Somer Valley Rural Towns and Villages Alliance representation to B&NES Reg. 19 Draft Local Plan Consultation

Representation to Policy 1.1, 1.2, 1.4, 4, 5 - Unjustified spatial strategy and housing requirement regarding the Somer Valley and Rural Areas

The Somer Valley and nearby rural areas are a region south west of Bath in North East Somerset comprising of numerous discrete villages and towns in the agricultural, hilly landscape of the historic Somerset Coalfield. The Somer Valley Rural Towns and Villages alliance represents the ~52,000 residents in this area, which has already seen extensive development over the past two decades. There are limited employment opportunities and restricted public transport and active travel options, leading to substantial out-commuting to the larger settlements of Bath and Bristol for employment and an extremely high (90%+) reliance on the car for journeys to work, education, health and leisure.

We believe that the cumulative impact of ~6000 more homes in this rural part of North East Somerset has not been effectively justified under the B&NES Draft Local Plan Reg. 19 Consultation considering the lack of infrastructure and services in this area (B&NES Chapter 1 - District Wide Strategy, 2026a) and as such the Local Plan is unsound and unsustainable and therefore incompatible with the NPPF. We are not objecting to a Plan that brings new housing where it is needed, taking a 'brownfield first' approach, and we support "*the right homes in the right places, supported by the timely provision of infrastructure*", but with an unrequired and unsustainable allocation of 22,000 homes in Bath and North East Somerset, this not what is offered by this Local Plan. The suggested scale of growth is unsound being disproportionate to capacity of the area and, if implemented, risks causing significant harm to both communities and the environment.

In Bath and North East Somerset there are currently ~5,000 homes with planning permission including those on brownfield sites and ~2,300 vacant homes that could be brought into use (B&NES SEB, 2025; B&NES LHNA, 2026b). These should be initially prioritised rather than building on new greenfield sites for housing. The Housing Supply Topic paper p.29 shows that this is not the strategy, as the brownfield sites in the Somer Valley e.g. Welton Bibby Baron are being earmarked for development after some of the greenfield sites e.g. Haydon, Farrington Road North and Chilcompton Road (B&NES HSTP, 2026c). Building these existing commitments and bringing the vacant homes into use would almost cover the entire affordable housing shortfall in Bath and North East Somerset, which is expected to be 8,300 households by 2043, 61% of which need is in Bath (B&NES LHNA, 2026b).

Policy 1.2 of the draft Local Plan states that the housing sites allocated by B&NES are "*not a 'cap' on development and additional housing may come forward in designated neighbourhood areas*"; therefore, B&NES provides no ceiling for the quantum of housing in each area and so B&NES does not know how much housing will come forward during the plan period. B&NES may point to other policy housing restrictions such as landscape and ecology that will prevent new housing but whilst B&NES has no 5-year Housing Land Supply, all villages are vulnerable to predatory planning applications. It's not clear how B&NES will be able to plan for the necessary transport and social infrastructure if it does not know how much and where the housing will amount to in each village. The housing figure for each village could be continually changing during the life of the plan. Whilst each new speculative housing site may address their own infrastructure needs, the cumulative impact cannot be assessed. This undermines the very purpose of preparing a Local Plan, which is to ensure a coordinated approach to development and infrastructure as the spatial strategy. This is not a plan led approach and so is contrary to national policy.

Given that Bath is the principal settlement in B&NES - the centre for jobs, services, amenities and travel connections - it would follow that Bath would see the most housing growth. In the Draft Local Plan, only 27% of new homes are proposed to be built in Bath and 32% of new homes are to be built in the least sustainably connected areas in B&NES: the Somer Valley and Rural Areas (B&NES C1 DWS, 2026a). The spatial strategy is therefore contrary to B&NES' declaration of Climate and Ecological Emergencies and its commitment to be Zero Carbon by 2030 because it disperses Bath's housing need to peripheral locations in rural towns and villages that are highly car dependent with no effective mitigation, limited sustainable transport and few jobs. Moreover, it appears B&NES has prioritised protecting Bath's heritage over climate and ecological issues in the Somer Valley and Rural Areas without evidence or justification, making the Plan unsound and not consistent with the NPPF.

In the development of this Draft Local Plan, to determine where homes should be placed, sites were scored on their Connectivity using the Department for Transport Connectivity Tool (B&NES Transport Topic Paper, 2026d, p. 26, fig. 4.4), shown in Figure 1.

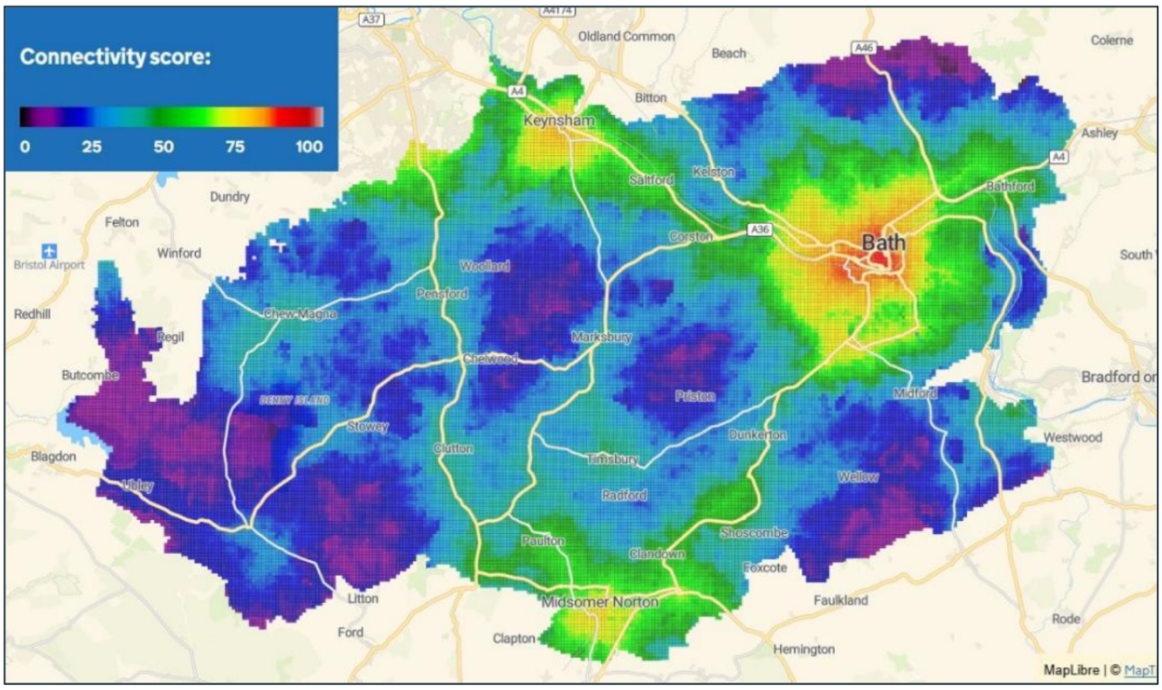


Figure 1 - Connectivity: all modes except driving (B&NES Transport Topic Paper, 2026d)

This tool shows how well the site is connected to the existing transport network considering driving, public transport and active travel to reach employment, education and services. B&NES has placed undue reliance on this Tool, which is too crude a basis for identifying suitable locations for housing sites and therefore the use of this data for formation of Settlement Tiers 1-4 (Table 1) is unjustified. Under Tier 1 – Principal Settlements, the City of Bath of which allocated sites have an overall mean Connectivity score of 74+ is grouped together with far smaller towns such as Midsomer Norton (Policy 4.8 and 4.9) and Radstock (Policy 4.4-4.6) that have substantially different scales of services and facilities and sites that only score between 47-55. This is similar for the Tier 2 – Highly Sustainable Settlements, with sites in villages such Paulton (Policy 4.11-4.14), Peasedown St John (Policy 4.1-4.3) and Timsbury (Policy 5.6 and 5.7) grouped in with settlements closer to the cities of Bristol and Bath with much better service and facility provision such as Saltford. Moreover, the Connectivity scores become meaningless at this level, because all sites outside of Bath and Keynsham score between 28-55 regardless of Tier. The places outside Tier 1 are so vastly more unsustainable than Tier 1 that it is highly questionable why B&NES has chosen to allocate housing to them. The original proposal to examine Bath's UNESCO World Heritage designation remains an alternative strategy argument. B&NES should identify which accessible housing opportunities are constrained by that designation, distinguish those constraints from other heritage protections, and assess whether changes to the planning approach could accommodate more housing closer to existing jobs and infrastructure. Even when considering these Tiers appropriate, housing allocation has not been justifiably and

consistently applied within them e.g. the allocation North of Fox Fields in Hallatrow (Policy 5.8), which is in Tier 4 – Less Sustainable Settlements. This proposed allocation also represents a significant departure from the strategy of the adopted High Littleton & Hallatrow Neighbourhood Plan, which promotes small-scale development. Further evidence is required to demonstrate why a site in Hallatrow was selected and how it aligns with the spatial strategy.

Table 1 – Current Settlement Tiers (B&NES C1 DWS, 2026a, p. 35)

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

Looking at travel patterns, no consideration seems to have been given as to where people in the Somer Valley and surrounding rural areas travel for purposes other than commuting to work in order to assess sustainability. B&NES sees Midsomer Norton as the "*main*

market town centre for the Somer Valley, serving a broad population from nearby towns and villages"... "*addressing most local needs*" (para 4.85), but this is not how it is viewed by most nearby villages, due to its lack of services and facilities and the fact that congestion issues in the Somer Valley area mean that it is often quicker and more convenient to travel by car to Bath, Wells or Keynsham from villages such as Timsbury, Paulton and those alongside the A37 and A39. Furthermore, the Local Plan explicitly entails housing to meet the needs of B&NES and not Bristol or any other authority, yet building alongside and to the west of the A37 just provides cheaper housing for people commuting to Bristol and visiting Wells, since Bath is inconvenient to reach from these locations.

Modifications required: the interpretation of this DfT data and its use in determining housing sites should be reassessed so that sites are allocated based on the underpinning evidence, making the Local Plan sound and legally compliant. The allocation of housing sites should therefore be reviewed to substantially reduce the number required to be built overall, increase allocation for Bath relative to those in peripheral areas considering the cumulative effect on the Somer Valley and Rural Areas and reviewing Bath's status as a UNESCO World Heritage Site if necessary. Brownfield sites should be built first. Unsustainable sites should be removed from the Local Plan.

Representation to Policy 1.1, 4, 5 & 6 – Unsound infrastructure provision for the Somer Valley and Rural Areas – Promoting Sustainable Transport

There is no effective strategy to "*align development with infrastructure*". Focusing firstly on transport, B&NES' entire strategy relies on encouraging modal switch from the private car to greater use of buses, walking, cycling and ride share. However, it has chosen development locations that are some of the most difficult and expensive to achieve this modal switch, since in the Somer Valley and Rural Areas there are no train stations, buses are limited, unreliable and have long journey times, and walking and cycling are hampered by the lack of suitable pavements, dedicated cycle lanes, undulating dangerous topography and the rural, dispersed nature of the settlements and their distance from major urban cities with employment. It is therefore not surprising that ~90% of commuting journeys in the Somer Valley are made using a private vehicle and the local lanes and roads are already struggling to cope with the increase in traffic that has followed housing growth in the previous two decades.

It is very difficult to attract business growth to these areas to help reduce out-commuting, as demonstrated by the SVEZ proposal (Policy 4.12) - the purpose of which was to provide employment for previous housing growth in the south of the district. The proposal originates from the 1980s and has been carried forward in respective Local Plans without yet being realised, so more housing just compounds the commuting issues. Westfield Industrial Estate has grown slowly over the last 60 years, with new

employment units built to meet business demand. This estate still has unimplemented planning permission as the demand for units in this area is so limited. Stacking vast amounts of housing growth in these areas south of Bath will therefore severely exacerbate existing unsustainable commuting patterns contrary to the Plan's own priorities and national policy on reducing the need to travel and to enable people to travel more sustainably.

It is also very difficult to mitigate such an inappropriate strategy, as shown in the Transport Modelling data, where building ~6000 homes on the Somer Valley and Rural Area sites will increase daily car trips by 5970 cars without mitigation, and the mitigation only reduces this by 5.95% (B&NES TTP, 2026d, p. 100). Across B&NES as a whole, car trips will increase by 17.6% under this local plan, with the mitigations only reducing this by 2.1 percentage points (B&NES TTP, 2026d, p. 92). Furthermore, as many sites in the Reg. 19 consultation were not previously presented in the Reg. 18 consultation, the trip-based data is out of date and not fully relevant and therefore the cumulated traffic impact has not been fully evidenced.

Despite the assertion that the transport strategy for the Somer Valley includes "*junction upgrades, traffic management and speed reduction measures, new access arrangements, and the prevention of inappropriate traffic use of unsuitable rural lanes* [quiet lanes]" as stated in paragraph 4.21, barely any mitigations are planned. This is the same for the Rural Areas, where it states in paragraph 5.16, "*development will support investment in public transport, walking, cycling and wheeling routes, helping to improve access to employment, education, healthcare and local services whilst reducing reliance on private car travel. The strategy supports improvements to transport corridors, travel hubs and local connections that make rural communities more sustainable and better connected*".

The proposed 'Travel Hubs' (4.18 and 5.16) are often just upgraded bus stops (e.g. in Radstock, Midsomer Norton and Paulton) and none at all are provided in Farmborough and Timsbury. The Local Plan's rural transport strategy proposes bus priority on strategic corridors including the A367, but also acknowledges that some rural bus services depend on grant funding whose future is uncertain. It would therefore be inappropriate for the sustainability of major housing allocations to rely upon public transport improvements that are not funded, committed and deliverable before occupation. There are also no improvements for cycling in Timsbury, Paulton, Farmborough, Clutton or Temple Cloud. Many of the sites allocated are only accessible through narrow lanes and entrances via other housing estates (e.g. all sites in Timsbury and Paulton) and roads cannot be widened due to historic highway layouts. Some of the quiet lanes/active travel routes will now have a housing estate surrounding them according to this Plan and so cannot be designated as such (Paulton South). Ride-sharing should not be assumed to resolve these problems either, since it depends on people travelling to similar

destinations at compatible times and having enough flexibility to share journeys regularly with reliability, and having the desire to do so. Residents report that ride sharing has previously been promoted or tried in Farrington Gurney without meaningful take-up. The council should investigate that experience, publish any available usage figures, and provide evidence from comparable rural communities before relying on ride sharing to reduce projected car trips (B&NES TTP, 2026d; B&NES Modelling Summary Report, 2026e; B&NES Infrastructure Delivery Plan, 2026f; B&NES Chapter 4 – Somer Valley, 2026g; B&NES Chapter 5 – Rural Areas, 2026h).

It should also be noted that traffic jams are an everyday occurrence the Somer Valley and Rural Areas, especially during the morning and evening commutes and school drop-off and collection times. Somerset Council has allowed hundreds of houses to be built adjacent to Midsomer Norton and Westfield, which has put a lot of pressure on heavily congested infrastructure in the area. Road closures due to accidents or maintenance result in traffic diversions for buses that mean villages are often cut off from public transport. There is therefore a clear risk that, without major improvements to public transport and the A367 in particular, additional vehicle movements will be displaced onto surrounding rural roads. The Local Plan already identifies examples of local roads being used as “cut through” routes, demonstrating that diversion from principal routes is an existing problem. For communities such as Dunkerton, Tunley and Timsbury, rat-running is already a concern. Rural roads are generally less suited to increased traffic volumes and can present particular concerns relating to road safety, pedestrians, cyclists, noise, air quality and village character. At morning and evening peak times in particular, there are a considerable number of vehicles from other parts of the Somer Valley that use Timsbury as a direct route to Bristol, thereby traversing the heart of the village. The B3115 through Tunley to Bath is also already congested, particularly during rush hours; therefore, any housing development in Timsbury, Hallatrow or Paulton will further worsen this congestion. There is currently no pedestrian crossing point at the A367 at Dunkerton. This raises issues for all residents in Dunkerton but particularly for children crossing to attend school and elderly people being able to access the bus stop for shopping and appointments. The Transport Topic Paper does identify the Timsbury Road/A39 junction for improvement (Table 6-1). Timsbury Road is a C-road that connects to the A39 and carries traffic from surrounding villages and the wider Somer Valley via narrow rural lanes. This improved junction will make other routes through Farmborough and neighbouring villages more attractive to drivers who want to avoid it. The plan does not assess where traffic would re-route, or what the effect would be, and identifies no mitigation either way (B&NES TTP, 2026d).

Overall, this means that building on these sites in the Somer Valley and nearby Rural Areas results in residents being unable to meet their daily needs locally, in a place where walking and cycling might be realistic for shorter trips. Furthermore, by B&NES’ own evidence, the Local Plan will increase the need to travel, increase pollution and carbon

emissions, increase delays and adversely affect the residents already in the area, which is against the Plan's Spatial Strategy Principles (Policy 1.1) that require new housing to be built in areas that will reduce travel distances and car dependency. Building in unsustainable locations such as the Somer Valley and Rural Areas is unsound and not legally compliant with the NPPF.

Modifications required: Complete a corridor-wide cumulative transport assessment and devise a functional transport strategy with effective mitigations, also considering rural communities such as Dunkerton and Tunley without proposed housing allocations. Remove the Somer Valley and nearby Rural Area sites from the Local Plan as they are unsustainable and therefore against the objectives of the Local Plan and principles of the NPPF.

Representation to Policy 4 and 6 – Unsound Health Infrastructure in the Somer Valley and Rural Areas

As with transport infrastructure, the Draft Local Plan is unsound in terms of health infrastructure, because it does not take a justified or effective approach due to the inadequate provision for healthcare facilities. It is evident that there is no coherent strategy on this issue. Even though B&NES admit that in the Somer Valley, "*The PCN currently experiences an overall space deficit for provision of primary care services to the existing residential population*", "*there is a lack of spare capacity in the locality that could accommodate additional primary care provision for new housing growth*" and acknowledge that "*the scale of planned growth within the Somer Valley is expected to generate significant additional demand for healthcare services*" (para 4.26), they, or health care providers, have not completed research into the future need e.g. infrastructure required, its location, its cost or who will fund it, "*the precise form, scale and location of future provision has not yet been determined … neither the NHS nor local partners have completed the work necessary to fully understand [it]"* (B&NES IDP, 2026f, p.14). Furthermore, The Royal United Hospitals Bath NHS Foundation Trust stated in its 2025 Annual General Meeting Q&A that in August 2025, it had a bed occupancy of 96% and its modelling showed there is insufficient bed space for the population currently served and projected demand (RUH, 2025). Therefore, there is not a justified or effective approach to health care provision in the Local Plan. This lack of a strategy and deferral to an unspecified future date is not positive planning and is contrary to NPPF that states clear requirements for provision of infrastructure for development to be sustainable.

Modifications required: Remove the Somer Valley and associated Rural Area sites from the Local Plan as health care provision is already at capacity. Devise a positive strategy for health care infrastructure and detail capacity of potential sites, their location, facilities and funding required.

Representation to Policy 4, 5, 6, PCS7A – Unsound Foul Sewage Infrastructure in the Somer Valley and Rural Areas

One of the most fundamental concerns that makes the housing allocation building in parts of the Somer Valley and Rural Areas undeliverable is the sewage system, which is struggling to cope with the amount of sewage currently generated. Settlements in the Somer Valley and nearby Rural Areas are in the catchment area of the Cam Brook and the Wellow Brook. There is already evidence of pressure on local wastewater infrastructure. The Cam Brook is in the top 8% of waterways in the country for sewage spills with 363 sewage discharges with a duration of over 2.5 months in 2025. The Wellow Brook scarcely fares better, with 322 sewage dumps lasting 1.6 months, making it top 13% (TotPs, 2026). Official monitoring records storm-overflow discharges associated with both the Dunkerton and Paulton systems that discharge into the Cam Brook. In 2025, the Cam Valley Dunkerton inlet recorded 28 spill events, while the Paulton Water Recycling Centre recorded 57 events totalling ~844 hours. This concern is reinforced by ongoing monitoring undertaken by the Dunkerton and Tunley Parish Council and the Bristol Avon Rivers Trust (BART) on the Cam Brook. BART's 2024 monitoring found that the site downstream of Paulton WRC showed considerable organic pollution and poor water quality. BART also recorded substantial siltation and reported its findings to Wessex Water.

This issue is particularly pertinent given that these rivers and their surrounding ecosystems also have sites designated by B&NES as Nature Reserves, Sites of Nature Conservation Interest and UK Priority Habitats (Policy NE3), part of the Ecological Grassland, Woodland and Wetland Strategic Networks (Policy NE5), Priority Grassland Habitat (BRERC) (Potential Irreplaceable Habitat, Confirmed and Unconfirmed) and Green Infrastructure (Policy NE1). They are also designated by WECA as a Local Nature Recovery Sites, and as Areas of Importance for Biodiversity and Focus Areas for Nature Recovery. Beavers – a protected species – have recently been found in both the Cam and Wellow Brooks in the Somer Valley.

The regulator Ofwat has imposed a £11 million enforcement package on Wessex Water due to its failure to operate, maintain and upgrade its wastewater network adequately. B&NES planning records have also previously noted that, although Dunkerton sewage works itself had treatment capacity for a particular development, the downstream sewer network had limited capacity and required upgrading and network modelling. The Wessex Water Paulton WRC at Goosard has a capacity of 12,000 population equivalent and serves the villages of Paulton, Farrington Gurney, High Littleton, Hallatrow, Clutton, Temple Cloud and parts of Timsbury. B&NES notes that wastewater capacity upgrade is critical for building in these villages, yet states that no growth or capacity increases are currently planned and expansion at Paulton WRC is constrained due to risk of flooding and odour impacts on nearby residential properties (B&NES IDP, 2026f). Any theoretical additional capacity has already been accounted for with planning permission granted for

72 houses and an 88-bed care home on the Purnell site at Paulton, various windfall sites and the forthcoming SVEZ. Therefore, villages served by the Paulton WRC would require a new sewage treatment works built at a new location, and this has not been planned or costed in the Plan. Similarly, the Cam Valley, Radstock and Farmborough WRCs serving Peasedown and parts of Timsbury, Radstock, and Farmborough, respectively; all have limited available capacity. B&NES again states that upgrades are critical, expansion at Radstock that may require land purchase would be required to accommodate substantial population growth, and this has not been planned or budgeted (B&NES IDP, 2026f).

Building in these areas therefore goes against B&NES' strategy to effectively manage waterways, be nature positive by 2030, its statements in the Sustainability Appraisal (B&NES SAR, 2026i) that the Plan is promoting the protection of water environments and makes the plan unsound as it is unjustified since it is not based on the available evidence and not effective since without water treatment infrastructure it is not deliverable. Furthermore, it is not positive planning to deter necessary matters to future updates and therefore the plan is not compliant with the NPPF.

Modifications required: Remove all sites from the Local Plan that feed into Paulton, Cam Valley, Radstock and Farmborough WRCs as these have limited capacity and require new sites and/or expansion and no suitable arrangements have been made for their provision in order to have adequate sewage treatment facilities, making the Plan unjustified, not deliverable and therefore not effective and overall unsound. Determine the cost of the infrastructure required for a new water recycling centre to serve any further development from villages that feed into Paulton WRC, and costs for expansion of Cam Valley, Radstock, and Farmborough WRCs.

Representation to Policy 4 and 5 – Unsound Water Provision in the Somer Valley and Rural Areas

In addition to lack of critical infrastructure for management of wastewater, B&NES have not provided evidence that there will be sufficient water supplies for the Somer Valley and surrounding areas for the new homes planned, therefore building here is unjustified, not deliverable and therefore unsound. The IDP on p.38 states that "*Bristol Water has advised that it does not currently have sufficient internal resource to analyse all site allocations in detail but will consider the allocations through its next Periodic Review, PR29, which will identify infrastructure requirements from 2030 onwards and particularly for the 2030–2035 period*". B&NES notes that water supply connections are critical throughout Bath and North East Somerset, and there are well documented existing water pressure problems in parts of the Somer Valley yet no details have been provided regarding the cost of any infrastructure that might be required and who would fund this

(B&NES IDP, 2026f). It is not a positive strategy to defer necessary matters to future updates and so this makes the Plan unsound and not compliant with the NPPF.

Modifications required: Ascertain whether there will be sufficient water for existing residents in the area and the new homes planned, and how this will be provided and funded. If there is insufficient water provision, then all affected sites should be removed from the Local Plan.

Representation to Policy 4, 5, RE5 – Sustaining a Buoyant Rural Economy - Grade 1-3a Agricultural land

Several sites have been included in the Draft Local Plan that are situated on Grade 1 best and most versatile agricultural land (Figure 2). These include the Hallatrow site, North of Fox Fields, the Farrington Road North site in Paulton, the Farrington Gurney South site and Midsomer Norton Thicket Mead site. Furthermore, the Farrington Road South site is classified as Grade 3 and given its proximity to Grade 1 sites is likely to be Grade 3a.

The Government assessment on biodiversity loss, ecosystem collapse and its impact on national security highlighting the challenges the UK faces with regards to food security shows that productive farmland should be protected and not built upon. The report states that, "*countries best placed to adapt are those that invest in ecosystem protection and restoration, and resilient and efficient food systems*" (DEFRA, 2026). Moreover, as the most nature depleted country in Europe, the use of farmland that has traditionally been organically farmed for housing is incredibly damaging to wildlife and biodiversity and these sites are all in active agricultural use. Including such sites is unsound.

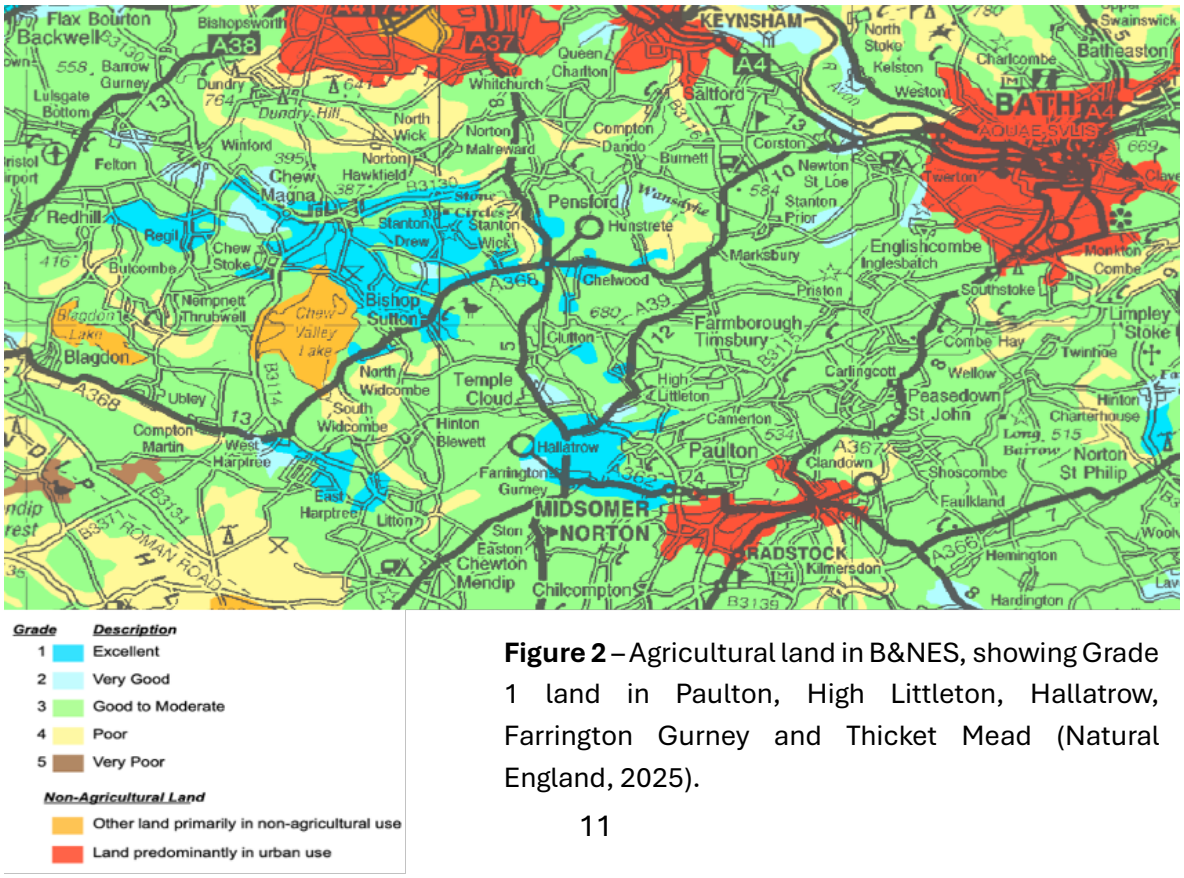


Figure 2 – Agricultural land in B&NES, showing Grade 1 land in Paulton, High Littleton, Hallatrow, Farrington Gurney and Thicket Mead (Natural England, 2025).

B&NES states that Grade 1-3a sites should not be included in the allocation for housing since Policy RE5 says that, "*Development which would result in the loss of the best and most versatile agricultural land particularly Grade 1 and 2 will not be permitted unless significant sustainability benefits are demonstrated to outweigh any loss. 2) Where it can be demonstrated that there is an overriding need for a proposal which will result in the loss of agricultural land, development should be steered towards the use of lower quality agricultural land in preference to higher quality agricultural land"*. Indeed, B&NES stated in the previous Reg. 18 consultation that building on the Hallatrow site was "*discounted due to the potential loss of Grade 1 agricultural land, which is recognised as a significant constraint*". This constraint is not mentioned in regard to this site in the Reg. 19 consultation. Other sites in the previous Draft Local Plan Reg. 18 consultation e.g. Farrington Gurney North were also discounted for development due the presence of Grade 1 agricultural land and being in active use (B&NES SAR, 2026i) and are not designated for development under the Reg. 19 consultation, so it is inconsistent and therefore unjustified to propose building on sites containing such land (Farrington Road North and South, Farrington Gurney South and North of Fox Fields), rendering the plan unsound and against the NPPF.

The Paulton South site, the West of Clutton site, and the Farmborough allocation are all classified as potentially the best and most versatile agricultural land (Grade 3). B&NES have not assessed whether this is Grade 3a (the best and most versatile) or Grade 3b agricultural land therefore building here is unjustified because it is not based on appropriate evidence since there is a risk that development would affect Grade 3a land making the Plan unsound. Indeed, when considering the latest update 2026 to the ALC classification shown in the SAR in Figure AB-2 (B&NES SAR, 2026i), the Paulton South site shows as Grade 3a. Similarly, the extent of Grade 1-3a land in the Farrington Gurney South site also requires clarification as the 2025 Local Plan Options Document (paragraph 7.136), a detailed 1990 MAFF survey of Cliff Farm, Farrington Gurney published by Natural England as ALCB00490, the B&NES SAR (2026i), and Site Selection Topic Paper (B&NES SSTP, 2026j) have conflicting and incomplete information regarding the classification.

Modifications required: B&NES should apply its policies protecting Grade 1-3a agricultural land consistently regarding site allocation and identify the technical evidence supporting its conclusions of the agriculture land grades, explain the weight given to that advice, and demonstrate how the loss of best and most versatile agricultural land influenced its comparison with reasonable alternatives. If this cannot be achieved, then sites containing Grade 1-3 land should be removed from the Local Plan as they are unjustified and unsound.

Representation to Policy 4, 5, Sustainability Appraisal

The Sustainability Appraisal itself (B&NES SAR, 2026i), appears incomplete and therefore unjustified and unsound. The housing numbers provided are contradictory to those in other documents e.g. the Hallatrow site North of Fox Fields HAL06 is said to deliver 40 homes in para 2.5.44, yet this is mentioned as 45 in Table 2.3 and in the Site Selection Topic Paper (B&NES SSTP, 2026j), and 50 elsewhere. For Timsbury Table 2.3 only includes Timsbury West (170 homes) and East (55 homes) and omits the Tim16 allocation, yet in paragraph 2.5.35 mentions the total number of new homes to be 400-450.

The Old Mills Batch at Paulton is mentioned as a potential alternative site for 100 homes, but aside from being one of the most prominent mining relics in the area and a non-designated heritage asset, this site is a Local Green Space, which should therefore not be a serious contender for housing allocations.

Modifications required: B&NES should review the Sustainability Appraisal, and the interpretation and use of its data as there are errors and inconsistencies making the Local Plan unjustified and unsound.

Representation to Policy 4, 5, NE2A - Landscape Setting of Settlements

Building in areas protected by the Landscape Setting of Settlements policy NE2A does not "*respect, conserve and enhance landscape settings*" as stated in the Local Plan. This Policy has been applied inconsistently in the Local Plan as it is being used as a justification to protect Saltford's sites from development but not Paulton or Farrington's (B&NES SSTP, 2026j). Furthermore, the Farrington Road North is part of HELAA site PAU12, but there is no entry for PAU12 on the Site Selection Topic Paper spreadsheet (B&NES SSTP, 2026j), and the entry for Farrington Road South PAU11 incorrectly states that NE2A is mitigated by Green Infrastructure opportunities at Paulton South, which is not true for the Farrington Road sites. This means that the Farrington Road sites have no mitigation for landscape harm in the Local Plan relevant to policy NE2A and therefore building here will cause unacceptable harm to the landscape setting, adversely affecting the landscape character, visual qualities and relationship between the Paulton and its surrounding countryside. The same applies for the Mendip Close site. In the Farrington Gurney South and Paulton South sites, the mitigations proposed fundamentally alter and do not compensate for the loss of the landscape setting in addition to putting at risk several natural habitats. Retaining the allocations in the absence of an effective means of mitigating the identified landscape harm raises fundamental concerns regarding its suitability and the robustness of the site selection process. The allocation is therefore considered insufficiently justified by the available evidence and therefore unsound.

Modifications required: B&NES should apply its policy NE2A consistently regarding site allocation and should provide adequate mitigation to compensate for the harm caused

by the loss of the landscape setting. If this cannot be achieved, then sites covered by policy NE2A should be removed from the Local Plan.

Representation to Policy 4, 5, Nature Conservation

B&NES declared an ecological emergency in 2020, and building in unsustainable locations such as the Somer Valley and Rural Areas is incongruent with this and will cause irreversible significant harm, contrary to Policy NE3. Farrington Road North supports at least eight bat species making it nationally significant. Farrington Road South is Priority Grassland Habitat (BRERC) (Potential Irreplaceable Habitat, Unconfirmed) and Farrington Road North is adjacent to such habitat. Building in rural areas will not comply with paragraph 5.18 to "*protect, enhance and extend networks of open space, habitats, hedgerows, trees, watercourses, public rights of way and accessible countryside*". Nor will it, "*support biodiversity recovery, climate resilience, recreation and landscape character, whilst helping to integrate development with its surroundings*" when sites are building over the fields containing the network of footpaths used by recreational walkers and discharging untreated sewage into the waterways. With the level of development proposed, we fail to understand B&NES's assertion that there will be a Net Biodiversity Gain and see nothing in the Plan that evidences this.

Modifications required:

Protect habitats from inappropriate development considering biodiversity constraints, with the knowledge the creating new sites under Biodiversity Net Gain policies cannot replace ancient hedgerows, veteran trees and established grasslands and waterways in order to make the plan justified and sound.

Representation to Policy 4, 5, 6.11, CP7, CP13, LCR6A Green Infrastructure

B&NES (paragraph 4.13) says that it wishes to, "*enhance access to local green spaces and deliver new open spaces*" and "*identify opportunities for green infrastructure and ecological enhancement*". The majority of the sites allocated for development in the Somer Valley and Rural Areas already provide green spaces for recreation. For example, Farrington Road North, Timsbury East and Paulton South have well used Public Right of Way footpaths that cross the site. The loss of these fields for recreation and amenity will adversely affect the mental wellbeing of residents in the locality, making the plan unjustified and unsound. Local Plans can propose new Local Green Spaces, but no LGS have been outlined for sites in Somer Valley and Rural Areas. Rather, the Local Plan's Open Space Assessment Appendix (B&NES OSAA, 2026k p.121) indicates that open space provision in the Somer Valley will decrease. This is not a positive strategy; it is unsound and contrary to both the final Spatial Priority and to the NPPF.

Modifications required: Improve access to open space and designate Local Green Spaces in the Somer Valley and Rural Areas in order to make the plan sound and legally compliant. Remove the sites from the Plan that impact the availability of green spaces.

Representation to Policy 4, 5, Education

Education provision has not been sufficiently demonstrated across the Somer Valley and Rural Areas. The Reg. 19 Draft Local Plan should not rely on substantial housing growth across the Somer Valley without demonstrating how sufficient school places will be available when families move in. Farrington Gurney illustrates the unresolved questions: the Sustainability Appraisal (B&NES SAR, 2026i), says 500 homes are needed to make a new primary school viable, but does not explain whether this is a construction-funding threshold or the pupil demand needed to sustain its operation. The proposed 210-place school has an indicative cost of £11,116,733 and a delivery window of 2028–2038. Whether it replaces or supplements the existing school remains important: using the reported roll of 84 pupils and the indicative yield of 155 additional primary pupils from 500 homes gives potential demand for 239 places if existing provision is replaced. This is an illustration, not a forecast, but it shows why replacement arrangements, phased demand, funding and opening dates must be resolved together. A school made necessary by development cannot, without further explanation, justify the scale of that development (B&NES SAR, 2026i; DfE, 2026a; B&NES IDP, 2026f; B&NES C4SV, 2026g).

Neighbouring settlements cannot be treated as a reserve of school places without accounting for their own growth. Paulton's housing figures include 420 homes in proposed allocations and 80 remaining from existing allocations - a combined 500 homes whose education demand must be reconciled with available places and existing forecasts. The Sustainability Appraisal (B&NES SAR, 2026i) also identifies unsafe walking routes between Farrington Gurney and schools in neighbouring villages, so a vacant place elsewhere is not automatically an accessible solution. At secondary level, Norton Hill's reported oversubscription requires a school-specific explanation of how additional demand will be accommodated. The working assumption of 19 secondary pupils per 100 homes would mean approximately 95 additional pupils from Farrington Gurney alone, before demand from other developments is considered. Although the IDP projects no additional secondary provision currently being required across the Somer Valley, subject to review, B&NES should publish the receiving-school, year-group and cumulative-demand forecasts supporting that conclusion. Current oversubscription does not prove a future shortage, but neither does an area-wide capacity statement demonstrate that suitable places will be available where and when they are needed (B&NES C1 DWS, 2026a; B&NES SAR, 2026i; B&NES IDP, 2026f; B&NES C4SV, 2026g).

The same delivery test applies to early years, SEND and school transport across the Somer Valley. B&NES' recently approved SEND reforms include stronger mainstream

support, inclusion bases, specialist recruitment and locality-based support, including a Midsomer Norton locality. These commitments must be matched to additional housing demand, suitable settings, staffing, funding and delivery dates. Likewise, Policy 4.15's contribution towards a non-hazardous route to Norton Hill does not itself demonstrate an achievable, funded route available before pupils need it. B&NES should publish one coordinated education delivery plan covering cumulative growth, existing-school arrangements, temporary provision, safe routes and transport, with enforceable occupation triggers. Until that evidence demonstrates that the necessary provision is feasible, funded and timely, the Somer Valley and rural allocations dependent on it have not been shown to be effective or justified and should be removed or reassessed (B&NES SEND, 2026m; B&NES IDP, 2026f; B&NES C4SV, 2026g; DfE, 2026b).

Modifications required: Adequately assess education provision in the Somer Valley and Rural Areas in order to make the plan justified, effective and sound.

Representation to Policy 4, 5, PCS6 - Pollution, Contamination and Safety - Ground Conditions

The Somer Valley's mining history means that proposed housing capacity must be supported by proportionate evidence of ground stability, contamination, mining hazards and drainage feasibility. The whole area bears the remnants of mining substructures. In Paulton, particularly in the Farrington Road North site, old mining shafts are not mapped, nor noted on any official documents. Residents of the adjoining Downsway have reported subsidence issues owing to the collapse of mines under their homes. At Farrington Gurney, British Geological Survey records identify Marsh Lane Colliery at grid reference ST 6321 5526 and workings in the Rudge and 21 Inch coal seams (BGS, 2026). B&NES should overlay available mine plans, recorded mine entries and mining-risk mapping with allocation boundaries, establishing which sites require further investigation. Government guidance recognises mining hazards as a consideration in plan preparation (MHCLA, 2026), while Mining Remediation Authority guidance explains that mine entries and associated no-build zones can affect development layout (MRA, 2026a; MRA, 2026b). Policy 4.15 requires a land-quality investigation, but that requirement alone does not demonstrate that its proposed housing, school and infrastructure package can accommodate any necessary restrictions. As it stands, B&NES have not provided evidence of investigation of ground stability, nor any plans to do so, meaning the Local Plan is not justified and potentially undeliverable therefore not effective (B&NES C4SV, 2026g; MHCLA, 2026; MRA, 2026b).

Modifications required: Across affected Somer Valley and Rural Area sites, B&NES should investigate ground stability and remove unsuitable and therefore undeliverable sites in order to make the Local Plan Sound.

Representation to Policy 4 - Pollution, Contamination and Safety - Air Quality

The Local Plan should demonstrate that cumulative development across the Somer Valley can be accommodated without unacceptable air-quality effects on existing and future residents. Farrington Gurney illustrates why traffic totals alone are insufficient: the A37 Options and Feasibility Study, drawing on June 2019 surveys, identifies pollution hotspots on the southbound approach to the A362 signals and near the Farrington Inn, associated with queuing and interrupted traffic flow. B&NES should assess how housing allocations, the SVEZ and relevant neighbouring development would affect shared road corridors and junctions, including whether congestion or traffic redistribution would increase exposure in other settlements.

Modifications required: Unless proportionate evidence demonstrates that cumulative exposure can be acceptably managed, the affected allocations and the Somer Valley distribution of growth should be reassessed, with sites removed or capacities reduced where necessary.

Representation to Policy 6.13 – Green Belt

The Council proposes to release Green Belt land at several rural and Somer Valley settlements. National policy – the NPPF – allows this only where exceptional circumstances are fully evidenced and justified, and where the Council has examined fully all other reasonable options: previously developed and underused land first, then density, then what neighbouring authorities could accommodate. Priority then goes to previously developed land, then grey belt, then other Green Belt. The Council's evidence does not yet show that sequence and is therefore unjustified and unsound. The Green Belt Exceptional Circumstances Topic Paper (B&NES GB, 2026l) says the Council has "*left no stone unturned*" but gives no figures for brownfield or underused capacity. The Sustainability Appraisal paragraph 3.11.2 (B&NES SAR, 2026i) says greenfield development is "*inevitable*" because of a "*lack of alternative brownfield opportunities*", again without figures. A district-wide case does not justify each site, and each release needs its own evidence of why that site and that scale, tested against the Council's own Green Belt assessment. We ask the Council to publish the evidence on options, brownfield and density before submission, to justify each Green Belt release site by site, and to limit any release to what that evidence supports.

This is shown in Farmborough (Policy 5.5, Timsbury Road). The plan allocates about 200 homes at Timsbury Road. FAR08 (Land at Little Lane, 0.99 hectares) is named and mapped, but FAR17 is defined only as a Land Registry title north of Tilley Lane, with no

site area. The Council's Stage 2 Green Belt Assessment covers a single 10.6 hectare area (S-004) and rates it strong on the purpose of safeguarding the countryside from encroachment, saying development "*would entail a large incursion into undeveloped countryside relative to the size of Farmborough*". The Policy 5.5 proforma nonetheless relies on grey belt status and on benefits it says, "*outweigh the harm*", without showing what brownfield or underused capacity was found in Farmborough or elsewhere.

Representation on Legal Compliance

1. B&NES did not effectively engage with stakeholders and residents as the consultation was very minimal – only published on their website with a few poorly attended drop-in sessions – and not the meaningful engagement with residents like they did for the Reg. 18 consultation with leaflets, roadshow presentations and drop ins. This has provided insufficient time for consultation.
2. New sites were added into the Reg. 19 consultation that were not in the Reg. 18 consultation or greatly expanded e.g. Timsbury East, Clutton, Farmborough, Hallatrow, Paulton South and Mendip Close. This is not compliant with the legislation in the Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 and has not allowed for fair consultation on these sites.
3. Site selection did not comply with planning legislation and regulations such as B&NES HELAA sites e.g. the Paulton Mendip Close site is not a HELAA site and the Paulton South site is twice as large as shown in B&NES C4SV (2026g) compared to the site outlined on the HELAA (Figure 3).

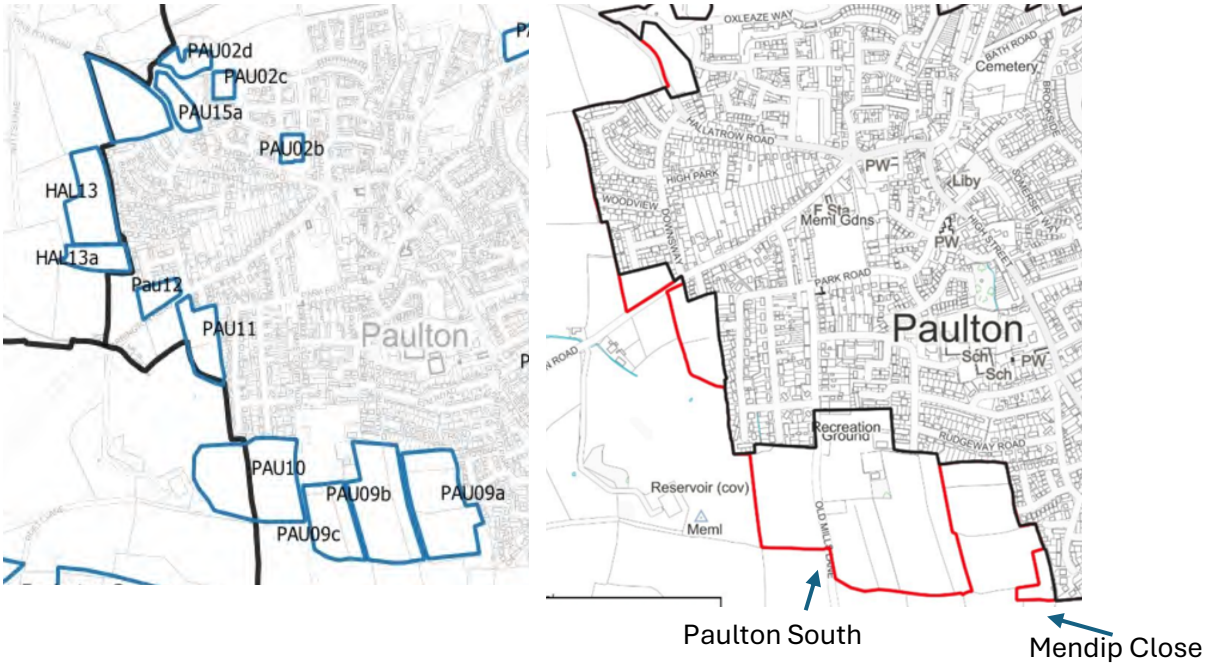


Figure 3 – HELAA sites in blue, selected sites in Red as per the modified HDB. Mendip Close is not a HELAA site and Paulton South has been extended on the site plans, so is twice the size as shown here.

4. Paulton Parish Council, Radstock Town Council and Farrington Gurney Parish Council have noted that the comments from the previous Reg. 18 consultation do not appear to reflect the views submitted. For example in Paulton, the Parish Council and residents submitted similar comments for all Paulton sites in the Reg. 18 consultation. The unjustified housing requirements were clearly articulated by PPC and likely other respondents and yet the summary comments state, "*respondents recognised the need to meet housing requirements and deliver affordable housing*" (B&NES Reg.18 CS, 2026n). Comments were also separated into those for Farrington Road sites focusing on archaeology and landscape character and those for Paulton East focusing on biodiversity, wildlife, green space, mining and heritage. PPC feel that this separation is unlikely since these constraints to development apply to both sites. This also reflects concerns about how Farrington Gurney's consultation responses have been mispresented: residents' objections to substantial development appear to have been treated as concerns that mitigation could resolve, rather than opposition to the scale of development itself. Therefore, B&NES has not fulfilled the requirements of Regulation 22(1) and so it is considered that the Local Plan is not legally compliant as B&NES has not properly considered the comments at Reg. 18 stage.
5. Housing Development Boundaries do not comply with planning legislation and regulations because B&NES claims they were consulted on, stating in the Settlement Boundary Review Topic Paper that, "*Parish and town councils have been informally consulted and were invited to view and comment on the draft settlement boundaries prior to the publication of the Regulation 19 Draft Local Plan*" (B&NES SBR, 2026o). This is not true. For example, there was a consultation for very minimal changes to HDBs in July 2025, but not the substantial changes shown in SBR Topic Paper (Figure 4, using Paulton as an example). Given that the 'option' sites for Paulton in 2025 were for Paulton East, rather than Paulton South,

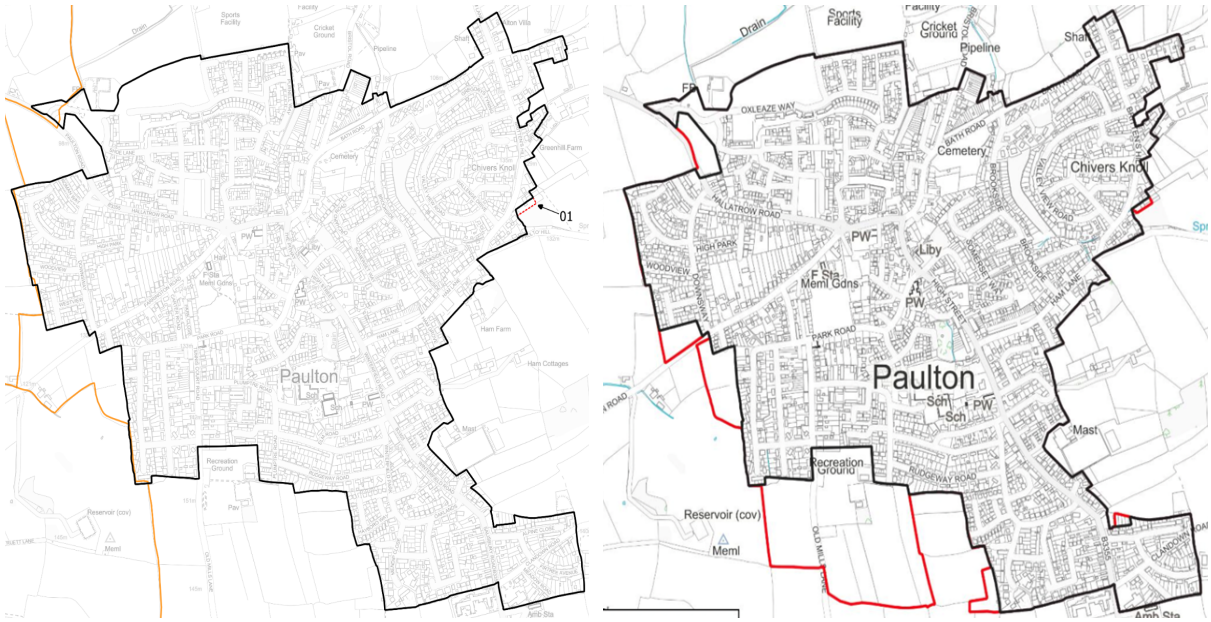


Figure 4 – Left: HDB consulted on in 2025; Right: HDB claimed to have been consulted on.

yet Paulton South is included in the HDB, it is clear that this is a last-minute change of HDB that occurred without the claimed consultation. High Littleton and Hallatrow and Farrington Gurney Parish Councils have expressed the same concerns. If B&NES continues to claim that they consulted with the parishes, they should supply the evidence.

6. Part of the allocation in Temple Cloud resides in the Parish of Clutton - CLU01a, which is a reduced allocation from that presented at Reg. 18. The full site was reduced to maintain the separate identity of Temple Cloud and Clutton, yet its inclusion means that the allocation straddles the parish boundaries. It is unclear how this housing will help to contribute towards Temple Cloud, when CIL money for development on this land will be allocated to Clutton and potentially, any affordable housing will also prioritise the Parish of Clutton over Temple Cloud. This is in contrary to the wording of Policy 5.11.

Taking everything into account, the Somer Valley Rural Towns and Villages Alliance state that the B&NES Draft Local Plan is overall unsound due to the flawed spatial strategy leading to the allocation of unsustainable sites in the Somer Valley and Rural Areas, lack of infrastructure provision rendering it non-deliverable and therefore not effective, and not justified due to the failure to allocate policies consistently. Overall, the Plan has not been positively prepared and is not sustainable, therefore it is inconsistent with the NPPF.

Yours sincerely,

Somer Valley Rural Towns and Villages Alliance

- Sue Batchelor (Dunkerton & Tunley Parish Council)
- Simon de Beer (Radstock Town Council)
- Paul Carroll (Timsbury Parish Council)
- Philip Edwards (Temple Cloud with Cameley Parish Council)
- Kathryn Ford (Paulton Parish Council)
- Simon Gould (High Littleton Parish Council)
- Deborah Griffin (Timsbury Parish Council)
- Liz Hardman (Paulton Parish Council and Paulton Ward Councillor)
- Dana Koellner (Farrington Gurney Parish Council)
- Simon McCombe (Mendip Ward Councillor)
- Ann Morgan (High Littleton Ward Councillor)
- Sam Ross (Farmborough Parish Council and Clutton and Farmborough Ward Councillor)
- Will Shepherd (Clerk and RFO Camerton Parish Council)
- Richard Thomas (Timsbury Parish Council)
- Hannah Willert (Dunkerton & Tunley Parish Council)

(Note all signatories are signing as individuals unless stated.)

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