Bath and North East Somerset Council

Local Plan 2025 – 2043

Pre-Submission Draft Local Plan (Reg 19)

September 2026

Topic Paper: Identifying sites for allocation in the Draft Local Plan

Bath & North East Somerset Council

Improving People's Lives

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1. Introduction

1.1 This Topic Paper summarises the process by which the sites that are allocated for development in the Pre-Submission Draft Local Plan have been selected. It builds on and updates the Topic Paper on identifying location options for strategic development that was published alongside the Reset Local Plan Options document in autumn 2025). It extends the previous Topic Paper by also outlining the process of identifying smaller, non-strategic sites for allocation including in the rural areas. As such it seeks to ensure there is a clear audit trail by outlining in one place the site sieving and selection process that has been undertaken. It also includes a table/spread sheet outlining the assessment of all sites/opportunities considered and in so doing it outlines why some sites have not been put forward for allocation. The Topic Paper also links to and should be read in conjunction with the consideration and assessment of site alternatives in other documents, including the Sustainability Appraisal which is key in explaining the judgements made in preparing the Pre-Submission Draft Local Plan. The Topic Paper.

2. Launch Document Consultation and Spring 2024 and Autumn 2025 Options Document Consultations (under Reg 18)

2.1 Feedback and responses to the Launch Document consultation are set out in the Local Plan 2022-2042 Launch Consultation – Findings Report. The Local Plan Options 2024 – Representation Summary Report summarises the key issues raised in comments on the spatial priorities of the Local Plan, needs of the district, strategy approach and site options set out in the spring 2024 options consultation, as well as the Council's response. As set out in section 3 below following government publishing changes to national planning policy and revising the standard method figure of housing need the Council undertook a further options consultation in autumn 2025. A summary of issues raised in comments on the 2025 options document and the Council's response is set out in the Regulation 18 Consultation Statement. Issues raised in response to both options consultation have been considered in preparing the Draft Local Plan.

3. Local Plan Spatial Priorities and Spatial Strategy/Location Assessment Principles

3.1 In 2024 government published changes to national policy and the revised standard method figures of housing need. The housing need figure for Bath & North East Somerset (B&NES) more than doubled, from around 720 to more than1,500 per annum. The Local Plan Options document published and consulted on in spring 2024 was based on identifying location options for meeting the need of around 720 dwellings per annum, or about 14,500 over a twenty-year period. As a result of the government changes referenced above the Council reset its Local Plan preparation to enable further evidence work to be undertaken and options for the substantial additional development required to be identified and assessed.

3.2 As set out in both the 2024 and 2025 Local Plan Options documents and the Draft Local Plan it is important that the options for development (and specifically the sites that are allocated in the Draft Local Plan) work towards achieving the spatial priorities of the Local Plan. The spatial priorities in the Draft Local Plan have not substantively changed from those that were set out in the 2024 and 2025 Options documents. The spatial priorities of the Local Plan are therefore as follows:

> Our Local Plan will plan for development in response to local needs to create attractive, healthy and sustainable places in line with the Council's Corporate Strategy.
>
> The Plan will:
>
> - Create a **fairer**, more **prosperous and sustainable** economy
> - Maximise the delivery of housing that is **affordable**
>
> In doing so, our plans for development must:
>
> a) Enable Bath and North East Somerset to become carbon neutral by 2030 and deliver a climate resilient district
>
> b) Protect and enhance nature through facilitating nature recovery
>
> c) Improve health and well-being outcomes for all, including through planning health promoting and inclusive places and providing for cultural enrichment

d) Reduce the need to travel unsustainably and enable improved connectivity for all through sustainable modes of transport and facilitating locally available services and facilities

e) Respect, conserve and enhance our heritage assets and their landscape settings, in particular the World Heritage Site of Bath and National Landscapes

f) Align the timely provision of transport, health, education, social, cultural, flooding and drainage and green infrastructure with development

3.3 The Local Plan Options documents noted that the spatial priorities are not necessarily locationally specific and as such are not particularly useful in considering potential site options and identification of sites for allocation. Therefore, in order to help facilitate this process spatial strategy or site assessment principles are set out. These principles link back to the spatial priorities (as summarised in the table below) and cover the main constraints and opportunities that have been used in considering location or site alternatives. The spatial strategy assessment principles used for assessing and identifying sites for allocation in the Draft Local Plan remain the same as those set out in the 2025 Reset Local Plan Options document. They are outlined in table 1 below.

Spatial Strategy/Site Assessment Principle	**Local Plan Spatial Priority**
Climate change and nature	a) Carbon neutral by 2030; b) Nature recovery; e) Landscape setting
Sustainable transport connectivity	d) Reduce need to travel unsustainably and improved connectivity
Flood risk	a) Climate resilience; c) Health & well-being
Local food production/agricultural land	a) Carbon neutral by 2030; c) Health and well-being
Biodiversity and nature recovery	b) Nature recovery
Landscape character impact (including designated landscapes)	e) Landscape setting
Historic environment	e) Heritage assets and landscape settings

Green Belt	e) Landscape settings; f) Green infrastructure
Infrastructure provision	f) Timely provision of infrastructure
Ground conditions	f) Timely provision of infrastructure (indirect); c) Health & well-being (indirect)
Existing land use	e) Landscape settings; f) Green infrastructure; c) Health & well-being
Air Quality	c) Health & well-being; d) Reduce need to travel unsustainably and improved connectivity
Local character and community identity	e) Landscape settings; c) Health & well-being; f) Green infrastructure

Table 1: Spatial Strategy/Site Assessment Principles relationship to Local Plan Spatial Priorities

3.4 It is worth noting that consideration of alternative locations/sites against the above principles did not result in them necessarily being sieved out as potential options or sites proposed to be allocated e.g. against Green Belt or other impacts. In some instances, as set out below, sites were presented and consulted on as options due to other sustainability or other benefits. In preparing the Draft Local Plan further assessment has been undertaken to determine whether identified benefits are considered to outweigh harm and therefore, whether the site is proposed to be allocated for development in the Draft Local Plan. This is outlined in the sections below.

3.5 Assessing potential sites or options against the spatial strategy principles outlined above is one stage of the site selection process. The various stages of the site sieving and assessment process are outlined in the sections below and a summary of the assessment conclusions at each stage for all sites assessed is set out in the table attached as Appendix 1.

4. Initial Filtering: site size threshold (Stage 1)

4.1 All sites that are being considered are recorded with basic details, including location, size and land type. Sites below the minimum size threshold for potential allocation in the Local plan (i.e. at least 0.5 hectares in area or capable of accommodating 10 or more homes) were excluded at this stage.

5. HELAA Opportunities (Stage 2)

5.1 The starting point in considering and assessing sites is the Housing and Employment Land Availability Assessment (HELAA). The HELAA comprises sites that have been submitted to the Council by landowners/promoters, developers and communities, as well as sites proactively suggested by the Council. Proactive sites are those located close to (within 400 metres) of the edge of the relatively more sustainable settlements (see below) where they have not been submitted by third parties. The identification of potential sites for strategic development were based on HELAA sites or groupings of HELAA sites.

5.2 The Council's call for sites through the HELAA is continually open. Deadlines for site submissions to enable sites to be considered at each stage of plan preparation are established and clearly communicated through a publicised call for sites. Therefore, a call for sites was run alongside the Local Plan launch document consultation, the 2024 options consultation and also the Reset Local Plan Options consultation in autumn 2025. Some new and additional sites were submitted in the latest call for sites and the HELAA has been updated to include an assessment of these sites. The updated HELAA that includes all sites considered for allocation in the Draft Local Plan is published here:

5.3 All of the HELAA sites have been assessed as to whether they are technically suitable for housing or employment development; whether the site is available for development; and whether development is likely to be achievable during the Local Plan period. Those sites that are assessed as being not suitable or not available for housing or employment development were sieved out early in the site selection process and have not been considered further.

5.4 Those HELAA sites that remain have been subject to a high-level GIS based quantitative constraints assessment through the Sustainability Appraisal. This assessment does not seek to assess the potential significance of sustainability effects for each of the sites, but rather is intended to indicate potential high-level constraints and opportunities that should be scrutinised further in assessment of sites for allocation. As such it has informed the next stages of the process outlined below and allocation (or not) in the Draft Local Plan. The Sustainability Appraisal GIS based quantitative constraints assessment of additional sites submitted through the autumn 2025 call for sites has been undertaken and will be published alongside submission of the Local Plan in December 2026 for examination.

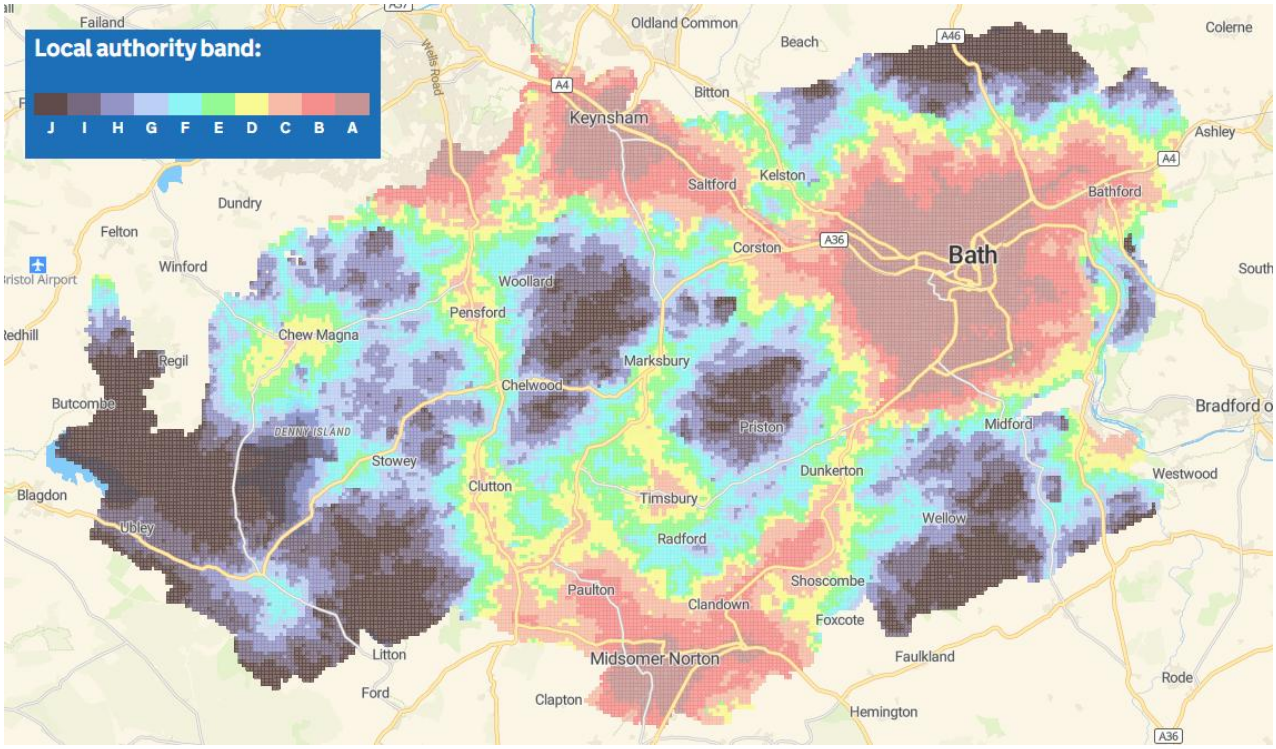
6. Settlements Identification (Stage 3)

6.1 In addition to sieving out unsuitable and unavailable HELAA sites at an early stage the spatial strategy approach of the Local Plan seeks to focus the identification and testing of options for strategic and non-strategic development on the most sustainable settlements. The most sustainable settlements are considered to be those with a range of employment opportunities, services and facilities that can be accessed through sustainable modes of transport i.e. walking, cycling, wheeling and public transport. Analysis and mapping of sustainable transport connectivity to employment and services & facilities mapping has been undertaken to inform identification of the comparatively more sustainable settlements.

6.2 The analysis of connectivity underpinning the 2024 options used the Transport Accessibility Framework prepared by the West of England Combined Authority (WECA) which assessed the sustainable connectivity of 800 metre hexagons across the District. For the 2025 reset Local Plan options consultation the Department of Transport (DfT) national connectivity tool was used. The tool is similar to the WECA Framework but is based on an analysis of 100 metre squares. This tool was used to help identify the comparatively better sustainably connected settlements – see map below. The map below shows the results of the analysis using the local authority bands, with those areas in red/orange

indicating areas with the best sustainable transport connectivity, through the green/blue and then black areas having the poorest connectivity.

Figure 1: *Department for Transport (DfT) National Connectivity Tool* outputs for Bath& North East Somerset.



6.3 The DfT tool provides a useful indication of those settlements with better sustainable transport connectivity which are the proposed main focus for considering site opportunities for strategic development i.e. Bath, Keynsham/Saltford, Whitchurch, Midsomer Norton, Radstock and Peasedown St John. In addition, improvements to sustainable transport connectivity that had been identified in 2024 and 2025 and are being actively progressed were also taken into account. For example, this resulted in the identification of Farrington Gurney as a settlement where strategic development opportunities were considered and consulted on at the options stage. In summary this is because Farrington Gurney has a ‘moderate’ range of local services and facilities; lies on a public transport corridor linking it to Bristol and Wells; is subject to improvements identified through the WECA Somer Valley Links Project; will be close to employment at the Somer Valley Enterprise Zone; and walking and cycling links to Midsomer Norton can potentially be improved.

6.4 As well as being used to identify the better sustainably connected settlements the DfT connectivity tool was also used to indicatively assess and score the comparative connectivity of the location options considered for strategic development. The sustainable connectivity of each location option has been assessed and graded using the local authority bands from A to J, with A being the best connected locations within B&NES through to J as the worst. The connectivity banding is not determinative of those site options subsequently taken forward for allocation in the Draft Local Plan, but the grading was identified in the 2025 options document to give an indication of comparative sustainable connectivity.

6.5 In addition to assessing and selecting the settlements to be the focus for strategic development a similar process was also used in identifying settlements, including villages, for non-strategic or more local scale development. Some non-strategic development opportunities are identified and assessed at the most sustainable settlements where strategic opportunities are focussed. The process for identifying the most sustainable villages to be the focus for considering non-strategic housing opportunities is outlined in the Rural Areas Topic Paper published as part of the 2025 Options consultation. In summary the key factors considered were:

- Demographic analysis, including consideration of recent housing completions/planning permissions and local housing need

- Services and facilities audit, with a weighted scoring system used to evaluate the range and quality of amenities, focussing on key facilities/essential services

- Transport connectivity assessment utilising the DfT connectivity tool and gradings (using the local authority bands) and also considering local analysis of public transport and recent changes to bus services

6.6 Through the above analysis the 14 most sustainable villages were identified in the 2025 options document where site opportunities for non-strategic Local Plan

led growth were focussed and assessed (see table 1 below). It is worth noting that in the 2024 options document opportunities for proportionate growth (indicatively 5%) were considered and that due to government more than doubling the figure of housing need opportunities for a greater scale of growth at these most sustainable villages was considered.

Bathampton	Corston
Batheaston	Farmborough
Bathford	Freshford
Bishop Sutton	High Littleton and Hallatrow
Chew Magna	Pensford
Chew Stoke	Temple Cloud
Clutton	Timsbury

Table 1: list of the 14 most sustainable villages identified in 2025 options document

6.7 In preparing the Draft Local Plan and in response to some strategic opportunities either not being available for development or their capacity being reduced (as a result of stage 5 below) it was necessary in the context of seeking to meet the standard method figure of housing need to consider a wider range of villages, albeit still focussing on the comparatively more sustainable villages. Updated analysis but using the same information as earlier work identified the following tiers of villages set out in table 2 below (based on their sustainability) and HELAA sites were considered for allocation at villages in tiers 1 to 3. Villages in tiers 4 and 5 are considered to be unsustainable places for additional Local Plan led growth due to them only have limited/basic services and facilities and weaker sustainable transport connectivity. Some small scale windfall or infill development may be appropriate and opportunities for community led development, including through the preparation of Neighbourhood Plans, can be considered and come forward.

Table 2: Current settlement tiers

Tier	Description	Typical characteristics	Settlements
Tier 1	Principal settlements	Excellent connectivity and a wide range of services/facilities	Bath, Midsomer Norton, Keynsham, Radstock
Tier 2	Highly sustainable settlements	Settlements with either good local service/facility provision and/or strong connectivity	Paulton, Peasedown St John, Saltford, Whitchurch, Batheaston. Bathampton, Chew Magna, Bathford, Timsbury
Tier 3	Moderately sustainable settlements	Settlements vary from broad to limited local service/facility provision and have good connectivity	Temple Cloud, Farrington Gurney, Pensford, Clandown, Haydon, Newton St Loe, South Stoke, Freshford, Corston, Farmborough, High Littleton, Clutton, Marksbury, Chew Stoke, Bishop Sutton, Kelston, Monkton Combe, Hinton Charterhouse
Tier 4	Less sustainable settlements	Settlements with basic to limited local services and/or weaker connectivity.	Stanton Prior, Englishcombe, Hallatrow[1], Queen Charlton, Upper Swainswick, Limpley Stoke, Sharpstone, East Harptree, West Harptree, Dunkerton, Shoscombe, Claverton, Woolley, Burnett, Camerton, Norton Malreward, Tunley, Stanton Drew, Wellow, Compton Martin, Combe Hay, Compton Dando, Ubley
Tier 5	Least Sustainable Settlements	Settlements with limited local services and poor connectivity.	Chelwood, North Stoke, Hinton Blewett, Priston

[1] Hallatrow is assessed jointly with High Littleton in the SA due to their shared parish and Neighbourhood Plan area, their functional relationship as a combined settlement, and the fact that several HELAA sites relate to both villages collectively. For this reason, the settlement is considered alongside High Littleton for further assessment in Stages 4 and 5 of the site-selection process, while Hallatrow's individual tier classification remains unchanged.

6.8 It is also worth noting that in the 2025 options document site options were not put forward for consideration at villages where there was no primary school capacity, on the grounds that this was unsustainable in resulting in likely daily car-based journeys for families. However, for the purposes of the Draft local plan and given the context of responding positively to the standard method housing need figure and limitations relating to other opportunities (see para 5.6 above) villages without primary school capacity, but otherwise relatively sustainable, were considered.

7. Identifying and Assessing Development Sites against the Spatial Strategy Principles (Stage 4)

Strategic Sites

7.1 Focussing on the most sustainable settlements identified in section 5 above, utilising HELAA sites or groupings of HELAA sites that are suitable, available and achievable, land or locations surrounding and adjacent to each settlement have been assessed. The locations have been assessed against the spatial strategy or site assessment principles outlined in the Local Plan and referenced in table 1 above. The results of this assessment are set out in the stage 4 part of the table as Appendix 1 to this Topic Paper. The assessment process results in some areas/locations being sieved out and therefore, they were not identified as location options for consultation within the 2024 or 2025 Options documents.

7.2 The assessment of land for strategic development against the spatial strategy/site assessment principles and resultant sieving out of some locations has been informed by the following documents:

- HELAA – the assessment of suitability and achievability has identified constraints and opportunities that inform other assessments

- Area of Search Assessments – to inform preparation of the 2024 options document and at Keynsham/Saltford, Midsomer Norton, Radstock, Peasedown St John, Farrington Gurney and Whitchurch areas formed of HELAA sites/groupings of HELAA sites were initially explored via the Area of Search Assessments. The table below outlines the criteria used in these

assessments and also shows how these criteria are linked to the spatial strategy/site assessment principles set out in the Local Plan and outlined above. The Area of Search Assessments, which are published here, inform why some land/locations have been sieved out at this stage and not presented as options in the Local Plan 2024 Options document

- Sustainability Appraisal (SA) – through the SA land surrounding the most sustainable settlements has been assessed in relation to the likely significant effects of development against the sustainability objectives. Through the SA some areas are sieved out as not being reasonable alternatives or options.

- Bath - the assessment of land cells around Bath in terms of whether they should be progressed and considered for potential strategic development is also outlined in the Bath Topic Paper (published alongside the 2024 Options document).

Spatial Strategy/Site Assessment Principle	**Areas of Search Assessment criteria**
Climate change and nature	• Green and Blue infrastructure • Presence of ecological designations • Priority habitats and significant linear features for protected species movement • Nature Recovery and BNG
Sustainable transport connectivity	• Existing levels of connectivity • Potential future levels of connectivity • Access feasibility • Potential for site to enhance sustainability
Flood Risk	• Flood Risk
Local food production/agricultural land	• Geological constraints (includes agricultural land grade)
Biodiversity and nature recovery	• Priority habitats and significant linear features for protected species movement • Nature Recovery and BNG
Landscape character impact	• Landscape/townscape
Historic Environment	• Heritage
Green Belt	• Green Belt
Infrastructure provision	• Green and Blue Infrastructure • Utilities: gas, water sewage, drainage and electricity • Site size and ability to deliver community infrastructure
Ground conditions	• Geological constraints
Existing land use	Not applicable
Air Quality	Not applicable
Local character and community identity	• Landscape and townscape • Ability to deliver community infrastructure

Table 3: Spatial strategy principles relationship to Areas of Search Assessment criteria

Non-Strategic Sites

7.3 Non-strategic opportunities, focussed on both the most sustainable settlements where strategic opportunities have been considered, as well as the relatively sustainable villages for Local Plan led-growth, have been assessed against the spatial strategy/site assessment principles. As per the strategic sites the results of this assessment are set out in the stage 4 part of the table appended to this Topic Paper. This assessment resulted in some sites being sieved out and not identified or consulted on as options in either 2024 or 2025. As set out in section 5 above the range of settlements at which HELAA sites were assessed increased through Local Plan preparation in response to the level of housing need and the context of some strategic opportunities not progressing to allocation.

Green Belt

7.4 Nearly 70% of land in B&NES is designated as Green Belt. Given the scale of housing need that the Local Plan is responding to it has been necessary to consider both strategic and non-strategic site opportunities within the Green Belt. The 2024 NPPF makes it clear that if development needs cannot be met sustainably through other means Green Belts should be reviewed in order to ascertain whether exceptional circumstances exist to justify removing land from the Green Belt for development. Where it is necessary to release land from the Green Belt the NPPF states that priority should be given to previously developed sites, then consider 'grey belt' that is non-previously developed and then other Green Belt locations. However, promoting sustainable patterns of development determines whether a location is appropriate for development.

7.5 The assessment of sites against the spatial strategy principles (as part of stage 4) has included consideration of the Green Belt. The importance or performance of the site/location in serving the Green Belt purposes set out in the NPPF and whether the site is in a location that is fundamentally important to the Green Belt as a whole has been assessed informed by the Strategic Green Belt Assessment (SGBA), firstly at the district-wide level at Stage 1, and then secondly at a more

granular level at Stage 2 for proposed allocations. Green Belt performance is not determinative as to whether a site has been taken forward for allocation. The spatial strategy seeks to focus development at the most sustainable locations. Therefore, in line with the NPPF accordance with the spatial strategy and therefore, sustainability has been balanced against Green Belt performance.

7.6 As such sites that are sustainable and perform well against the other spatial strategy principles that are considered appropriate for allocation have then been subject to more detailed Green Belt assessment through the Stage 2 Green Belt Assessment (GBA). The Stage 2 GBA has considered the impact of the Green Belt of specific sites, whether the site in question meets the definition of 'grey belt' and assesses whether its release from the Green Belt would fundamentally undermine the purposes of the remaining Green Belt. The SGBA and Stage 2 GBA have also been used to inform demonstration of 'exceptional circumstances' necessary to justify release of the land from the Green Belt. The 'exceptional circumstances' are set out in the Green Belt Topic Paper.

Other Evidence

7.7 The assessment of strategic and non-strategic sites against the spatial strategy principles has been informed by a series of other evidence studies. These include the SFRA (Level 1 and Level 2), landscape sensitivity assessments, heritage impact assessments etc. The relevant studies/reports are published as part of the evidence base supporting each stage of Local plan preparation.

New Settlements

7.8 It is also worth noting that a potential option that required consideration, particularly in response to the significant levels of housing that need to planned for over the longer term, is that of new settlements. At this stage it is not considered that new settlements are deliverable within the current Local Plan period. In the reset Local Plan Options document, a methodology for assessing and identifying potential locations for a new settlement is outlined. It is concluded that the potential for new settlements is most appropriately considered

strategically and sub-regionally through the preparation of the WECA Spatial Development Strategy.

8. Detailed Site Assessment for Allocation (Stage 5)

8.1 Informed by the conclusions of the above assessment stages and consideration of the issues raised in responses to the Options consultations sites have been selected for allocation. Those sites that have been selected for allocation have then been subject to further, more detailed assessment (both at a site specific level and to understand cumulative impacts).

8.2 The detailed site assessment stage included investigating and analysing constraints and opportunities for each site covering issues such as landscape sensitivity (impact and mitigation), heritage impact and mitigation, transport impacts and mitigation etc. This assessment work was undertaken both by Council officers and through a range of consultancy studies which are published as part of the supporting evidence base. The outcome of this work has:

- Confirmed whether a site should be allocated
- The spatial extent of a site allocation, including identification of non-developed areas such as Green Infrastructure
- An estimate of development/housing capacity
- Identification of key development requirements, including to satisfactorily mitigate adverse impacts, which are reflected in site allocation policies

9. Conclusions

9.1 The above Topic paper outlines the stages of the process that has been followed in identifying and assessing sites for allocation in the Pre-Submission Draft Local Plan. These stages have been followed in firstly, identifying site options for consultation in the 2024 and 2025 consultations under Reg 18, and finally in allocating sites and setting out site requirements in the Draft Local plan. The list of sites assessed (from the HELAA) and results of the assessment are summarised in the table in Appendix 1.