proportionately towards this infrastructure and include mechanisms to ensure that costs are shared fairly across development sites.

1.79 A number of consultation responses highlighted concerns regarding the impact of development on heritage assets, particularly Keynsham Manor, the historic character of Saltford and nearby listed buildings. Site allocations incorporate detailed policy requirements to ensure that heritage considerations inform future masterplanning and design work. The allocation policies require

comprehensive Historic Environment Assessments and identify specific heritage assets whose settings must be considered. Development proposals will be expected to demonstrate how impacts have been avoided, minimised or mitigated through layout, design, green infrastructure and landscape measures. The West Saltford allocation requires a buffer to Keynsham Manor to respond to mitigate harm to the setting of the Listed Building.

1.80 Environmental considerations were also a key issue raised through the consultation. The Council recognises the importance of biodiversity, ecological connectivity and landscape character within and around Saltford. Allocation policies therefore require detailed ecological assessment, delivery of a minimum 20% biodiversity net gain, retention and enhancement of hedgerows and trees, habitat buffers, dark corridors, strategic green infrastructure and nature recovery measures. Significant areas of multifunctional green infrastructure and publicly accessible open space are proposed alongside development to provide recreational opportunities, strengthen ecological networks and contribute towards wider nature recovery objectives.

1.81 The Council also notes concerns regarding Green Belt release and the need to demonstrate exceptional circumstances. The proposed strategy has been informed by the Council's evidence base, including Green Belt assessment work. The Council considers that the exceptional circumstances required by national policy are provided by the need to meet identified housing and infrastructure requirements, the relative sustainability of the location, and the ability of the allocations to deliver significant public benefits including affordable housing, education facilities, transport improvements, healthcare provision, community facilities and substantial green infrastructure. Development released from the Green Belt will be required to deliver public benefits consistent with national policy.

Hicks Gate

Settlement Overview

1.82 Consultation responses relating to Hicks Gate focused on its strategic location at the eastern edge of the Bristol urban area and its potential role in accommodating growth within the Bath to Bristol Corridor. Respondents frequently referred to the area's accessibility, proximity to major transport routes and employment opportunities, together with its relationship with surrounding settlements. Many representations recognised Hicks Gate as one of the more sustainable locations under consideration due to its strategic connectivity and proximity to existing services, whilst others emphasised that significant infrastructure investment would be required before substantial growth could be accommodated.

1.83 Transport emerged as the dominant theme throughout responses. Respondents highlighted the importance of the A4 corridor, the A4174 Ring Road and wider connections to Bath, Bristol and Keynsham. Many responses identified opportunities to improve public transport, active travel links and strategic transport infrastructure, whilst others raised concerns regarding existing congestion and the cumulative impact of future growth on already constrained parts of the network.

1.84 Environmental considerations, Green Belt issues, provision of community facilities and cross-boundary planning also featured strongly within consultation responses. A recurring theme was the need for any future growth at Hicks Gate to be planned comprehensively and in collaboration with neighbouring authorities, reflecting the strategic role of the location within the wider Bristol housing and employment market.

Hicks Gate

1.85 Consultation responses relating to Hicks Gate reflected a mix of support and concern regarding its potential role as a strategic growth location. Many respondents identified the area's strong strategic connectivity as a key advantage, highlighting its location adjacent to the A4 and A4174 together with

its proximity to Bristol, Keynsham and major employment areas. Some respondents considered Hicks Gate to represent one of the most sustainable opportunities for accommodating growth within the district due to its relationship with the wider transport network, existing services and employment markets.

1.86 The potential for a new transport interchange emerged as one of the most frequently discussed issues. Respondents referred to opportunities to create a transport hub, relocate park and ride facilities and improve links between Bath, Bristol and surrounding communities. Proposals for enhanced public transport, active travel infrastructure and future mass transit connections received support from a number of respondents who considered these improvements could help reduce reliance on private vehicles and support more sustainable patterns of development. Some respondents also identified opportunities to improve strategic connectivity across the wider corridor.

1.87 Despite these opportunities, concerns were raised regarding existing congestion on the A4 corridor and the ability of the transport network to accommodate substantial growth. Respondents questioned whether additional development would place further pressure on already busy routes and highlighted the importance of securing significant investment in transport infrastructure. The cumulative impact of growth on surrounding communities and strategic road junctions was also frequently raised. A number of responses emphasised that transport improvements should be delivered in advance of, or alongside, any significant development.

1.88 Several respondents identified opportunities to deliver housing, employment space, community facilities and supporting infrastructure as part of a comprehensive masterplanned approach. The site's cross-boundary location generated discussion regarding how housing delivery should be apportioned between local authorities and how future planning and infrastructure provision should be coordinated. Some respondents considered Hicks Gate capable of accommodating a significant proportion of future development needs if supported by the necessary infrastructure and services.

1.89 Environmental considerations, Green Belt issues and infrastructure constraints were also highlighted throughout consultation responses. Respondents referred to the need to protect landscape character, biodiversity and ecological networks whilst ensuring that healthcare, education, wastewater infrastructure and utilities are capable of supporting future development. Concerns were also raised regarding the effect of development on nearby communities and the importance of creating a well-designed and integrated place rather than a predominantly transport-led development.

1.90 Statutory consultees and infrastructure providers identified matters requiring further assessment. Wessex Water highlighted that the development location sits on the edge of the Avonmouth wastewater treatment catchment and noted that further upgrades could be required if available capacity at Avonmouth WRC is exceeded. Environment Agency and NHS Property Services also identified the importance of recognising the site's relationship with the Bristol City Council boundary and the need for appropriate liaison and infrastructure planning. Responses also referred to Flood Zone 3 constraints associated with potential transport interchange and park and ride proposals.

Council Response

1.91 The Council has carefully considered the consultation responses relating to Hicks Gate. The issues raised have informed the proposed strategy for this strategically important location within the Bath to Bristol Corridor. The Council recognises Hicks Gate's strong accessibility, proximity to major employment areas and potential to support sustainable patterns of growth through investment in transport infrastructure and associated development.

1.92 Transport was the dominant theme throughout consultation responses. The Council acknowledges concerns regarding congestion and network capacity whilst recognising opportunities to improve connectivity through investment in public transport, active travel infrastructure and wider strategic transport improvements. The proposed strategy supports the principle of an integrated transport-led approach which seeks to maximise accessibility and reduce

reliance on private car travel. Future development proposals will be required to demonstrate that transport impacts can be appropriately addressed and mitigated.

1.93 Many respondents identified opportunities to accommodate homes, employment uses, community facilities and supporting infrastructure as part of a comprehensive masterplanned development. The Council agrees that any future growth in this location should be planned comprehensively and delivered alongside the infrastructure necessary to support sustainable communities. Cross-boundary working with neighbouring authorities and infrastructure providers will remain important in ensuring coordinated delivery and effective planning of transport, utilities and community infrastructure.

1.94 Environmental considerations, Green Belt matters and infrastructure constraints have also informed the Council's approach. Future development proposals will be required to protect and enhance biodiversity and ecological networks, provide strategic green infrastructure, address flood risk and demonstrate that supporting utilities and wastewater infrastructure can accommodate growth. The Council considers that, subject to these requirements, Hicks Gate has the potential to make an important contribution towards meeting development needs in a sustainable and well-connected location.

Whitchurch Village

Settlement Overview

1.95 Consultation responses relating to Whitchurch Village focused on the scale and location of potential growth, the implications of Green Belt release and the relationship between future development and the character of the existing settlement. Respondents frequently referred to Whitchurch Village's proximity to Bristol whilst also highlighting concerns regarding transport capacity, environmental impacts, heritage considerations and infrastructure provision. Views differed regarding the role that the village should play in accommodating future housing needs, but there was broad recognition that any future development would need to respond carefully to local constraints and opportunities.

1.96 Transport emerged as one of the most prominent themes throughout responses. Respondents highlighted existing congestion on the A37 and surrounding road network, concerns regarding the cumulative impacts of growth and the need for significant investment in public transport, walking and cycling infrastructure. The relationship between future development and Bristol was frequently discussed, together with the extent to which residents would be reliant upon services, facilities and employment opportunities beyond the district.

1.97 Green Belt issues also featured strongly throughout consultation responses. Many respondents emphasised the importance of maintaining the distinct identity of Whitchurch Village and preserving separation from the Bristol urban area. Concerns regarding urban sprawl, coalescence and the loss of openness were commonly raised across all site options. Landscape character, biodiversity, agricultural land and ecological networks were similarly identified as matters requiring careful consideration.

1.98 The historic environment was another recurring theme. Respondents frequently referred to the importance of nearby heritage assets, including Maes Knoll and the Wansdyke, and emphasised the need to ensure that future growth responds appropriately to the area's historic landscape. Infrastructure capacity,

particularly in relation to healthcare provision, schools, wastewater infrastructure and utilities, was also raised throughout the consultation.

North Whitchurch

1.99 Responses relating to North Whitchurch focused primarily on the scale of development proposed and the implications this may have for Green Belt purposes, settlement identity and local infrastructure. Several respondents questioned whether the density required to achieve the proposed level of housing delivery would be achievable or appropriate in this location. Others considered the site capable of contributing towards housing need and identified it as a potentially deliverable option within the plan period.

1.100 The Green Belt featured prominently throughout consultation responses. Many respondents expressed concern that development could significantly reduce the separation between Whitchurch Village and Bristol, eroding openness and weakening the distinction between the village and the urban area beyond. Concerns regarding coalescence, village character and the retention of open countryside formed a recurring theme within representations.

1.101 Transport and infrastructure considerations were also raised. Respondents referred to congestion on the A37, pressures on local roads and concerns regarding access to schools and services. Questions were raised regarding public transport provision, healthcare capacity and the sustainability of future travel patterns associated with development.

1.102 Heritage and landscape considerations were also highlighted. Respondents referred to the sensitivity of the setting of Maes Knoll, the Wansdyke and nearby heritage assets and emphasised the importance of ensuring that the historic environment is appropriately protected and incorporated into any future masterplanning work.

East Whitchurch

1.103 Responses relating to East Whitchurch focused on the implications of development for transport networks, Green Belt objectives and settlement separation. Respondents consistently referred to existing congestion on the A37 and raised concerns that additional development could exacerbate traffic pressures, air pollution and rat-running through nearby communities. Concerns regarding access arrangements and the ability of the local road network to accommodate growth were raised throughout consultation responses.

1.104 Green Belt impacts and the relationship between Whitchurch Village and Bristol featured strongly within responses. Many respondents argued that the site contributes to the remaining separation between the village and the city and expressed concerns that development could lead to urban sprawl and coalescence. The role of open land in maintaining village identity and protecting settlement character was frequently highlighted.

1.105 Respondents also raised concerns regarding accessibility and active travel. The distance between parts of the site and existing services and facilities led some representations to question the sustainability of the location, particularly where safe walking and cycling connections are limited. Potential impacts on biodiversity, landscape character and environmental quality were also highlighted.

South East Whitchurch

1.106 South East Whitchurch generated substantial discussion due to the scale of development under consideration and its strategic location within the corridor. Some respondents highlighted opportunities to create a comprehensively planned new community incorporating homes, schools, employment uses, local services and sustainable transport infrastructure. Proposals for a mobility hub, public transport improvements and supporting community facilities were identified as potential benefits by some respondents.

1.107 Other respondents expressed concerns regarding the scale of growth proposed and the cumulative implications for surrounding communities. Traffic impacts featured prominently throughout responses, with many respondents highlighting existing congestion on the A37 and wider Bristol-Bath corridor. Concerns were also raised regarding air quality, settlement severance and the potential for increased rat-running through neighbouring villages.

1.108 Heritage considerations were frequently referenced, particularly in relation to Maes Knoll, the historic landscape and the setting of nearby conservation areas. Respondents highlighted the sensitivity of the landscape and questioned whether large-scale development could be accommodated without significant adverse impacts. Accessibility, Green Belt release and environmental impacts were also frequently cited, with respondents questioning the walkability of the site and highlighting the importance of understanding ecological and infrastructure constraints before decisions regarding future development are made.

1.109 Statutory consultee responses highlighted a number of issues requiring further assessment. Historic England raised concerns regarding the sensitivity of nearby heritage assets, including Maes Knoll and the wider historic landscape, and advised that further evidence would be required to understand the potential effects of development in this location. The consultee highlighted the importance of ensuring that heritage considerations inform any future masterplanning and site assessment work.

West Whitchurch

1.110 Responses relating to West Whitchurch reflected differing views regarding the suitability of the location for development. Some respondents considered the site to represent a logical extension to the existing settlement and highlighted its proximity to services and public transport corridors. Landowners and promoters argued that parts of the site could provide opportunities for housing, community facilities and green infrastructure whilst maintaining the separate identity of Whitchurch Village.

1.111 Many other respondents raised concerns regarding Green Belt release and the potential impact on settlement identity. The importance of maintaining a distinction between Whitchurch Village and Bristol was repeatedly referenced and concerns were raised regarding coalescence, urban sprawl and the loss of open countryside. Respondents questioned whether exceptional circumstances existed to justify Green Belt release and highlighted the importance of protecting openness and village character.

1.112 Transport impacts also featured prominently within consultation responses. Respondents referred to existing congestion on the A37, traffic conditions on local roads including Maggs Lane and concerns regarding village severance. Questions were raised regarding the deliverability of transport improvements and the role of future public transport investment in supporting growth. Ecology, public open space and recreational facilities were also identified as issues requiring detailed consideration.

Stockwood Lane

1.113 Responses relating to Stockwood Lane focused primarily on the principle of development within the Green Belt and the relationship of the site to the existing urban edge of Bristol. Many respondents considered that development would represent an extension of the urban area into open countryside and questioned whether exceptional circumstances exist to justify Green Belt release. Bristol City Council also raised concerns regarding the site's relationship to neighbouring communities and the wider cross-boundary implications of development in this location.

1.114 Transport, accessibility and sustainability were recurring themes throughout responses. Respondents questioned whether the site represents a sustainable location for development given its distance from services, schools and facilities and highlighted concerns regarding increased car dependency. Concerns were also raised regarding the capacity of local roads, particularly routes serving Stockwood Vale, and whether appropriate transport infrastructure could be delivered to support development. Some respondents also questioned

references within the consultation material to improved connections through Stockwood Vale, noting uncertainty regarding previously proposed transport schemes.

Council Response

1.115 The Council has carefully considered the consultation responses relating to Whitchurch Village. The issues raised have informed the refinement of the spatial strategy, and site allocation policies for the area. Whilst concerns regarding Green Belt release, transport impacts, infrastructure capacity, heritage assets, biodiversity and settlement identity were frequently expressed, the Council considers that Whitchurch Village has an important role to play in meeting identified housing and infrastructure needs in a sustainable location adjacent to Bristol and existing public transport corridors. The proposed strategy seeks to balance growth with the protection of environmental assets and community identity through a comprehensive, infrastructure-led approach.

1.116 The Draft Local Plan comprises the following site allocations at Whitchurch Village:

- *North Whitchurch – Land allocated for a new secondary school*
- *East Whitchurch – A housing-led mixed-use development incorporating a local centre, primary school and supporting community infrastructure.*
- *South-West Whitchurch – A housing-led development and supporting community infrastructure. This allocation incorporates the former West Whitchurch site consulted on at Regulation 18 together with an additional area of land adjoining Bristol Whitchurch which was not previously consulted on.*

1.117 The following allocations consulted on at Regulation 18 have not been taken forward into the Draft Local Plan:

- *South East Whitchurch – Not taken forward due to the majority of the site no longer being available for development.*
- *Stockwood Lane – Not taken forward as the site is no longer available for development.*

1.118 A recurring concern relates to the potential loss of separation between Whitchurch Village and Bristol. The Council recognises the importance that

respondents attach to maintaining the distinct identity of the village. The Local Plan's strategic objectives for the Bristol to Bath Corridor also specifically seek to maintain and reinforce separation between Bristol and Whitchurch Village. The allocation strategy has therefore been designed to retain and reinforce strategic green infrastructure corridors and areas of open land between development and the Bristol urban area. In particular, the North Whitchurch allocation for a secondary school retains a substantial green gap between development and Stockwood, whilst the East and South-West Whitchurch allocations include extensive green infrastructure, landscape buffers and areas of public open space intended to maintain a clear distinction between settlements and provide strong Green Belt boundaries beyond the Plan period.

1.119 Transport concerns were among the most commonly raised issues. The Council acknowledges existing congestion on the A37 corridor and the importance of ensuring that growth is supported by sustainable transport infrastructure. The proposed allocations therefore form part of a wider corridor-based transport strategy including improvements to bus services, active travel routes, travel hubs and traffic management measures. East Whitchurch will deliver a new vehicular connection between the A37 and Stockwood Lane which is intended to improve network connectivity and reduce pressure on existing routes through the centre of the village. Development proposals will also be required to provide extensive walking, cycling and wheeling connections, improve access to National Cycle Network Route 3, support public transport improvements, contribute towards travel hubs and deliver measures to reduce reliance on private car travel.

1.120 Many respondents questioned whether infrastructure capacity is sufficient to support future growth. The Council agrees that development must be accompanied by appropriate infrastructure provision. For this reason, the Whitchurch Village strategy includes the allocation of land for a new secondary school at North Whitchurch, a new primary school and local centre at East Whitchurch, healthcare provision identified through engagement with the Integrated Care Board, community facilities, sports provision and supporting utilities infrastructure. Allocation policies require development to contribute

proportionately towards this infrastructure and include mechanisms to ensure that costs are shared fairly across development sites.

1.121 A number of consultation responses highlighted concerns regarding the impact of development on heritage assets, particularly Maes Knoll, the Wansdyke, the historic character of Whitchurch Village and nearby listed buildings. The Council recognises the significance of these assets and has carried out a Heritage Impact Assessment to support the preparation of the Local Plan. Where harm to heritage assets occur, the Council has weighed the level of harm against the public benefits of allocating the sites, as set out in the Whitchurch Village Heritage Topic Paper. Site allocations incorporate detailed policy requirements to ensure that heritage considerations inform future masterplanning and design work. The allocation policies require comprehensive Historic Environment Assessments and identify specific heritage assets whose settings must be considered. Development proposals will be expected to demonstrate how impacts have been avoided, minimised or mitigated through layout, design, green infrastructure and landscape measures.

1.122 Environmental considerations were also a key issue raised through the consultation. The Council recognises the importance of biodiversity, ecological connectivity and landscape character within and around Whitchurch Village. Allocation policies therefore require detailed ecological assessment, delivery of a minimum 20% biodiversity net gain, retention and enhancement of hedgerows and trees, habitat buffers, dark corridors, strategic green infrastructure and nature recovery measures. Significant areas of multifunctional green infrastructure and publicly accessible open space are proposed alongside development to provide recreational opportunities, strengthen ecological networks and contribute towards wider nature recovery objectives.

1.123 Some respondents questioned the scale of development proposed within the village. The Council considers that the proposed allocations provide the opportunity to deliver comprehensively planned extensions to the village capable of supporting the infrastructure that existing and future communities require. Concentrating growth within a limited number of strategic sites enables the

delivery of a new primary school, secondary school, local centre, healthcare provision, transport improvements and strategic green infrastructure that would be unlikely to come forward through smaller dispersed developments.

1.124 The Council also notes concerns regarding Green Belt release and the need to demonstrate exceptional circumstances. The proposed strategy has been informed by the Council's evidence base, including Green Belt assessment work. The Council considers that the exceptional circumstances required by national policy are provided by the need to meet identified housing and infrastructure requirements, the relative sustainability of the location, and the ability of the allocations to deliver significant public benefits including affordable housing, education facilities, transport improvements, healthcare provision, community facilities and substantial green infrastructure. Development released from the Green Belt will be required to deliver public benefits consistent with national policy.

Chapter Summary

1.125 Consultation responses relating to the Bath to Bristol Corridor demonstrated broad recognition of the important role that the corridor may play in accommodating future housing and employment growth. Respondents frequently acknowledged the relative sustainability of locations such as Keynsham, Saltford Village, Hicks Gate and Whitchurch Village, particularly in relation to their accessibility to services, employment opportunities and transport networks.

1.126 At the same time, significant concerns were raised regarding transport impacts, infrastructure capacity, Green Belt release, landscape character, biodiversity, heritage assets and the cumulative impacts of growth. The need for improvements to public transport, walking, wheeling and cycling infrastructure, together with investment in healthcare, education, utilities and wastewater infrastructure, emerged as consistent themes across responses.

1.127 Environmental considerations featured prominently throughout consultation responses. Respondents highlighted the importance of protecting settlement

identity, maintaining green gaps and open spaces, safeguarding biodiversity and ensuring that future development responds appropriately to landscape and heritage sensitivities. Questions regarding the scale, distribution and location of growth generated differing views, reflecting the balance that must be struck between meeting housing needs and protecting valued environmental and community assets.

1.128 Overall, the consultation responses emphasised the importance of ensuring that future growth is supported by robust evidence, planned alongside appropriate infrastructure and delivered in a way that contributes positively to existing communities whilst addressing identified housing and employment needs

Council Response

1.129 The Council has carefully considered the consultation responses received in relation to the Bristol to Bath Corridor. The issues raised have informed the proposed strategy and site allocations, which seek to direct growth to some of the district's most sustainable locations, including Keynsham, Saltford Village, Hicks Gate and Whitchurch Village. These locations benefit from proximity to Bath and Bristol, existing transport corridors and opportunities to deliver supporting infrastructure.

1.130 Concerns regarding transport, infrastructure capacity and the cumulative impacts of development have been addressed through an infrastructure-led strategy. The Draft Local Plan includes requirements for transport improvements, enhanced public transport, active travel connections, new education provision, healthcare facilities, local centres and strategic green infrastructure, with development expected to contribute towards the delivery of these measures.

1.131 The Council also recognises the importance of protecting settlement identity, environmental quality and heritage assets. Allocation policies therefore include measures to maintain separation between settlements, deliver biodiversity net gain, support nature recovery, provide publicly accessible green space and

ensure development responds appropriately to landscape and heritage sensitivities.

Somer Valley

Introduction

1.1 The Somer Valley is identified as a key focus for housing, employment and infrastructure investment within Bath and North East Somerset. The area includes the principal settlements of Midsomer Norton, Radstock and Westfield, together with larger villages and communities including Peasedown St John, Paulton and Farrington Gurney. Through the Local Plan Options consultation, respondents were invited to comment on a range of place-based growth options and individual site options across the Somer Valley. These options sought views on how future housing and employment needs might be accommodated whilst supporting regeneration, improving sustainability and protecting environmental and heritage assets.

1.2 This chapter summarises the comments received in relation to the Somer Valley place and site options. Responses were submitted by local residents, community organisations, businesses, developers, landowners, infrastructure providers, statutory consultees and other interested parties. Representations covered a broad range of matters including housing need, employment opportunities, transport and accessibility, community infrastructure, environmental protection, landscape character, heritage conservation and climate resilience.

1.3 A significant proportion of responses focused on the ability of existing infrastructure and services to accommodate future growth. Respondents frequently referred to traffic congestion, healthcare provision, school capacity, wastewater infrastructure and public transport connectivity. At the same time, many respondents highlighted the importance of protecting the distinctive landscape setting of Somer Valley settlements, conserving biodiversity and ensuring that future development respects local character and heritage assets. These themes were raised consistently across multiple settlements and site options.

1.4 Alongside comments from local communities, a number of statutory consultees and infrastructure providers provided detailed technical responses. Organisations including Natural England, the Environment Agency, Wessex Water, Sport England and NHS Property Services commented on matters

including biodiversity, flood risk, wastewater infrastructure, healthcare provision and community facilities. Their responses provided important evidence regarding constraints, mitigation requirements and infrastructure considerations associated with potential development options.

1.5 The purpose of this chapter is not to reproduce every representation received, but to identify and summarise the principal issues raised through the consultation. It begins with a summary of the key themes that emerged across the Somer Valley before providing a settlement-by-settlement overview of responses relating to individual places and site options. The chapter concludes with a summary of the main messages arising from consultation and the issues that respondents considered most important in shaping the future growth of the Somer Valley.

Key Themes

1.6 A number of common themes emerged across responses to the Somer Valley place and site options. Whilst views varied regarding the suitability of individual sites and the distribution of growth between settlements, many respondents raised similar issues relating to infrastructure, transport, environmental protection and the character of existing communities. These themes were evident across comments submitted by local residents, community organisations, landowners, developers, statutory consultees and infrastructure providers.

Infrastructure Capacity

1.7 Infrastructure capacity was one of the most frequently raised issues throughout the consultation. Respondents commonly questioned whether existing roads, schools, healthcare facilities, utilities and wastewater infrastructure could accommodate the scale of growth being considered across the Somer Valley. Many representations argued that infrastructure provision should be delivered alongside, or in advance of, development and that lessons should be learned from previous growth where infrastructure was perceived not to have kept pace with housing delivery.

1.8 Infrastructure providers and statutory consultees also highlighted capacity issues affecting a number of locations. In particular, Wessex Water identified

wastewater treatment and sewer network constraints in several catchments and emphasised the need for further assessment of cumulative impacts and future infrastructure requirements. NHS Property Services raised matters relating to healthcare provision and the ability of existing services to accommodate additional population growth.

Transport and Accessibility

1.9 Transport impacts featured prominently throughout the consultation responses. Respondents frequently referred to existing congestion on key routes such as the A367 and A362, as well as concerns regarding the capacity of local roads and junctions to accommodate additional traffic generated by development.

1.10 Many respondents highlighted the importance of reducing reliance on private car travel through improved public transport, walking, cycling and wheeling infrastructure. There was broad support for improving connectivity between settlements, employment areas and local services, although respondents often questioned whether current public transport provision was sufficiently frequent or reliable to support significant growth. Transport accessibility featured particularly strongly in responses relating to strategic growth locations and larger site options.

Landscape Character and Settlement Identity

1.11 Landscape character was a recurring theme across the Somer Valley. Respondents frequently referred to the importance of hillsides, valleys, open countryside and green gaps in defining the character and setting of individual settlements. Concerns were often expressed regarding the visual impact of development on prominent sites and the potential erosion of settlement identity through incremental expansion.

1.12 Many representations emphasised that development should respect local character, respond to landscape constraints and avoid disproportionate growth that would fundamentally alter the character of existing communities. Particular concern was expressed regarding sites located on elevated land, within prominent landscapes or forming part of the setting of settlements.

Biodiversity and the Natural Environment

1.13 Protection of biodiversity and the natural environment was another significant theme. Respondents highlighted the importance of woodlands, hedgerows, watercourses, wildlife habitats and ecological networks across the Somer Valley. Many representations sought stronger protection for environmental assets and greater emphasis on habitat creation, ecological enhancement and green infrastructure.

1.14 Natural England raised matters relating to habitat connectivity, protected species and the importance of maintaining ecological networks. Respondents also highlighted the need to ensure development takes account of designated environmental sites, protected habitats and opportunities for nature recovery.

Heritage and Historic Environment

1.15 Heritage considerations featured regularly within consultation responses. Respondents referred to conservation areas, listed buildings, archaeological remains and historic landscapes across a number of settlements and site options. Concerns were raised regarding the potential impact of development on the setting and significance of heritage assets, particularly where sites occupy visually sensitive locations or form part of the historic setting of settlements.

1.16 Many respondents emphasised the importance of ensuring that new development reflects local distinctiveness and conserves those historic features that contribute to the character and identity of Somer Valley communities. Archaeological potential was also highlighted for a number of sites.

Scale and Distribution of Growth

1.17 A recurring strategic issue concerned the amount and distribution of growth across the Somer Valley. Whilst many respondents accepted that the area would need to accommodate additional housing and employment development, views differed regarding where that growth should be located and the scale of development individual settlements should accommodate.

1.18 Some respondents favoured concentrating growth in larger settlements such as Midsomer Norton and Radstock, where a wider range of services and

facilities already exist. Others argued for a more dispersed approach or questioned whether some of the larger growth options would be appropriate. Concerns regarding cumulative impacts, infrastructure provision and settlement character often influenced views on the preferred distribution of growth.

Regeneration, Housing and Employment Opportunities

1.19 Alongside concerns regarding infrastructure and environmental impacts, many respondents also recognised the opportunities associated with investment and growth. Representations highlighted the potential benefits of delivering new housing, including affordable housing, supporting local employment opportunities and strengthening the role of the Somer Valley as a place to live and work.

1.20 Particular support was expressed for proposals that could contribute towards economic growth, regeneration, improved public transport and enhanced community facilities. However, respondents frequently emphasised that such benefits should be balanced against environmental constraints and supported by appropriate infrastructure and mitigation measures.

Council Response

1.21 Infrastructure capacity –Site allocations include specific provision for the expansion of education facilities and financial contributions to early years and SEND places. Healthcare facilities will be improved through the provision of financial contributions and wastewater provision will be managed by Wessex water.

1.22 Transport and accessibility - Transport mitigation measures are proposed in the Somer Valley including improvements to public transport and access to active travel. This is intended to reduce the reliance on the private car. Alongside the A362, A367 and A37 a network of travel hubs will improve access to public transport and active travel. The frequency of public transport will increase.

1.23 Landscape character – The council acknowledges the importance of the surrounding landscape to the identity of the Somer Valley. All site allocations include landscape mitigation and green infrastructure requirements. In particular to screen development within hill tops.

1.24 Biodiversity and the Natural Environment – Wildlife buffers have been included within site allocations to protect existing wildlife sites such as SNCIs and SSSIs. Green infrastructure has been included within all site allocations to improve biodiversity, improve ecological netowrks and all site allocations are subject to biodiversity net gain.

1.25 Heritage – All site allocations include landscape mitigation to existing heritage assets such as SAMs. Heritage assessments are required on site allocations close to heritage assets. Archaeological assessments are required in areas of potential archaeology.

1.26 Scale and Distribution of Growth – Growth has been concentrated adjacent to settlements. Transport access will be improved to allow access to the local centres and improve the sustainability of the settlements.

1.27 Regeneration, housing and employment opportunities – All site allocations will require 30% affordable housing. Additional employment sites are proposed at Peasedown and Westfield.

Places and Site Options

1.28 This section summarises responses received in relation to the individual place and site options consulted upon across the Somer Valley. The summaries identify the principal issues raised by respondents and do not seek to reproduce every representation received.

Peasedown

Settlement Overview

1.29 Responses relating to Peasedown St John focused on the settlement's role within the wider Somer Valley and the extent to which additional development could be accommodated by existing infrastructure. Across the site options, respondents frequently raised concerns regarding highway capacity, healthcare provision, school places, utilities and wastewater infrastructure. Traffic congestion on routes connecting Peasedown St John with Bath, Radstock and Midsomer Norton was a recurring theme, alongside calls for improvements to public transport, walking and cycling connections.

1.30 Many respondents also emphasised the importance of protecting the surrounding landscape, biodiversity and rural setting of the village. Whilst some representations recognised opportunities to deliver additional housing and employment development close to existing services and facilities, others questioned whether infrastructure improvements had kept pace with previous development and expressed concern regarding the cumulative impacts of further growth.

South Peasedown

1.31 Responses relating to South Peasedown focused primarily on the scale of development proposed and its relationship to the existing settlement. Some respondents considered that the site represented a logical extension to the village and highlighted opportunities to improve active travel links and public transport connections between new development and existing facilities.

1.32 Concerns were raised regarding traffic generation and highway capacity, particularly on the A367 corridor and surrounding road network. Respondents also highlighted potential impacts on landscape character, biodiversity and nearby environmental assets, including ancient woodland and established hedgerows. Several representations emphasised the need to retain landscape buffers and ensure that development responds appropriately to the site's edge-of-settlement location.

1.33 Wessex Water highlighted wastewater infrastructure constraints affecting the area and advised that further assessment would be required to understand servicing arrangements and longer-term capacity requirements. Environmental considerations were also raised by consultees, who emphasised the importance of habitat protection and appropriate mitigation.

Bath Business Park

1.34 Responses relating to Bath Business Park focused principally on its potential contribution to employment growth within the Somer Valley. Some respondents supported expansion of employment uses adjacent to the existing business park and recognised the economic benefits associated with additional industrial and commercial floorspace.

1.35 Other respondents raised concerns regarding visual impacts and the effect of further development on the surrounding landscape. Particular attention was drawn to the prominence of existing development and the need for substantial landscaping, screening and environmental mitigation. Traffic impacts, accessibility and supporting infrastructure were also recurring themes. Several representations also referred to Green Belt considerations.

Lower Peasedown

1.36 Comments regarding Lower Peasedown focused on the site's relationship with the existing settlement and its potential to provide a relatively modest level of housing growth. Some respondents considered that development could contribute towards local housing needs whilst improving pedestrian connections and accessibility.

1.37 Concerns centred on landscape impacts and the effect of development on local character. Representations also referred to heritage considerations, particularly the setting of a nearby Grade II listed church, and highlighted the need for any future development to be sympathetic to the historic and visual character of the area. Wessex Water also identified infrastructure constraints affecting the wastewater network.

North Peasedown

1.38 North Peasedown attracted fewer comments than some of the larger Peasedown options, although many of the themes raised elsewhere remained relevant. Respondents referred to landscape impacts, Green Belt considerations and the need to protect the character of the northern edge of the settlement.

1.39 Environmental considerations featured prominently within responses. Natural England highlighted the importance of maintaining ecological connectivity, protecting habitats and incorporating biodiversity enhancements within new development. Wessex Water also raised matters relating to wastewater capacity and connection arrangements. Some respondents referred to archaeological interests requiring further investigation.

Council Response

1.40 The Council has carefully considered the consultation responses relating to Peasedown. The issues raised have informed the refinement of the spatial strategy and site allocation policies for the area.

1.41 Transport mitigation including active travel and better access to public transport would mitigate against the impact of new homes. Financial contributions will be sought to improve healthcare and education. All allocations include extensive landscape mitigation.

1.42 At South Peasedown the transport modelling requires the provision of travel hubs with parking to improve access to public transport. The proposals also include upgrades to active travel including new footway crossings on the A367. The policy requirements for South Peasedown include extensive planting and green infrastructure to protect the landscape and improve biodiversity. New landscape buffers are required along the ridge line. Landscape buffers will also protect existing habitats such as ancient woodland. Waste water infrastructure upgrades will be investigated by Wessex Water.

1.43 At Bath Business Park the increase in economic floorspace will contribute to employment growth. Landscape buffers will mitigate the impact of any development within the landscape in particular the view of the ridgeline. Transport modelling requires the provision of travel hubs with parking to improve access to public transport. The proposals also include upgrades to active travel including new footway crossings on the A367.

1.44 At Lower Peasedown landscape mitigation will mitigate against the visual impact of development within the surrounding landscape and the adjacent Grade II listed church. Waste water infrastructure upgrades will be investigated by Wessex Water.

1.45 The land at North Peasedown is not available for development so is not being considered as an option for development.

Radstock

Settlement Overview

1.46 Responses relating to Radstock generally recognised the town's role as a focus for regeneration, housing delivery and economic growth within the Somer Valley. However, concerns were also raised regarding transport congestion, healthcare provision, education capacity, wastewater infrastructure and the cumulative effects of growth across the wider Radstock and Midsomer Norton area. Respondents frequently highlighted the importance of protecting the town's landscape setting and preserving its distinctive character.

North Radstock

1.47 North Radstock generated significant discussion regarding landscape, infrastructure and heritage issues. Many respondents highlighted the site's elevated position and the contribution that surrounding hillsides make to the setting and appearance of Radstock. Heritage considerations and the presence of nearby historic assets were also identified as important issues.

1.48 Infrastructure capacity was another recurring theme. Wessex Water and the Environment Agency raised matters relating to wastewater infrastructure, drainage and cumulative growth impacts, whilst Sport England highlighted concerns relating to sports and recreation provision.

Writhlington

1.49 Writhlington attracted a broad range of comments reflecting both the scale of the option and its strategic nature. Transport and accessibility were recurring themes, with respondents highlighting existing congestion and raising concerns regarding the capacity of local roads and junctions to accommodate significant growth. The site's relationship with neighbouring Somerset was also frequently raised.

1.50 NHS Property Services highlighted healthcare infrastructure considerations, whilst Wessex Water identified wastewater infrastructure as a key issue requiring further assessment. Many respondents considered that substantial infrastructure improvements would be required to support development at the scale proposed.

Haydon

1.51 Responses relating to Haydon focused primarily on environmental, landscape and heritage considerations. Respondents highlighted the site's proximity to designated environmental assets and raised concerns regarding potential impacts on biodiversity, geological interests and landscape character. Several representations also referred to the site's relationship with the conservation area and nearby listed buildings.

Council Response

1.52 The Council has carefully considered the consultation responses relating to Radstock. The issues raised have informed the refinement of the spatial strategy and site allocation policies for the area.

1.53 Transport mitigation including active travel and better access to public transport would mitigate against the impact of new homes. Financial contributions will be sought to improve healthcare and education. All allocations include extensive landscape mitigation.

1.54 The proposed allocation at North Radstock occupies an elevated position and therefore extensive landscape planting is required to mitigate the impact on the ridgeline. Development will not occur within the heritage asset boundaries and planting will provide screening. A travel hub will improve access to public transport. The existing sports ground will be retained. Wastewater infrastructure will be managed by Wessex Water. Land will be safeguarded to allow for the expansion of the existing primary school.

1.55 At Writhlington active travel improvements and more frequent bus services will reduce the need to rely on a private car. Development will facilitate new road junctions and relieve pressure from the existing five way junction. The council will work with Somerset Council under the Duty to Cooperate. Financial contributions will be sought through planning applications to provide for healthcare improvements and the local centre improved.

1.56 At Haydon landscape mitigation will be required to screen the development from the surrounding hillsides. Landscape mitigation will also provide an environmental buffer to the adjacent SSSI.

Westfield

Settlement Overview

1.57 Responses relating to Westfield focused largely on the relationship between housing growth, employment provision and regeneration. Many respondents recognised Westfield's role as an important employment location within the Somer Valley and highlighted the need to retain and strengthen local job opportunities. The balance between residential and employment development was a recurring theme.

Westfield Industrial Estate East

1.58 Representations relating to Westfield Industrial Estate East highlighted differing views regarding the most appropriate future use of the site. Some respondents supported employment uses whilst others favoured residential or mixed-use development. Environmental and infrastructure issues featured prominently. Natural England, the Environment Agency and Wessex Water raised matters relating to biodiversity, flood risk, drainage and wastewater capacity.

Council Response

1.59 The Council has carefully considered the consultation responses relating to Westfield. The issues raised have informed the refinement of the spatial strategy and site allocation policies for the area.

1.60 The proposed development site at Westfield has been proposed to employment uses to meet the employment needs of the surrounding district. It sits adjacent to an existing industrial estate, therefore provides an opportunity to extend the existing industrial estate. The proposal includes landscape and wildlife buffers to protect the existing biodiversity. Development will not occur within the floodplain. Wastewater infrastructure will be managed by Wessex Water.

Midsomer Norton

Settlement Overview

1.61 Responses relating to Midsomer Norton generally recognised the town's role as one of the principal service centres within the Somer Valley and acknowledged that it is likely to accommodate a significant proportion of future growth. At the same time, respondents raised concerns regarding the cumulative effects of development on transport networks, healthcare services, education provision and wastewater infrastructure. The protection of landscape character, biodiversity and the setting of the town were also recurring themes.

Land to the North of Midsomer Norton

1.62 This site generated extensive comment. Many respondents highlighted the importance of the surrounding hillsides to the character and setting of Midsomer Norton and expressed concern that development could adversely affect the town's landscape setting. Transport and infrastructure issues also featured prominently.

1.63 Environmental considerations featured strongly within responses. Natural England highlighted the importance of protecting ecological networks and habitat connectivity, whilst Wessex Water identified the need for further assessment of drainage and wastewater infrastructure.

Thicket Mead A and B

1.64 Responses relating to Thicket Mead A and B focused on the site's relationship with existing development and its potential to accommodate modest levels of growth. Concerns centred on landscape impacts, ecological interests and the fragmented nature of land ownership across the site. Natural England, the Environment Agency and Wessex Water also raised matters relating to biodiversity, flood risk and existing infrastructure constraints.

Midsomer Norton South

1.65 Many respondents viewed Midsomer Norton South as a comparatively small-scale option capable of contributing towards local housing needs. Concerns

focused on accessibility, public transport provision and environmental considerations. Natural England, the Environment Agency and Wessex Water each highlighted matters requiring further assessment, including biodiversity, flood risk and wastewater infrastructure.

Council Response

1.66 The Council has carefully considered the consultation responses relating to Midsomer Norton. The issues raised have informed the refinement of the spatial strategy and site allocation policies for the area.

1.67 Transport mitigation including active travel and better access to public transport would mitigate against the impact of new homes. Financial contributions will be sought to improve healthcare and education. All allocations include extensive landscape mitigation.

1.68 The proposed option at Midsomer Norton North will not be considered as an option. The existing access to the site would not be able to accommodate additional traffic from new homes and its is unviable to make improvements to the access.

1.69 The proposed allocation at Thicket Mead includes landscape and ecological buffers to mitigate the impact of development to the surrounding landscape. Green Infrastructure will enhance the ecological network. Development will not be located close to Wellow Brook and has been kept away from the floodplain. The site will be connected to the active travel network.

1.70 The land at Midsomer Norton South is located on a public transport route and will connect into the existing active travel network. Landscape and ecological buffers are required to mitigate the impact on the surrounding landscape and improve biodiversity. Development will not be located within the floodplain of the River Somer.

Paulton

Settlement Overview

1.71 Responses relating to Paulton frequently focused on infrastructure capacity, traffic congestion and village character. Many respondents questioned whether local roads, schools, healthcare facilities and utilities could accommodate

additional development without significant investment. At the same time, respondents recognised the need to meet housing requirements and deliver affordable housing.

Farrington Road South and North

1.72 Comments regarding Farrington Road South and North focused largely on highway considerations, connectivity and landscape impacts. Respondents expressed concern regarding development that would appear disconnected from the existing settlement and highlighted the importance of achieving strong pedestrian connections. Archaeological potential and historic landscape character were also frequently raised.

Paulton East

1.73 Paulton East attracted considerable discussion regarding environmental, heritage and ground conditions issues. Respondents highlighted biodiversity interests, wildlife habitats and the importance of protecting green space. A number of representations referred to former colliery activity and raised concerns regarding contamination, land stability and mining legacy issues. Heritage considerations were also frequently referenced.

Council Response

1.74 The Council has carefully considered the consultation responses relating to Paulton. The issues raised have informed the refinement of the spatial strategy and site allocation policies for the area.

1.75 Transport mitigation including active travel and better access to public transport would mitigate against the impact of new homes. Financial contributions will be sought to improve healthcare and education. All allocations include extensive landscape mitigation.

1.76 Through the consultation process two additional sites at Paulton South and Paulton Mendip Close have been promoted and this is included in the draft document as a site allocation.

1.77 The proposed developments at Farrington Road require the provision of additional pedestrian access to the village centre, alongside financial

contributions to sustainable transport measures. Both sites include landscape requirements which will mitigate the impact of the development on the surrounding landscape.

1.78 Proposed development at Paulton East will not be considered as an option for development as the land is not available.

Farrington Gurney

Settlement Overview

1.79 Responses relating to Farrington Gurney focused heavily on the scale of development proposed relative to the size of the village. Respondents questioned whether substantial growth could be accommodated sustainably and raised concerns regarding infrastructure capacity, transport accessibility and impacts on village character. Healthcare provision, education capacity and public transport were recurring themes.

Farrington Gurney (south)

1.80 Representations relating to Farrington Gurney (south) reflected contrasting views regarding the development options presented through the consultation. Some respondents supported the delivery of additional housing, whilst others expressed concern that large-scale development would significantly alter the character of the village and place additional pressure on infrastructure and services. Wessex Water also raised infrastructure-related matters associated with the option.

Council Response

1.81 The Council has carefully considered the consultation responses relating to Farrington Gurney. The issues raised have informed the refinement of the spatial strategy and site allocation policies for the area.

1.82 The proposed allocation will more than double the size of the village. Transport mitigation including active travel and better access to public transport would mitigate against the impact of new homes. This will include the provision of a new travel hub. The quantum of development will require the provision of a

new primary school. Financial contributions will be sought to improve healthcare and education. The allocation will include extensive landscape mitigation.

Chapter Summary

1.83 Consultation responses relating to the Somer Valley generally recognised the area's important role in accommodating future housing, employment and infrastructure growth. Many respondents acknowledged the benefits of directing development towards the principal settlements of Midsomer Norton, Radstock and Westfield, whilst also recognising opportunities for more limited growth within other settlements across the Somer Valley. Respondents frequently referred to the need to balance growth with the protection of environmental assets, community identity and quality of life.

1.84 A consistent theme throughout consultation responses was the importance of infrastructure provision. Respondents regularly questioned whether existing transport networks, healthcare services, schools, utilities and wastewater infrastructure could accommodate the level of growth being considered. Concerns regarding congestion, public transport provision, school capacity and healthcare services were raised across multiple settlements, often accompanied by calls for infrastructure improvements to be delivered alongside development. Infrastructure providers, including Wessex Water and NHS Property Services, also highlighted capacity constraints and the need for further assessment in a number of locations.

1.85 Transport and accessibility issues featured prominently across the chapter. Respondents frequently referred to existing congestion on key routes and highlighted the importance of improving public transport, walking and cycling connections to support more sustainable patterns of development. Many representations emphasised that future growth should be planned in a way that reduces reliance on private vehicles and improves connections between homes, employment areas, services and facilities.

1.86 Environmental considerations were also a recurring theme throughout responses. Respondents consistently highlighted the importance of protecting landscape character, biodiversity and the distinctive identity of Somer Valley settlements. Consultees including Natural England and the Environment Agency

highlighted the need to protect ecological assets, manage flood risk and ensure development is supported by appropriate mitigation and environmental enhancement measures.

1.87 Heritage considerations also informed consultation responses across a number of settlements and site options. Respondents drew attention to conservation areas, listed buildings, archaeological interests and historic landscapes, emphasising the importance of ensuring that future development conserves local distinctiveness and respects the historic environment.

1.88 Views differed regarding the most appropriate scale and distribution of growth across the Somer Valley. Whilst many respondents accepted that additional housing and employment development would be required, opinions varied on which settlements and sites were most suitable for accommodating future growth. Concerns regarding cumulative impacts frequently influenced these views, particularly where respondents considered that existing infrastructure and services were already under pressure.

1.89 Despite differing opinions on individual sites, a number of common messages emerged consistently throughout the consultation. Respondents generally supported investment in homes, jobs and community facilities where this would contribute positively to the long-term vitality of the Somer Valley. However, there was strong emphasis on ensuring that growth is accompanied by appropriate infrastructure, responds to local character, protects biodiversity and heritage assets, and delivers sustainable, well-connected communities. These themes will help inform the Council's consideration of site options and growth strategies in preparing the Draft Local Plan.

Council Response

1.90 Site allocations include specific provision for the expansion of education facilities and financial contributions to early years and SEND places. Healthcare facilities will be improved through the provision of financial contributions and wastewater provision will be managed by Wessex water.

1.91 Transport mitigation measures are proposed in the Somer Valley including improvements to public transport and access to active travel. This is intended to reduce the reliance on the private car. Alongside the A362, A367 and A37 a

network of travel hubs will improve access to public transport and active travel. The frequency of public transport will increase.

1.92 The council acknowledges the importance of the surrounding landscape to the identity of the Somer Valley. All site allocations include landscape mitigation and green infrastructure requirements. In particular to screen development within hill tops. Wildlife buffers have been included within site allocations to protect existing wildlife sites such as SNCIs and SSSIs. Green infrastructure has been included within all site allocations to improve biodiversity and all site allocations are subject to biodiversity net gain.

1.93 All site allocations include landscape mitigation to existing heritage assets such as SAMs. Heritage assessments are required on site allocations close to heritage assets. Archaeological assessments are required in areas of potential archaeology.

1.94 Growth has been concentrated adjacent to settlements. Transport access will be improved to allow access to the local centres and improve the sustainability of the settlements.

1.95 All site allocations will require 30% affordable housing. Additional employment sites are proposed at Peasedown and Westfield.

Rural Areas

Introduction

1.1 This chapter summarises responses received in relation to the Rural Areas Strategy and associated site options consulted upon as part of the Local Plan Options consultation. The consultation sought views on the role that villages and rural communities should play in accommodating future growth, alongside a range of place-based and site-specific options across the district's rural areas. These included opportunities for proportionate growth in villages, affordable housing provision, the potential review of Green Belt boundaries in some locations and the identification of sites capable of supporting local needs whilst maintaining the distinctive character of rural communities.

1.2 Responses were received from local residents, parish councils, neighbourhood planning groups, statutory consultees, landowners, developers and other stakeholders. Comments addressed both the principle of growth in rural communities and the suitability of individual sites. Whilst views varied between settlements, a number of recurring issues emerged relating to housing affordability, village sustainability, landscape protection, infrastructure capacity, transport connectivity and the long-term future of rural communities.

1.3 Many respondents recognised the challenges facing rural settlements, including the affordability of housing, changing demographics, the retention of younger households and the need to support local services and facilities. At the same time, respondents frequently highlighted the importance of protecting village character, valued landscapes, biodiversity, heritage assets and the wider countryside. Across a number of settlements there was support for ensuring that any future growth remains proportionate to the size, role and function of each village and reflects locally identified priorities, including those set out in adopted neighbourhood plans.

1.4 The summaries that follow identify the principal issues raised in relation to each settlement and site option. They provide an overview of the key matters raised through the consultation and do not seek to reproduce every individual representation received.

Key Themes

Housing Needs and Affordability

1.5 Housing need and affordability emerged as one of the most frequently raised themes across the rural areas consultation. Many respondents highlighted challenges faced by younger households, families and those with existing local connections who wish to remain within rural communities but are unable to access suitable housing. There was broad support for the provision of affordable housing where it would help meet identified local needs, sustain village populations and support the long-term viability of local services. Responses frequently emphasised the importance of delivering an appropriate mix of homes, including affordable housing, smaller homes and accommodation suited to changing demographic needs.

1.6 Views differed regarding the scale of growth that individual villages should accommodate. Whilst some respondents considered additional housing necessary to support local services and contribute towards wider housing requirements, others argued that growth should remain limited and carefully managed to protect village character and avoid placing additional pressure on infrastructure.

Proportionate Growth and Village Sustainability

1.7 Many responses focused on the principle of proportionate growth and the role of villages in accommodating future development. Respondents generally supported locating growth in settlements with an established range of services, facilities and community infrastructure, whilst recognising that villages differ in terms of their size, accessibility and capacity to accommodate development. Settlements such as Timsbury, Temple Cloud, Bishop Sutton, Chew Magna and Chew Stoke were often discussed in terms of their ability to support modest levels of additional development alongside existing facilities.

1.8 Parish councils and local communities frequently emphasised the importance of aligning future growth with adopted neighbourhood plans and community aspirations. Responses highlighted the need for development to reflect local circumstances rather than applying a uniform approach across all rural settlements.

Landscape, Green Belt and Rural Character

1.9 Protection of landscape character, village identity and the wider countryside emerged as one of the most significant and recurring themes. Respondents frequently emphasised the importance of ensuring that development respects the distinctive character of rural settlements, protects important views and avoids the erosion of settlement identity. Concerns were commonly raised regarding the potential for development to alter the setting of villages, increase urbanisation and affect the relationship between settlements and the surrounding landscape.

1.10 Green Belt issues featured prominently in many responses, particularly in settlements such as Chew Magna, Chew Stoke, Farmborough and villages located within the Bath urban fringe. Comments referred to recent changes to national Green Belt policy, including the concept of grey belt, and the need to balance development requirements with the purposes of the Green Belt. Cotswolds National Landscape highlighted the importance of conserving and enhancing natural beauty and ensuring that development proposals fully consider impacts on the National Landscape and its setting.

Heritage and Historic Environment

1.11 Many responses highlighted the contribution that heritage assets and historic landscapes make to the character and identity of rural communities. Respondents emphasised the importance of protecting conservation areas, listed buildings, archaeological remains, historic field patterns and valued village settings when considering future growth options. In several settlements, heritage considerations were closely linked to landscape character and views.

1.12 Historic England comments highlighted the need to understand and appropriately manage potential impacts on the significance and setting of heritage assets, particularly where growth could affect historic settlement form, important views or designated heritage assets.

Infrastructure, Services and Community Facilities

1.13 Many respondents expressed concern regarding the ability of existing infrastructure and services to accommodate additional development. Commonly

raised issues included school capacity, healthcare provision, drainage and wastewater infrastructure, community facilities, recreational provision and local service capacity. Respondents frequently emphasised that growth should be supported by timely infrastructure improvements and should not exceed the capacity of existing services.

1.14 At the same time, some respondents argued that carefully planned growth could help sustain schools, shops, community facilities, local businesses and other services that are important to the long-term viability of rural communities. Wessex Water highlighted the importance of ensuring that wastewater infrastructure and treatment capacity are capable of supporting future development and growth across the district.

Transport and Accessibility

1.15 Transport and accessibility were recurring themes in many representations. Respondents referred to existing traffic congestion, road safety concerns, parking pressures, limited public transport provision and the challenges of reducing reliance on private cars in rural locations. Particular concerns were raised regarding the availability, frequency and long-term viability of rural bus services, reflecting the importance of public transport in supporting sustainable communities.

1.16 Many respondents supported improvements to walking, cycling and wheeling routes, particularly where these could improve access to schools, community facilities, local centres and public transport services. Comments also highlighted the importance of ensuring that development is accompanied by transport improvements that encourage more sustainable travel choices.

Biodiversity, Agricultural Land and Environmental Protection

1.17 Environmental considerations featured prominently throughout the consultation. Responses highlighted the importance of protecting and enhancing biodiversity, safeguarding habitats and ecological networks and supporting opportunities for nature recovery. Many respondents emphasised the need for development to incorporate green infrastructure and biodiversity enhancements whilst avoiding harm to environmentally sensitive locations.

1.18 The protection of Best and Most Versatile agricultural land was also a recurring issue, particularly in the Chew Valley and other areas where development options affect high-quality farmland. Natural England comments emphasised the importance of considering impacts on agricultural land, biodiversity resources and environmental designations when planning for future growth. Responses also referred to climate resilience, water management and the wider environmental implications of development in rural areas.

Community Identity and Local Decision-Making

1.19 A strong theme throughout the consultation was the importance of community identity and local involvement in shaping future growth. Parish councils, neighbourhood planning groups and local residents frequently referred to neighbourhood plans, village design guidance and locally developed visions for future development. Respondents often emphasised the importance of ensuring that future growth reflects local character, community priorities and a clear understanding of village context.

1.20 There was broad support for approaches that combine strategic planning with local decision-making, including neighbourhood planning, community-led initiatives and site selection processes informed by local knowledge. Responses sought clarity regarding how local views and existing community planning frameworks would influence future site allocation decisions and the preparation of the Draft Local Plan.

Council Response

1.21 The consultation responses demonstrated broad support for addressing housing affordability and supporting the long-term sustainability of rural communities, whilst highlighting concerns regarding landscape character, biodiversity, heritage assets, Green Belt, infrastructure capacity and transport. Respondents also emphasised the importance of ensuring that growth remains proportionate to the role and character of individual settlements and reflects local priorities.

1.22

1.23 In response, the Regulation 19 Local Plan has refined the Rural Place Strategy and site allocations through further assessment of settlement capacity, infrastructure requirements and environmental constraints. The Plan seeks to direct growth towards the most sustainable rural locations, whilst strengthening requirements relating to affordable housing, green infrastructure, biodiversity enhancement, infrastructure provision, sustainable transport and high-quality design. The strategy also continues to support neighbourhood planning and other locally-led approaches to meeting local needs.

Places and Site Options

1.24 This section summarises responses received in relation to the individual place and site options consulted upon across the Rural Area. The summaries identify the principal issues raised by respondents and do not seek to reproduce every representation received.

Bathford and Batheaston

Settlement Overview

1.25 Bathford and Batheaston generated a significant volume of responses reflecting their location on the eastern edge of Bath, the range of development options presented and the environmental sensitivities affecting the area. Responses were received from local residents, parish councils, statutory consultees, landowners, developers and other stakeholders. Comments focused on the principle and scale of growth, the suitability of individual sites, Green Belt considerations, impacts on the landscape setting of the settlements, transport and infrastructure capacity, biodiversity impacts and the relationship of the villages to Bath.

1.26 Many respondents recognised the need to address housing needs, including the provision of affordable housing, but views differed regarding the extent to which additional development should be accommodated within or adjacent to the settlements. Concerns were frequently raised regarding the cumulative impacts of development on local roads, schools, healthcare provision and community infrastructure, as well as impacts on landscape character and the setting of

heritage assets. Other responses highlighted the relative sustainability of the area, its accessibility to Bath and the potential to support local housing needs in a well-connected location. Cotswolds National Landscape highlighted the importance of considering impacts on the National Landscape and its setting, whilst Historic England highlighted the need to consider effects on heritage assets and the wider setting of the Bath World Heritage Site.

Bathford Nurseries North

1.27 Responses to Bathford Nurseries North focused on the site's relationship to the existing settlement, the principle of development in this location and the balance between meeting housing needs and protecting the surrounding landscape. Some respondents considered the site to represent a logical extension to the existing built form and highlighted its proximity to local services, public transport and the wider Bath urban area. Supportive comments often referred to opportunities to deliver housing, including affordable housing, in a relatively sustainable location.

1.28 Other respondents raised concerns regarding impacts on the rural setting of the village, loss of open land and the cumulative effects of development within the wider Bathford and Batheaston area. Landscape, infrastructure and transport impacts were recurring issues, with respondents highlighting the need to ensure that any development is accompanied by appropriate mitigation and improvements to local infrastructure. Cotswolds National Landscape highlighted the importance of assessing impacts on the National Landscape and its setting, while Historic England commented on the need to consider the historic environment and the contribution of the surrounding landscape to the setting of heritage assets. Infrastructure consultees highlighted the need to ensure appropriate provision for drainage, wastewater and transport infrastructure.

Bathford Nurseries South

1.29 Responses relating to Bathford Nurseries South focused on the sustainability of the location, the site's relationship to the existing settlement and the potential implications of development for landscape character and local infrastructure. Some respondents considered that the site could contribute towards meeting

local housing needs whilst maintaining reasonable accessibility to services and public transport.

1.30 Concerns were raised regarding the potential impact of development on the settlement edge, landscape character and the transition between the villages and surrounding countryside. Respondents also referred to transport impacts, infrastructure capacity and the cumulative impact of development when considered alongside other growth options within the area. Biodiversity and green infrastructure were also recurring issues. Cotswolds National Landscape highlighted the need for careful assessment of landscape impacts, including effects on the setting of the National Landscape and views from surrounding elevated land. Infrastructure consultees emphasised the importance of understanding the capacity of local services, drainage infrastructure and transport networks before any allocation is taken forward.

Box Road

1.31 Box Road generated extensive comment owing to its prominent location and relationship with the wider landscape setting of Bathford and Batheaston. Many respondents considered that the site makes an important contribution to the character of the area and raised concerns regarding landscape and visual impacts, the visibility of development and the effect on the setting of the villages. Responses frequently referred to the importance of maintaining settlement character, protecting key views and safeguarding the landscape setting of the eastern edge of Bath.

1.32 Transport and highway concerns also featured prominently, with respondents referring to existing congestion, road safety and the cumulative impact of development on the local highway network. Other comments related to infrastructure capacity, biodiversity, drainage, public transport accessibility and the ability of local services to accommodate growth. Supportive representations referred to the site's relationship with the existing settlement and its potential contribution towards housing delivery, including affordable housing provision. Cotswolds National Landscape highlighted the sensitivity of the landscape setting and the need to consider impacts on natural beauty and the setting of the National Landscape. Historic England raised issues relating to the historic

environment, including the contribution of the surrounding landscape to the setting of heritage assets and the Bath World Heritage Site. Infrastructure consultees highlighted the importance of understanding the implications of development for local transport, drainage and utility infrastructure, together with identifying appropriate mitigation where necessary.

Ashley Road

1.33 Responses relating to Ashley Road focused on its relationship with the existing settlement pattern, potential impacts on residential amenity and the ability of the site to accommodate development in a manner consistent with local character. Several respondents considered that the site's location adjacent to existing development could present opportunities for sustainable growth, particularly where development contributes towards identified housing needs.

1.34 Concerns centred on traffic generation, highway safety, infrastructure capacity and the ability of local roads to accommodate additional development. Respondents also raised issues relating to biodiversity, drainage and landscape impacts, whilst emphasising the need for any development to integrate successfully with surrounding development and maintain the distinct character of the area. Technical consultees highlighted the need to assess access arrangements, transport impacts, drainage and infrastructure requirements, while environmental consultees emphasised the importance of considering biodiversity interests and environmental constraints as part of any future development proposals.

Titan Drive

1.35 Responses relating to Titan Drive focused on the site's relationship with the existing built-up area and its potential contribution towards local housing needs. Some respondents considered that the site could represent a sustainable location for development given its proximity to existing services and development.

1.36 Concerns focused on access arrangements, highway impacts and infrastructure capacity. One respondent highlighted uncertainty regarding access rights to the site and noted that the access route is an unadopted highway. Other

comments referred to the need to ensure that any development can be accommodated without adverse impacts on neighbouring uses or the local highway network. Technical consultees highlighted the need to assess access, transport and infrastructure requirements as part of any future consideration of the site

Council Response

1.37 Consultation responses highlighted differing views regarding the scale and location of growth, with concerns focusing on landscape, heritage, transport and infrastructure impacts alongside recognition of the area's relative sustainability and relationship with Bath.

1.38 In response, the Regulation 19 Plan proposes a limited number of carefully selected allocations capable of contributing towards housing and employment needs whilst respecting the character and environmental sensitivities of the area. The allocation strategy has been refined through further evidence gathering and includes strengthened requirements relating to landscape protection, biodiversity, sustainable transport, drainage, infrastructure provision and design quality.

Bishop Sutton

Settlement Overview

1.39 Bishop Sutton generated a wide range of responses concerning the role of the village in accommodating future growth and the suitability of land to the west of the settlement for development. Responses were received from local residents, the parish and neighbourhood planning community, statutory consultees, landowners and developers. Comments focused on the scale of proposed growth, alignment with the Stowey Sutton Neighbourhood Plan, landscape impacts, agricultural land, local infrastructure and the capacity of the village to accommodate additional housing whilst retaining its distinct character.

1.40 Many respondents acknowledged the need for affordable housing and modest growth to help support local services and facilities. However, views differed regarding the extent of development that would be appropriate within the village. Concerns were frequently raised regarding landscape impacts, the rural setting

of the settlement and the cumulative effect of development on local roads and infrastructure. A recurring theme was the importance of ensuring that future growth reflects the vision and objectives of the adopted neighbourhood plan and responds positively to the character of the village and surrounding Chew Valley landscape.

Bishop Sutton West

1.41 Responses relating to Bishop Sutton West focused on the principle of growth on the western edge of the village and the suitability of the site in relation to the existing settlement. Some respondents considered that the location could accommodate a modest level of growth due to its relationship with the existing built form and proximity to village services and facilities. Supportive comments frequently referred to opportunities to deliver affordable housing and help maintain the long-term sustainability of the village.

1.42 Many responses raised concerns regarding the scale of growth proposed and the potential effects on the rural character and landscape setting of the village. Particular concerns were raised regarding the proximity of the site to the Mendip Hills National Landscape, with respondents emphasising the importance of protecting views, landscape character and the distinctive setting of the Chew Valley. Whilst some respondents considered that smaller-scale growth on the edge of the village could be accommodated, larger-scale development was generally considered less appropriate due to landscape constraints and the potential impact on village character.

1.43 The quality of agricultural land was also a recurring issue, with concerns raised about the potential loss of Best and Most Versatile agricultural land. Respondents highlighted the importance of balancing housing delivery with the protection of productive farmland and the wider rural environment. Traffic, highway safety and infrastructure capacity were also frequently referenced, alongside concerns regarding the ability of local services and facilities to accommodate additional growth. Mendip Hills National Landscape comments highlighted the importance of considering impacts on the National Landscape and its setting, while other environmental comments referred to landscape sensitivity and the protection of the wider countryside.

1.44 A number of responses also commented on the potential extension of Westway Business Park. Some respondents supported opportunities to strengthen the local economy and increase employment opportunities, whilst others raised concerns regarding traffic generation, landscape impacts and the relationship between employment development and the surrounding rural area.

Council Response

1.45 Consultation responses acknowledged the need for affordable housing and local employment opportunities but raised concerns regarding landscape impacts, agricultural land, infrastructure capacity and the scale of development that would be appropriate for the village.

1.46 In response, the Regulation 19 Plan identifies a planned approach to growth at West Bishop Sutton together with an extension to Westway Farm Business Park. The allocations seek to balance housing and employment opportunities with protection of the village setting, landscape character and environmental assets. Additional requirements relating to infrastructure delivery, active travel, landscape mitigation, biodiversity enhancement and community benefits have been incorporated through the draft Plan.

Chew Magna

Settlement Overview

1.47 Responses relating to Chew Magna focused on the principle of growth within the village, Green Belt policy, housing affordability, village character, infrastructure capacity and the relationship between future growth and the adopted neighbourhood plan. Responses were received from local residents, parish interests, statutory consultees, landowners and developers.

1.48 Many respondents recognised the need for affordable housing and acknowledged the challenges faced by local people seeking to remain within the village. However, views differed regarding the extent to which additional development should be accommodated and whether exceptional circumstances existed to justify Green Belt release. A recurring theme was the importance of ensuring that development reflects the character of the village, protects the surrounding landscape and remains proportionate to the scale and role of the

settlement. Respondents also highlighted the importance of aligning future growth with the objectives of the Chew Valley Neighbourhood Plan and supporting local services and facilities without undermining the village's distinctive character..

Old Tennis Courts

1.49 Responses relating to the Old Tennis Courts site focused on the suitability of the land for development and the opportunities it could provide to address local housing needs. Some respondents supported development of the site on the basis that it comprises previously developed land located between existing built form and could provide a modest number of homes, including affordable housing. Supportive comments frequently referred to the site's relationship with the existing settlement and its potential contribution to meeting local needs whilst limiting encroachment into the wider countryside.

1.50 Concerns focused on Green Belt policy, village character and the principle of releasing land from the Green Belt for development. Respondents discussed whether the site meets the definition of grey belt and whether development could be accommodated without adversely affecting openness, settlement character or the wider landscape setting of the village. Comments also referred to infrastructure capacity, traffic and parking pressures and the ability of local services to accommodate additional growth.

1.51 Many responses emphasised that, if development were to be supported, it should remain modest in scale and focused on addressing local housing needs. Mendip Hills National Landscape highlighted the importance of considering impacts on the National Landscape and its setting. Environment Agency comments highlighted the need to consider flood risk, drainage and water management issues as part of any future development proposals. Other responses emphasised the need to protect the character of the Chew Valley landscape and ensure that development remains proportionate to the role and character of the village.

Council Response

1.52 Consultation responses focused on housing affordability, Green Belt considerations, village character, infrastructure capacity and the relationship between future growth and the objectives of the Chew Valley Neighbourhood Plan.

1.53 In response, the Regulation 19 Plan proposes a modest allocation at the Old Tennis Courts to help address local housing needs, including affordable housing, in a location closely related to the existing settlement. The allocation has been informed by consultation responses and includes strengthened requirements relating to landscape, biodiversity, heritage, drainage and sustainable transport whilst maintaining a proportionate scale of growth.

Chew Stoke

Settlement Overview

1.54 Responses relating to Chew Stoke focused on the role of the village in accommodating future growth, the protection of its landscape setting and the suitability of land north of the village for development. Responses were received from local residents, parish interests, statutory consultees, landowners and developers. Comments focused on Green Belt policy, housing affordability, agricultural land quality, village character, infrastructure capacity and the relationship between future growth and the objectives of the Chew Valley Neighbourhood Plan.

1.55 Many respondents recognised the challenges associated with housing affordability within the village and supported the principle of providing homes that meet local needs. Views differed, however, regarding the scale and location of development that would be appropriate. A recurring theme was the importance of ensuring that any growth remains proportionate to the size and character of the village and respects its landscape setting. Chew Stoke Parish Council expressed support for appropriately scaled growth where it would deliver clear benefits to the community, including affordable housing and improvements to local facilities and infrastructure.

Hedgehogs

1.56 Responses relating to the Hedgehogs site focused on the suitability of the site for accommodating a modest level of growth and its relationship to the existing settlement. Some respondents considered that the site could provide an opportunity to deliver affordable housing whilst maintaining access to village services, schools and community facilities. Supportive comments frequently referred to the site's location adjacent to the existing built form and its potential to help address identified local housing needs.

1.57 Concerns focused on Green Belt release, the loss of agricultural land and the potential impact of development on the character and setting of the village. A number of respondents referred to the site's classification as Best and Most Versatile agricultural land and questioned whether the loss of productive farmland could be justified. Comments also referred to traffic, parking and infrastructure capacity, as well as the need to ensure that development reflects the distinct character of the village and wider Chew Valley landscape.

1.58 Mendip Hills National Landscape highlighted the importance of considering impacts on the National Landscape and its setting. Environment Agency comments emphasised the need to consider flood risk, drainage and water management issues as part of any future development proposals.

Council Response

1.59 Consultation responses highlighted support for meeting local housing needs alongside concerns regarding Green Belt release, loss of agricultural land, landscape impacts, infrastructure capacity and village character.

1.60 In response, the Regulation 19 Plan proposes the Hedgehogs allocation as a planned extension to the village at a scale capable of delivering housing, including affordable housing, alongside wider community and environmental benefits. The allocation includes strengthened requirements relating to landscape integration, biodiversity enhancement, community infrastructure, active travel and protection of the character and setting of the village.

Clutton

Settlement Overview

1.61 Responses relating to Clutton focused on the role of the village in accommodating future growth, the suitability of land to the west of the settlement for development and the relationship between future growth and the adopted neighbourhood plan. Responses were received from local residents, parish interests, statutory consultees, landowners and developers. Comments focused on housing need, site selection, landscape impacts, infrastructure capacity and the importance of protecting the village's rural identity.

1.62 Many respondents recognised the need to provide affordable housing and support the long-term sustainability of the village. However, views differed regarding the scale of development that would be appropriate and the extent to which growth should be concentrated on a single site. Some responses suggested that more strategic growth may offer greater opportunities to secure infrastructure improvements, affordable housing and wider community benefits than a number of smaller, dispersed developments. Other respondents emphasised the importance of ensuring that any development remains proportionate to the character and role of the settlement and aligns with the objectives of the adopted neighbourhood plan.

Clutton West

1.63 Responses relating to Clutton West focused on the principle of development on the edge of the village and its potential contribution towards meeting local housing needs. Some respondents supported the site on the basis that it adjoins the existing settlement and could provide housing, including affordable homes, whilst helping support local facilities and services.

1.64 Concerns focused on the impact of development on the rural character of the village, the surrounding landscape and local infrastructure. Traffic, access arrangements and service capacity were recurring issues, alongside comments regarding healthcare provision, education and community facilities. Respondents also referred to biodiversity, green spaces and the importance of protecting local views and village character.

1.65 A number of responses raised concerns regarding land quality and the presence of former mining activity in the area, including the potential implications of contaminated land and ground conditions for future development. Environment Agency comments highlighted the need to consider drainage, flood risk and water management issues, whilst other consultees referred to the need to assess environmental and infrastructure constraints as part of any future consideration of the site.

Council Response

1.66 Consultation responses recognised the need for additional housing and affordable homes but raised concerns regarding infrastructure capacity, landscape impacts and the scale at which future growth should be accommodated.

1.67 In response, the Regulation 19 Plan adopts a coordinated approach to growth through allocations at West of Clutton and Maypole Close. This approach enables housing delivery to be planned alongside education provision, community infrastructure, public open space, green infrastructure and sustainable transport improvements. The allocations have been informed by consultation responses and further technical assessment to ensure that growth is supported by appropriate mitigation and infrastructure.

Farmborough

Settlement Overview

1.68 Responses relating to Farmborough focused on the principle of proportionate growth within the village, the suitability of land south of the settlement accessed from Timsbury Road and the implications of Green Belt release. Responses were received from local residents, parish interests, statutory consultees, landowners and developers. Comments focused on housing need, village character, Green Belt policy, landscape impacts, infrastructure capacity and the ability of the village to accommodate future growth whilst retaining its rural identity.

1.69 Many respondents recognised the need to address local housing needs, particularly through the delivery of affordable housing. However, views differed

regarding the scale of development that would be appropriate and whether exceptional circumstances exist to justify Green Belt release. A recurring theme was the importance of ensuring that any growth remains proportionate to the size and role of the village, protects its character and setting and supports existing community facilities. Respondents also highlighted the importance of maintaining the rural character of the village whilst ensuring that younger households and those with local connections have opportunities to remain within the community.

Timsbury Road

1.70 Responses relating to the Timsbury Road site focused on the site's relationship to the existing built form, the principle of development within the Green Belt and the potential contribution the site could make towards meeting local housing needs. Supportive comments generally referred to the site's proximity to existing development and the opportunity to deliver a modest level of housing, including affordable homes, whilst providing wider community benefits. Several respondents highlighted the potential to create or enhance green space associated with the Village Hall and community shop, helping to strengthen existing community assets.

1.71 Concerns focused on Green Belt release, landscape impacts and the potential effect of development on the rural character and setting of the village. Respondents also referred to traffic, highway safety, infrastructure capacity and the need to ensure that local services can accommodate additional growth. Comments highlighted the importance of demonstrating that any development would be supported by appropriate infrastructure and community benefits. Environment Agency comments highlighted the need to consider drainage, flood risk and water management issues as part of any future development proposals, whilst other consultees highlighted the importance of assessing infrastructure and environmental constraints alongside opportunities for growth..

Council Response

1.72 Consultation responses highlighted local housing needs and the importance of supporting village services and facilities, whilst raising concerns regarding

Green Belt release, transport impacts, landscape character and infrastructure capacity.

1.73 In response, the Regulation 19 Plan proposes a residential allocation at Timsbury Road that seeks to support local housing needs whilst contributing towards the long-term vitality of the village. The allocation includes requirements relating to community infrastructure, sustainable transport, landscape mitigation, biodiversity enhancement and green infrastructure, reflecting the principal issues raised during consultation.

High Littleton and Hallatrow

Settlement Overview

1.74 Responses relating to High Littleton and Hallatrow focused on the role of the villages in accommodating future growth, housing affordability, infrastructure capacity and the suitability of land at Combe Lane for development. Responses were received from local residents, parish interests, statutory consultees, landowners and developers. Comments frequently referred to the need to balance housing provision with the protection of village character, landscape setting and the wider rural environment.

1.75 Many respondents recognised the challenges associated with housing affordability and supported the delivery of homes that meet local needs, particularly affordable housing. However, views differed regarding the extent to which additional growth should be accommodated and whether the proposed site represented the most appropriate location for development. Respondents also highlighted the importance of ensuring that any growth is accompanied by appropriate infrastructure improvements and reflects the character and role of the villages within the wider rural area.

Combe Lane, Hallatrow

1.76 Responses relating to Combe Lane focused on the site's potential to deliver a modest level of housing growth, including affordable housing, in a location adjacent to the existing settlement. Some respondents supported the site on the basis that it could help meet local housing needs whilst providing a proportionate scale of development. Comments also referred to the opportunity to build upon

the recently completed Fox Fields development and support the long-term sustainability of the village.

1.77 Concerns focused on landscape impacts, village character and the cumulative effects of development within Hallatrow and the surrounding area. Several respondents highlighted the need to ensure that development is sensitively designed and integrated with the existing settlement. Traffic, highway safety, access arrangements and infrastructure capacity were also recurring issues. Respondents referred to the importance of understanding the capacity of local services and ensuring that any development is supported by appropriate infrastructure improvements.

1.78 The protection of agricultural land was also raised through the consultation. Comments noted that land to the north of the recently completed Fox Fields development had previously been discounted due to the loss of Grade 1 agricultural land, and respondents highlighted the importance of considering agricultural land quality when assessing future development options. Environment Agency comments highlighted the need to consider drainage, flood risk and water management matters as part of any future proposals, whilst other consultees referred to landscape, infrastructure and environmental considerations that would require further assessment.

Council Response

1.79 Consultation responses focused on housing affordability, agricultural land, village character, infrastructure provision and the potential impacts of development on the surrounding landscape.

1.80 In response, the Regulation 19 Plan proposes a proportionate allocation north of Fox Fields to help meet local housing needs whilst supporting the objectives of the adopted neighbourhood plan. The allocation has been refined through further assessment and includes requirements relating to landscape mitigation, biodiversity enhancement, sustainable drainage, active travel and infrastructure provision.

Temple Cloud

Settlement Overview

1.81 Responses relating to Temple Cloud focused on the role of the village as a local service centre, the principle of future growth and the suitability of land to the north of the village for development. Responses were received from local residents, parish interests, statutory consultees, landowners and developers. Comments focused on housing need, village character, infrastructure capacity, traffic and air quality, together with the ability of the village to accommodate additional development whilst maintaining its role within the wider rural area.

1.82 Many respondents recognised that Temple Cloud benefits from a wider range of facilities and services than some surrounding villages and acknowledged that this may support a degree of future growth. Support for development was often linked to the provision of affordable housing and investment in local services and infrastructure. However, concerns were raised regarding the cumulative impact of development on the A37 corridor, the capacity of local infrastructure and the need to ensure that future growth remains proportionate to the character and scale of the village.

Temple Cloud North

1.83 Responses relating to Temple Cloud North focused on the suitability of the site for accommodating development and its accessibility to existing services and public transport. Some respondents supported the site on the basis that it is located close to existing facilities and could provide housing, including affordable housing, in a relatively sustainable location. Supportive comments also referred to the village's role as a local service centre and the potential for development to support the long-term vitality of local facilities.

1.84 Concerns focused on traffic and highway impacts, particularly in relation to the A37 corridor, together with infrastructure capacity and the effect of development on village character and the surrounding landscape. Air quality was also a recurring theme, with respondents highlighting the existing Air Quality Management Areas affecting both Temple Cloud and nearby Farrington Gurney and questioning the cumulative impact of additional development on traffic levels. Respondents also referred to drainage, healthcare provision, school

capacity and the need to ensure that development is supported by appropriate infrastructure improvements.

1.85 Environment Agency comments highlighted the need to consider drainage, flood risk and water management issues as part of any future development proposals. Other consultees raised issues relating to transport, infrastructure capacity and environmental constraints that would require further assessment as part of any future consideration of the site.

Council Response

1.86 Consultation responses acknowledged Temple Cloud's role as a local service centre but raised concerns regarding traffic, air quality, landscape impacts and the capacity of local infrastructure and services to support additional growth.

1.87 In response, the Regulation 19 Plan proposes an allocation north of Temple Cloud together with a package of requirements relating to transport improvements, active travel, air quality mitigation, green infrastructure and community infrastructure. The allocation seeks to balance the need for additional housing with the protection of environmental assets and the maintenance of local character.

Timsbury

Settlement Overview

1.88 Responses relating to Timsbury focused on the role of the village as one of the more sustainable rural settlements in the district and its capacity to accommodate future growth. Responses were received from local residents, parish interests, statutory consultees, landowners and developers. Comments focused on housing need, village character, infrastructure capacity, transport issues and the appropriateness of the sites identified for development.

1.89 Many respondents recognised the need to address local housing needs, particularly affordable housing, and acknowledged Timsbury's role as a local service centre with a relatively broad range of facilities. However, views differed regarding the scale and location of growth that would be appropriate. Concerns were frequently raised regarding existing pressures on healthcare provision, traffic and transport infrastructure, particularly around North Road, and the ability

of services and facilities to accommodate additional development. Respondents also highlighted the importance of ensuring that growth respects the character of the village and delivers benefits for the wider community.

West Timsbury

1.90 Responses relating to West Timsbury focused on the scale of development proposed and its relationship to the existing settlement. Some respondents considered that the site could provide opportunities to meet housing needs and support the long-term sustainability of the village, particularly where development delivers affordable housing and infrastructure improvements.

1.91 Concerns focused on landscape impacts, the relationship of development to the village edge and the potential effect on the rural setting of Timsbury. Respondents also raised issues relating to traffic generation, highway safety and the ability of local infrastructure and services to accommodate additional development. Comments highlighted the importance of ensuring that any growth is supported by appropriate mitigation and community benefits.

East of St Mary's School

1.92 Responses relating to land east of St Mary's School focused on the site's status as an existing allocation and the potential to increase the number of homes delivered. Some respondents supported the principle of expanding development in this location, noting that it adjoins the existing settlement and could contribute towards local housing needs, including affordable housing provision.

1.93 Concerns focused on the impact of additional development on landscape character, important views and local infrastructure. Respondents referred to traffic and parking impacts, school and healthcare capacity and the cumulative effects of growth within the village. Comments also highlighted the importance of ensuring that any increase in development remains sensitive to the surrounding landscape and village character.

Crocombe Lane

1.94 Responses relating to Crocombe Lane focused on the suitability of the site for development and its relationship to the existing built-up area. Supportive comments referred to opportunities to provide housing in a location connected to the village and to contribute towards identified local needs.

1.95 Concerns focused on landscape impacts, highway safety, access arrangements and infrastructure capacity. Respondents questioned the ability of local roads and services to accommodate additional development and highlighted the importance of protecting the character of the village and its rural setting. Comments also referred to drainage and environmental considerations that would require assessment as part of any future development proposals. Environment Agency comments highlighted the need to consider drainage, flood risk and water management matters in bringing forward development.

Council Response

1.96 Consultation responses recognised Timsbury's role as one of the more sustainable rural settlements in the district, whilst highlighting concerns regarding traffic, healthcare provision, school capacity, infrastructure and landscape impacts.

1.97 In response, the Regulation 19 Plan proposes a coordinated strategy for growth at West Timsbury and East Timsbury. The allocations are intended to help meet housing needs whilst supporting investment in education, healthcare, community facilities, sustainable transport and green infrastructure. Policy requirements have been strengthened to ensure that development responds positively to village character, landscape setting and environmental considerations.

Chapter Summary

1.98 Consultation responses relating to the Rural Areas Strategy demonstrated broad support for addressing local housing needs and maintaining the long-term sustainability of rural communities. Many respondents acknowledged the challenges associated with housing affordability, changing demographics and the need to support local services and facilities. There was general support for

the principle of proportionate growth where it would help meet identified local needs and strengthen the viability of villages and community infrastructure.

1.99 At the same time, respondents consistently emphasised the importance of ensuring that future growth respects the character, identity and setting of rural settlements. Landscape impacts, Green Belt policy, biodiversity, heritage assets and the protection of agricultural land emerged as recurring themes across many settlements. Concerns were also raised regarding the cumulative effects of development on local infrastructure, including schools, healthcare services, drainage networks, wastewater infrastructure and transport systems.

1.100 Many responses highlighted the importance of aligning future growth with neighbourhood plans, community aspirations and local evidence. Views differed regarding the scale and location of development that individual villages should accommodate, reflecting local circumstances and the distinct role and function of different settlements. Respondents frequently sought assurance that any future allocations would be supported by appropriate infrastructure improvements and informed by further technical evidence where required.

1.101 Overall, the consultation responses highlighted the need to balance the delivery of homes, including affordable housing, with the protection of valued environmental assets and the character of rural communities. The issues raised through the consultation, together with ongoing evidence gathering and assessment work, will inform the preparation of the Draft Local Plan and future decisions regarding the scale and distribution of growth across the district's rural areas.

Council Response

1.102 Consultation responses demonstrated broad support for maintaining thriving rural communities, addressing housing affordability and supporting local services and facilities. At the same time, respondents consistently highlighted the importance of protecting the distinctive character, landscapes, biodiversity and heritage assets that define the rural area.

1.103 The Regulation 19 Local Plan responds by focusing growth in the most sustainable rural settlements whilst strengthening requirements relating to infrastructure delivery, landscape protection, biodiversity enhancement,

sustainable transport and design quality. Consultation responses have directly informed the Rural Place Strategy, the selection of site allocations and the development requirements attached to them, helping to ensure that future growth is planned in a way that reflects both local needs and environmental considerations.

Development Management Policies

Introduction

1.1 This section summarises responses received in relation to the Development Management Policy Options. The summaries identify the principal issues raised by respondents and do not seek to reproduce every representation received.

1.2 Development Management policies provide the framework for determining planning applications across Bath and North East Somerset. Unlike the place-based chapters, responses focused on policy approaches relating to housing, climate change, the natural environment, the economy and community infrastructure. Whilst many comments related to specific policy options, a number of recurring themes emerged across the chapter and are summarised below.

Key Themes

1.3 A number of common themes emerged across responses to the Development Management Policy Options. Whilst comments often related to individual policies, several recurring issues were raised across multiple policy areas.

Climate Change, Energy and Environmental Sustainability

1.4 Respondents generally supported the inclusion of policies aimed at addressing the climate and ecological emergencies and improving the environmental performance of development. There was support for measures relating to climate adaptation, renewable energy generation, district heating, retrofit and low-impact farming. However, some respondents considered that proposed requirements should be supported by robust evidence and viability testing to ensure policy aspirations can be delivered in practice. Concerns were also raised about the cumulative impact of policy requirements on development viability and housing delivery. Responses highlighted the importance of balancing environmental objectives with deliverability, while ensuring new development contributes towards carbon reduction, resilience to climate change and sustainable resource use.

Biodiversity, Landscape and Nature Recovery

1.5 The protection and enhancement of biodiversity, landscape character and valued green spaces was a recurring theme. Responses discussed the proposed approach to Biodiversity Net Gain, protection of habitats and ecological networks, landscape-led design and the role of Local Green Spaces in safeguarding community assets. Views differed on whether local biodiversity requirements should exceed national standards, with some respondents supporting stronger ecological outcomes and others raising concerns regarding implementation and viability. Comments also highlighted the importance of protecting landscape character, settlement setting, heritage-sensitive landscapes and public access to green infrastructure.

Housing Delivery, Housing Mix and Meeting Identified Needs

1.6 A number of responses focused on the role of Development Management policies in supporting the delivery of homes which meet a range of housing needs. This included comments on affordable housing, Houses in Multiple Occupation, co-living schemes, Gypsy and Traveller accommodation and Housing Development Boundaries. Respondents discussed the need to increase the supply of affordable housing, particularly social rented homes, whilst ensuring that policy requirements remain deliverable. There were also differing views regarding the balance between family housing, student accommodation, co-living provision and other specialist forms of accommodation. In rural areas, comments highlighted the role of Housing Development Boundaries in managing growth whilst respecting settlement character and landscape constraints.

Growth, Infrastructure and Deliverability

1.7 Many responses highlighted the relationship between development, infrastructure provision and policy deliverability. Comments relating to Green Belt policy, climate adaptation, biodiversity, waste infrastructure and wider development requirements emphasised the need for development to be supported by appropriate infrastructure and for cumulative impacts to be properly understood. Some respondents considered that policy requirements should

remain closely aligned with national policy, whilst others advocated a more ambitious local approach. Infrastructure issues raised included flood risk management, wastewater infrastructure, green infrastructure and the long-term management of environmental assets.

Economy, Town Centres and Community Assets

1.8 Responses also highlighted the importance of supporting the local economy, protecting employment opportunities and maintaining valued community and cultural assets. Comments on undesignated industrial sites reflected differing views about the balance between retaining employment land and allowing redevelopment for other uses. Respondents emphasised the continued importance of town and local centres, cultural infrastructure and community facilities in supporting sustainable communities. There were also detailed comments relating to the protection and interpretation of heritage assets, including the Somersetshire Coal Canal and Wansdyke, and the role these assets play in local identity and placemaking.

National Policy, Evidence and Implementation

1.9 Across a number of policy areas, respondents stressed the importance of ensuring Development Management policies are supported by a robust evidence base and remain consistent with national policy and guidance. This was particularly evident in relation to Green Belt, Biodiversity Net Gain, affordable housing, renewable energy and landscape policies. Respondents frequently sought clarity regarding how policies would be implemented, monitored and justified, and highlighted the need for transparent evidence where local requirements are proposed that go beyond national standards.

Housing Policies

1.10 This section summarises responses received in relation to the individual place and site options consulted upon across the Somer Valley. The summaries identify the principal issues raised by respondents and do not seek to reproduce every representation received.

Policy H/AH: Affordable Housing (Large Sites)

Overview

1.11 Comments focused on the proposed approach to securing affordable housing from major development and the balance between meeting identified housing needs and maintaining development viability. Comments addressed affordable housing percentages, tenure mix, delivery mechanisms and the evidence used to inform policy requirements.

Key themes

- Respondents sought clarity regarding the level of affordable housing that should be required and whether policy requirements should be informed solely by the Local Housing Needs Assessment or a wider evidence base.
- There was support for prioritising genuinely affordable housing products, particularly social rent, alongside ensuring an appropriate mix of affordable dwelling types and sizes.
- Comments highlighted the importance of viability testing and transparency regarding assumptions used to determine affordable housing requirements. Many respondents considered that affordable housing levels should be supported by robust evidence demonstrating deliverability.
- Some comments referred to the role of housing associations, council housing and community-led delivery models in helping to meet affordable housing needs.
-

Overarching Support and Demand for Affordable Housing:

1.12 There is broad support for maintaining a strong affordable housing requirement and securing affordable homes through new development.

1.13 Commentators expressed excitement about the development options in Keynsham and the potential for finding affordable housing in their community.

1.14 A number of comments supported the continued use of affordable housing thresholds linked to major development, including requirements applying to schemes of 10 or more dwellings or sites of 0.5 hectares or larger, with affordable housing generally expected to be provided on-site.

1.15 There is a strong sentiment that affordable housing should be maximised as far as legally possible, with concerns that developers might prioritise profit over providing sufficient affordable units.

Critiques of Affordability Definitions and Mechanisms:

1.16 A significant theme is that the current definition of "affordable housing" (e.g. 80% of market rate) is not genuinely affordable for those on low incomes. Comments highlighted concerns that rents linked to market values and some shared ownership products may remain beyond the reach of households on lower and middle incomes. Several respondents suggested that affordability should be more closely linked to local incomes and housing costs, with a stronger emphasis on social rented housing and other genuinely affordable tenures.

1.17 There is a call for a more radical definition that reflects what individuals on low incomes can actually afford, with suggestions to align with the ONS definition of 30% of income.

1.18 Many believe existing mechanisms and products for delivering affordable housing have failed to meet the scale of the housing crisis, pointing to inadequate investment in social housing and less affordable rent models.

Specific Housing Needs:

1.19 Comments also highlighted the importance of providing a broad range of affordable housing products, including family-sized homes, accessible dwellings, homes for younger households, first-time buyers and people seeking to remain within their local communities throughout different stages of life. This included calls for housing specifically designed to meet the needs of older people, including downsizer accommodation, bungalows and specialist older persons housing. Respondents considered that the policy should recognise changing demographic needs and support a wider range of housing choices throughout people's lives.

1.20 A recurring suggestion is for smaller "starter houses" and "affordable houses" specifically for young adults who want to stay in the area and for elderly people looking to downsize. One comment highlights the absence of policy provisions for specialist housing for older people, despite demographic projections and proposes a specific policy to address this need.

Concerns about Siting and Infrastructure:

1.21 There is a recurring view that social housing needs to be built where it is most needed, with good public transport and access to work, not in isolated locations.

1.22 Comments note that affordable housing in rural areas should focus on smaller homes that meet the needs of first-time buyers, younger households and downsizers.

Developer Viability and Policy Options:

1.23 Responses expressed differing views on the proposed 46% affordable housing requirement set out in Option 1. While some respondents supported the use of the Local Housing Needs Assessment (LHNA) as the principal evidence base for determining affordable housing requirements, others favoured a broader evidence-based approach, arguing that wider considerations should inform the final policy position. Option 2 (plan-wide viability approach) is favoured by some developers as it needs to be supported by plan-wide viability testing.

1.24 Concerns are raised that the LHNA's figure of 46% affordable housing may not be viable for development schemes. Preliminary viability testing undertaken in 2025 suggests that delivering 40% affordable housing may be the maximum achievable level in many cases, with a lower percentage for all-flatted development. Some commentators considered that affordable housing requirements should be supported by comprehensive plan-wide viability testing, including assessment of different site typologies, tenure mixes, development locations and cumulative policy requirements.

1.25 Respondents proposed a range of affordable housing percentages, including requirements above 40%, reflecting differing views on the balance between housing need and development viability.

1.26 Flexibility in affordable housing tenure split is considered crucial for development viability.

1.27 A number of commentators considered that the policy should include a clear and explicit affordable housing percentage rather than relying solely on future housing needs evidence or case-by-case negotiations. Concerns were raised that the distinction between the two policy options was unclear and could create uncertainty for applicants and decision-makers.

1.28 Greater flexibility in affordable housing tenure requirements may be needed, subject to the findings of further viability testing. Some respondents also suggested that affordable housing policies should retain sufficient flexibility to enable schemes to access grant funding and respond to changing funding opportunities over the plan period.

1.29 There was support for the policy to recognise that affordable housing requirements may need to vary between different development typologies and locations, reflecting local market conditions and viability. Suggestions included differentiated requirements for flatted development, Green Belt release sites, Bath City sites, and areas within nationally protected landscapes where higher levels of affordable housing provision may be appropriate.

Advocacy for Diverse and Progressive Housing Types:

1.30 Respondents also highlighted the potential role of community-led housing, community land trusts, co-housing, self-build and other alternative delivery models in increasing the supply of affordable housing. These approaches were viewed as having the potential to support long-term affordability, strengthen community stewardship and provide a wider range of affordable housing options.

Housing Associations and Stock:

1.31 The important role of Housing Associations in delivering affordable homes should be recognised and early engagement with them should be encouraged.

1.32 Some respondents also highlighted the importance of understanding the capacity of Housing Associations and other affordable housing providers to deliver and manage additional affordable homes. Early engagement with providers was considered important to ensure affordable housing requirements remain deliverable in practice.

1.33 Individual comments raised concerns regarding the long-term retention of affordable housing stock and suggested that mechanisms should seek to ensure affordable homes remain available to meet housing needs in perpetuity. One respondent suggested that policy mechanisms should seek to prevent affordable homes from being sold in bulk to private investors, to help ensure they remain available to meet identified housing needs over the long term.

Further Comments

1.34 Several commentators highlighted that affordable housing requirements should be informed by a robust and transparent evidence base. Concerns were raised regarding the availability of supporting evidence, including the Local Housing Needs Assessment and assumptions underpinning viability work and some commentators requested greater engagement with stakeholders as evidence is developed. Some respondents expressed concern regarding the availability of supporting evidence during the consultation, including the status of the Local Housing Needs Assessment and supporting viability evidence. Comments suggested that additional stakeholder engagement, publication of supporting information and further discussion of viability assumptions may be required as the evidence base develops.

1.35 Statutory consultees and other respondents drew attention to examples from National Parks and National Landscapes where higher affordable housing requirements and stronger emphasis on social rented housing have been adopted in response to local affordability pressures. Some respondents considered that developments within National Landscapes and other protected areas should be subject to higher affordable housing requirements than the district-wide approach. Reference was made to policies in National Parks and National Landscapes that require affordable housing provision of 50% or more and place particular emphasis on social rented housing and affordable homes retained in perpetuity. Respondents considered these examples demonstrated how local planning authorities can respond to acute affordability pressures in designated landscapes.

1.36 Several comments highlighted the relationship between overall housing delivery and affordable housing provision. It was suggested that meeting identified affordable housing need may require additional housing allocations or an increase to overall housing numbers alongside any affordable housing percentage requirement. Some respondents also questioned aspects of the housing need evidence and the relationship between student accommodation and general housing delivery. It was suggested that student accommodation should be considered separately from general housing need assessments and

that increases in overall housing delivery may be necessary if identified affordable housing needs are to be met in full.

Recommendations for Policy Improvement:

1.37 Comments called for affordability definitions to better reflect local incomes and household circumstances, rather than relying primarily on market-based measures of affordability.

1.38 Comments supported increasing the provision of genuinely affordable homes, particularly social rented housing, to better meet identified housing needs.

1.39 Comments highlighted the importance of locating affordable housing in sustainable locations with good access to infrastructure, services, employment and public transport.

1.40 Comments sought stronger and more secure mechanisms to support the long-term delivery and retention of affordable housing.

1.41 Comments expressed differing views on affordable housing percentages but included suggestions for higher or location-specific requirements on larger developments, subject to evidence and viability considerations.

- Overall, comments welcomed the objective of increasing affordable housing delivery but indicated a desire for a more ambitious approach to affordability, a broader range of housing types and tenures and stronger mechanisms to ensure affordable homes are delivered and remain accessible to those in housing need.

Other Issues

1.42 Other points included the need to provide family-sized and accessible affordable homes, concerns regarding the disposal of affordable housing stock, and the relationship between overall housing delivery and affordable housing provision.

Council Response

1.43 In preparing the Draft Local Plan the breadth of comments raised during the consultation have been carefully considered by the Council. It is acknowledged

that Option 2 does not mention housing need and states “evidence base” without defining it.

1.44 While viability is a key consideration, local housing needs surveys are recognised in national policy and Planning Practice Guidance (PPG) as an important source of evidence for identifying affordable housing needs. The policy should therefore continue to reference such evidence sources, as they provide a more detailed understanding of local housing requirements than headline percentages alone.

1.45 The policy should clearly state that affordable housing requirements will be informed by the most up-to-date evidence available and reviewed as necessary over time. At present, the 2025 Local Housing Needs Assessment (as amended) provides a robust and valuable evidence base for understanding local housing need.

- While the policy increases the proportion of Social Rent within the overall affordable housing requirement to better meet the needs of the most vulnerable households in B&NES, the overall tenure split remains informed by the percentages identified in the Council's latest Local Housing Needs Assessment (LHNA). For ease of application and negotiation, the Social Rent and Affordable Home Ownership proportions have been rounded to practical whole-number percentages. The Council's latest policy has also been updated to strengthen viability provisions and support the maximum delivery of affordable homes across a range of development typologies.

Policy H/CL: Co-living Schemes

Overview

1.46 Responses focused on the role of co-living accommodation within the housing market, particularly the relationship between co-living schemes, student accommodation and wider housing needs. Views differed regarding the extent to which co-living developments should accommodate students.

Key Themes

- Some respondents supported restrictions on student occupancy in order to maintain mixed communities and avoid displacement of housing for non-student residents.

- Others considered co-living schemes should remain flexible and be available to a broader range of occupiers, including part-time and postgraduate students.
- Responses highlighted the relationship between co-living schemes, Houses in Multiple Occupation and purpose-built student accommodation, emphasising the need for a coordinated approach to planning for different housing types.
- Bath Preservation Trust supported a mixed-community approach and encouraged a more positive policy position towards co-living, recognising its potential environmental and social benefits when designed and managed appropriately.

Other Issues

1.47 Other comments supported a more positive vision for co-living, recognising the potential benefits of shared facilities, co-working opportunities, efficient use of resources and community-building.

Council Response

The Council recognises the differing views regarding student occupation within co-living developments. Policy H/CL seeks to ensure that co-living accommodation contributes to housing choice for non-student households whilst allowing limited occupation by part-time and postgraduate students.

The Council agrees that co-living forms part of a wider housing offer alongside Houses in Multiple Occupation and Purpose Built Student Accommodation and should be planned as part of a coordinated approach to meeting identified housing needs.

The policy supports well-designed and professionally managed co-living schemes that provide high-quality accommodation, communal facilities and opportunities for social interaction. The Council considers that co-living can make a positive contribution to housing choice, efficient use of land and the creation of mixed and balanced communities.

Policy H/GT: Gypsies, Roma, Travellers and Travelling Showpeople

Overview

1.48 The relatively small number of responses supported recognition of identified accommodation needs and raised issues regarding the provision of sites and pitches across the district.

Key Themes

- Respondents supported reflecting identified accommodation needs within planning policy.
- Comments highlighted the importance of ensuring sufficient provision of sites and pitches over the plan period.
- Some responses considered that the policy should more clearly identify responsibilities for helping to secure appropriate accommodation.

Other Issues

1.49 No significant recurring issues were identified beyond the need for clear policy wording regarding provision, relocation and future delivery.

Council Response

1.50 The Council welcomes the support for recognising and addressing the accommodation needs of Gypsies, Travellers and Travelling Showpeople. The Regulation 19 Local Plan is informed by the updated Gypsy and Traveller Accommodation Assessment and subsequent engagement with households on the public site at Carrswood View where most of the need arises, which identify a need for additional pitches over the Plan period.

1.51 The Council has investigated opportunities to meet this need through the intensification or expansion of existing sites, a targeted call for sites, an assessment of Council-owned land and engagement with neighbouring authorities. However, no suitable and available sites have currently been identified for allocation, and further intensification, reconfiguration or expansion of Carrswood View is not considered achievable. The Council will continue to investigate opportunities to identify suitable provision ahead of submission of the Local Plan.

1.52 In the meantime, the Regulation 19 Local Plan includes a criteria-based policy to guide proposals for new sites and pitches, including through the intensification of suitable existing private sites. The policy seeks to ensure that proposals provide access to services and facilities, safe access, suitable living conditions and necessary utilities, while appropriately addressing flood risk, landscape, biodiversity, heritage, amenity and infrastructure considerations.

In

Policy H/HMO: Houses in Multiple Occupation

Overview

1.53 Responses discussed the balance between protecting family-sized homes and retaining HMOs as a source of accommodation for students, graduates and young professionals. The policy was also linked to student accommodation supply and the management of concentrations of HMOs within existing communities.

Key Themes

- Several respondents supported stronger controls to prevent the loss of family housing stock to HMOs, particularly in locations where family homes are in limited supply.
- Other respondents considered that existing planning controls are already sufficient and that additional restrictions may reduce housing choice and flexibility.
- Concerns were raised regarding concentrations of HMOs and associated impacts on local amenity, parking, waste management and community cohesion.
- Responses frequently referred to the need for HMO policies to be considered alongside wider approaches to purpose-built student accommodation and co-living schemes.

Other Issues

1.54 Other suggestions included reviewing concentration thresholds, considering proximity to schools and family housing areas, and supporting measures to encourage the return of HMOs to family housing where appropriate.

Council Response

1.55 The Council has carefully considered the consultation responses received in relation to Policy H/HMO: Houses in Multiple Occupation. Responses highlighted differing views regarding the role of HMOs in meeting housing needs, the

protection of family housing, and the management of HMO concentrations within existing communities. The Council recognises that HMOs play an important role in providing accommodation for students, young professionals and other households who may not be able to access other forms of housing. However, the Council also recognises concerns regarding the loss of family homes and the cumulative impacts that high concentrations of HMOs can have on local communities.

1.56 The policy therefore seeks to strike an appropriate balance between retaining HMOs as part of the district's housing offer and protecting the supply of conventional family housing. In particular, the policy seeks to retain existing three-bedroom family homes in areas where monitoring indicates substantial HMO conversion pressure and where affordable family housing is in relatively limited supply.

1.57 Concerns regarding amenity impacts, parking, waste management and community cohesion have also informed the policy approach. The policy continues to manage concentrations of HMOs and requires proposals to demonstrate that they would not result in unacceptable impacts on neighbouring occupiers, local character, transport conditions or the standard of accommodation provided for future residents.

1.58 The Council also acknowledges comments regarding the relationship between HMOs, purpose-built student accommodation and co-living schemes. These forms of accommodation perform different roles within the housing market and are addressed through separate policies within the Local Plan. Together, these policies seek to provide a coordinated approach to meeting a range of housing needs whilst supporting balanced and sustainable communities.

1.59 Overall, the Council considers that Policy H/HMO provides an appropriate framework for managing future HMO development, supporting housing choice whilst protecting residential amenity, maintaining balanced communities and safeguarding the supply of family housing.

Policy H/HDB: Housing Development Boundaries

Overview

1.60 Responses focused on how Housing Development Boundaries should be defined, whether they should facilitate limited rural growth, and how they should relate to landscape constraints and settlement character.

Key Themes

- Many respondents considered that revised Housing Development Boundaries could assist in delivering small-scale and proportionate growth in appropriate settlements.
- Others emphasised the importance of protecting countryside, maintaining settlement identity and avoiding unnecessary encroachment into open landscapes.
- A recurring issue concerned the methodology used to define boundaries, including whether residential curtilages and larger gardens should be included. Respondents sought a consistent and transparent approach.
- Responses also highlighted the need for clear mapping and explanation of proposed changes and their relationship to other proposed allocations and policies.

Other Issues

1.61 Other comments referred to landscape setting, open space and ecological considerations, and requested that changes associated with unallocated sites should be reconsidered if those sites are not taken forward within the final plan.

Council Response

1.62 The Council has carefully considered the consultation responses relating to Housing Development Boundaries. Responses recognised that clearly defined boundaries can help manage development and support limited, proportionate growth, while also emphasising the need to protect the countryside, landscape setting and distinct character of settlements. Comments also sought a consistent

and transparent approach to defining boundaries, including the treatment of residential curtilages, gardens and sites that are not taken forward for allocation.

1.63 In preparing the Regulation 19 Local Plan, Housing Development Boundaries have been reviewed alongside the wider spatial strategy and proposed site allocations. Boundaries have been amended where appropriate to reflect the development strategy, including removing proposed changes associated with site options that have not been taken forward. The approach seeks to provide clarity about where development may be acceptable in principle while ensuring that proposals outside settlement boundaries continue to be assessed against the relevant countryside, landscape and environmental policies.

Climate Change and Energy Policies

Policy C/AR: Climate Adaptation and Resilience

Overview

1.64 Responses generally supported the inclusion of a dedicated climate adaptation and resilience policy, recognising the need for development to respond to the impacts of climate change and contribute towards the long-term resilience of communities, infrastructure and the natural environment. Comments focused on flood risk, water management, green infrastructure, climate resilience measures and the practical delivery of policy requirements.

Key Themes

- Flood risk and surface water management were among the most frequently raised issues. Respondents highlighted existing flooding problems in parts of the district and emphasised the importance of ensuring that new development does not increase flood risk elsewhere.
- Respondents supported measures requiring development to incorporate climate resilience, including sustainable drainage systems, green infrastructure, urban greening, climate-resilient design and measures to address overheating.

- Environment Agency comments highlighted the importance of sustainable drainage, water efficiency, rainwater management and consideration of existing flood risk infrastructure when planning for future growth. Responses also recognised the need to consider flood management at a strategic and catchment-wide scale.
- Some development interests supported the overall objectives of the policy but sought flexibility where requirements may prove technically challenging or where there may be implications for development viability and deliverability.

Other Issues

1.65 Other comments referred to separate drainage systems, climate-resilient planting, water supply resilience and the relationship between climate adaptation, water resources and wastewater management.

Council Response

1.66 The Council has carefully considered the consultation responses received in relation to the draft Climate Adaptation and Resilience Policy. Responses were generally supportive of the introduction of a dedicated policy to enhance the climate resilience of development across the district, with strong support expressed for measures relating to sustainable drainage systems, green infrastructure, climate resilient design, rainwater management and the reduction of overheating risk.

1.67 The Council has taken account of these responses in the development and refinement of the policy. The responses have informed the development of a policy framework requiring development to consider current and future climate-related risks over its lifetime, including flooding, drought, overheating and extreme weather events. The policy requires development to be designed in a manner to avoid increasing flood risk elsewhere and supports the effective management of surface water runoff, as highlighted by the Environment Agency response.

1.68 The Council considers that the policy provides a robust and proportionate approach to improving climate resilience. The Council has taken account of the few responses seeking flexibility where requirements may prove technically

challenging and policy requirements have been scaled according to the nature and size of the development, whilst retaining flexibility where justified by site-specific circumstances.

Policy C/DH: District Heating

Overview

1.69 Responses generally supported the role of district heating and low-carbon heat networks in helping to decarbonise development, although views differed regarding the extent to which development should be required to connect to, or provide, district heating infrastructure. Comments focused on technical feasibility, viability, evidence and opportunities for low-carbon energy generation.

Key Themes

- Respondents generally supported the principle of district heating and recognised its potential contribution to reducing carbon emissions and supporting the transition to low-carbon energy systems.
- Several responses suggested that requirements for connecting to district heating networks should be subject to technical feasibility and viability considerations and should not prevent otherwise sustainable development from coming forward.
- Other respondents supported a stronger policy approach and argued that new development should actively contribute towards low-carbon heat generation and distribution infrastructure.
- Comments identified opportunities for alternative low-carbon heat sources, including water-source heat pumps using rivers and canals and the recovery of waste heat from existing infrastructure and industrial processes.

Other Issues

1.70 Other comments highlighted the importance of ensuring district heating systems are supplied by renewable or low-carbon energy sources and that policy requirements remain proportionate alongside wider development objectives.

Council Response

1.71 The Council has carefully considered the consultation responses received in relation to the District Heating Policy. Responses were generally supportive of the role that district heating can play in reducing carbon emissions and supporting the transition to a low-carbon energy system. The Council notes the broad recognition of the potential benefits of heat networks, alongside differing views regarding the extent to which development should be required to connect to, or provide infrastructure for, such networks.

1.72 In response to consultation comments, the policy has been refined to provide a clear and proportionate framework for supporting the expansion of district heating infrastructure across the district. Recognising concerns regarding deliverability, viability and technical constraints, the policy allows applicants to demonstrate where connection is not feasible or viable, whilst requiring developments to be designed so that future connection remains possible. This approach seeks to balance the need to support the long-term growth of heat networks with the practical circumstances of individual developments.

1.73 The Council also welcomes comments highlighting opportunities for alternative low-carbon heat sources, including waste heat recovery and the use of water-source heat pumps. The policy has been expanded to include specific requirements for developments that generate significant quantities of waste heat to assess opportunities for heat capture, reuse and distribution, including connection to existing or planned heat networks. This reflects the important role that waste heat recovery can play in improving energy efficiency and supporting the development of local low-carbon energy networks

Policy C/LIF: Low Impact Farming

Overview

1.74 Responses generally supported the principle of a dedicated low impact farming policy and welcomed recognition of the role agriculture can play in supporting climate resilience, biodiversity recovery and sustainable food production. Comments focused on policy clarity, implementation and the relationship between farming activities and environmental objectives.

Key Themes

- Respondents considered that a dedicated policy could provide support for regenerative farming practices, local food production, soil health improvements and biodiversity enhancement.
- The policy was viewed by many as providing a clearer framework for both applicants and decision-makers when assessing proposals associated with low-impact agricultural enterprises.
- Several responses referred to examples of similar approaches elsewhere and highlighted links between food production, climate resilience and environmental stewardship.
- Cotswolds National Landscape comments highlighted the importance of ensuring proposals do not cause unacceptable impacts on landscape character, natural beauty, heritage assets or neighbouring uses.

Other Issues

1.75 Other responses referred to the need for effective monitoring and enforcement and questioned whether a dedicated policy was necessary given the existence of wider planning policies affecting agricultural development.

Council Response

1.76 The Council has carefully considered the consultation responses received in relation to low impact farming. Responses were generally supportive of recognising the role that sustainable and regenerative farming practices can play in supporting biodiversity recovery, climate resilience, local food production and improved soil health. Consultees welcomed the principle of a dedicated policy and considered that it could provide greater certainty for applicants and decision-makers when assessing proposals associated with low impact agricultural enterprises. Comments also highlighted the importance of ensuring that development associated with such enterprises remains compatible with landscape character, environmental objectives and neighbouring land uses.

1.77 In response, the Regulation 19 Local Plan includes a dedicated policy on Low Impact Farming and Regenerative Land-based Development. The policy provides a clear framework for considering development associated with

regenerative land management approaches, including agroecology, agroforestry, permaculture and market gardening. It supports development that is necessary to the operation of genuine regenerative enterprises whilst ensuring that proposals are appropriately located, proportionate in scale and deliver wider environmental benefits. The policy also strengthens the relationship between sustainable food production, biodiversity enhancement, soil health and climate resilience, reflecting the principal themes raised through consultation.

Policy C/RE: Renewable Energy

Overview

1.78 Responses broadly supported renewable and low-carbon energy generation, particularly where integrated into new development. Comments focused on balancing renewable energy opportunities with landscape, environmental and infrastructure considerations.

Key Themes

- Strong support was expressed for small-scale renewable energy technologies including solar photovoltaics, battery storage, electric vehicle charging infrastructure and heat pumps.
- Respondents supported a flexible policy approach that can accommodate a range of technologies while responding appropriately to site constraints and landscape sensitivity.
- Community energy initiatives and opportunities for local benefit were supported by some respondents, alongside measures to increase local energy resilience and reduce carbon emissions.
- Comments highlighted the importance of considering potential impacts on nationally designated landscapes, biodiversity and landscape character. Cotswolds National Landscape emphasised the need to avoid unacceptable impacts on natural beauty and sensitive landscapes.
- Technical responses highlighted infrastructure considerations including grid capacity, aviation safeguarding, defence interests, communications infrastructure and glint and glare assessment.

Other Issues

1.79 Other comments referred to hydropower, water-source energy technologies, biodiversity-sensitive solar development and ensuring renewable energy infrastructure remains resilient to future climate change impacts.

Council Response

1.80 The Council has carefully considered the consultation responses received in relation to renewable energy development and targets. Responses demonstrated broad support for increasing renewable and low carbon energy generation, including support for the 300MW figure identified through the Council's earlier Climate Emergency evidence. Respondents also highlighted the importance of an approach that remains evidence-based and responsive to technological change, while enabling progress to be monitored.

1.81 The Regulation 19 Local Plan does not apply 300MW as a fixed development management target. Instead, it seeks to maximise renewable and low carbon energy generation, with the scale and mix of provision informed by the latest available renewable energy resource assessment and other relevant evidence. The 300MW figure provides a reference point for the Council's ambition and monitoring rather than a fixed threshold or ceiling for individual proposals.

1.82 Policy 6.1 provides a criteria-based framework for renewable and low carbon energy development, informed by the Renewable Energy Resource Assessment Study and Landscape Sensitivity Assessment. It supports renewable energy generation while enabling landscape, biodiversity, heritage, amenity, infrastructure and cumulative impacts to be considered.

Policy C/RF: Retrofit First

Overview

1.83 Responses generally supported the principle of prioritising retention, reuse and retrofit of existing buildings before demolition and redevelopment. Comments focused on the scope of the policy, evidence requirements and the balance between carbon reduction objectives and practical delivery considerations.

Key Themes

- Respondents supported encouraging applicants to consider retrofit and reuse as part of a sequential approach before pursuing demolition and replacement.
- Many comments supported requiring robust evidence where substantial or total demolition is proposed, including assessment of embodied carbon and opportunities for retention of existing structures.
- Some development interests expressed concerns that overly prescriptive requirements could impose disproportionate costs, particularly on brownfield sites and buildings where retrofit may not be practical or viable.
- Responses highlighted the relationship between retrofit objectives and the protection of historic buildings, with support for approaches that improve building performance while respecting heritage significance.

Other Issues

1.84 Other comments referred to the need for standardised evidence requirements, proportionate assessment and recognition that, in some circumstances, replacement buildings may achieve greater carbon savings than retrofit solutions alone.

Council Response

1.85 The Council welcomes the strong support for the retrofit-first principle and the retention, reuse and refurbishment of existing buildings. The consultation responses demonstrated broad agreement that applicants should consider opportunities to retain and improve existing buildings before pursuing demolition and redevelopment, and these views have helped shape the development of the Regulation 19 policy.

1.86 In response to the comments, the policy establishes a clear presumption in favour of repairing, refurbishing and re-using existing buildings over demolition and rebuild. The Council considers that retaining existing building fabric wherever practical represents an effective way of avoiding the unnecessary loss of embodied carbon and reducing the demand for new construction materials. The policy therefore adopts a sequential approach that prioritises retention and improvement before demolition is considered.

1.87 The Council has also carefully considered representations regarding the need for a proportionate approach that recognises practical, technical and viability constraints. Concerns were raised that overly prescriptive requirements could affect the delivery of development, particularly on brownfield sites or where existing buildings present significant challenges to refurbishment. In response, the policy recognises that retention and reuse will not be appropriate in every circumstance and includes a range of criteria through which demolition may be justified.

1.88 The Council also welcomes comments regarding the importance of whole-life carbon assessment and the recognition that, in some circumstances, replacement buildings may achieve greater carbon savings over their lifetime than retrofit solutions. Reflecting these comments, the policy does not apply an absolute prohibition on demolition. Instead, it allows demolition where applicants can demonstrate through robust evidence that repair, refurbishment or reuse would not represent the lowest-net-carbon solution when both embodied and operational emissions are taken into account. This ensures that decisions are informed by a comprehensive assessment of carbon impacts rather than a singular focus on building retention.

Policy GB/GB: Green Belt

Overview

1.89 Green Belt policy generated significant discussion relating to the application of revised national policy, exceptional circumstances, grey belt designation and the long-term protection of open land. Responses focused on how the council should apply recent changes to national policy whilst balancing development needs against environmental and landscape considerations.

Key Themes

- Responses debated how the policy should reflect the revised National Planning Policy Framework and its ‘golden rules’ for Green Belt release. Some respondents supported explicit references within local policy, whilst others considered reliance on national policy sufficient.

- Many respondents emphasised the importance of robustly demonstrating exceptional circumstances before altering Green Belt boundaries and of prioritising brownfield and grey belt opportunities before considering wider Green Belt release.
- Concerns were raised regarding impacts on openness, settlement separation, rural character, heritage assets and landscape quality. Cotswolds National Landscape Board commented that land meeting the definition of grey belt excludes locations where National Landscape policies would provide a strong reason for restricting development, including development affecting the setting of a National Landscape.
- Responses also highlighted the importance of establishing defensible long-term Green Belt boundaries and securing environmental improvements within the remaining Green Belt, including green infrastructure and nature recovery opportunities.

Other Issues

1.90 Other comments referred to the need for strategic Green Belt and grey belt assessments, cumulative impact analysis, and ensuring that local policy remains aligned with evolving national guidance.

Council Response

1.91 The Council has carefully considered the consultation responses received in relation to Green Belt policy. Responses highlighted differing views regarding the role of the Green Belt in accommodating future growth, the application of revised national policy, the concept of grey belt land and the circumstances in which Green Belt boundaries should be altered. Respondents emphasised the importance of demonstrating exceptional circumstances, protecting openness, maintaining settlement separation and safeguarding landscape character, heritage assets and environmental quality. Comments also highlighted the need for a robust evidence base and a clear framework for applying national policy requirements.

1.92 In response, the Regulation 19 Local Plan includes a revised Green Belt policy informed by changes to national planning policy and supported by the

Council's Green Belt evidence. The approach reflects the need to balance housing, employment and infrastructure requirements with the continued protection of the Green Belt's fundamental purposes. The Local Plan identifies strategic and non-strategic releases of Green Belt land where exceptional circumstances have been demonstrated through the plan-making process, whilst retaining protection for the remaining Green Belt. The proposed Development Management policy also provides greater clarity regarding the application of national policy requirements, including the consideration of grey belt land, application of the NPPF 2024 'golden rules' including the delivery of environmental improvements and green infrastructure alongside development

Policy N/BNG: Biodiversity Net Gain

Overview

1.93 Responses focused on whether the policy should require the statutory 10% Biodiversity Net Gain or introduce a higher local requirement for major development, and whether sufficient evidence exists to justify any uplift above national requirements.

Key Themes

- Many respondents argued that the policy should remain aligned with the statutory 10% requirement unless a higher target is supported by robust evidence relating to ecological need, deliverability and viability.
- Some respondents supported stronger biodiversity outcomes and considered that development should make a greater contribution towards nature recovery, ecological networks and habitat enhancement.
- Comments highlighted concerns regarding implementation, long-term management and monitoring arrangements, particularly where higher local requirements are proposed.
- Several responses emphasised the importance of integrating Biodiversity Net Gain delivery with wider green infrastructure networks, habitat connectivity and Local Nature Recovery Strategy objectives.

Other Issues

1.94 Other comments referred to off-site biodiversity credits, ecological surveys, protected species, hedgerow retention, dark corridors and ensuring flexibility should national Biodiversity Net Gain requirements change in future.

Council Response

1.95 The Council welcomes support for Biodiversity Net Gain and nature recovery objectives. Policy 6.9 reflects the statutory requirement for a minimum 10% Biodiversity Net Gain in accordance with national legislation.

1.96 The Council recognises comments regarding viability, deliverability and evidence for any higher local requirement. The policy is therefore aligned with the national framework and supported by wider policies on Green Infrastructure, ecological networks and the Local Nature Recovery Strategy.

1.97 The Council agrees on the importance of habitat connectivity, long-term management and monitoring. The policy prioritises on-site delivery where possible and requires off-site provision to contribute towards local nature recovery objectives.

1.98 The Council considers that the policy provides an appropriate balance between biodiversity enhancement, nature recovery and development viability.

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

Overview

1.99 Responses emphasised the importance of landscape-led planning and protecting the distinctive character of the district's landscapes. Comments focused on nationally designated landscapes, settlement setting, visual impacts, heritage sensitivity and the role of landscape infrastructure in accommodating future growth.

Key Themes

- Respondents supported the use of existing landscape features such as trees, woodland, hedgerows, landform and watercourses to help integrate development into its surroundings.
- Cotswolds National Landscape considered that policy amendments should fully reflect the statutory duty to seek to further the conservation and enhancement of natural beauty within National Landscapes and suggested a stronger policy framework specifically addressing nationally designated landscapes.
- Several responses highlighted the need for site-specific landscape and visual assessment where development could affect skylines, heritage assets, valued views or the setting of settlements.
- Other respondents considered that some sites could accommodate development where landscape effects are limited and where appropriate mitigation and landscape-led design measures are incorporated from the outset.

Other Issues

1.100 Other comments referred to biodiversity enhancement, public rights of way, access to green space, dark skies, historic field patterns, conservation areas and the relationship between landscape policies and Green Belt objectives

Council Response

The Council welcomes support for a landscape-led approach to planning. The Local Plan requires development to respond positively to landscape character, settlement setting, heritage assets and local distinctiveness, including within nationally designated landscapes.

1.101 The Council supports the retention and integration of existing landscape features, including trees, hedgerows, woodlands and watercourses, and the use of landscape-led design and green infrastructure to mitigate impacts and integrate development.

1.102 Development affecting sensitive landscapes, heritage assets or important views will be required to demonstrate that impacts have been appropriately assessed and mitigated. The Council considers the policy framework provides an appropriate balance between landscape protection and sustainable growth.

Policy HVC/LGS: Local Green Spaces

Overview

1.103 Responses were dominated by requests to designate specific sites as Local Green Space, particularly allotments and other valued community spaces. Comments focused on the contribution these sites make to community wellbeing, food growing, recreation, biodiversity and local identity.

Key Themes

- Many respondents supported the designation of existing allotments and community growing spaces as Local Green Space, citing their long-standing community value and contribution to local food production.
- Food security, community wellbeing and access to outdoor space were recurring themes. Respondents emphasised the importance of protecting opportunities for food growing, recreation and community interaction.
- Biodiversity and ecological value were frequently referenced, with comments highlighting the contribution of allotments and green spaces to habitat provision and nature recovery.
- Respondents also highlighted the educational and social value of Local Green Spaces, including opportunities for community learning, environmental awareness and healthy lifestyles.

Other Issues

1.104 Other comments referred to mapping and boundary issues, vehicle access, links to public rights of way and the relationship between Local Green Space designation and other planning designations.

Council Response

1.105 The Council has carefully considered the consultation responses received in relation to Local Green Spaces. Responses highlighted the importance of protecting valued community spaces, including allotments, informal recreation areas and other green spaces that contribute to local character, biodiversity,

food growing, recreation and community wellbeing. Respondents also emphasised the role that Local Green Spaces can play in supporting health, nature recovery and local identity.

1.106 The Regulation 19 Local Plan retains policies relating to Local Green Spaces, allotments and local food growing as part of the wider green infrastructure framework. The Council supports the protection of valued green spaces where they meet the relevant national and local policy tests and recognises the contribution these spaces make to communities and the natural environment. Specific requests for Local Green Space designation have been considered through the plan-making process and assessed against the criteria set out in national planning policy. As a result some Local Green Spaces (additional to those designated in the adopted Local Plan) are proposed for designation. The wider policy framework also strengthens protection and enhancement of green infrastructure, biodiversity, recreation and food growing opportunities across the district.

Economy and Community Policies

Policy J/UI: Undesignated Industrial Sites

Overview

1.107 Responses were divided between protecting undesignated employment sites and allowing redevelopment of underused or obsolete industrial land for alternative uses, particularly housing. Comments focused on balancing the retention of employment opportunities with the efficient use of brownfield land and wider regeneration objectives.

Key Themes

- Many respondents supported the continued protection of undesignated industrial sites where they provide important employment opportunities and contribute to the local economy.
- Others considered that some industrial sites are no longer suitable for employment use due to their location, condition or lack of market demand and could make an important contribution towards housing delivery.
- Concerns were raised that overly restrictive policies could prevent the redevelopment of vacant, underutilised or obsolete brownfield sites.

- Some responses highlighted the importance of supporting the evolution of employment land to accommodate modern business activity, including innovation, technology, research and low-carbon industries.
- Other Issues
- Other comments referred to amenity issues associated with industrial uses, including traffic, noise and heavy goods vehicles, as well as individual site-specific examples where redevelopment opportunities should be considered.

Other Issues

1.108 Other comments referred to amenity issues associated with industrial uses, including traffic, noise and heavy goods vehicles, as well as individual site-specific examples where redevelopment opportunities should be considered.

Council Response

It is acknowleged that support for Reset Options 2025 proposed Options Option 1 i.e. retention of all undesignated industrial sites is preferred by some. Others are concerned about the overrestrictive policies will prevent redevelopment of underused and vacant sites.

On the basis there are limited development opportunities within the Bath urban area and there is more scope for expansion and new build premises outside Bath in for example the Somer Valley, given employment allocations including the Westfield Industrial Estate extension and the Somer Valley Enterprise Zone, and on the basis that permitted development rights for change of use from employment are applicable outside the Bath World Heritage Site area, it is proposed to take Option 2 forward ie a more restrictive approach in Bath and outside Bath requires applicants for to present evidence to demonstrate that the site is no longer required, suitable or viable for employment use based on policy criteria.

It has been highlighted that the proposed increase in overall quantum of jobs and employment floorspace relates to the housing requirement identified, and this may not be met. The housing sites to accommodate the requirement are being assessed.

The evidence on need for employment over the Local Plan period is clear that in any event there is a need for significant increase in jobs and floorspace, and the protection of existing premises based on this policy is justified by this evidence.

Policy HVC/TC: Retail Hierarchy and Development

Overview

1.109 Responses focused on maintaining the vitality and viability of town, district and local centres while ensuring that the retail hierarchy remains responsive to changing patterns of shopping, leisure and community activity. Comments

particularly related to specific local centres and the future role of non-retail uses within town centres.

Key Themes

- Respondents generally supported the continued protection and enhancement of town and local centres as locations for shopping, services, employment and community activity.
- Comments emphasised the need for centres to adapt to changing consumer behaviour, including the continued growth of online retailing and increasing demand for leisure, cultural and community uses.
- Some responses highlighted individual centres and suggested reviews of existing designations, boundaries or supporting evidence.
- Respondents also highlighted the role of complementary non-retail uses in maintaining activity and footfall within centres throughout the day and evening.

Other Issues

1.110 Other comments referred to traffic impacts, accessibility and the relationship between local services and sustainable communities.

Council Response

1.111 The reset Options 2025 referred only to the extension of Primary Shopping Areas in Midsomer Norton. There were no objections to this, and therefore the proposed changes will be taken forward into the Draft Local Plan.

Cultural Infrastructure

Overview

1.112 Responses generally supported stronger recognition of cultural infrastructure and cultural activity within planning policy. Comments highlighted the importance of protecting existing cultural assets and supporting opportunities for creative, cultural and community activity across the district.

Key Themes

- Respondents supported policies aimed at protecting and enhancing cultural facilities, creative workspaces and community cultural assets.
- A number of comments highlighted the importance of affordable workspace for artists, makers and creative organisations, particularly within Bath.

- Responses emphasised the contribution cultural facilities make towards placemaking, community wellbeing, education, tourism and the local economy.
- Some respondents considered that cultural uses should be integrated into wider development proposals, including mixed-use development and city-centre regeneration opportunities.

Other Issues

1.113 Other comments welcomed greater recognition of culture within planning policy but requested draft policy wording before detailed comment could be made on its practical application.

Council Response

1.114 The Council has carefully considered the consultation responses received in relation to cultural infrastructure. Responses highlighted the importance of cultural facilities, creative workspaces and community cultural assets in supporting placemaking, community wellbeing, education, tourism and the local economy. Respondents also emphasised the need to retain and provide affordable spaces for artists, makers and creative organisations, particularly within Bath, and supported the integration of cultural uses within wider regeneration and mixed-use development proposals.

1.115 In preparing the Regulation 19 Local Plan, the Council has sought to support cultural infrastructure through the wider policy framework relating to centres, regeneration, employment space and community facilities. The Plan recognises the contribution that cultural and creative activities make to the vitality and identity of places and supports opportunities for cultural uses within town and local centres, regeneration schemes and mixed-use developments where appropriate. The Council considers that this integrated approach provides a flexible framework for supporting cultural activity whilst allowing cultural infrastructure to evolve alongside changing community and economic needs.

Policy HD/SCCW: Somersetshire Coal Canal and the Wansdyke

Overview

1.116 Responses raised detailed issues relating to the future treatment of the Somersetshire Coal Canal and the Wansdyke within planning policy. Comments

focused on heritage significance, restoration aspirations, deliverability and the potential implications of safeguarding routes and infrastructure.

Key Themes

- Many respondents questioned the feasibility of restoring the Somersetshire Coal Canal to navigation and raised concerns regarding water supply, land ownership, funding requirements and long-term deliverability.
- Some responses expressed concern that safeguarding possible restoration corridors introduces uncertainty for landowners and affects future development opportunities.
- Respondents generally supported the conservation and interpretation of the surviving canal and Wansdyke heritage assets and their contribution to local identity and historic character.
- Several responses suggested distinguishing more clearly between the treatment of the Somersetshire Coal Canal and the Wansdyke within policy, reflecting their different functions, significance and future prospects.

Other Issues

1.117 Other comments referred to ecological impacts, infrastructure constraints, public access opportunities and the need to strike an appropriate balance between heritage protection and wider planning objectives.

Council Response

1.118 The Council has carefully considered the consultation responses received in relation to the Somersetshire Coal Canal and the Wansdyke. Responses highlighted support for the conservation, interpretation and enhancement of these important heritage assets, while also raising concerns regarding the feasibility of canal restoration, land ownership implications, infrastructure constraints, long-term deliverability and the potential effects of safeguarding routes on landowners and future development opportunities. Respondents also highlighted the importance of recognising the differing character, significance and future prospects of the Somersetshire Coal Canal and the Wansdyke.

1.119 In preparing the Regulation 19 Local Plan, the Council reviewed the need for a standalone policy relating to the Somersetshire Coal Canal and the Wansdyke. The Council concluded that the significance of these existing heritage assets, and proposals affecting them, should continue to be protected and this can be addressed through the retained historic environment policy framework and

relevant national policy requirements. As such it is proposed that adopted Local Plan Policy HE2 is saved to ensure continued protection of the existing heritage assets.

1.120 With regards to the separate identification and protection of diversion areas to help facilitate potential restoration of the Somersetshire Coal Canal, the Council has balanced the benefits of seeking restoration of the Canal against concerns around the impact on property owners of a safeguarding policy restricting/prohibiting development on their land and property that would require planning permission. In addition, much development which would be appropriate within these areas could come forward via permitted development rights and would not be impacted by such a policy. Furthermore, there are limited opportunities for development requiring planning permission in these diversion areas which would accord with other elements of the Local Plan policy framework. The Council has not included in the Draft Local Plan a separate policy protecting identified diversion/restoration areas.

Policy Waste

Overview

1.121 Responses supported a broader circular economy approach to waste management and highlighted the importance of planning positively for the infrastructure required to support future growth. Comments addressed waste reduction, recycling, resource efficiency and utility infrastructure.

Key Themes

- Respondents supported ensuring that new development incorporates appropriate facilities for waste storage, recycling and resource recovery.
- There was support for embedding circular economy principles within planning policy, including waste minimisation, reuse of materials, recycling and design for deconstruction.
- Wessex Water highlighted the importance of safeguarding and supporting water and wastewater infrastructure required to accommodate future growth, including treatment works, operational land and associated buffer zones.
- Cotswolds National Landscape suggested that policies should continue to provide appropriate protection for nationally designated landscapes from potentially harmful waste-related development.

Other Issues

1.122 Other comments referred to the management of excavated materials, community repair and reuse initiatives, fly-tipping, monitoring technologies and nature-based approaches to infrastructure and environmental management.

Council's Response

1.123 Support noted for management of waste through circular economy principles.

1.124 A policy safeguarding waste infrastructure including waste water infrastructure has been included within the Draft Local Plan. Policy 10 – Waste water treatment – relating to proposals for waste water treatment within the adopted Joint Waste Core Strategy 2011 is saved and will remain part of the development plan until it is replaced by any new Waste Local Plan.

1.125 In relation to the Cotswold National Landscape comments, it is proposed that the policies relating to landfill and waste recycling are saved within the Joint Waste Core Strategy 2011 which forms part of the development plan. It is proposed that the only policies to be subject to amendment within the draft Local Plan relate to residual waste treatment and safeguarding waste infrastructure. Criteria on location of residual waste treatment facilities are proposed.

1.126